

The City of Oklahoma City's

CONSOLIDATED PLAN & FIRST YEAR ACTION PLAN

2025-2029

Approved by the Oklahoma City Council on May 20, 2025
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Executive Summary

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

1. Introduction

The City of Oklahoma City (the City) is a federal Entitlement Community under the U.S. Department of Housing and Urban Development (HUD). As such the City receives annual formula Community Development Block Grant (CDBG), Home Investments Partnership Program (HOME), Emergency Solutions Grant (ESG), and Housing 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 of the plan is to provide an updated community-based analysis of current demographic, economic, and public policy trends, and to reassess low- and moderate-income populations' needs 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. The Consolidated Plan is carried out through Annual Action Plans, which provide a concise summary of the actions, activities, and specific resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan. 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.

This Consolidated Plan has identified several complex issues affecting Oklahoma City and its low-income populations. The City's **housing market** remains challenging, with home prices growing rapidly since the pandemic. In addition, Oklahoma City's homes affordable to low-income populations often have serious maintenance needs. Last, the City's housing market faces a shortage of both affordable and higher-income homes, resulting in a market squeeze in middle-income housing.

The City is innovating services to the **homeless** and nearly homeless communities. The Key to Home initiative is a reorganization of the CoC network to educate the community on the issue of homelessness and lead the development and coordination of community strategies to ensure that homelessness is rare, brief, and non-recurring in OKC. Key to Home can accept public funding and private donations and employs a data-driven approach to guide strategies.

Lastly the city will continue to support **community development and neighborhood revitalization** in underserved communities. The Strong Neighborhoods Initiative focuses public and private resources on neighborhoods in the central city that have long faced disinvestment. This program adds housing, infrastructure, and economic opportunities to the selected communities with the goal of tipping the neighborhood from decline into steady growth.

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.

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

The 2025-2029 Consolidated Plan contains an assessment of housing and community development needs, as well as those of homeless persons and special populations in Oklahoma City. Objectives and outcomes were established through a review of the data presented in the Needs Assessment and Market Analysis based on HUD's data, input from the public, and consultation with local non-profits and service providers.

Housing: Multiple data sources indicate that Oklahoma City has many of the same housing needs as cities across the nation: high cost burden and a lack of affordable units. These needs are exacerbated by demographic and market factors. Oklahoma City's population continues to grow at a rate exceeding the national average, the number of renters in the city is growing, and there is a lack of affordable housing for small households, and for the highest and lowest-income populations.

Homelessness: Homelessness is an increasing need in Oklahoma City. Residents experiencing homelessness are subject to challenges that exacerbate the effects of simply not having housing. The City's Key to Home initiative is prioritizing housing for community members, and then working with them as needed while they stabilize. To be effective in reducing the number of households experiencing homelessness, the City needs more supportive housing units, better access to rapid rehousing, and more affordable housing.

Neighborhood Revitalization: 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. This includes housing, economic development, and infrastructure investments targeted to the SNI neighborhoods' needs and desires.

This Consolidated Plan may be amended as the City responds to changing market needs, disasters, economic shifts, and community demographics to ensure the best use of limited resources.

3. Evaluation of past performance

The City's 2020-24 Consolidated Plan called for achieving **housing goals** by providing funding and engaging in program activities that included support for nonprofit and for-profit housing developers to rehabilitate and construct new affordable housing; support for Community Housing Development Organizations to rehabilitate and construct new affordable housing; support for the Oklahoma City Housing Authority to modernize public housing units; funding to assist with emergency repairs of

housing for low-income households; support for down payment and closing cost assistance to expand homeownership opportunities for low-income households; and, funding for activities that support the City's housing rehab program, and housing and services for persons with HIV/AIDS.

The goal of providing a **suitable living environment** was addressed in the prior Consolidated Plan and Action Year strategies by continuing ongoing programs that addressed specific community needs. The 2024-25 Action Plan called 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; removal of graffiti; and, removal of slum and blight conditions in low-income areas.

In addition, the City of Oklahoma City made progress in attaining its goals for **expanding economic opportunities**. The City's Consolidated Plan and Annual Action Year Strategies called for engaging in program activities that provide technical assistance to small businesses.

The City continues to innovate programs and is moving towards a more data-driven approach to evaluating and implementing programs. Increased costs have resulted in fewer programmatic accomplishments. During the period of this five-year plan, the City intends to make process improvements and increase efficiency.

4. Summary of citizen participation process and consultation process

The consultation process for this Plan provided several opportunities for residents, service providers, and others to contribute. In October 2024, the City published a Notice of Public Meetings for four community input sessions held in various areas of the City in December 2024 and January 2025. Meetings were held in public facilities, with one meeting during the afternoon to accommodate persons working evening hours. A total of 28 citizens and representatives of local organizations and service providers attended these meetings. Survey forms offering opportunity for feedback and comments were distributed.

City staff notified the public of the planning meetings through notices on the city's website, via an email newsletter, and by including notification in the residents' water bill. The Division Manager appeared on the evening news to promote the meetings. In addition, staff attended a virtual meeting hosted by the Neighborhood Alliance of Central Oklahoma to discuss the Consolidated Plan and gather additional citizen input.

In addition to public meetings, opportunity for community input was provided during a public meeting of the Citizens Committee for Community Development meeting held on April 22, 2025. A 30-day Notice seeking public comment on the proposed Consolidated Plan and Annual Action Plan and providing

notification of a final public hearing at City Council was published in *The Oklahoman* on April 19, 2025. Staff accepted written correspondence from the public until 5:00 p.m. on May 20, 2025. A final opportunity for input was provided in a public hearing before the City Council on May 20, 2025. A summary of community input is attached to this report. Consultation with numerous outside agencies and other municipalities is discussed in Section PR-10 of the 2025-2029 Consolidated Plan. The City of Oklahoma City's Citizen Participation Plan is also attached.

5. Summary of public comments

Citizen input at the various meetings and forums described above touched on many different topics. Key areas of concern or discussion were the following:

- **Affordable Housing:** Comments primarily focused on the need for affordable housing and what the City is doing to address the housing crisis with federal funds. Multiple comments asked about alternative affordable housing funding sources. Citizens offered ideas and solutions to the lack of affordable housing in the City, including tiny homes, ADUs, and adaptive re-use.
- **Homelessness:** Comments also focused on concerns about rising homelessness in the City. Citizens often wanted to know how to help someone who is homeless, as well as individuals in mental crisis. Citizens want to understand what the City is doing to help the homeless, and if funding is being spent efficiently.
- **Economic Development:** Comments were made suggesting programs that focus on economic development for unhoused populations. The lack of high-paying jobs was brought up as an issue in the City.

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 not accepted generally proposed ineligible activities that did not meet the regulatory requirements.

7. Summary

The City will continue to prioritize housing, homelessness, and community revitalization needs in Oklahoma City throughout the 2025-2029 Consolidated Plan.

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 Five-Year Consolidated Plan and First Year Action Plan. A similar public participation process will be used to inform each of the future Action Plans.

A substantial amendment may be required from time to time as the City adapts to changing needs and priorities within an Action Plan year. A substantial amendment to this Consolidated Plan is defined as an amendment that a) changes the goals and priority needs in the Consolidate Plan; b) funds a new activity not described in the Action Plan; or c) increases funding allocated to an activity by more than 25%.

The Process

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

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

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

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

Table 1 – Responsible Agencies

Narrative

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

Consolidated Plan Public Contact Information

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

PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(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 several social service providers who provide guidance on allocation and expenditure of ESG and HOPWA funds. Citizen input on allocations and expenditures of federal grant funds is received from the Citizens Committee for Community Development (CCCD), a formal citizens advisory committee.

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

The City routinely communicates with the Oklahoma City Housing Authority (OCHA) to understand their programs and needs. OCHA has housing units in the City’s SNI neighborhoods, and we have discussed with them the potential for exterior improvements to help the neighborhood. We have also planted trees on several OCHA properties within the SNI as part of our neighborhood tree planting initiative. The City is collaborating with OCHA about affordable housing needs and priorities. The First Year Action Plan contains two allocations totaling \$2 million for two OCHA developments.

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

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

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

In 2020, the City began reorganizing the Continuum of Care Board into the Key to Home Partnership. The Key to Home Partnership, a collaboration of more than 50 organizations, is working together to prevent and end homelessness in Oklahoma City. The City of Oklahoma City serves as the lead agency for the Key to Home Partnership. The organization's goal is to educate the community on the issue of homelessness and lead the development and coordination of community strategies to ensure that homelessness is rare, brief, and non-recurring in OKC. By driving strategy through collaboration, data-driven decisions, and the voice of those with lived experience, Key to Home can ensure that the response is both appropriate and effective. The City of OKC works directly with the Department of Housing and Urban Development to allocate federal funds across the partnership to support programs that provide shelter, housing, and supportive services to people experiencing homelessness in OKC.

Key to Home is a public-private partnership that allows the City to leverage the generosity of private donations to fill gaps that public funds cannot cover. The City believes that it is possible to create and sustain a community where homelessness is rare, brief and non-recurring through strong public/private partnerships, supporting collaboration among stakeholders, using data to guide strategy, and educating the public on homelessness and its solutions.

Over the last 3 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 these smaller committees. In collaboration with the City Planning staff and the Homeless Alliance, the Coalition organizes and executes the annual PIT count of the Homeless each January. This 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.

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

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

The geographic area served by ESG is the same as the Oklahoma City Continuum of Care (CoC), and ESG-funded agencies are considered members of the CoC. All ESG and CoC-funded organizations are members of the Coalition to End Poverty and several CoC subrecipients also receive ESG funding and conduct ESG-eligible activities. As the CoC lead agency, the 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 collaborates with CoC and ESG-funded agencies to

develop local policies related to other ESG elements such as case management. The CoC Board ranks and determines funding allocations and monitors financial and programmatic elements of both CoC and ESG-funded projects. The CoC board provides feedback on strengths and weaknesses as well as determining if projects should be defunded if performance does not improve by a set deadline.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Metropolitan Fair Housing Council
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	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?	Metro Fair Housing provided data on fair housing cases and actions in previous years. Identification of issues related to Fair Housing will inform this Consolidated 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.

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).
4	Agency/Group/Organization	Key to Home Partnership
	Agency/Group/Organization Type	Services - Housing Services-Homeless Services-Health
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Key to Home Partnership was consulted for the homeless housing needs assessment and identification of social services gaps.

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

The City of Oklahoma City consulted with all relevant agencies and municipalities and provided an opportunity to comment and provide feedback on Plan priorities through public meetings and forums, focus groups, and a formal 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	Homelessness needs and strategies
Housing Affordability Study	The City of Oklahoma City	Housing affordability needs
Housing Affordability Implementation Plan	The City of Oklahoma City	Housing needs and strategies
Community and Economic Development Strategy	Association of Central Oklahoma Governments	Economic development strategies
Hazard Mitigation Plan	The City of Oklahoma City	Disaster and hazard resilience and mitigation
Oklahoma Housing Needs Assessment	Oklahoma Housing Finance Agency	Housing needs and strategies
planokc	The City of Oklahoma City	Housing needs and strategies, climate needs

Table 3 – Other local / regional / federal planning efforts

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

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

Narrative (optional):

The City of Oklahoma City maintains an ongoing dialogue with local non-profit 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, deconcentrating 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.

Four (4) public meetings were held to discuss the 2025-2029 Consolidated Plan in December 2024 and January 2025 in multiple areas of the City. Attendance at these meetings by local service providers and neighborhood associations included representatives from Community Action Agency, City Care, The Homeless Alliance, Positively Paseo, OKC Metropolitan Area Realtors, Neighborhood Services Organization, and Jefferson Park Neighborhood Association. Comments and input received during these public meetings are provided in the appendices of this report.

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

Collaborative efforts to promote economic growth are sometimes more difficult to achieve due to the competition for sales tax dollars between local communities. The funding of city services relies heavily on continued increases in sales tax receipts and the City of Oklahoma City often finds itself in direct competition with suburban municipalities for new businesses.

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(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 November 6, 2024. In addition, the City sent out notification of the meetings via email new release and in residents' water bill. Meetings were held in various public facilities between December 2024 and January 2025 at the following locations:

- Belle Isle Library, 5501 N. Villa Ave, at 6:30 PM on Tuesday, December 10th, 2024
- Downtown Library, 300 Park Ave, at 3:30 PM on Thursday, December 12th, 2024
- Capitol Hill Library, 327 SW 27th St, at 6:30 PM on Tuesday, January 14th, 2024

The meeting originally scheduled for January 9th, 2025, at the Ralph Ellison Library was cancelled due to inclement weather. Feedback received at the public meetings was used in conjunction with quantitative data and current demographics to establish priority needs for this Consolidated Plan. Where possible, strategic goals were identified based on the most urgent community needs. Staff will evaluate needs on an ongoing basis. Funding allocations in each Annual Action Plan will be adjusted as needed to promote a strategic and targeted allocation of resources, with the hope of creating a noticeable and sustainable community benefit.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
	Newspaper Ad	Non-Targeted/broad community	The planning meetings and a request for comments were noticed with an ad in The Oklahoman on November 6, 2024.	No written comments were received in response to the notice.	Not applicable	
	Public Meeting	Non-targeted/broad community	Four (4) public meetings were held in various public facilities in all quadrants of the City. The Downtown Library meeting held on December 10, 2024, was attended by 7 citizens and 6 staff members. The Belle Isle meeting held on December 12, 2024, was attended by 7 citizens and 4 staff members.	Multiple Pages. Attached in Appendix.	All comments and suggestions were given due consideration in the allocation process	NA

			The Capitol Hill Library meeting held on January 14, 2025, was attended by 14 citizens and 4 staff members			
	Newspaper Ad	Non-targeted/broad community	A thirty (30) day comment period Notice of Public Hearing and Notice of Public Comment Period was printed in <i>The Oklahoman</i> on April 19, 2025.	No additional comments were received in response to the published request for public comment about proposed activities.	Not Applicable	NA
	Public Hearing	Non-targeted/broad community	Public hearing before City Council May 20, 2025.	No additional public comment was received during the public hearing before City Council.	Not Applicable	NA

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The Consolidated Plan Needs Assessment examines the City of Oklahoma City's needs for housing, homelessness, and community development. The needs assessment is informed by existing plans, studies, datasets, and public input. The City conducted multiple public meetings to receive input from residents, neighborhood associations, governmental entities, and local community organizations. The City also consulted with community stakeholders and service providers to gauge their perception of funding gaps, unmet service needs, and opportunities for public-private partnerships. This section outlines the needs identified throughout this process.

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

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

The most recent (2017-2021) Comprehensive Housing Affordability Strategy (CHAS) data series was the primary source of data used. This data is automatically imported into the following tables in the Econ Planning Suite. U.S. Census and American Community Survey data were also used to inform the Needs Assessment section of the Consolidated Plan. In addition, the City consulted the Oklahoma Housing Finance Agency's Housing Needs Assessment (HNA), Oklahoma City's Housing Affordability Study (HAS), and Oklahoma City's Housing Affordability Implementation Plan (HAIP) extensively. These documents provided additionally essential data on housing needs in Oklahoma City and informed the plan where applicable.

Annual Action Plans will be written and amended as necessary to adjust housing need priorities that may be identified following the future release of new Census data. The results of consultations with the Oklahoma City Housing Authority and local service providers are included final analysis.

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

Summary of Housing Needs

Multiple data sources indicate that Oklahoma City has many of the same housing needs as cities across the nation: high cost burden and a lack of affordable units. These needs are exacerbated by demographic and market factors. Oklahoma City's population continues to grow at a rate exceeding the

national average, the number of renters in the city is growing, and there is a lack of affordable housing for small households, and for the highest and lowest-income populations.

The housing needs in the city are particularly acute for the lowest-income population, those earning between 0 and 30% of the Area Median Income (AMI). Renters at this income level face a gap of over 33,000 units. Renters at this income level also face gaps in the supply at all unit sizes, from studios to 3+ bedrooms (Oklahoma Housing Needs Assessment, 2024). Renters at this income level are also often severely cost-burdened. Of all severely cost-burdened households, 79% earned less than 30% AMI. The gap data and the severity of cost burden on these lowest-income households indicate that many households are forced to move into unaffordable apartments, because of a lack of available affordable units. Naturally occurring affordable units at this income level are more likely to have severe problems and need major rehabilitation (HAS, 2019). Cost burden is high in the city, particularly among renters. 30% of the city’s population is estimated to be cost burdened. A gap analysis for the city’s metropolitan area shows that high cost burden could be due in part to a squeeze in the market at both the low and high ends. Oklahoma City has a shortage of units available for the highest and lowest income earners, putting additional pressure on the market sector affordable to 30-80% of AMI households from lower and higher income brackets move into these units. High cost burden can also be exacerbated by the lack of studio and one-bedroom units available for all income levels for renters in the city. Currently, there is a surplus of affordable 2 and 3+ bedroom units, but a shortage of one-bedroom and studio units. Renters may move into a larger and more expensive apartment than is needed if they are unable to find an adequate smaller unit. Last, households with a high housing cost burden can face greater negative impacts of income shocks, such as an unexpected bill or unemployment. These households are less likely to be able to save for emergencies and are at greater risk of losing their housing in the event of an income shock. In some instances, these households may face eviction and homelessness.

The city’s HAS and data below indicate a need for housing rehabilitation, particularly among the lowest-income households. 53% of Oklahoma City’s housing units were built prior to 1980, indicating an aging housing stock that likely needs significant rehabilitation. Aging housing stock can have increased rehabilitation costs due to lead paint and asbestos abatement that may be required. The central part of Oklahoma City has the highest concentrations of pre-1980 housing stock and the greatest need for rehabilitation.

Demographics	Base Year: 2009	Most Recent Year: 2023	% Change
Population	610,670	688,693	13%
Households	232,255	275,193	18%
Median Income	\$47,779.00	\$66,702	40%

Table 5 - Housing Needs Assessment Demographics

Data Source:	2000 Census (Base Year), 2018-2023 ACS (Most Recent Year)
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Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	35,340	31,530	46,435	26,355	107,245
Small Family Households	10,230	10,140	17,035	9,735	51,460
Large Family Households	2,585	3,255	5,095	2,554	9,415
Household contains at least one person 62-74 years of age	6,588	5,915	8,554	5,415	23,615
Household contains at least one person age 75 or older	3,024	5,165	4,705	3,005	7,365
Households with one or more children 6 years old or younger	5,903	6,043	8,139	3,860	13,203

Table 6 - Total Households Table

Data Source:	2016-2020 CHAS
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Housing Needs Summary Tables

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

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	579	529	415	105	1,628	194	90	197	69	550
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	155	305	365	235	1,060	45	30	220	15	310
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	595	760	955	279	2,589	260	405	579	270	1,514
Housing cost burden greater than 50% of income (and none of the above problems)	15,385	3,350	730	25	19,490	5,700	2,710	975	184	9,569
Housing cost burden greater than 30% of	3,005	9,075	5,950	555	18,585	1,275	3,055	4,705	1,690	10,725

income (and none of the above problems)										
Zero/negative Income (and none of the above problems)	2,520	0	0	0	2,520	1,475	0	0	0	1,475

Table 7 – Housing Problems Table

Data Source:	2016-2020 CHAS
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2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	16,725	4,945	2,460	635	24,765	6,200	3,235	1,950	535	11,920
Having none of four housing problems	7,945	13,210	20,995	9,420	51,570	4,475	10,145	21,005	15,765	51,390
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

Table 8 – Housing Problems 2

Data Source:	2016-2020 CHAS
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3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	6,520	4,860	2,490	13,870	1,925	1,785	2,289	5,999
Large Related	1,590	1,075	430	3,095	615	873	734	2,222
Elderly	3,189	2,617	934	6,740	2,964	2,303	1,720	6,987
Other	8,165	4,880	3,049	16,094	1,822	974	1,055	3,851
Total need by income	19,464	13,432	6,903	39,799	7,326	5,935	5,798	19,059

Table 9 – Cost Burden > 30%

Data Source:	2016-2020 CHAS
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4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	0	0	975	975	1,475	945	0	2,420
Large Related	0	0	205	205	475	219	49	743
Elderly	2,454	1,204	265	3,923	2,410	1,063	325	3,798
Other	0	6,905	1,345	8,250	1,545	0	0	1,545
Total need by income	2,454	8,109	2,790	13,353	5,905	2,227	374	8,506

Table 10 – Cost Burden > 50%

Data Source:	2016-2020 CHAS
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5. Crowding (More than one person per room)

	Renter					Owner				
	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										

Single family households	710	975	1,010	320	3,015	275	340	574	240	1,429
Multiple, unrelated family households	45	95	214	159	513	35	95	205	55	390
Other, non-family households	0	35	125	29	189	0	0	19	0	19
Total need by income	755	1,105	1,349	508	3,717	310	435	798	295	1,838

Table 11 – Crowding Information – 1/2

Data Source:	2016-2020 CHAS
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	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present								

Table 12 – Crowding Information – 2/2

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

The American Community Survey 2023 5- Year Estimates indicate 86,860 persons living alone in Oklahoma City (12.85% of households). Median household income for all households in Oklahoma City according to the ACS 2023 5-Year Estimates is \$66,702.

The maximum HUD income limit in 2024 for a one-person household is \$50,150 (80% AMI). Single-person households will have a housing cost burden (housing costs exceeding 30% of monthly income) if housing costs including utilities exceed \$1,253 per month.

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

Persons with Disabilities: According to 2023 ACS 5-year estimates, out of 677,449 total residents, 94,116 (13.9%) were living with a disability. Seniors have substantially higher rates of disability – 36.5% of those aged 65 or older experienced a disability. Ambulatory difficulties are the highest disability type for that age range, with 22.9% affected. There is a need for more housing assistance for those living with disabilities, especially the elderly population.

Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking: The victim service provider that the Oklahoma City CoC has partnered with to serve victims of domestic violence is the Young Women's Christian Association (YWCA). Program oversight and funding for YWCA's services is provided through the Oklahoma Attorney General's office.

In 2023, 520 clients received residential emergency shelter from the YWCA at the Thelma Gaylord Emergency Shelter, the only certified shelter for women and children in Oklahoma County (YWCA OKC Annual Report, 2023). The 2024 Point in Time Count reported 137 people homeless due to domestic violence. The actual number of domestic violence victims is difficult to ascertain due to challenges surrounding accurate reporting of domestic violence. It is estimated that 33% of all police time is spent responding to domestic disturbance calls. Between 30-60% of children in domestic violence situations are abused.

The State of Oklahoma consistently ranks as one of the top ten states in the nation for women being murdered by men since 1996. In 2022, The Domestic Violence Fatality Review Board (DVFRB) identified more than 100 victims who were killed due to domestic violence (Oklahoma Attorney General DVFRB Annual Report, 2023). Domestic violence is a significant issue in the state of Oklahoma and the City of Oklahoma City.

The City of Oklahoma City works closely with the YWCA to provide supportive services to victims of domestic violence. Currently, the YWCA operates a shelter and provides supportive services for individuals and children fleeing domestic violence. In 2017, Palomar, Oklahoma City's Family Justice Center was opened. Palomar utilizes a centralized "one-stop shop" collaborative model that connects community service agencies to individuals and families affected by violence. In 2023, Palomar served 5,727 clients (Palomar Impact Report, 2023-2024).

What are the most common housing problems?

Housing cost burden is one of the primary housing problems in Oklahoma City. Households are considered cost burdened when they spend more than 30 percent of their income on housing costs. A severe cost burden occurs when households spend more than 50 of their income on housing costs. Table 7, using data from 2020, shows that 58,369 total households are cost burdened. The 2023 ACS 5-year estimates identify 81,047 (30.42%) of occupied housing units paying more than 30% of their income on housing costs. Additionally, cost burden was identified as one of the largest housing problems in Oklahoma City's Housing Affordability Study, particularly among low-income, minority, or elderly renters.

The City's Housing Affordability Study (HAS) identified a lack of affordable rental units for the lowest-income renters, while at the same time, the proportion of renters in the city continues to grow. According to Table 7, 75.93% of severely burdened rental households earn less than 30% AMI. The HAS found that at least 7% of all housing in the city is in serious need of repairs, with higher concentrations

of major and minor rehabilitation needs with the central city, and especially in the Northeast Urban portion of the city. This area overlaps significantly with the city's current NRSA and SNI neighborhoods.

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

As can be expected, those households below 30% AMI experience overcrowding, substandard housing conditions, and very high housing costs burden more than 50% at a much higher rate than other income demographics. This is especially true for renters. Oklahoma City's Housing Affordability Study found that renters earning less than \$50,000 a year, approximately 60% AMI at the time of the study, were more likely to live in housing with serious need of rehabilitation.

In addition, the City's Housing Affordability Study completed in 2021 found that more census tracts in the City are unaffordable to African American and Hispanic populations than white populations, indicating that the affordability challenges in the City are not shared evenly across populations.

Vacant and abandoned buildings continue to be an issue primarily in the center of the city identified as the NRSA. SNI Neighborhoods, when consulted, also frequently identify vacant and abandoned buildings as major issues in their neighborhoods.

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

Individuals and families that are currently housed but are at risk of losing that housing most often need the type of assistance that the Emergency Solutions Grant (ESG) program provides. Being behind on rent or utility payments is often the cause of evictions. These individuals may need to be connected with ESG assistance to stabilize. Many of the families who need prevention resources to remain housed are at or below 30% AMI. Often, their needs are exacerbated by an acute circumstance that leads to an imminent risk of homelessness, such as job loss, change in relationships, domestic violence, and/or sudden illness.

Families in need of rapid re-housing assistance, and those with assistance that is terminating, need a source of revenue and oftentimes assistance to address other contributory issues. Other identified needs may include transportation needs, mental health and/or substance abuse treatment, parenting skills, supplemental income while in treatment or temporarily disabled, or employment. All households receiving ESG assistance work with a case manager to address the issues jeopardizing their housing.

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

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

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

Greater housing cost burden and lower incomes overall are linked with instability and an increased risk of homelessness. Research shows that there is a positive correlation between states with high homelessness and the share of renter with severe cost burdens. The rental market in Oklahoma is at very low capacity overall, particularly for individuals with low incomes. Individuals and families living in some of the most cost-efficient units often find they are no longer able to afford them as housing demand increases, leading to rising rents. The inability to make rental security deposits and utility deposits is often a barrier to those households who are being evicted or are attempting to locate a cheaper housing option. Short-term assistance is often the difference between maintaining shelter and avoiding homelessness.

Discussion

Oklahoma City’s Metropolitan Area shows a surplus of housing units across all income levels; however, this obscures the large gaps in the City for housing among the lowest and highest income populations. This economic squeeze at both ends of the market exacerbates the housing needs for residents of Oklahoma City, by pushing residents of all incomes into housing that is affordable for low- and moderate-income households. While Oklahoma City has a relatively low cost of living when compared with the rest of the country, the city is seeing many of the same economic pressures as the rest of the nation in the housing market. The city has a growing population with a growing need for a diverse and affordable housing stock that is not being met by the current conservative housing market. As housing costs, inflation, and homelessness rise, the housing needs in Oklahoma City will only grow.

Using HUD funds, the City should consider adding a diverse mix of affordable housing to the central city, where housing needs are greatest, and new housing is not being constructed. These units would serve the greatest need if they consisted of studios and one-bedroom units. Targeted housing toward the lowest-income earners could relieve some pressure in the market for low- and moderate-income households. In addition, addressing housing in need of major and minor repairs in affordable central city areas could benefit low-income households wishing to remain in their affordable homes.

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

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

Introduction

The following section analyses housing problems at different income levels and among different racial/ethnic identities. This data is valuable for understanding if a specific minority population may be experiencing worse (disproportionally greater) housing needs than the greater population. A disproportionately greater need exists when the members of racial or ethnic group at a given income level experience housing problems at a greater rate (10% or more) than the income level as a whole. The four housing problems included in the data analysis include lack of complete kitchen facilities, lack of complete plumbing facilities, more than one person per room, and housing cost burden greater than 30%.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	27,205	8,135	0
White	11,345	3,220	0
Black / African American	8,438	2,710	0
Asian	505	219	0
American Indian, Alaska Native	929	170	0
Pacific Islander	10	0	0
Hispanic	4,324	1,339	0

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source:	2016-2020 CHAS
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*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	20,310	11,225	0
White	9,650	6,125	0
Black / African American	3,840	2,085	0
Asian	660	320	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
American Indian, Alaska Native	620	229	0
Pacific Islander	15	0	0
Hispanic	4,655	2,048	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source:	2016-2020 CHAS
---------------------	-----------------------

*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	15,085	31,355	0
White	7,675	16,120	0
Black / African American	2,690	5,209	0
Asian	615	939	0
American Indian, Alaska Native	375	1,014	0
Pacific Islander	0	35	0
Hispanic	2,680	6,575	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source:	2016-2020 CHAS
---------------------	-----------------------

*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,405	22,940	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
White	2,065	14,745	0
Black / African American	515	2,709	0
Asian	140	930	0
American Indian, Alaska Native	45	404	0
Pacific Islander	20	14	0
Hispanic	493	3,145	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source:	2016-2020 CHAS
---------------------	-----------------------

*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

An analysis of the 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) tables for the Oklahoma City area as reflected below shows a disproportionately greater need for persons experiencing housing problems only among Pacific Islanders earning less than 50% of the Area Median Income. It should be noted that while Pacific Islanders are experiencing disproportionately greater housing needs, the low numbers of Pacific Islanders in the population may be impacting the calculation. Also, while the need is not “disproportionally greater” in general, minority households under 50% AMI experience more housing problems than the population as a whole, with the exception of the Asian population. The results of the analysis are summarized in the table below.

Income Level	Minority or Ethnicity with Disproportionally Greater Need
0%-30% of AMI	Pacific Islander
30%-50% of AMI	Pacific Islander
50%-80% of AMI	None
80%-100% of AMI	None

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

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

Introduction

This data details severe housing problems across different income brackets (measured as a percentage of Area Median Income, AMI) and racial/ethnic groups. Severe housing problems are defined as a lack of complete kitchen facilities, lack of complete plumbing facilities, more than 1.5 persons per room, and a housing cost burden greater than 50%. A "disproportionately greater need" exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10% or more) than the greater population.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	22,925	12,420	0
White	9,445	5,120	0
Black / African American	7,343	3,805	0
Asian	470	254	0
American Indian, Alaska Native	749	350	0
Pacific Islander	10	0	0
Hispanic	3,524	2,135	0

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source:	2016-2020 CHAS
---------------------	-----------------------

*The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	8,180	23,355	0
White	4,205	11,580	0
Black / African American	1,704	4,225	0
Asian	260	720	0
American Indian, Alaska Native	215	634	0
Pacific Islander	15	0	0
Hispanic	1,544	5,164	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source:	2016-2020 CHAS
---------------------	-----------------------

*The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,410	42,000	0
White	2,040	21,755	0
Black / African American	570	7,329	0
Asian	259	1,299	0
American Indian, Alaska Native	105	1,295	0
Pacific Islander	0	35	0
Hispanic	1,284	7,960	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source:	2016-2020 CHAS
---------------------	-----------------------

*The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,170	25,185	0
White	425	16,390	0
Black / African American	210	2,999	0
Asian	90	980	0
American Indian, Alaska Native	25	424	0
Pacific Islander	20	14	0
Hispanic	375	3,270	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source:	2016-2020 CHAS
---------------------	-----------------------

*The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

As expected, the prevalence of severe housing problems decreases as income levels increase. Pacific Islanders face a disproportionately higher percentage of severe housing problems at lower income levels (0%-50% AMI). American Indian/Alaska Native and Hispanic groups also have higher rates of severe housing problems in lower income brackets; however, the rates are not disproportionately higher. Across all income levels, Asians tend to have a lower percentage of severe housing problems compared to most other groups.

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

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

Introduction:

The following section looks at households with a housing cost burden divided by race and ethnicity to determine if any racial group experiences a cost burden disproportionately to the jurisdiction as a whole. A disproportionately greater need exists when the members of a racial or ethnic group at a given income level experience a housing cost burden at a greater rate (10 percentage points or more) than the total income level. For example, assume that 60 percent of all low-income households within a jurisdiction have a housing problem and 70 percent of low-income Hispanic households have a housing problem. In this case, low-income Hispanic households have a disproportionately greater need. The data below is from the 2016-2020 Comprehensive Housing Affordability Study. Table 21 displays cost burden information for the City of Oklahoma City and each racial and ethnic group, including no cost burden (less than 30 percent), cost burden (30-50 percent), severe cost burden (more than 50 percent), and no/negative income.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	178,510	33,260	30,954	4,180
White	114,905	16,950	14,745	1,460
Black / African American	21,715	6,195	8,610	1,535
Asian	7,265	914	894	99
American Indian, Alaska Native	4,030	980	914	80
Pacific Islander	105	0	10	0
Hispanic	22,775	6,130	4,083	774

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source:	2016-2020 CHAS
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Discussion:

The data presented above indicates that Black/African American and Pacific Islander households experience housing cost burdens at a disproportionately greater rate than the jurisdiction as a whole. Black/African American households continue to have a severe cost burden at a disproportionately high rate. Overall, most minority communities experience a housing cost burden at a higher - if not disproportionate - rate to the jurisdiction as a whole, except for Asian communities.

Housing Cost Burden	Percentage with Cost Burden	Percentage with Severe Cost Burden
Jurisdiction as a whole	27.7%	12.6%
White	23.2%	10.2%
Black / African American	41.5%	21.4%
Asian	21.0%	8.7%
American Indian, Alaska Native	34.5%	17.9%
Pacific Islander	58.5%	10.6%
Hispanic	33.1%	13.1%

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

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

Pacific islander populations in Oklahoma City appear to experience disproportionately greater housing needs across all categories. This community is more likely to have housing problems, severe housing problems, and cost burden at 0-30% AMI and 30-50% AMI. Pacific Islanders make up a very small proportion of Oklahoma City's housing population, making up just 0.04% of the total number of households, and 0.08% of the total cost burdened households.

Black/African American households also experience disproportionately high housing cost burden and severe housing cost burden. 41% of Black/African American households in Oklahoma City pay more than 30% of their income on housing costs, compared with 28% of the city as a whole experiencing cost burden.

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

The sections above focus on specific housing problems, such as a lack of plumbing, kitchen, overcrowding, or cost burden. However, some communities face housing needs that are not encompassed by the housing problems above such as loan denial rates and eviction.

According to Oklahoma City's Housing Affordability Implementation Plan, the loan denial rate in Oklahoma City is increasing. For the city as a whole, the loan denial rate increased from 8.5% in 2019 to 11.5% in 2023. Among African Americans, it is disproportionality higher and increasing, going from 13.6% in 2019 to 17.5% in 2023. The city's overall loan denial rate is higher than the US average.

Evictions also impact certain populations disproportionately. Oklahoma City has an estimated eviction rate of 14.5% (HAIP). The Eviction Lab determined through work with the U.S. Census Bureau that certain demographic factors increased the likelihood a household would face eviction. Households with children make up over half of the households that faced eviction. Black and African American

households make up a disproportionate share of those filed against for eviction, with over 51.1% of Black renters facing eviction nationally (Eviction Lab, 2023).

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

Geographically, low-income households are located within the central metropolitan area. A significant concentration of the Black and African American population remains in the northeast quadrant of the City. The Black and African American population in Oklahoma City remains concentrated in Census Tracts to the east and northeast of the city center. The growing Hispanic population in Oklahoma City is clustered to the southwest and west of the downtown area.

NA-35 Public Housing – 91.205(b)

Introduction

The PIC (PIH Information Center) data reflected in the following tables has been verified and updated with input from the Oklahoma City Housing Authority (OCHA). OCHA has a total of 5,001 total vouchers in use for project and tenant-based units. 4,378 of these are tenant based and 623 are project based. The average annual income of the tenants is \$11,320. A total of 825 are elderly program participants at least 62 years of age and 1,198 are disabled. 2,107 public housing residents (46%) and 1,455 voucher holders are White (29.1%), 1,832 public housing residents (40%) and 2,220 voucher holders (44.4%) are Black/African American. 45 public housing residents and 47 24 voucher holders identify as Asian. 320 public housing residents and 143 voucher holders identify as American Indian/Alaska Native. Other ethnicities account for less than 1% of all voucher holders. 15% of public housing residents and 18% of voucher holders self-identify as Hispanic.

The Public Housing program has site-based waiting lists. As of December 2024, a total of 15,951 households are waiting for Senior/Disabled properties. For family properties, there are currently 26,964 families waiting for 1-bedroom homes, 11,496 waiting for 2-bedroom homes, 7,129 waiting for 3-bedroom homes, 1,312 waiting for 4-bedroom homes, and 218 waiting for 5-bedroom homes. Families can sign up on multiple lists, therefore many of those waiting may be duplicated between categories. As such, it is not possible to provide an exact number of those in need of units, but the need is demonstrably significant. The average waiting period for a public housing unit is estimated at two (2) years for families applying at the time of reporting. While the turnover rate for vouchers remains average at approximately 48 per month, the rate has remained steady during the previous three (3) years.

Totals in Use

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	11	2,716	4,238	543	3,205	278	41	424

Table 22 - Public Housing by Program Type

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

Data Source: PIC (PIH Information Center)

Characteristics of Residents

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	9,865	9,260	10,678	7,061	10,361	12,732	12,024
Average length of stay	0	6	4	5	2	5	0	2
Average Household size	0	1	2	2	1	2	1	3
# Homeless at admission	0	11	0	0	0	0	0	0

# of Elderly Program Participants (>62)	0	4	825	499	385	794	13	0
# of Disabled Families	0	11	1,198	2,051	95	1,738	17	5
# of Families requesting accessibility features	0	4	2,999	3,989	7	3,728	67	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	7	2,107	1,455	304	1,340	115	12	22
Black/African American	0	1	1,832	2,220	200	2,189	84	10	9
Asian	0	0	45	24	7	45	2	0	0
American Indian/Alaska Native	0	1	320	143	12	233	2	0	1
Pacific Islander	0	0	0	7	0	0	1	2	0
Other	0	1	0	296	12	117	14	7	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	1	687	763	28	164	15	13	0
Not Hispanic	0	10	3,839	3,475	525	3,564	271	28	32
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

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

At the present time, OCHA reports there are five (5) residents awaiting transfer to an accessible unit. In some cases, OCHA can accommodate the tenant with minor modifications to an available unit. Approximately 10% of available units are handicapped accessible. Often, apartments are leased to a current tenant who has aged in place and now requires features that were not needed at the time of move-in. Units are modified as resources allow.

What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

There are presently five residents waiting for a transfer to a Section 504 accessible unit. As of December 2024, a total of 15,951 households are waiting for Senior/Disabled properties. For family properties, there are currently 26,964 families waiting for 1-bedroom homes, 11,496 waiting for 2-bedroom homes, 7,129 waiting for 3-bedroom homes, 1,312 waiting for 4-bedroom homes, and 218 waiting for 5-bedroom homes. Families can sign up on multiple lists, therefore many of those waiting may be duplicated between categories.

Consultation with OCHA reveals the greatest needs at the present time are onsite mental health services, onsite health and wellness prevention services, access to quality healthcare, early childhood school readiness, employment education, and financial literacy. As noted in the introduction above, there are large waiting lists for public housing units and additional Section 8 vouchers.

Capital improvements are also a pressing need. At the time of this report, OCHA has a backlog of modernization needs exceeding \$20 million, primarily due to the aging of properties. Capital Funds provided annually by the U.S. Department of Housing and Urban Development (HUD) have decreased substantially in recent years. The cost of deferred maintenance exacerbates the existing problems and ultimately requires more costly repairs as properties continue to deteriorate. Regularly scheduled maintenance and immediate correction of property deficiencies require less monetary investment than crisis remedies.

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

The need for available affordable units mirrors that of the general population. Housing needs continue to exceed available resources. Market rate rental units generally do not maintain a waiting list and units can typically be occupied within 60 days. The need for capital improvements in public housing units is greater than that of the general population due to OCHA's reliance on HUD funding to meet ongoing property concerns. The private market by contrast is generally supported by the ability to increase gross

rents in response to decreasing cash flow. In addition, the availability of private capital and the ability to borrow against equity at favorable loan terms provides a cushion of protection from rising maintenance costs.

Discussion

OCHA has set a goal of assisting ten (10) families in achieving homeownership each year through the Housing Authority Family Self-Sufficiency Program. Oklahoma City Housing Authority offers the Family Self-Sufficiency (FSS) Program to individuals utilizing a Housing Choice Voucher with the Oklahoma City Housing Authority. OCHA and an adult member of each participating family execute a Contract of Participation, generally for five years with a possible two-year extension for good cause, incorporating the specific training and services plan for the family. Participating families are provided with an interest-bearing escrow account made up of the difference between the rent the family pays when entering the program and the increased rent that would be charged as the family's earned income increased. On completion of the FSS contract, a family may claim its escrow account if the person who signs the Contract is employed, no family member is receiving welfare assistance, and the family has met their other individual goals.

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

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

For the last year, Oklahoma City has intensified focus on housing for youth and individuals who are chronically homeless through funding from the HUD CoC competitive grant, the YHDP program grant and other resources. Using the annual PIT as a gauge of where to target services, the City through community partnerships has worked to create permanent supportive housing beds, rapid rehousing beds, drop-in and other services in efforts to make homelessness among these populations brief, rare and non-recurring. The City has a Coordinated Entry System and assessment tool which emphasizes housing people of the highest need first. Additionally, the City began a rehousing initiative focusing on encampments and has selected an organization to pilot a diversion program in calendar year 2025.

The annual PIT count of the homeless remains a valuable tool in identifying the needs of domestic violence victims. In 2020, 128 individuals (8% of the homeless population) reported experiencing domestic violence. Many of these individuals were unable to obtain safe and secure housing options after removing themselves from a threatening environment. The total number of cases involving domestic violence has been increasing in Oklahoma City each year. National statistics demonstrate that increases in domestic violence cases can be attributed to a high rate of poverty or significant economic stress such as job loss. We expect these trends to continue.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Unsheltered	Sheltered				
Persons in Households with Adult(s) and Child(ren)	0	316	623	229	299	7
Persons in Households with Only Children	0	11	27	8	8	90
Persons in Households with Only Adults	433	1,078	6,330	1,516	1,516	173

Chronically Homeless Individuals	209	246	562	96	96	730
Chronically Homeless Families	0	19	12	1	1	730
Veterans	37	100	746	210	210	173
Unaccompanied Child	19	152	27	8	8	90
Persons with HIV	8	7	99	21	21	174

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

Not applicable. Data is provided in the previous table.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	564	201
Black or African American	513	623
Asian	6	0
American Indian or Alaska Native	79	69
Pacific Islander	3	4
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	148	32
Not Hispanic	1181	401

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

The City estimates that there are approximately 101 families in need of housing on any given night. The most recent Point-In-Time count found no homeless veteran's families that were homeless. Most families experiencing homelessness can be effectively assisted with prevention or rehousing assistance through the Emergency Solutions Grant (ESG), or through another financial source providing a similar type of support. Only a small number of chronically homeless families have been located during the annual Point-in-Time count and most families assisted throughout the year are typically found in

shelters. Goodwill currently assists a small number of families of veterans with housing and services funded through the Supportive Service for Veteran's Families (SSVF) grant.

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

In the table above, it is reported that 42% of the homeless population is White, 34% is Black/African American, 8% is American Indian and 6% have self-reported as multi-racial, although the table in IDIS does not capture this population. These numbers suggest Black/African Americans and Native Americans experience homelessness disproportionately as they make up 13% and 3.4% of the Oklahoma City's overall population respectively. 9% percent of Oklahoma City's homeless population are Hispanic.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Based upon the 2024 PIT count, an estimated 1146 are sheltered on any given night. An additional 433 remain unsheltered. Approximately two hundred and forty-eight (248) of those sheltered are chronically homeless and sixty-four (64) are Veterans. Sixty-three (63) sheltered households have children present. Seven (7) of these families are chronically homeless.

Discussion:

The provision of permanent housing through rapid re-housing and permanent supportive housing with associated supportive services remain high priorities in this Strategic Plan, as do homelessness prevention services. The City remains the lead entity for the Oklahoma City Continuum of Care and coordinates these activities among service partners. Activities included in this Consolidated Plan include STRMU and TBRA assistance, funding for case management resources, and rapid rehousing for families with children. In addition to using ESG, HOPWA, and Continuum of Care grants to address service needs, the City is also using other resources such as grants from private organizations. This funding paired with federal programs has allowed the CoC to launch and encampment rehousing initiative in 2023-24 and will also allow the CoC to launch a homelessness diversion program in 2025. The Encampment Rehousing Initiative has successfully housed over 300 people who were chronically homeless. The program has a target to house 500 people by the end of 2025

To address the growing challenges with homelessness on our community, the Mayor's Task Force on Homelessness was launched in April 2019. In December 2019, Oklahoma City began formalizing a Comprehensive Strategy to prevent, respond to, and combat homelessness. The strategy was completed in the summer of 2020. Multiple strategic planning sessions between City staff and local service providers were held to identify measurable goals and priorities that are realistic and achievable. Once the study was completed, the City contracted with Clutch Consulting to prioritize and execute services. Progress will be reported annually in the Consolidated Annual Performance and Evaluation Report (CAPER).

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

Introduction:

This section describes the level of housing needed for persons who are not homeless but require some supportive housing, including the elderly, persons with disabilities, those with substance abuse disorders, and persons with HIV/AIDS. Persons living with HIV/AIDS often have very low incomes and require supportive housing and housing subsidies. These individuals also benefit from case management and support for accessing medical services. The elderly often have accessibility issues and fixed incomes, so they may require help with transportation and accessible units that allow them to age in place. All non-homeless special needs populations have distinct needs, but many require some housing support.

HOPWA

Current HOPWA formula use:	
Cumulative cases of AIDS reported	3,319
Area incidence of AIDS	202
Rate per population	13.8
Number of new cases prior year (3 years of data)	204
Rate per population (3 years of data)	14.1

Current HIV surveillance data:	
Number of Persons living with HIC (PLWH)	3,319
Area Prevalence (PLWH per population)	227.4
Number of new HIV cases reported last year	202

Table 26 – HOPWA Data

Data Source: CDC HIV Surveillance

HIV Housing Need (HOPWA Grantees Only)

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

Table 27 – HIV Housing Need

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

Describe the characteristics of special needs populations in your community:

Low-Income Persons Living with HIV/AIDS: Oklahoma City's HOPWA program serves low-income people living with HIV/AIDS. 74% of households served by the program earn below 30% of the area median income, meaning their income is categorized as extremely low income. Statewide, Oklahoma has seen increases in HIV/AIDS diagnoses, particularly in rural areas. Municipal level data on HIV/AIDS cases is not available for Oklahoma City. Households in Oklahoma City receiving HOPWA services are primarily stably housed and receiving a housing subsidy.

While only 15 people who are homeless reported having HIV/AIDS, a significantly higher number of people who are not homeless requested assistance through the City's HOPWA program.

- Racial Demographics: 48.24% Black/African American, 46.13% white, and 4.58% American Indian/Alaska Native
- Ethnicity: 9.86% Hispanic/Latino
- Age: 58% age 31-50, 28% age 51+, 14% age 18-30
- 70% male, 24% female, and 5.63% transgender

Older Adults and People with Disabilities: In 2023, 91,352 people in Oklahoma City were older than 65, making up 13.26% of the population of the city (ACS, 2018-2023). For those 65 and older, 36.6% of individuals have a disability, and 8.5% receive SNAP or Foods Stamp benefits and 9.4% are below the poverty line. 19.5% of elderly households in Oklahoma City pay more than 30% of their income on housing costs (ACS, 2018-2023).

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

The City of Oklahoma City, as the Continuum of Care lead, helped develop the City's Coordinated intake system for homeless services. All housing service providers, whether federally funded or not, participate in the system and are required to utilize the CoC's assessment tool to determine every client's level of need. The assessment used by the CoC was previously the Vulnerability Index Service Prioritization Decision Assistance Tool (VI-SPDAT). The VI-SPDAT has since been discontinued so the CoC has developed its own assessment tool called the Oklahoma City Susceptibility Estimate (OKCSE). This assessment tool produces a comprehensive inventory of every client's health issues plus other contributing factors to determine the intensity of housing and services required to maintain housing. A score is generated based on those factors. Clients with higher scores are prioritized for housing. The overwhelming number of people served by these programs require permanent supportive housing or rapid rehousing assistance with case management.

Additionally, the primary services requested through the City's 211 provider are for rental and utility assistance. This, coupled with the increase in unsheltered homelessness in Oklahoma City in recent years, would indicate there is a significant need for more intensive supportive housing for the most severe client cases and, in the absence of a significant increase in the supply of affordable housing,

private resources that can be used to incentivize current landlords to provide access to units for people that are homeless.

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

According to the 2022 HIV Surveillance Report released by the Center for Disease control (CDC), the cumulative number of people living with HIV/AIDS in Oklahoma City is 3,319, an increase of 98 new diagnoses from what was reported in the 2018 report. 15 people surveyed during the City's Point In Time homeless census reported having an HIV/AIDS diagnosis. Most HOPWA beneficiaries are single and, similar to other housing assistance programs, rent & utility assistance along with supportive services are the most frequent services needed. This would suggest that most people with HIV/AIDS in need of housing assistance are not in need of intensive services.

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii))

Not applicable.

Discussion:

Non-Homeless Special Needs populations have a variety of needs. Persons living with HIV/AIDS may need different supports and levels of case management than the elderly or victims of domestic violence. Where non-homeless special needs populations interact with city and nonprofit services, housing needs are a throughline. Many of these populations struggle to find and maintain housing, even when not homeless. Affordable housing is essential for these populations, who may have limited or fixed incomes. For seniors, accessibility is essential, as many seniors are living with one or more disability.

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

Describe the jurisdiction's need for Public Facilities:

Oklahoma City communities have an ongoing need for public facilities to provide community-wide benefits in low- to moderate-income neighborhoods. The City has historically restricted these improvements to the NRSA and SNI neighborhoods. The SNI program works with specific neighborhoods to identify and improve neighborhood public facilities, including sidewalks and parks.

The Association for Central Oklahoma Governments' 2024 Comprehensive Economic Development Strategy (CEDS) identified insufficient public transit and aging infrastructure as a regional public facility need. The City of Oklahoma City is currently spending funds and implementing projects from the MAPS4 penny sales tax, approved by voters in 2019. This temporary penny sales tax runs from 2020 to 2028. The projects funded by MAPS4 include public facilities such as sidewalks, bike lanes, youth and senior centers, and a Family Justice Center. This large investment in public facilities is helping to reduce the public facility needs in the City, leaving federal funding to focus on housing needs.

Public facility projects that support special needs populations may be considered, including but not limited to facilities that serve homeless populations, the elderly, and those fleeing domestic violence. These kinds of facilities are often not served with other public funding. Public facilities in underserved neighborhoods may also be considered.

How were these needs determined?

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

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

Other public facility needs were identified through input from the public and provider organizations during Consolidated Plan development. These projects will go through an application process and will

be evaluated based on their strength, the capacity of the operating organization, and the availability of funds.

Describe the jurisdiction's need for Public Improvements:

The most pressing need for public improvements in Oklahoma City neighborhoods is public infrastructure; specifically, the construction of sidewalks and adequate street lighting. The municipal boundaries of Oklahoma City contain a geographical area of 621 square miles, making it very difficult to meet ongoing maintenance needs for public infrastructure. This large service area provides unique challenges in terms of both administrative and financial resources, and the City's capacity to keep pace with needed repairs is limited. Both MAPS programs and General Obligation Bonds often pay for public improvements but often do not provide adequate funding in low-income and underserved areas with high infrastructure needs.

Public improvement activities proposed in this Consolidated Plan include the construction of sidewalks, tree planting, and park improvements in SNI neighborhoods. Infrastructure may also be needed in other low-moderate income areas for park improvements, or to support the development of affordable housing.

How were these needs determined?

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

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

The other needs mentioned were identified through input from the public during Consolidated Plan Development. Funded projects will go through an application process and will be evaluated based on their strength, the capacity of the operating organization, and the availability of funds. Considerations for funding non-housing projects include whether the project 1) serves a special needs population, 2) is in an SNI or underserved area, and 3) will have a significant catalytic effect on investment.

Describe the jurisdiction's need for Public Services:

The need for public services always exceeds available resources due to the statutory 15% public services cap. The SNI program works with specific communities to identify public service needs and create effective programs. The City is looking to align funded public services more effectively with the goals and strategies identified in the Housing Affordability Implementation Plan. The HAIP identifies a need for services and support for renters, homeless persons, and those with extremely low-incomes. The city recently reorganized the homeless services operations within the Continuum of Care network and could better support these organizations in a streamlined manner. In addition, public service funds could be better utilized as capacity-building grants that can support the growth and development of an effective non-profit organization without a long-term funding obligation. The City does support many worthy activities and will continue to do so over the life of this Plan.

How were these needs determined?

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

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

Housing Market Analysis

MA-05 Overview

Market Analysis Overview:

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

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

Introduction

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

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

The City commissioned a Housing Affordability Study, completed in 2019, and a Housing Affordability Implementation Plan, completed in 2024. Both plans identified a lack of affordable housing units for low-income households, particularly renters. The plans identified a market gap in the types of units being constructed, primarily 3-bedroom, 2-bath units, and the types of units needed, primarily 1 bed, 1 bath.

To encourage reinvestment in older neighborhoods and to promote pedestrian-oriented housing options, the City has strategically targeted three (3) neighborhoods in the central core as part of the

Strong Neighborhoods Initiative Program. These include Martin Luther King, Jr Neighborhood (MLK), Stockyards Neighborhood, and Ross Heights-Pitts Park Neighborhood. This year, two SNI neighborhoods will sunset, Capitol Hill and Metro Park. The City of Oklahoma City continues to emphasize homeownership activities while also ensuring that sufficient housing options exist for public housing, Section 8 voucher assistance, and rental opportunities for persons of all ethnicities and income levels.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	188,725	68%
1-unit, attached structure	8,800	3%
2-4 units	15,185	6%
5-19 units	35,240	13%
20 or more units	18,764	7%
Mobile Home, boat, RV, van, etc.	9,359	3%
Total	276,073	100%

Table 28 – Residential Properties by Unit Number

Data Source: 2016-2020 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	579	0%	4,355	4%
1 bedroom	1,845	1%	27,295	27%
2 bedrooms	20,775	14%	36,755	37%
3 or more bedrooms	123,170	84%	32,105	32%
Total	146,369	99%	100,510	100%

Table 29 – Unit Size by Tenure

Data Source: 2016-2020 ACS

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

On average, the City of Oklahoma City (City) funds the construction of 7-9 new affordable homes for sale each year through the Community Housing Development Organization (CHDO) program. On average, the City of Oklahoma City rehabilitates 107 low-income housing units per year, using HOME and CDBG funding. The City constructs approximately 50 new affordable rental units per year with HOME funds. The most recent available data from the Oklahoma Housing Finance Agency has 3,942 affordable LIHTC units currently under construction within Oklahoma City. These units are likely to become available within 5 years.

Oklahoma City's internal tracking of affordable units indicates an increase of 1,029 affordable units in 2024. The increase in unit counts this year primarily has to do with newly announced GOLT and ARPA units, as well as new projects added to the OHFA LIHTC development list. Over the past five years, the aggregate affordable unit count in OKC has increased by 1,983 units. The parameters involved for this count include rental units within the Oklahoma City boundaries that are subject to a local or federal affordability compliance period and are either in service or are under construction. These do not include privately held units that receive a Housing Choice Voucher (HCV) subsidy with the exception of Project Based HCV units owned by local non-profits.

CDBG, HOME, and LIHTC funds serve families earning less than 80% of the Area Median Income. Often, HOME-assisted rental units serve those under 60% AMI. HOME-ARP and ARPA units also serve low- and moderate-income households. The units constructed with City GOLT funds create both workforce and affordable housing, meaning the income limits can be as high as 120% AMI.

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

The National Housing Preservation Database's 2022 report for Oklahoma City estimates 1,577 federally assisted homes with rent restrictions expiring in the next five years in Oklahoma City. There are currently enough new units being generated each year to cover the loss of these units; however, the demand far exceeds the number of units being produced, even without older units going offline. The Oklahoma City Housing Authority (OCHA) administers 5,001 Section 8 Housing Choice Vouchers. It is unknown if they will have a loss of funding over the next five (5) years that will result in a loss of vouchers. The Section 8 waiting list has a waiting period estimated at over three (3) years. The turnover rate for the vouchers is average and remains steady.

OCHA administers a total of 2,716 public housing units. The tenant's share of rent is based on household income and a subsidized tenant may choose to pay more of their rent to occupy a more expensive unit.

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

Multiple housing studies conducted since 2019 have identified a mismatch between the available homes and the types and cost of homes needed. There is a lack of available, affordable units for households at the very high and very low end of the income spectrum in Oklahoma City. This results in a squeeze of units available to middle-income households, as both low-income and high-income households occupy these units when unable to find more or less expensive units.

In addition, there is a mismatch between the diversity of new households by size and the inventory of household types. Homes under construction are large, the most common type is a 3 bed 2 bath single family home. There is a lack of homes with 1 and 2 bedrooms. These smaller homes would also have lower costs and would be affordable for a broader range of households.

Describe the need for specific types of housing:

The City needs housing for its lowest-income renter households. Households earning between 0-30% AMI face a gap of approximately 33,210 units. These households face a shortage across all unit types, from studio to 3+ bedroom units.

For households across the income spectrum, there is a shortage of available studio and 1-bedroom units. There is a lack of diversity in the size of housing units being produced. Builders focus on large 3+ bedroom single family homes and are less interested in smaller homes and apartments. Right-sizing of the housing market would create more housing opportunities for families of all sizes and reduce the cost-burden.

Community surveys and public comments indicate a preference for more affordable and workforce housing in the Central Business District which would enable those persons working downtown to adopt an urban and pedestrian lifestyle. Market rate housing units in the urban core have increased significantly since the previous Consolidated Plan was approved; however rental rates in the urban core are often priced for the upper end of the market and are not accessible to low- and moderate-income households. The City continues to emphasize mixed-income development to create economic diversity and ensure equal housing opportunity in all areas of the city.

Discussion

The City is highly focused on preserving and increasing affordable housing. With the adoption of the Housing Affordability Implementation Plan in 2025, the City is taking active steps towards improving the housing market for all its residents. Gaps and needs analyses indicate rental housing for low-income households and a diversity of housing types are the greatest needs, particularly in the center of the city, where access to opportunity is high. Affordable housing and the rehabilitation of aging housing stock remain high priorities under this Plan. An emphasis on mixed-income housing and deconcentrating poverty will remain a focus in all funding decisions. The City's needs and opportunities will be evaluated annually to ensure that resources are targeted strategically and that the stated goals of the Plan remain timely and relevant.

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

Introduction

Oklahoma City continues to grow, adding over 27,000 households from 2019 to 2022. From 2010 to 2019, the City grew by 20,000 households. This rapid growth rate is expected to continue and has impacted the housing market in the City. Housing costs in Oklahoma City have risen rapidly. From 2019 to 2023, the median home value increased by over 35%, and the median gross rent has increased 24%. Oklahoma City's share of cost-burdened households also continues to grow by approximately 2,200 households per year. The cost of housing in Oklahoma City, while affordable compared with the rest of the nation, is growing at a faster rate than the rest of the country. These cost increases are not reflected in rising wages, and more and more residents are cost burdened.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2020	% Change
Median Home Value	138,600	161,800	17%
Median Contract Rent	609	717	18%

Table 30 – Cost of Housing

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	18,466	18.4%
\$500-999	63,815	63.5%
\$1,000-1,499	13,989	13.9%
\$1,500-1,999	2,780	2.8%
\$2,000 or more	1,474	1.5%
Total	100,524	100.0%

Table 31 - Rent Paid

Data Source: 2016-2020 ACS

Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	6,595	No Data
50% HAMFI	33,428	16,389
80% HAMFI	70,738	42,003
100% HAMFI	No Data	59,739

Total	110,761	118,131
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Table 32 – Housing Affordability

Data Source: 2016-2020 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	775	821	1,016	1,353	1,536
High HOME Rent	637	689	867	1,184	1,334
Low HOME Rent	637	689	831	960	1,071

Table 33 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

There is a significant need for rental units affordable to households earning less than 30% of area median income. In the Oklahoma City Metro Area, there is a gap of over 33,000 units for renters earning less than 30% AMI. These renters are forced to rent more expensive homes, resulting in a higher cost burden. In the data presented above, there are only 6,595 units affordable for those earning 30% AMI or less, representing just 6% of all available units.

Additionally, there is a lack of housing in the market for those earning above 80% AMI. These households are not considered low-income, but the lack of units priced at their income levels pushes these households into units that would be affordable to low-income households. This reduces the number of affordable units available for those earning less than 80% AMI.

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

Home prices and rents in Oklahoma City continue to rise, though not as dramatically as in the post-pandemic years from 2020-2022. Since mid-2023 home values seem to have leveled out due to interest rate increases. The housing market is not as competitive as it was in the aftermath of the pandemic and very low interest rates. Oklahoma City continues to see high year-over-year rent increases. While the rent increase appears to be slowing, it is expected that affordability will continue to be an issue as home value and rents increase each year.

Year	Median Home Value	% Change	Median Gross Rent	% Change
2023	\$215,100	9.35%	\$1,083	7.02%
2022	\$196,700	16.46%	\$1,012	8.47%

2021	\$168,900	4.39%	\$933	5.54%
2020	\$161,800	2.08%	\$884	1.49%
2019	\$158,500	3.12%	\$871	2.59%

Source: ACS 5-Year Estimates.

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

The *median* gross rent in Oklahoma City was \$1,083 according to the 2023 ACS; however, the data does not indicate the number of bedrooms, or property type. According to Apartments.com, in February 2025, the average rent in Oklahoma City is \$918 per month. Data on the average rent per unit compared with the HUD FMR is presented below. The current HUD FMR is comparable to the cost of renting an apartment, but not a house. Oklahoma City's housing market is dominated by single-family homes. Many renter households in the city live in single family homes. The HUD FMR presents a challenge in a market that is dominated by single-family homes that are more expensive per room to rent than the HUD FMR, as the HUD FMR sets the limit for rental subsidies.

	Apartment	House	HUD FMR
Studio	\$837	NA	\$775
One Bedroom	\$918	\$1,093	\$821
Two Bedroom	\$1,087	\$1,806	\$1,016
Three Bedroom	\$1,316	\$2,785	\$1,353
Four Bedroom	NA	\$2,801	\$1,536

The City's high market rents, especially when compared with the HOME High and Low rents, indicate the need to continue to produce and preserve affordable housing in Oklahoma City. These units require subsidies, as the private market cannot produce affordable housing for low-income populations without a subsidy. The units cost too much to produce for them to be rented at prices that would be affordable to low-income households.

Discussion

Multiple studies commissioned in the last 5 years indicate that Oklahoma City faces a shortage of affordable housing, and that households in our community are increasingly cost-burdened. The Housing Affordability Implementation Plan in particular calls for a strategic approach to increasing both affordable and market-rate housing in the city to alleviate pressures in the market. The city is working to implement the HAIP, adopted in 2025, which will impact the strategies and approaches presented in this plan, and in future Action Plans.

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

Introduction

Oklahoma City's 2021 Housing Affordability Study estimated that 7 percent of the City's population was living in housing in serious need of repair. These issues are spread throughout the city but are concentrated in the central part of the city, including the central south and northeast. The city encompasses a large land area with a wide variety of housing ages; however, the NRSA, where most federal grant funds are spent, is a significantly older part of the city. Approximately 53% (144,332) of housing units in Oklahoma City were built before 1979 and are likely to have lead paint.

The ACS data below shows that 17% of owner-occupied units and 42% of rental units suffer from at least one adverse condition. These include (1) Lacking complete plumbing facilities, (2) Lacking complete kitchen facilities, (3) more than one person occupancy per room, and (4) cost burden exceeding 30%.

Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":

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

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

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

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	25,530	17%	41,855	42%
With two selected Conditions	700	0%	2,480	2%
With three selected Conditions	70	0%	53	0%
With four selected Conditions	0	0%	0	0%

No selected Conditions	120,075	82%	56,125	56%
Total	146,375	99%	100,513	100%

Table 34 - Condition of Units

Data Source: 2016-2020 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	40,705	28%	18,810	19%
1980-1999	36,065	25%	25,615	25%
1950-1979	51,455	35%	41,004	41%
Before 1950	18,154	12%	15,110	15%
Total	146,379	100%	100,539	100%

Table 35 – Year Unit Built

Data Source: 2016-2020 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980.	69,609	47%	56,114	56%
Housing units built before 1980 with children present	21,075	14%	13,570	13%

Table 36 – Risk of Lead-Based Paint

Data 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)

Source:

Vacant Units

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

Table 37 - Vacant Units

Comprehensive data on vacant and abandoned units is not available.

Need for Owner and Rental Rehabilitation

As noted previously, 47% of owner-occupied residences and 56% of rental units were constructed prior to 1979. This large supply of aging housing stock itself is an indicator that rehabilitation needs will continue to increase over the five (5) year Consolidated Plan period. Additionally, 17% of owner-occupied residences and 42% of rental units reported in the table above have at least one (1) substandard condition that requires immediate attention. The Housing Affordability Study estimated that approximately 9% of the City's housing is in serious need of repairs. The percentage of homes in need of major and minor repairs in the HAS is lower because it does not include cost burden and overcrowding, only physical issues. The HAS also estimates approximately 10% of rental units need major repair, and 9% of owner-occupied units are in need of major repair.

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

The data above shows that 69,609 owner-occupied units were built prior to 1980, of which 14% have children present. On the rental side, 56,114 units were built prior to 1980, of which 13% have children present. Approximately 42.5% of all households earn less than 80% of the area median income. When applying the same percentages for the determination of potential Lead-Based Paint hazards, it can be expected that approximately 29,622 owner-occupied homes built before 1980 are occupied by low or very low-income families. Likewise, it can be estimated that 23,879 rental units constructed before 1980 are occupied by low or very low-income households.

Discussion

Housing units in Oklahoma City are primarily in good condition. However, there are a significant number of units in need of repairs, and those are more likely to be occupied by low-income households. In addition, these units are most likely to be concentrated in the central city, and within the NRSA. These units are also likely to contain lead-based paint, as most units in the NRSA were built before 1978. There is a need for housing rehabilitation for both renters and owners.

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

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

Introduction

The Oklahoma City Housing Authority owns 2,716 public housing units in projects and scattered rental units. The units are divided among senior and general occupancy units. Section 8 Vouchers are provided to 4,216 families, of which 181 are project-based and 4,035 are tenant-based. OCHA's public housing units' range in age from 31 to 100+ years old and typically have a vacancy rate of 3-9%. All residents are low income, and the vast majority of residents have incomes below 30% AMI.

To summarize, OCHA administers a total of 7,717 housing units. The tenant share of rent is based on household income and a subsidized tenant may make a choice to pay more of their own money to have a more expensive rental unit.

Totals Number of Units

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	12	2,716	5,001	623	3,475	311	61	531
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 38 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

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

Senior Housing Units: OCHA has 1,194 elderly/disabled housing units located in eleven (11) housing development sites. 15,951 applicants are on a waiting list for elderly units at the time of reporting. The

occupancy rate on these units is 97% and the average age of these structures is 42 years. All residents are low income-the majority are very low income.

General Occupancy Housing Units: OCHA has 1,515 housing units classified as family units. These units are located at six (6) developments and on multiple scattered sites. 47,119 applicants are on a waiting list at the time of reporting. Families may sign up for multiple waiting lists, so this number includes duplicated requests. The average age of the multifamily structures is 54 years. The 446 scattered site units range in age from 31-82 years old. The occupancy rate is 91%. All residents are low income-the majority being very low income.

Section 8 Housing: OCHA administers 5,001 Section 8 Housing Choice Vouchers. There are approximately 1,400 participating landlords. It is unknown if a loss of funding will be experienced over the next five (5) years resulting in a loss of vouchers. The Section 8 waiting list is 15,317 households at the time of reporting and there is an average waiting period of over three years. While the turnover rate for vouchers remains average, the rate has been steady over the past 5 years. A person or family applying at the time of this report can anticipate a waiting period of at least three (3) years before receiving assistance.

Type	AMP Number	Name	Address	Number of Units
FAMILY	AMP 101	Will Rogers Courts	1620 Heyman	348
FAMILY	AMP 102	Oak Grove	3301 S.W. 17th Street	288
FAMILY	AMP 103	Ambassador Courts	800 S.E. 15th Street	200
FAMILY	AMP 104	Scattered Sites		448
FAMILY	AMP 105	Fred Factory Gardens	3901 Dunjee Blvd.	74
FAMILY	AMP 106	N.E. Duplexes	2600 Martin Luther King Ave	159
SENIOR	AMP 111	Marie McGuire Plaza	1316 N.E. 12th Street	141
SENIOR	AMP 111	Wyatt F. Jeltz	1225 N. Kate	201
SENIOR	AMP 112	Classen Senior Center	913 N.W. 12th	100
SENIOR	AMP 112	The Towers Apartments	135 N.W. 9th Street	138
SENIOR	AMP 114	Shartel Towers	5415 S. Shartel	201
SENIOR	AMP 114	Hillcrest Senior Center	2325 S.W. 59th Street	101
SENIOR	AMP 115	Andrews Square	2101 S. Harvey	201
SENIOR	AMP 115	Reding Senior Center	1000 S.W. 38th Street	101
SENIOR	AMP 115	Reding Annex	1001 S.W. 38th Street	10

Public Housing Condition

Public Housing Development	Average Inspection Score
Will Rogers Courts (AMP no. 101)	48
Oak Grove (AMP no. 102)	59

Ambassador Courts (AMP no. 103)	62
Scattered Site Units (AMP no. 104)	42
Fred Factory Gardens (AMP no. 105)	58
N.E. Duplexes (AMP no. 106)	45
Marie McGuire Plaza & Wyatt F. Jeltz Senior Center (AMP no. 111)	83
The Towers Apartments (AMP no. 112)	85
Classen Senior Center (AMP no. 112)	92
Shartel Towers and Hillcrest Sr. Center (AMP no. 114)	95
Andrews Square (AMP no. 115)	90
Reding Senior Center, Reding Annex (AMP no. 115)	92

Table 39 - Public Housing Condition

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

The Housing Authority's Capital Funds are used for major repair and replacement of failed systems. OCHA has experienced an annual decrease in capital repairs and improvements funding since 2010 which has severely limited the number of upgrades that are possible to complete. This trend is expected to continue in future years.

The average public housing unit in Oklahoma City is 53 years old. OCHA has a backlog of modernization needs of more than \$20 million due to the age of the properties and insufficient maintenance reserves. Project maintenance needs are as follows:

Type	AMP Number	Name	Number of Units	Project Maintenance Needs
FAMILY	AMP 101	Will Rogers Courts	348	Redevelopment
FAMILY	AMP 102	Oak Grove	288	Major Renovation
FAMILY	AMP 103	Ambassador Courts	200	Minor Renovation / Modernization
FAMILY	AMP 104	Scattered Sites	448	Redevelopment
FAMILY	AMP 105	Fred Factory Gardens	74	Major Renovation
FAMILY	AMP 106	N.E. Duplexes	159	Redevelopment
SENIOR	AMP 111	Marie McGuire Plaza	141	Major Renovation
SENIOR	AMP 111	Wyatt F. Jeltz	201	Minor Renovation / Modernization
SENIOR	AMP 112	Classen Senior Center	100	Major Renovation
SENIOR	AMP 112	The Towers Apartments	138	Redevelopment
SENIOR	AMP 114	Shartel Towers	201	Minor Renovation / Modernization
SENIOR	AMP 114	Hillcrest Senior Center	101	Minor Renovation / Modernization
SENIOR	AMP 115	Andrews Square	201	Minor Renovation / Modernization
SENIOR	AMP 115	Reding Senior Center	101	Minor Renovation / Modernization
SENIOR	AMP 115	Reding Annex	10	Minor Renovation / Modernization

The following projects for improvement of the public housing stock are planned and/or underway at the time of this report:

NE Duplexes (AMP 106): 159 units are planned for Section 18 demolition and disposition. New construction on the existing 15 acres and 15 adjacent acres is planned for the Summer of 2025.

The Towers (AMP 112): 138 units are planned for Section 18 demolition and disposition. New construction is planned for the replacement of 138 units with additional units of independent and assisted senior living located at NW 10th & Classen. In addition, OCHA is working with the Community Enhancement Corporation (CEC) to implement the 2016-2026 Strategic Investment Plan, which includes the rehabilitation and/or redevelopment of 1,000 public housing units. As part of the plan, the agency is coordinating with the City on a Choice Neighborhoods Initiative for Will Rogers Court. The CNI plan is expected to be published in the summer of 2025. An implementation grant will be applied for. These units would be demolished and replaced on a one-for-one basis with mixed income housing.

OCHA is also working on the development of two new public housing projects, Creston Park and Vita Nova. These projects are both supported with a variety of funds, including HOME funding.

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

The Oklahoma City Housing Authority (OCHA) is a nonprofit organization operating in accordance with policies established by the Board of Commissioners and statutes administered by the U.S. Department of Housing and Urban Development (HUD). OCHA is dedicated to one purpose: providing clean, safe, and decent housing for low-income families and senior citizens of Oklahoma City. In addition to housing, services are offered to residents. For example, OCHA provides childcare assistance to working parents, 24-hour security services, youth programs, and neighborhood watch programs.

All apartment complexes have a community and recreation center. These centers are available to all residents. Activities for children, teens, and adults are conducted in these facilities as well as in other nearby locations. Modern playground equipment is available so children can enjoy a safe place to play outdoors.

With CEC, OCHA is on multiple strategies to improve public housing residents' quality of life. These include working to add a Senior Health Care Network. This would leverage the construction of JHJ Care Suites into a system of affordable health care and housing for seniors, focusing on providing care to public housing and Section 8 residents. OCHA is also working to identify affordable housing development opportunities that combine supportive services and create economic mobility for residents. OCHA also hopes to add homeownership programs. The CEC will purchase and rehabilitate or construct homes in Oklahoma City and will sell them to low-income households.

Discussion:

The City of Oklahoma City maintains a collaborative relationship with the Oklahoma City Housing Authority. Due to decreased federal funding for capital repairs, the need for capital improvements in public housing projects continues to exceed available resources resulting in a maintenance backlog. The need for additional Section 8 vouchers remains a critical need in the community, with average wait times exceeding three years.

OCHA has multiple projects in development with the City of Oklahoma City, including Vita Nova, supported with both HOME and local funding, which would provide permanent supportive housing for previously homeless individuals. Another project funded with a variety of federal and local resources is Creston Park, a project under development that would provide seniors with affordable housing. The agency is in the process of multiple RAD conversions, as well as the demolition and disposal of multiple properties. Affordable housing options for low- to moderate-income families remain limited, and efforts to produce and rehabilitate more affordable units are highly prioritized in this Consolidated Plan.

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

Introduction

The City has previously funded beds available to the homeless with HOME and CDBG funds and will continue to support these types of activities as funds allow. While Oklahoma City's shelter facilities are predominantly funded through other resources, a portion of ESG funds are annually allocated to support shelter services. The remaining, majority of ESG funds are allocated predominantly to rapid rehousing activities. More intensive housing services such as Permanent Supportive Housing are funded through the Continuum of Care program grant.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	224	40	113	407	113
Households with Only Adults	514	350	137	707	14
Chronically Homeless Households	0	0	0	211	0
Veterans	20	0	35	591	0
Unaccompanied Youth	28	10	69	4	0

Table 40 - Facilities and Housing Targeted to Homeless Households

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

When an intake is completed with a client, an inventory is taken to identify sources of their cash income and other mainstream resources. Clients are assessed for mainstream service needs; not only at intake but also at interim intervals and when discharged from the program. If a person qualifies for mainstream benefits they have not yet applied for, their case manager will help them through that process. If a client has received MEDICAID or MEDICARE, they may use it to obtain health services from a general provider. However, the primary resource for people in that situation is reliance upon one of the few local healthcare providers who treat the low income and homeless.

Several homeless service providers within the Oklahoma City Continuum of Care (CoC) specialize in working with individuals with mental health concerns. Case managers within these organizations receive SSI/SSDI Outreach, Access and Recover (SOAR) training, and the ability to connect their clients to SSI/SSDI benefits. All Community Mental Health Centers in Oklahoma City collaborate with housing providers within the CoC to provide services to their clients. Two of these Centers are CoC service providers themselves.

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

The City continues to allocate federal grant funds to assist non-profit and for-profit housing developers to rehabilitate and construct new affordable housing, and by providing funding assistance to Community Housing Development Organizations.

In 2024, ESG funds were provided to ten (10) agencies to assist in the provision of emergency shelter, and transitional housing for mentally ill persons, and homeless youth. ESG funding is also allocated to provide rehousing and prevention services for homeless families and people exiting the correctional system to help and to quickly move them into a permanent unit or help them remain in their current home if possible. To provide these needed activities, the City consults with several agencies that include the Oklahoma Department of Rehabilitative Services, COTPA, Oklahoma City Housing Authority, and providers of transitional and permanent supportive housing among others.

The City of Oklahoma City Continuum of Care (CoC) uses a “No Wrong Door” approach to homelessness. An individual or family can have an assessment performed by any CoC provider agency simply by walking in the door, or by calling 211. Based on that assessment, clients will be prioritized for housing based on their vulnerabilities and directed to the organization that is most suited to their needs. Four (4) CoC organizations provide prevention and rehousing assistance using Emergency Solutions Grant funds.

Key To Home is the City's local effort to house people experiencing homelessness in our community. All CoC organizations and government agencies that serve people who are homeless have joined in this effort, including the Veteran's Administration (VA), the Oklahoma City Housing Authority (OCHA) and the Oklahoma Housing Finance Agency (OHFA). Currently, OCHA and OHFA provide a housing preference for those who are coming through Journey Home for their Housing Choice Vouchers. OCHA extends this preference for their public housing units. This effort serves both chronically homeless individuals, families, veterans, unaccompanied youth, and those recently released from incarceration.

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

The Continuum of Care Board continues to seek more efficient methods of locating unaccompanied youth in Oklahoma City. The City has two homeless youth providers. SISU Youth and Pivot both operate overnight shelters, drop-in centers and housing programs for unaccompanied youth.

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

Introduction

Special Needs facilities and services offered in the City focus on maintaining the ability of special needs populations to continue or achieve independent residency. Services are available to assist persons with special needs including the homeless, low to moderate income seniors over age 62, persons with permanent disabilities, victims of domestic violence, abused children, and children aging out of the foster care system. One key recurring issue with persons with special needs continues to be access to transportation. The City continues to allocate CDBG and ESG funds to Central Oklahoma Transportation and Parking Authority (COTPA-Oklahoma City's Transit Authority) to implement the Share-a-Fare program, a program that provides discounted coupons for bus and taxi fare to eligible persons.

The City will continue to fund housing programs that help address problems for homeowners at less than 80% AMI with exterior maintenance grants and emergency repairs, and whole house forgivable rehabilitation loans to seniors or disabled residents at or below 60% of median income. The programs will assist these persons in maintaining their residency.

Federal grant funds from the City's CDBG and HOME grants are used to fund the activities outlined. To provide these needed activities, the City consults with outside agencies that include the Oklahoma Department of Rehabilitative Services, Central Oklahoma Transportation and Parking Authority, Oklahoma City Housing Authority, Providers of transitional and permanent supportive housing, and the Homeless Alliance among others. HOPWA funds are used to provide a variety of services to those who test positive for HIV/AIDS and their families.

HOPWA Assistance Baseline Table

Type of HOWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
TBRA	67
PH in Facilities	0
STRMU	65
ST or TH Facilities	0
PH Placement	58

Table 41– HOPWA Assistance Baseline

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

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

According to the 2022 Housing Inventory Count, the OKC CoC has approximately 1,000 permanent supportive housing units, all of which solely accommodate individuals with disabilities, or families with a disabled family member. This enables the providers to serve elderly homeless individuals, persons with mental, physical or developmental impairments, persons with addictions, and persons with HIV/AIDS and their families. The City works closely with our local Housing Authority to house CoC eligible clients in permanent housing and assist with housing choice vouchers. All clients are housed through our Coordinated Entry System to ensure that those most in need obtain priority access to housing and services. All clients are assigned trained case managers to address their disabilities and ensure they can maintain their housing. If a person's assessment indicates they may need around-the-clock care, their case manager will instead work towards obtaining a unit at a residential care facility.

While nearly all permanent housing programs funded through the Continuum of Care use a housing first approach, two (2) maintain sobriety requirements. We have maintained these sobriety requirements as there are many clients who request them. There remains a shortage of professional treatment programs for clients who either can't or choose not to be placed in housing a program with sobriety requirements.

While homeless individuals with an HIV/AIDS diagnosis are eligible for the CoC program, they are typically housed through the HOPWA program, unless circumstances don't allow. The HOPWA program has the added benefit of serving not only people who are homeless, but those with low incomes as well. The Homeless Alliance currently serves as CoC's HOPWA provider, and they provide the full range of HOPWA eligible housing assistance. Each client is staffed with a case manager to connect them with other needed services.

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

Oklahoma has a state mandated discharge policy for individuals exiting mental and physical health institutions. Ideally, these individuals should connect with supportive family members or with an agency that can provide them with housing. One of Oklahoma City's housing service providers now collaborates with local mental health institutions to try and ensure patients have safe housing plans at discharge. Staff at many of the local mental health institutions have been trained to administer the community wide housing assessment tool, enabling their patients to be added to the community wide list for supportive housing. Unfortunately, affordable housing is in short supply, so a unit is not always readily available upon someone's exit from a mental health facility. However, all eligible clients are assessed and are added to the community by-name list for housing so housing can be provided immediately once it becomes available.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with

respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

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

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

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

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

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

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

Negative Effects of Public Policies on Affordable Housing and Residential Investment

This section asks the City to explain whether the development and retention of affordable housing is affected by public policies, particularly those of the City. Such policies include tax policy affecting land and other property, land use controls, zoning ordinances, building codes, fees, growth limits, and policies that affect the return on residential investment.

The City of Oklahoma City conducted three important studies to identify the regulatory barriers that may influence housing affordability in the city: the Analysis of Impediments (2020), the Housing Affordability Study (2021), and the Housing Affordability Implementation Plan (2025). Each of these plans identified the city's current development and zoning codes as areas with a potential negative effect on housing production. Since 2021, the City has been working on a code update to address these issues.

The HAS and the City's Development Code Update process identified the following areas of potential regulatory reform to encourage more affordable housing, and reduce impediments to fair housing:

- Zoning modifications, such as allowing ADUs by right
- A reduction of minimum home and lot sizes in specified central neighborhoods in the city
- Clarify the definition of family
- Clarify the code's treatment of persons living in group homes
- Modify densities and development standards to accommodate a wide range of housing types and products to encourage affordability and discourage economic segregation.

Certain statewide public policies also have a direct effect on housing in the City. The Oklahoma Residential Landlord Tenant Act (ORLTA) offers little to no protection for tenants. Under the ORLTA, tenants who report issues with their units, complain about code violations, and participate in a tenant organization have no protection from retaliation.

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

Introduction

The City of Oklahoma City participates in a regional Comprehensive Economic Development Strategy (CEDS) administered by the Association of Central Oklahoma Governments (ACOG). The CEDS identifies three (3) strategic goals:

- **Affordable Living and Quality of Life:** Address cost-of-living challenges, improve housing affordability, increase housing supply, explore building code reform, and support placemaking initiatives.
- **Workforce Development:** Encourage collaboration and coordination of resources, align education and training programs with industry needs to build a skilled, equitable workforce, and leverage a diverse pool of funding, including the private, nonprofit, and public sectors.
- **Economic Diversification:** Leverage partnerships for technology and innovation, maximize key investments, strengthen key industries, promote entrepreneurship, and advance rural development projects.

The goals of the CEDS align neatly with the City's Consolidated Plan goals. The City of Oklahoma City is currently in a period of population growth that has led to challenges with affordability. The City's young population continues to increase, but the aging population is also expanding. Oklahoma City's strong public investments continue to fuel economic growth.

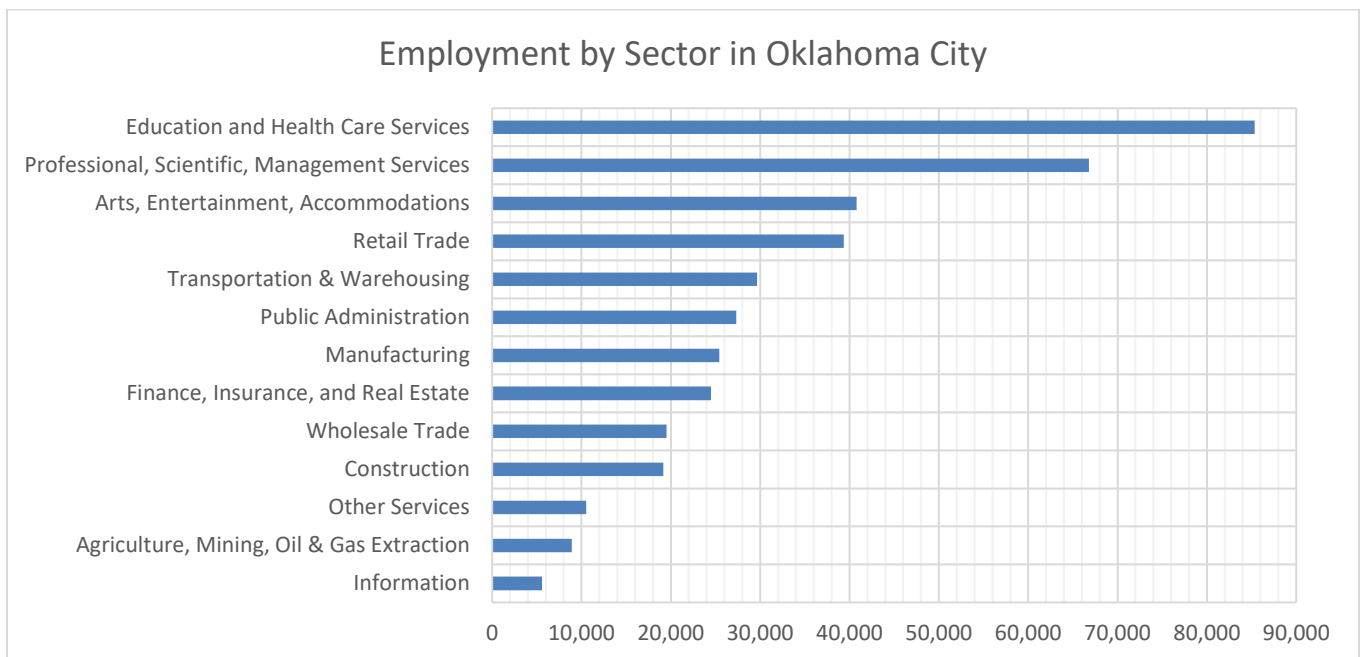
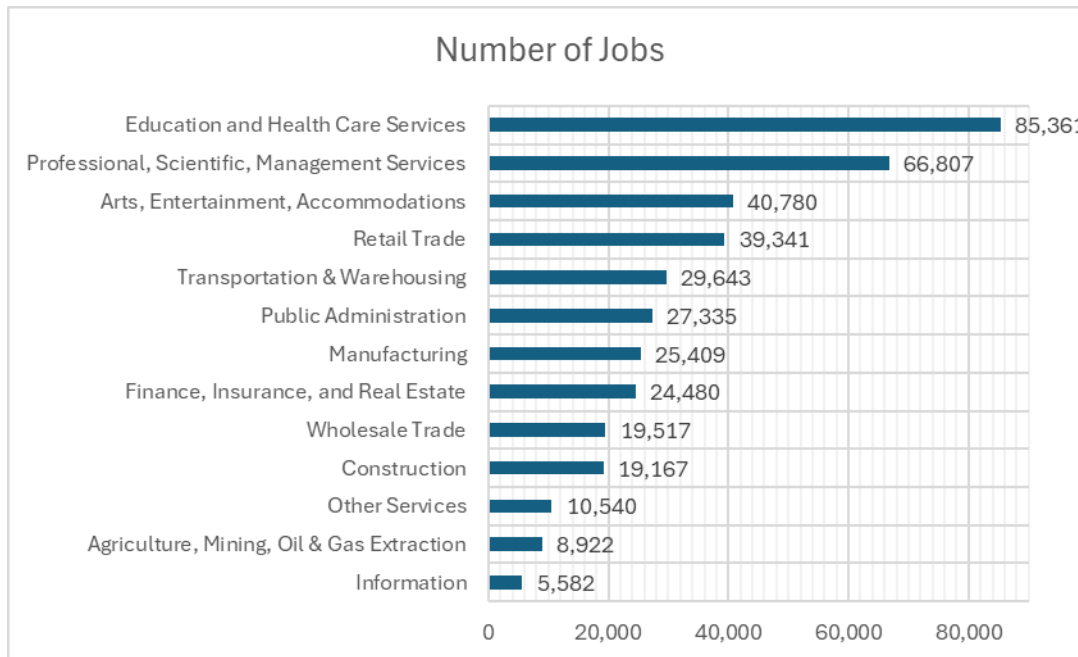
Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	8,930	8,922	2.63%	2.21%	-0.42%
Arts, Entertainment, Accommodations	31,215	40,780	9.21%	10.12%	0.92%
Construction	25,297	19,167	7.46%	4.76%	-2.70%
Education and Health Care Services	73,649	85,361	21.72%	21.19%	-0.54%
Finance, Insurance, and Real Estate	21,547	24,480	6.36%	6.08%	-0.28%
Information	5,344	5,582	1.58%	1.39%	-0.19%
Manufacturing	23,854	25,409	7.04%	6.31%	-0.73%
Other Services	17,526	10,540	5.17%	2.62%	-2.55%
Professional, Scientific, Management Services	40,257	66,807	11.87%	16.58%	4.71%
Public Administration	22,967	27,335	6.77%	6.78%	0.01%
Retail Trade	41,583	39,341	12.27%	9.76%	-2.50%
Transportation & Warehousing	18,670	29,643	5.51%	7.36%	1.85%
Wholesale Trade	8,197	19,517	2.42%	4.84%	2.43%
Grand Total	339,036	402,884			

Table 42 - Business Activity

Data Source: 2018-2023 ACS (Workers), 2022 Longitudinal Employer-Household Dynamics (Jobs)



Labor Force

Total Population in the Civilian Labor Force	332,350
Civilian Employed Population 16 years and over	317,015
Unemployment Rate	4.61
Unemployment Rate for Ages 16-24	13.94

Unemployment Rate for Ages 25-65	3.08
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Table 43 - Labor Force

Data Source: 2016-2020 ACS

Occupations by Sector

Occupations by Sector	Number of People
Management, business, and financial	79,385
Farming, fisheries, and forestry occupations	11,475
Service	33,075
Sales and office	72,530
Construction, extraction, maintenance, and repair	30,819
Production, transportation, and material moving	20,225

Table 44 – Occupations by Sector

Data Source: 2016-2020 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	229,718	76%
30-59 Minutes	62,565	21%
60 or More Minutes	8,526	3%
Total	300,809	100%

Table 45 - Travel Time

Data Source: 2016-2020 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	29,810	1,510	15,630
High school graduate (includes equivalency)	55,465	4,109	23,265
Some college or Associate's degree	78,910	3,164	21,455
Bachelor's degree or higher	92,090	1,770	13,420

Table 46 - Educational Attainment by Employment Status

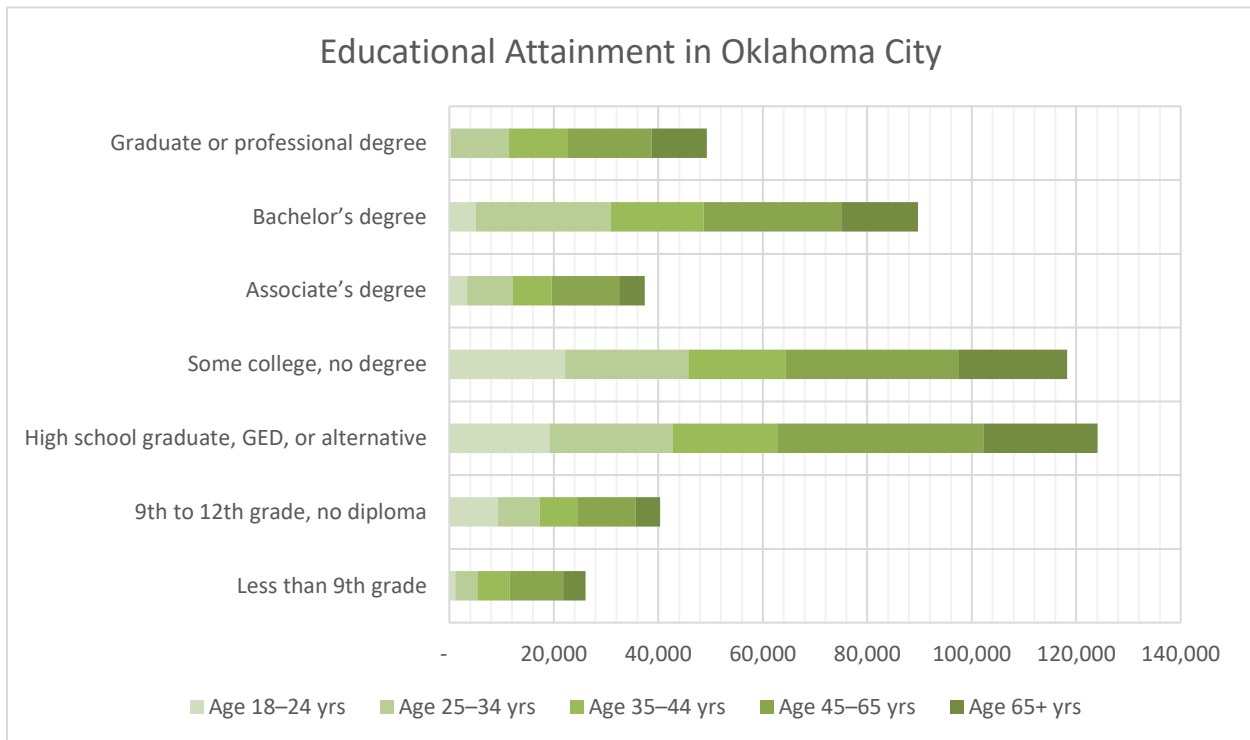
Data Source: 2016-2020 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	1,153	4,200	6,204	10,224	4,283
9th to 12th grade, no diploma	9,265	8,035	7,195	11,185	4,660
High school graduate, GED, or alternative	19,130	23,665	19,955	39,435	21,885
Some college, no degree	22,140	23,580	18,680	33,180	20,665
Associate's degree	3,415	8,679	7,460	12,980	4,860
Bachelor's degree	5,025	25,895	17,765	26,305	14,715
Graduate or professional degree	294	11,049	11,345	16,020	10,570

Table 47 - Educational Attainment by Age

Data Source: 2016-2020 ACS



Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
------------------------	---------------------------------------

Less than high school graduate	\$30,440
High school graduate (includes equivalency)	\$36,463
Some college or Associate's degree	\$42,498
Bachelor's degree	\$57,933
Graduate or professional degree	\$74,611

Table 48 – Median Earnings in the Past 12 Months

Data Source: 2018-2023 ACS

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

Oklahoma City's top three employment sectors include:

- Education and Health Care Services (21.19%)
- Professional, Scientific, and Management Services (16.58%), and
- Arts, Entertainment, and Accommodations (10.12%)

In addition, Oklahoma City is forecast to continue to grow in the aerospace, agribusiness and bioscience, and transportation and logistics sectors. These sectors are targeted employment areas for ACOG and the Central Oklahoma Workforce Innovation Board (COWIB), and resources for workforce and infrastructure development are targeted to these sectors. Oklahoma City has high concentrations of public administration employees due to the state and the area's largest municipality. The city also has a strong concentration of logistics and energy sector employees.

Describe the workforce and infrastructure needs of the business community:

Oklahoma City's unemployment rate has remained relatively low in recent years. The unemployment rate of 4.61% reflected in the above table from the 2016-2020 ACS, has declined somewhat. Oklahoma City's unemployment rate in 2023 averaged 3%, and that trend continued through 2024.

The state of Oklahoma has a highly ranked career technologies training program, Oklahoma CareerTech. These programs provide job-focused training that is tailored to Oklahoma-based companies' workforce needs. In 2023, 22,420 industry-endorsed certificates were earned. However, even while the state has a strong CareerTech system, the state's education system is a serious weakness. Oklahoma faces a large teacher shortage, and education policy has become highly politicized. This affects the student outcomes in Oklahoma City, where the public school district is chronically underfunded and struggles to fill teacher positions.

The city's infrastructure also presents a challenge. The huge land area of Oklahoma City limits the city's ability to pay for and develop sufficient infrastructure to meet current and growing demand. The City's public transit system has made large strides in adding services and speed; however, it remains

underdeveloped compared to other major metropolitan areas. The reliance on private automobiles in the city has direct negative impacts on low-income households, or those without access to a car.

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

Oklahoma City is experiencing growth with multiple projects recently completed, underway and planned for the near future. Both residential and commercial development projects are slated for completion during the five (5) year consolidated plan period that will significantly affect the local economy in terms of jobs created, population growth, tourism, and business activity. The OKANA resort on the Oklahoma River will open in 2025, and the city is expected to host a portion of the Olympic games on the Oklahoma River in 2028.

Oklahoma City voters approved the penny sales tax to fund MAPS 4 in a special election on Dec. 10, 2019. The MAPS 4 funding will support the construction of a new Fairgrounds Coliseum, a new animal shelter, a civil rights museum, and construction of a multi-purpose soccer stadium. In addition to the larger public facilities projects, the MAPS 4 funds will provide additional trails and sidewalks, youth centers, park improvements, beautification projects, mental health and domestic violence services, transit improvements, and a diversion hub. The MAPS funding is allocated on a “pay as you go” basis. The temporary penny sales tax funding MAPS 4 began April 1, 2020, and ends in 2028. Most projects are expected to be completed by 2030.

The Association of Central Oklahoma Governments (ACOG) is leading a regional transit initiative that is expected to improve intermodal activity between major urban centers within the five-county region. The Regional Transportation Authority of Central Oklahoma (RTA) is considering routes between Edmond, Norman, Oklahoma City. Four regional corridors have been identified in the Transit System Plan: North/South Corridor, East Corridor, West Corridor, and Airport Corridor. In 2023-24, the RTA completed an Alternatives Analysis study resulting in a Locally Preferred Alternative (LPA) for each of the corridors. These alternatives include Bus Rapid Transit (BRT) and Commuter Rail. The RTA established detailed evaluation criteria to support their goals and objectives, as depicted. It is anticipated that the RTA will present a sales tax proposal to voters in the three member communities in 2025 or 2026 for their approval. If approved, federal funding would be unlocked to match the region’s investment in the system. All these activities are expected to exceed \$1 billion in public and private investment.

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

In January 2025, the Greater Oklahoma City Partnership reported 95 companies are currently considering relocating or expanding in the region. Of those companies, three out of five are in

manufacturing. This reinforces what we are seeing nationally where companies are reshoring operations to improve supply chain logistics and move to lower cost markets. Aerospace and distribution projects continue to have strong interest in OKC. The number of office projects continue to be in decline due to structural changes in how and where people work.

The Greater Oklahoma City Chamber of Commerce expects non-farm payrolls to add an average of 1,500 jobs per month, or 18,200 jobs for the year, marking 2.5% growth at year end. Job gains will be concentrated in the health, trade, and hospitality service sectors with strong gains expected in the construction sector as well.

Oklahoma City possesses significant education and training infrastructure for workers. The state of Oklahoma has a highly ranked CareerTech program that offers free customized training to future employees. The greater Oklahoma City area is home to 19 colleges and universities, including nine CareerTech centers. Five years after graduation, approximately 2 out of 3 graduates from Oklahoma universities are still working in Oklahoma. However, Oklahoma's education climate poses challenges for economic growth in the City. The state continues to be poorly ranked nationally in education outcomes.

The City of Oklahoma City continues to focus on the development, attraction and retention of labor, primarily through the management of economic development, small business training, and job training activities.

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

The Central Oklahoma Workforce Innovation Board (COWIB) coordinates the greater Oklahoma City area's workforce system. The COWIB provides no cost services for job seekers and businesses, including paid internships, on-the-job training, and recruitment assistance. Central Oklahoma's workforce system provides comprehensive support to job seekers and employers through a network of service centers and offices. This network includes one Comprehensive Center located in Oklahoma County that coordinates services with multiple partner organizations. This partnership between Work Ready Oklahoma, Metro Technology Center, and the OKC Central Oklahoma Works center creates a centralized "one-stop shop" where job seekers can easily access a comprehensive array of services. This streamlined approach eliminates barriers, allowing individuals to explore career paths with Work Ready Oklahoma, gain valuable skills training at Metro Technology Center, and connect with potential employers through OKC Central Oklahoma Works, all in one location.

The Greater Oklahoma City Chamber also coordinates multiple economic development initiatives within the metro area. These initiatives support business development and expansion in Oklahoma City through financial incentives. Oklahoma City's Strategic Investment Program (SIP) is a discretionary deal-closing fund that provides companies with a cash award based on newly created jobs within Oklahoma City. Qualifying companies such as manufacturing firms, headquarters and shared service or customer

care operations must hire a minimum of 50 full-time employees and produce an annual payroll of \$1.75 million. Firms must also meet or exceed specific average wage thresholds. Receipt of SIP funds is performance based, tied to the company's actual job creation and capital investment.

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

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

Yes. The CEDS is prepared by the Association of Central Oklahoma Governments (ACOG) in consultation with representatives of local governments and interested parties. The CEDS was last updated in 2024. The City of Oklahoma City collaborates with the Association of Central Oklahoma Governments (ACOG) to identify activities, development projects, and business creation opportunities that align with the regional goals of the CEDS. Specific CEDS initiatives can be reviewed at the following link: <https://www.acogok.org/ceds/>. ACOG's current CEDS outlines three strategic goals:

- Focus on cost-of-living affordability and quality of life to support continued regional growth.
- Strengthen regional workforce development
- Through regional collaboration, solidify economic gains while advancing equitable efforts to diversify the economy and enhance regional competitiveness in both urban and rural areas.

The first goal, focused on affordability in the region, coordinates well with this plan's renewed focus on affordability and housing in the region. With the adoption of the Housing Affordability Implementation Plan (HAIP), the city is committed to improvements to housing. The HAIP includes similar actions and strategies as the CEDS, including coordination with builders and developers to increase housing supply, stronger building codes to reduce insurance costs, and zoning and permitting changes to streamline housing development.

Discussion

Currently, Oklahoma City's economy looks strong and resilient. However, the unprecedented population and job growth of the previous five years is projected to slow over the next five years. Already, sales tax collections and job growth slowed from 2023 to 2024. Economic uncertainty tied to the new presidential administration's economic policies may exacerbate the effects of a slowing economy. High interest rates and high inflation continue to impact the market.

Oklahoma City's workforce is skilled and has access to effective, free training in targeted industries such as aerospace, biotechnology, and manufacturing. Businesses looking to expand or relocate to Oklahoma City have access to multiple performance-based incentives.

Multiple strategic plans for the City and the surrounding region are focused on the cost of living and housing to continue Oklahoma City's economic growth and development, and to ensure a high quality of life for all residents.

MA-50 Needs and Market Analysis Discussion

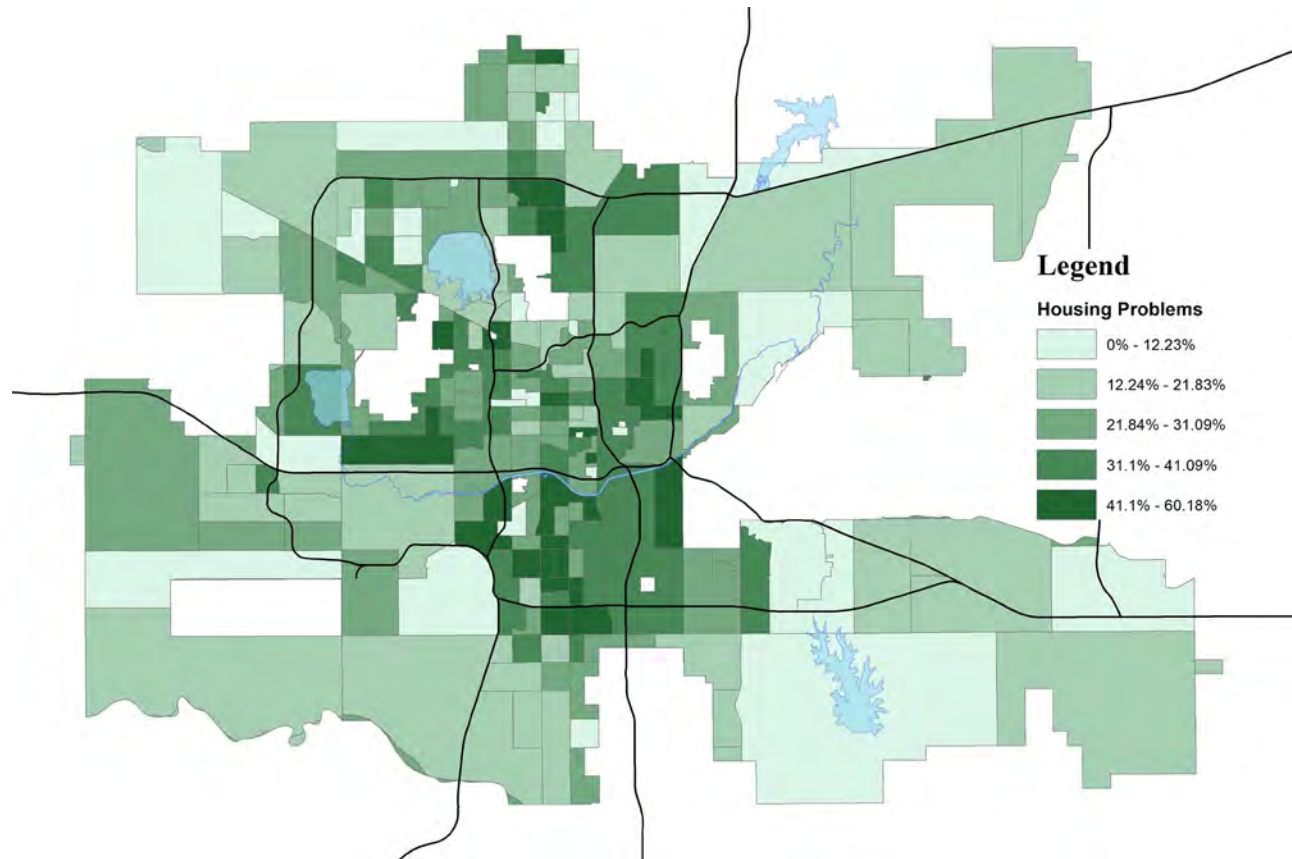
Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

The City defines "concentration" as multiple Census tracts that have percentages of housing problems that exceed 41%. The map below indicates that no area of the city exhibits a concentration of areas with one or more housing problem. Tracts towards the center of the city, and some areas in the South and East of the urban core exhibit more tracts with a higher percentage of housing problems.

The data below shows the percentage of homes with one or more housing problem. The four housing problems are a.) Lacking complete plumbing facilities, b.) Lacking complete kitchen facilities, c.) Housing with more than one occupant per room, and d.) Monthly owner costs or gross rent as a percentage of household income more than 30%.

The Housing Affordability Study (2021) also identified repair problems throughout the city. The study found that the issues were heavily concentrated in the central subareas of the city – Southwest-Urban, Central, Northeast-Urban, and Southeast-Urban.

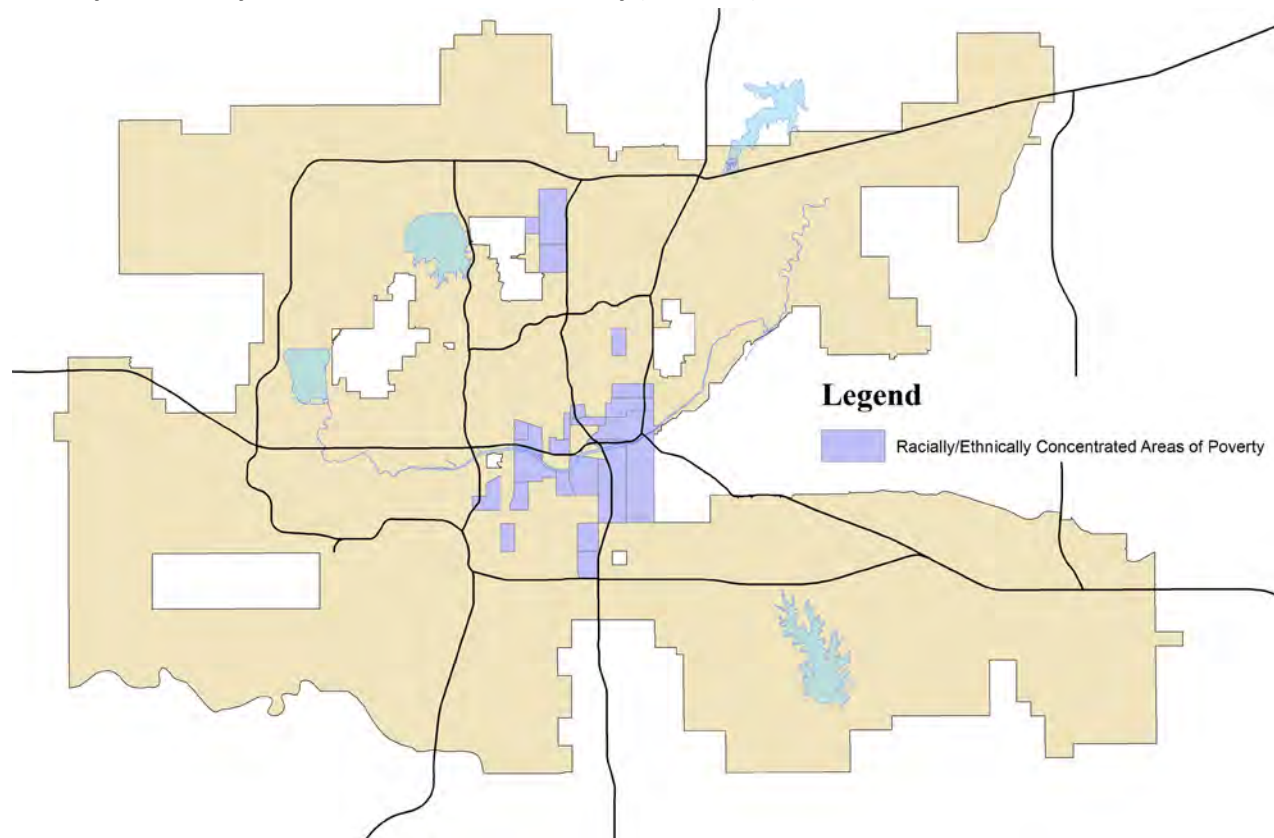
Percent of Homes with One or More Housing Problem by Tract



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

Oklahoma City has 23 census tracts that are Racially / Ethnically Concentrated Areas of Poverty (R/ECAP). These are neighborhoods that have a poverty rate of 40 percent and higher and are more than 50 percent Non-White and Hispanic residents. All of the R/ECAPs located within Oklahoma City's boundaries are mapped below. They are largely in the central northeast and central southern areas of the City.

Racially / Ethnically Concentrated Areas of Poverty (R/ECAPs)



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

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

Are there any community assets in these areas/neighborhoods?

All these neighborhoods have strong community assets, including parks, proximity to Downtown Oklahoma City, historic homes, and nearby commercial districts. Each community has its own distinct identity.

The three (3) SNI neighborhoods are predominantly minority areas. The City's SNI efforts have included partnerships with local schools to provide after school programming, neighborhood led infrastructure projects, tree planting and beautification projects, and corporate sponsorships to address needs in these communities. Although not all these assets can be measured monetarily, there has been a significant

contribution of human resources and investment of volunteer labor to support initiatives in these targeted communities.

Are there other strategic opportunities in any of these areas?

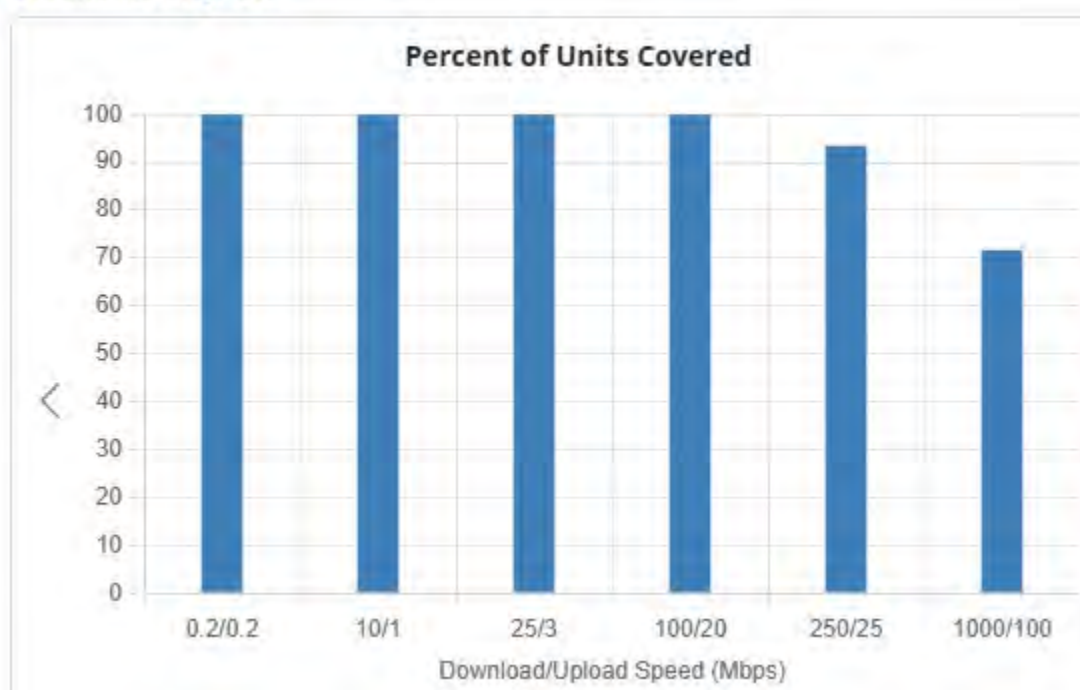
MAPS 4 funding includes support for the Freedom Center, a civil rights museum to honor local African American history in our community. Infill opportunities still abound in all areas of the City, and it is anticipated that new development proposals will be received for projects in underserved areas of the City. As Bricktown and development in the Health Sciences area expands, the City will continue to incentivize and subsidize proposals that provide benefit to impoverished neighborhoods. The potential for investment in Opportunity Zones is also being monitored and explored.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

Oklahoma City is 100% served with broadband access, according to the Oklahoma Broadband Office and the FCC Broadband Map. There is not a difference between low income and non-low-income areas of the city.

Oklahoma City, OK



Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

The two largest competitors for broadband services in Oklahoma City, Cox and AT&T, both provide services for low-moderate income households but costs for internet service are frequently high. Data from the FCC indicates more internet service providers in the area, which are primarily satellite internet providers.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

The City's geographic location, size and development patterns make it susceptible to a wide range of weather-related risks and extremes that include high winds, tornadoes, hail, flooding, drought, wildfire, extreme heat, and winter storms. The impact and frequency of these natural hazard risks is exacerbated by climate change. The City of Oklahoma City's Hazard Mitigation Plan (HMP) identified seven major disaster declarations in Oklahoma City since 2013. The HMP ranked the probability of identified hazards occurring in the City. The following natural hazard events have a high probability of occurring in Oklahoma City:

- Extreme Heat
- Flooding
- Hail
- High Winds
- Lightning
- Tornadoes
- Winter Weather
- Drought
- Wildfire
- Earthquake
- Mosquito Borne Disease

It should be noted that many of the above natural hazards frequently co-occur, such as tornadoes, high winds, and hail. Tornadoes are also often accompanied by heavy rain that results in flooding. Extreme heat, drought, and wildfires often affect each other and increase or decrease the intensity of each hazard.

The City of Oklahoma City has made use of a variety of data, analyses, and reports to determine, document, and project the expected impacts of climate change on services, infrastructure, and its residents. The City adopted **adaptokc** in 2020 as an implementation element of the Comprehensive Plan, **planOKC**. **Adaptokc** focuses on three sustainability principles: 1) positioning OKC to lead by example as a steward of public resources, 2) adapting OKC's infrastructure, services, and communities to OKC's changing climate, and 3) identifying how to use technological innovations to OKC's advantage. Policies in **adaptokc** include improving building codes to reduce the impacts of tornados and high winds, easing the permitting for green energy to reduce emissions from oil and gas, and updating municipal codes around construction in the 100-year and 500-year floodplain. These policies would help reduce the risks of hazards that are exacerbated by climate change.

The September 2015 *Climate in the Heartland* report prepared by the Urban Sustainability Directors Network (USDN) examined five major cities in the Midwest- one of which was Oklahoma City (OKC). Historical climate variability studies from the past three decades were looked at by climatologists and compared to recent weather changes. OKC's historical context showed the annual average high and low temperature of 72.2°F and 50.8°F., and the average precipitation was 36.5" of annual rainfall and 7.8" of annual snowfall. However, recent observed seasonal weather changes include:

- Summers have increased variability in seasonal precipitation totals;
- More frequent warm nights in the last decade;
- Falls are dryer with an average date of first frost being three (3) days later;
- Winters are warmer and wetter; and
- OKC has fewer cool springs, and the average date of the last frost is four (4) days earlier.

In short, climate change is making Oklahoma City warmer, the weather is less predictable, and severe storms are more intense.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Oklahoma City's increased storms and heat have a direct impact on low- and moderate-income households. A growing issue in Oklahoma City and throughout the state of Oklahoma is the high cost of homeowner's insurance. Home insurance costs have rapidly increased in Oklahoma due to the frequency of high wind and hail claims requiring the replacement of roofs. Oklahoma has been ranked as a state with the most expensive average home insurance rates per year, with premiums averaging \$5,858 per year in Oklahoma. The second highest state is Kansas, at \$4,843 per year. Oklahoma's insurance costs have become such an issue that the state recently passed legislation to create a grant program called the Strengthen Oklahoma Homes program. This program will provide grants to homeowners to fortify their roofs, improving resilience against future storms. Strengthened roofs reduce the likelihood of damage and often qualify homeowners for discounts on their insurance policies. In addition, this program encourages roofers and builders to become familiar with fortified construction standards, thereby increasing roof options for homeowners in the private market.

Data from the American Council for and Energy-Efficient Economy looked and energy burden in major U.S. cities, including Oklahoma City. It shows that energy burden is on average 5.7% for all households, but averages as high as 14% for low-income households. These energy burdens are also disproportionately higher among Black and Hispanic households.

Low-income, African American, Latino, and renter households devote a disproportionate share of their income to energy expenses. Low-income households typically live in less energy-efficient housing and are often more difficult to reach with information about energy efficiency programs.

The City of Oklahoma City Hazard Mitigation Plan can be viewed in the Appendix.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Strategic Plan section of the Consolidated Plan outlines the City's priority needs, as determined by data from the Needs Assessment and Market Analysis. The Strategic Plan also outlines the City's goals, which describe how the city will address identified needs over the next five years.

Priority needs established in this Plan were developed through review and analysis of CHAS, Census, and ACS data. Input was received from consultations with service providers, citizen participation meetings, and analysis of the Housing Needs Assessment and Housing Market Analysis data presented earlier in this report.

Generally, the priority needs and goals identified focus on the following:

- **Housing:** The provision and retention of affordable housing for low-income residents surfaced as an increasing need in Oklahoma City during both public outreach and planning processes. The strategic plan focuses on the development of affordable for sale and rental housing in the NRSA and SNI neighborhoods, on the acquisition of affordable homes for low-income buyers, and on the retention of naturally occurring affordable housing through housing rehabilitation programs.
- **Homelessness:** Plan needs and goals also address increased homelessness in the City. ESG funds are dedicated entirely to the homeless population; however, housing, homelessness, economic development, and neighborhood revitalization goals also contribute, both directly and indirectly, to reducing the number of unhoused or unstably housed households in the community.
- **Neighborhood Revitalization:** The Strategic Plan outlines continued community support for neighborhoods in the central city. The Strong Neighborhoods Initiative will continue to provide public facility improvements, public services, and more in eligible neighborhoods. The elimination of slum and blight, neighborhood revitalization, public services, and affordable housing goals identified below all contribute to the revitalization of these historically disinvested communities.

The City continues to invest federal funds in the community as strategically as possible, to create the maximum effect with the least amount of public funding necessary. Geographic priorities concentrate funding in particular neighborhoods, instead of spreading it in a scattershot approach throughout the city. The visible investments the City makes in these communities encourages further private investment, improving opportunities and outcomes for all.

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

Geographic Area

1	Area Name:	NEIGHBORHOOD STRATEGY AREA
	Area Type:	Strategy area
	Other Target Area Description:	
	HUD Approval Date:	6/21/2006
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	The City of Oklahoma City applied for and received an NRSA designation from HUD that consists of all or part of 45 low-income census tracts covering an area of approximately 29.5 square miles (outlined in orange on the attached map). The Census Tracts and Block Groups that comprise the NRSA include: 100400, 100500, 100700, 101000,101100, 101200, 0101300, 101400, 101500, 101600,101900, 102400, 102500, 102600, 102700, 102800, 102900, 103000, 103101, 103102, 103200, 103300, 103400, 103500, 103601, 103602, 103700, 103800, 103900, 104000, 104100, 104200, 104300, 104400, 104600, 104700, 104800, 104900, 105600, 105700, 105800, 1053002, 1053003, 1070012,1070013, 1070014, 1070021, 1070022, and 1073051.

	<p>Include specific housing and commercial characteristics of this target area.</p>	<p>Census survey data (2018 ACS 5-year estimates 2014-2018) indicates the NRSA housing vacancy rate is 18.7% compared to the City's overall housing vacancy rate of 12%. In addition, there is a much greater proportion of renter-occupied housing (61%) in the NRSA versus rentals citywide (at 41%). Aging housing stock and deferred maintenance, along with large numbers of vacant and abandoned properties, create significant problems for NRSA residents. Crime rates in many NRSA neighborhoods are much higher than in other areas of the community. Commercial opportunities do exist but require development partners who are willing to assume short-term risk in exchange for long-term benefit. Most neighborhoods within the NRSA experience high concentrations of poverty which exacerbates social problems associated with limited opportunity.</p> <p>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.</p>
	<p>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</p>	<p>The NRSA comprises approximately 29.5 square miles of the central portion of Oklahoma City. Since its designation as an NRSA, the City has continued to expend most federal funds in this strategically targeted area to benefit the highest concentrations of low-income residents. The NRSA received its designation based in part on the general indicators of need documented in this narrative; its geographic location encompassing much of the central city; and its concentration of lower-income residents. As a result, the City will continue to focus on the NRSA as the area where most federal funds will be expended to benefit the largest numbers of lower-income residents and areas of greatest need.</p>
	<p>Identify the needs in this target area.</p>	<p>Many of the low- and moderate-income areas contained in the traditional neighborhood developments within the NRSA suffer from high poverty rates, high vacancy rates, deferred property maintenance, and lower rates of home ownership.</p>

	What are the opportunities for improvement in this target area?	Most of the NRSA consists of traditional neighborhoods encompassing residential and commercial areas that are fifty (50) years of age or older. Opportunities exist for the revitalization of these neighborhoods to deconcentrate poverty and create thriving, vibrant neighborhoods.
	Are there barriers to improvement in this target area?	Local and federal resources are insufficient to address all needs, even those of the highest priority. The development of infill housing is challenging and more expensive than greenfield housing and requires a complicated layering of subsidies with various requirements.
2	Area Name:	Strong Neighborhoods Initiative
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	<p>Area 1: The Martin Luther King target area is generally bounded by NE 23rd St to NE 30th St, and Glyn Ellen Avenue to Martin Luther King Avenue. The neighborhood organization in this area is the Martin Luther King Neighborhood Association and East End 23rd, a commercial district.</p> <p>Area 2: The Ross Heights/Pitts Park target area is generally bounded by NE 16th to NE 23rd and Lottie Avenue to Martin Luther King Avenue. The organizations in this area are the Ross Heights Neighborhood Association and East End 23rd, a commercial district.</p> <p>Area 3: The Stockyards City target area is generally bound by Agnew Avenue to the Oklahoma River to the railroad right-of-way near Birch Street. The organizations in this area are the Stockyards City Neighborhood Association and Historic Stockyards City Main Street, a commercial district.</p>

<p>Include specific housing and commercial characteristics of this target area.</p>	<p>All three (3) targeted neighborhoods primarily consist of older single-family residential homes of various ages and architectural styles. Homes have been constructed over several decades and are representative of the era in which they were built. Commercial opportunities surrounding the SNI neighborhoods are significant and infill opportunities for commercial and mixed-use development are plentiful. All neighborhoods in the target areas have experienced disinvestment in recent years and are identified for revitalization due to their strategic locations, active neighborhood associations, proximity to jobs and services, and potential for growth with significant local support.</p>
<p>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</p>	<p>The Martin Luther King neighborhood was selected in 2023. Ross Heights/Pitts Park and Stockyards City were selected in 2025. The City's Planning Department uses neighborhood conditions data, community leadership evaluation, housing conditions surveys and other analysis to identify a small number of areas to consider for targeted revitalization. Priority is given to areas experiencing decline, but adjacent to stable neighborhoods and/or commercial districts and close to employment centers and transit. A 22-member selection committee is assembled to review neighborhood applications and criteria to make final recommendations to the City Council.</p>
<p>Identify the needs in this target area.</p>	<p>The primary needs in the SNI neighborhoods are infill development, demolition and/or remediation of vacant and abandoned buildings, housing options for all income ranges, rehabilitation of older housing stock, improved accessibility and infrastructure, park improvements, educational opportunities for youth, tree planting, food security, hazardous tree removals, and small business assistance. All these activities are recommended for funding in this Consolidated Plan.</p>

	What are the opportunities for improvement in this target area?	Opportunities for improvement in the SNI neighborhoods are plentiful. Elimination of blight, housing rehabilitation, property maintenance, poverty prevention, absentee owners, partnerships with local schools and non-profit housing agencies, improved parks, and improved infrastructure have all been identified as strategic goals of the program. New housing construction and mixed-use development opportunities are prioritized.
	Are there barriers to improvement in this target area?	The cost of real estate and construction are obvious barriers. Ownership issues related to title can be a barrier to real estate transactions and prevent access to resources for home improvements. Some issues have arisen in which property owners are unwilling to repair a property and bring it up to code but are also unwilling to sell it. Competing development goals between the public and private sectors have also proven to be problematic, specifically in terms of desired design standards.

Table 49 - Geographic Priority Areas

General Allocation Priorities

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

The City of Oklahoma City targets approximately 80% of its CDBG and HOME funds to activities within the NRSA, and whenever possible within the three targeted Strong Neighborhoods Initiative (SNI) designated neighborhoods. Funding is highly concentrated within the SNI Neighborhoods and NRSA to promote strategic targeting of scarce resources and provide a comprehensive approach to revitalization. For this Consolidated Plan period, priorities for funding may also be directed to eligible Opportunity Zone areas.

The Oklahoma City Continuum of Care accepts applications for ESG projects annually and determines allocations based on current service needs and the ability of the applicant organizations to provide those services. Needs are determined by results of the annual Point In Time homeless census, data from the CoC's Homeless Management Information System (HMIS) database, data from 211, and needs expressed by service providers to address deficiencies in the current delivery system.

Providers also submit applications to the CoC for the HOPWA program. However, rather than allocating parts of the overall total to several different organizations, the full amount of the grant is allocated to one service provider. The provider is determined based on experience with the necessary services, the

quality of the services they have provided in past years, and their ability to provide these services throughout the entire City.

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

Priority Needs

Table 50 – Priority Needs Summary

1	Priority Need Name	Creation and Retention of Affordable Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Elderly
	Geographic Areas Affected	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Associated Goals	Increase Affordable Housing Opportunities Retain Affordable Housing Stock
	Description	Multiple data sources indicate that Oklahoma City has many of the same housing needs as cities across the nation: high cost burden and a lack of affordable units. These needs are exacerbated by demographic and market factors. Oklahoma City's population continues to grow at a rate exceeding the national average, the number of renters in the city is growing, and there is a lack of affordable housing for small households, and for the highest and lowest-income populations. In addition, affordable housing for extremely low-income households is often in poor condition.
	Basis for Relative Priority	The City continues to place a high priority on homeownership and sustainability, with special emphasis on neighborhoods targeted for revitalization. The City promotes homeownership opportunities and encourages mixed-income housing in all communities. The provision of affordable housing for extremely low, low, and moderate families is an ongoing need and is a high priority.
2	Priority Need Name	Decrease and Prevent Homelessness
	Priority Level	High

	Population	Extremely Low Low Moderate Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	
	Associated Goals	Increase Affordable Housing Opportunities Support Public Services Invest in Underserved Neighborhoods & Communities Decrease and Prevent Homelessness Support for Populations Living with HIV/AIDs
	Description	Based upon the 2024 PIT count, an estimated 1,146 homeless persons are sheltered on any given night. An additional 433 persons remain unsheltered. Approximately two hundred and forty-eight (248) of those sheltered are chronically homeless and sixty-four (64) are Veterans. Sixty-three (63) sheltered households have children present. Seven (7) of these families are chronically homeless. Oklahoma City is not alone facing an increasing need for direct homeless services, exacerbated by the housing crisis. The provision of rapid re-housing, permanent supportive housing with associated supportive services, and homelessness prevention services have been identified as high needs in this Plan.

	Basis for Relative Priority	The City of Oklahoma City strives for annual improvement in the number of persons maintaining permanent housing for more than six (6) months. The elimination and prevention of homelessness is one of the City's highest priorities, and substantial time and resources have been allocated for these activities.
3	Priority Need Name	Neighborhood Revitalization
	Priority Level	High
	Population	Extremely Low Low Moderate Non-housing Community Development
	Geographic Areas Affected	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Associated Goals	Increase Affordable Housing Opportunities Retain Affordable Housing Stock Invest in Underserved Neighborhoods & Communities
	Description	Many neighborhoods within the central city and NRSA are suffering from decades of disinvestment and neglect. These neighborhoods are often areas of concentrated elderly, minority populations and poverty. The City intends to continue systematically targeting resources to these communities to create real, sustainable, and steady revitalization. These communities need public facilities, infrastructure investments, public services, and community engagement.
	Basis for Relative Priority	
4	Priority Need Name	Support Public Services
	Priority Level	Low
	Population	Extremely Low Low Moderate Families with Children Elderly Non-housing Community Development
	Geographic Areas Affected	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Associated Goals	Support Public Services Decrease and Prevent Homelessness

	Description	The need for public services frequently exceeds the available funding and resources. The City is looking to align public services support with current and future strategic goals, as well as to expand community capacity for serving extremely low and low-income residents. The needs assessment identified public service needs as most acute among renters, homeless persons, and extremely low-income populations.
	Basis for Relative Priority	The City of Oklahoma City remains committed to supporting public services for low- and moderate-income persons and neighborhoods as resources allow. These activities are a lower priority than housing and homelessness activities in which needs are greater and immediate threats to life, health and safety are extant.
5	Priority Need Name	Economic Opportunity
	Priority Level	Low
	Population	Extremely Low Low Moderate Non-housing Community Development
	Geographic Areas Affected	
	Associated Goals	Increase Economic Opportunity
	Description	Oklahoma City's economy is generally strong and has weathered economic shocks and downturns well overall. However, the unprecedented population and job growth of the previous five years is projected to slow over the next five years. Already, sales tax collections and job growth slowed from 2023 to 2024. Multiple strategic plans for the City and the surrounding region are focused on the cost of living and housing to continue Oklahoma City's economic growth and development, and to ensure a high quality of life for all residents.
	Basis for Relative Priority	These activities are lower priority than housing and homelessness activities for which needs are greater and immediate threats to life, health and safety are extant.
6	Priority Need Name	Support those Living with HIV/AIDS
	Priority Level	Low
	Population	Extremely Low Low Moderate Persons with HIV/AIDS Persons with HIV/AIDS and their Families

	Geographic Areas Affected	
	Associated Goals	Support for Populations Living with HIV/AIDs
	Description	Support for persons living with HIV/AIDs continues to be a need within Oklahoma City. HIV/AIDS cases in the state are on the rise. 74% of households served by the HOPWA program earn below 30% of the area median income, meaning their income is categorized as extremely low income. Many of these populations struggle to find and maintain housing, even when not homeless. Affordable housing is essential for these populations, who may have limited or fixed incomes.
	Basis for Relative Priority	These activities are lower priority than housing and homelessness activities for which needs are greater and immediate threats to life, health and safety are extant.
7	Priority Need Name	Elimination of Slum and Blight
	Priority Level	Low
	Population	Non-housing Community Development
	Geographic Areas Affected	NEIGHBORHOOD STRATEGY AREA
	Associated Goals	Elimination of Slum and Blight Invest in Underserved Neighborhoods & Communities
	Description	The City remains committed to eliminating slum and blight in all areas of the City, with emphasis placed on our urban renewal areas and low-moderate Census Tracts. Funded activities may include acquisition, clearance, remediation, infrastructure development, and/or environmental cleanup.
	Basis for Relative Priority	Cleanup of properties in urban renewal areas is on-going. Activities may include acquisition and cleanup of property for future development, demolition, environmental remediation and/or other activities required to return these properties to useful life. These activities are a lower priority than housing and homelessness activities for which needs are greater and immediate threats to life, health and safety are extant.
8	Priority Need Name	Administration and Fair Housing Activities
	Priority Level	Low
	Population	Non-housing Community Development
	Geographic Areas Affected	

	Associated Goals	Administration, Planning, and Fair Housing
	Description	Funding for administration is necessary to facilitate ongoing management and administration of formula grant programs. Administrative funds are used for staff support and program operations to ensure that CDBG, HOME, ESG, and HOPWA funds are allocated, tracked, disbursed, and monitored in compliance with federal regulations.
	Basis for Relative Priority	These activities are a lower priority than housing and homelessness activities in which needs are much greater and immediate threats to life, health and safety are extant.

Narrative (Optional)

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

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Tenant Based Rental Assistance is being considered for HOME or CDBG funding during the term of the 2025-2029 Consolidated Plan due to the level of need. However, no funding has been established for this activity in the Action Plan as no program design has yet been established. Some TBRA assistance is provided to persons with special needs using HOPWA funding. A decrease in Section 8 funding to the Oklahoma City Housing Authority would immediately create a significant increase in demand for TBRA support.
TBRA for Non-Homeless Special Needs	Tenant Based Rental Assistance is available from HOPWA funds on a limited basis for persons with special needs. Funding is limited for this activity.
New Unit Production	<p>Affordability in Oklahoma City is a growing issue and concern for residents. Affordable housing units cannot be developed fast enough to meet demand. Households earning less than 30% of the AMI are impacted most by this lack of affordable housing. There is a shortage of over 33,000 units affordable to renters earning less than 30% AMI.</p> <p>In addition, there is a shortage of housing available at higher incomes, indicating a need in the market for both affordable and market rate housing. Mixed-income housing could meet this need while simultaneously deconcentrating poverty. New unit production is the highest identified priority.</p>
Rehabilitation	Oklahoma City continues to struggle with high numbers of homes that need serious repairs, as identified in the Housing Affordability Study (2021). Homes in need of serious repairs are concentrated in Oklahoma City's NRSA. These homes are occupied by both renters and owners, with more renters living in homes in significant need of repair. The SNI program also identifies via windshield survey high numbers of homes in the selected neighborhoods that need exterior maintenance and repair. Housing rehabilitation and the creation of a rental rehabilitation program are considered high priorities in this plan.
Acquisition, including preservation	Acquisition/rehabilitation of existing properties for conversion to affordable rental housing are eligible for funding, with special emphasis on preservation and/or adaptive reuse of historical properties. Acquisition in Oklahoma City presents significant cost challenges. Properties, even in disrepair, in the NRSA are sold for high speculative prices that make their full rehabilitation unfeasible unless they are developed into market rate properties.

Table 51 – Influence of Market Conditions

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

Introduction

The City of Oklahoma City expects allocations for four entitlement programs over the next five years: CDBG, HOME, ESG, HOPWA. First program year allocations are based upon level funding. CDBG allocations in future years are projected to decrease by 1% each year. The estimated HOME funding for future program years is projected to reduce by 1% per year for the next five years. ESG is projected to decrease by 1% and HOPWA funding is expected to increase by 2% each year. The City is the lead applicant for competitive Continuum of Care (CoC) funds which have been successfully obtained for several years. The City typically receives about \$3M a year in CoC funding which is awarded competitively to help those who are homeless, and it remains a critical resource.

National Housing Trust Fund (HTF) awards are administered by the State under a structure similar to Low Income Housing Tax Credits (LIHTC). It is unknown at present if the City will pursue HTF funding through the State; however, if an opportunity arises to increase affordable housing production through this resource, an application will be made. 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 has 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. Section 108 Loan Guarantee applications may be submitted to further the City's ongoing economic development initiatives if additional opportunities materialize during the term of this Consolidated Plan.

The City is planning a General Obligation (GO) Bond election 2025. Oklahoma City's 2017 GO Bond included \$10 million for affordable housing. The new package is expected to contain a proposition for more affordable housing funding. If passed, these local funds would complement HOME and CDBG funding currently used for the development of affordable housing in Oklahoma City.

Annual allocations, funds carried forward from prior program years, and program income estimates are based on the most recent data available at the time of report submission.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				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	5,130,024	0	2,986,421	8,116,445	20,012,198	Prior year resources include 2024-2025 funds obligated/under contract and distribution of funds reallocated and recaptured. Future allocations assume a 1% decrease in CDBG funding over the life of the Plan.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New	2,319,980.93	0	8,350,020.80	10,670,001.73	9,050,234	Prior year resources include 2024-2025 funds obligated/under contract and distribution of funds reallocated and recaptured. Future allocations assume a 1% decrease in HOME funding over the life of the Plan.

		construction for ownership TBRA						
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	1,419,527	0	0	1,419,527	5,967,748	Future allocations assume a 2% increase in HOPWA funding over the life of the Plan.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance	444,290	0	0	444,290	1,733,173	Future allocations assume a 1% decrease in ESG funding over the life of the Plan.

		Services Transitional housing						
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Table 52 - Anticipated Resources

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

The City of Oklahoma City prioritizes activities that leverage federal funds with other public and private resources to address needs in the community. In general, most programs operated under this plan require some type of match or leverage. Affordable housing developments are rarely funded more than the gap funding required.

Regarding required HOME match contributions, Presidential Disaster Declarations and HUD match reduction for severe fiscal distress has eliminated the need to provide 25% match funding for the HOME program in most recent program years. Although match reductions or waivers cannot be projected in future years, it should be noted that the City has accumulated a significant banked match credit which will ensure that adequate leverage is available for new activities. However, The City of Oklahoma City continues to prioritize funding of projects that leverage private capital and non-federal funding.

The City provides HOME funds to Community Housing Development Organizations (CHDOs) for new home construction and rehabilitation/sale activities. 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. The City facilitates the transfer at no cost, of Oklahoma County-owned vacant lots to nonprofit organizations for the construction of affordable housing. The lots are provided to the City through an agreement with Oklahoma County. The City also facilitates CHDO developments on Oklahoma City Urban Renewal Authority property at little or no cost in SNI neighborhoods. CHDO activities funded under this year's Action Plan include continued development of the Walnut Project and the development of homes in Capitol Hill. The CHDOs are bringing private financing for the projects, as well as covering certain hard and soft costs with other non-federal funds.

The City's down payment and closing cost assistance program supports the achievement of home ownership and has proven to be an attractive program that stimulates significant interest among private lenders. The City will continue to leverage its Down Payment Assistance program funds with private financial institution mortgage investments.

The City also provides local funding (general funds) to agencies that provide services to the homeless. Match for ESG programs is also required to be generated by the service providers who utilize these funds.

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 its 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, brownfield 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, Harrison Walnut and NE Renaissance.

For this Action Plan year, the City intends to leverage this land to develop housing in two SNI neighborhoods, Ross Heights/Pitts Park and MLK. These neighborhoods have a significant number of vacant OCURA lots that provide a great opportunity for the development of affordable for-sale homes. In addition, these neighborhoods contain commercial parcels owned by OCURA that are currently under development, including the Clara Luper Civil Rights Center, and a property at 23rd Street and MLK, which is involved in concept development. These developments will help address the neighborhood revitalization and affordable housing needs identified in this plan.

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. This property continues to be an opportunity for the development of housing. Major challenges to any development include a lack of necessary infrastructure serving the lots. 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. The City is working to develop a new RFP for the properties which will be released during the 5-year Plan period.

Discussion

Land costs continue to increase within the NRSA and SNI areas, hindering the development of small-scale affordable housing. Leveraging existing land, especially in new and former SNI neighborhoods for the development of affordable housing is a high priority under this strategic plan. Staff continue to explore new and innovative mechanisms for acquiring affordable and developable land, with an emphasis on SNI neighborhoods.

SP-40 Institutional Delivery Structure – 91.215(k)

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Oklahoma City	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Public Housing Rental neighborhood improvements public facilities public services	Jurisdiction
OKLAHOMA CITY HOUSING AUTHORITY	PHA	Public Housing	Jurisdiction
OKLAHOMA CITY URBAN RENEWAL AUTHORITY	Redevelopment authority	Economic Development Non-homeless special needs Ownership	Jurisdiction

Table 53 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The City's institutional structure for delivery of community development and affordable housing programs has the following strengths:

- Numerous nonprofit social service agencies that provide a wide variety of essential public services to low income and special needs populations, including programs for seniors, disabled, women and domestic violence survivors, and health-related services for low-income populations.
- A local housing authority that effectively provides assisted housing programs and is actively involved with expanding and improving its supply of affordable housing.

- Active Community Housing Development Organizations (CHDOs) that regularly build new homes on infill lots.
A redesigned CoC with a renewed focus on reducing homelessness and a comprehensive strategy.
- An active Urban Renewal Authority interested in selling and developing vacant land that has been owned by the authority since the 1970s.
A public base willing to invest in and support community investment initiatives, including mental health, housing, and community development, as seen from multiple years of MAPS and GO Bond investments.
- An effective Strong Neighborhoods Initiative (SNI) program that conducts wholistic neighborhood revitalization in selected neighborhoods.

However, the following gaps in institutional structure also exist:

- Limited number and capacity of nonprofit housing developers and CHDOs.
- Limited availability and supply of land and housing for increasing the supply of affordable housing units, and the high cost of such land and construction costs.
- Limited sources of funding for housing activities for both new construction and rehabilitation/preservation of older housing stock, with limited sources of funding especially for housing extremely low-income populations.
- Challenges associated with complex institutional structure that involves multiple stakeholders and partners layering subsidies.
- Public transit improvements are needed.
- Lack of mental health resources, and limited substance abuse programs available.
- Limited shelter and transitional housing for unsheltered persons.

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

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

Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics	X	X	
Other Street Outreach Services	X	X	

Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	
Employment and Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS	X	X	X
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X	X	

Other			
Other	X	X	

Table 54 - Homeless Prevention Services Summary

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

As the lead agency for the Oklahoma City CoC, the City's Homeless Services team is responsible for coordinating housing and services for the community's homeless population. To increase the effectiveness of this task and to ensure we are working with a comprehensive group of organizations to address the services listed above, we have significantly increased our capacity in the last 2 years. This allows us to now have staff dedicated solely to the coordination and performance of the homeless services system. This includes better performance tracking through improved HMIS reporting and continuous quality improvement efforts. Outreach is now coordinated by the City team and teams are assigned a territory that they work with daily to ensure the same staff is working with the same people to build rapport. These teams include law enforcement and mobile clinics.

The City's permanent supportive housing programs focus on the chronically homeless population and have consistently resulted in a high rate of retention. This includes the VASH and SSVF programs, which we partner with to provide housing services for veterans and one PSH program for youth funded through the YHDP program. Case management is provided for every housed client and has played a significant role in client stabilization system wide. However, some gaps do remain with other supportive services, especially transportation, healthcare, and employment. Staff and providers are working to improve these areas by increasing access to Medicaid services for clients and by providing micro transit options in situations where mass transit does not meet a client's needs.

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

Oklahoma City has focused on housing for the chronically homeless through funding from the HUD CoC competitive grant. This has been accomplished primarily via CoC permanent supportive housing, Housing Choice Vouchers, and a coordinated intake system which enables providers to pool resources and more effectively manage services. Since 2012, over 1,000 people have been housed with a retention rate between 80-90%. With our community partners, the City has worked to create additional permanent supportive housing beds to eliminate homelessness.

Since 2014, Oklahoma City has focused efforts through ESG on decreasing the number of families with children who enter shelters. However, in the last two years, Oklahoma City has seen an increase in the number of families with children experiencing homelessness. This troubling increase coincides with significant increases in housing costs. To further address family homelessness, the CoC awarded the first CoC rapid rehousing grant for families in 2023.

Thanks primarily to increasing the efficiency of housing services, we saw an overall downward trend in homelessness among almost every subpopulation since 2016. However, the 2024 count reflected a sharp increase in most populations. While the unsheltered population has experienced a decline over the last four years, the number of chronically homeless who are unsheltered was shown to be very high and nearly 44% of the City's chronically homeless population was shown to be unsheltered. To help address this concern, the Continuum of Care added a new intensive outreach team and has dedicated staff to managing outreach. CDBG funding was recently allocated to assist with the construction of a new, low-barrier emergency shelter. Most importantly, the City began an encampment rehousing initiative emphasizing rapid provision of permanent housing and case management for people living in encampments. This program has housed over 300 people in the last two years with a goal of housing 500 people by the end of 2025.

The 2024 PIT count also reflected an increase in unaccompanied youth. Many of these youth maintain a transitory lifestyle (commonly referred to as "couch surfing"), so exact numbers are difficult to obtain. Among those affected, many have aged out of the foster care system at age 18 without subsequent

housing options available to them. OKC was a recent recipient of the YHDP program grant which has assisted significantly with addressing youth homelessness. However, this population is predominantly “couch homeless” making them not eligible for many of the resources available.

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

The local 211 provider reports that utility and rental assistance are routinely within the top five categories of need for which they receive service calls. A person must work nearly two minimum wage jobs to afford a two bedroom rental home at fair market rent, and Oklahoma City has some of the highest eviction rates in the nation. The City of Oklahoma City passed a bond package to help address the housing situation in 2019. This program provides up to \$50 million for the development of affordable housing with an emphasis on housing for people who are homeless and/or have extremely low incomes.

The City recently applied for the CoC Builds program to expand housing inventory even further. We hope to receive feedback on the application in the next several months. Meanwhile, the City, local foundations, and service providers have created other avenues to access the current inventory of units that have become harder to access. This includes the development of a privately funded flex fund and landlord engagement team. These developments succeeded in the past year by securing units for our encampment rehousing initiative. Homeless Services leadership has set a fundraising goal to expand this service to the full CoC within the next two to three years. Providers have also created several small programs to assist with employment and transit for people who are homeless.

Grant funds covered under the Consolidated Plan and other grant funds are utilized in an efficient manner 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 in the areas of concentrated lower-income persons to the greatest extent possible.

The primary weakness in the delivery system is the lack of funds to address the identified needs within the community. The need for additional funding, or at minimum a higher CDBG public services cap above 15%, is needed to support the many requests for public service activities which remain unfunded. The City has and continues to address underserved needs by prioritizing the programs believed to provide the most benefit to the greatest number of lower-income residents in concentrated low-income neighborhoods.

SP-45 Goals Summary – 91.215(a)(4)

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase Affordable Housing Opportunities	2025	2029	Affordable Housing	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Creation and Retention of Affordable Housing Decrease and Prevent Homelessness Neighborhood Revitalization	CDBG: \$0 HOME: \$15,073,485	Rental units constructed: 50 Household Housing Unit Homeowner Housing Added: 50 Household Housing Unit Direct Financial Assistance to Homebuyers: 75 Households Assisted
2	Retain Affordable Housing Stock	2025	2029	Affordable Housing	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Creation and Retention of Affordable Housing Neighborhood Revitalization	CDBG: \$9,841,841 HOME: \$2,878,517.41	Rental units rehabilitated: 10 Household Housing Unit Homeowner Housing Rehabilitated: 300 Household Housing Unit
3	Invest in Underserved Neighborhoods & Communities	2025	2029	Non-Housing Community Development	NEIGHBORHOOD STRATEGY AREA Strong	Elimination of Slum and Blight Decrease and Prevent	CDBG: \$7,441,878.54	Public Facility or Infrastructure Activities other than Low/Moderate Income

					Neighborhoods Initiative	Homelessness Neighborhood Revitalization		<p>Housing Benefit: 140000 Persons Assisted</p> <p>Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 100 Households Assisted</p> <p>Public service activities other than Low/Moderate Income Housing Benefit: 45000 Persons Assisted</p> <p>Facade treatment/business building rehabilitation: 10 Business</p> <p>Other: 22500 Other</p>
4	Support Public Services	2025	2029	Non-Homeless Special Needs Non-Housing Community Development	NEIGHBORHOOD STRATEGY AREA	Decrease and Prevent Homelessness Support Public Services	CDBG: \$714,043.64	Public service activities other than Low/Moderate Income Housing Benefit: 325375 Persons Assisted

5	Increase Economic Opportunity	2025	2029	Non-Housing Community Development	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Economic Opportunity	CDBG: \$986,139.30	Businesses assisted: 200 Businesses Assisted
6	Decrease and Prevent Homelessness	2025	2029	Homeless		Decrease and Prevent Homelessness Support Public Services	ESG: \$2,177,463	Tenant-based rental assistance / Rapid Rehousing: 250 Households Assisted Homeless Person Overnight Shelter: 9290 Persons Assisted Homelessness Prevention: 1000 Persons Assisted
7	Support for Populations Living with HIV/AIDs	2025	2029	Non-Homeless Special Needs		Decrease and Prevent Homelessness Support those Living with HIV/AIDs	HOPWA: \$7,387,275	Public service activities other than Low/Moderate Income Housing Benefit: 400 Persons Assisted Tenant-based rental assistance / Rapid

								Rehousing: 200 Households Assisted Homelessness Prevention: 200 Persons Assisted
8	Elimination of Slum and Blight	2025	2029	Non-Housing Community Development	NEIGHBORHOOD STRATEGY AREA	Elimination of Slum and Blight	CDBG: \$4,116,297	Other: 5000 Other
9	Administration, Planning, and Fair Housing	2025	2029	Program Administration		Administration and Fair Housing Activities	CDBG: \$5,028,444 HOME: \$1,153,372	

Table 55 – Goals Summary

Goal Descriptions

1	Goal Name	Increase Affordable Housing Opportunities
	Goal Description	CDBG and HOME funding increase affordable housing opportunities for low- and moderate- income households. Activities addressing this goal include acquisition, pre-development, construction, and financing support to increase available affordable housing opportunities. This goal includes the Down Payment Assistance Program (DPA), the Affordable Housing Development Program (AHDP), and the Community Housing Development Organization Program (CHDO). Funds may be used to support low-income homebuyers and to produce single-family, multi-family, or mixed-use developments for owners or renters. Funds may be used to support the needs identified in the City's Housing Affordability Implementation Plan. Strategic priorities include housing for those earning less than 50% of the AMI and infill housing in SNI neighborhoods. It is expected that the AHDP will produce an average of 10 units per year, and the CHDO program will produce 10 units per year. The DPA program expects to support 15 households per year. This results in 50 AHDP units, 50 CHDO units, and 75 DPA households over the five-year plan period.
2	Goal Name	Retain Affordable Housing Stock

	Goal Description	CDBG and HOME funding to support whole house rehabilitation, exterior maintenance, and emergency repairs for low-moderate income homeowners or renters. During this five-year Consolidated Plan, an estimated 25 homeowners will receive whole house rehabs, 150 homeowners will be assisted with emergency repairs, and 125 homeowners will benefit from exterior maintenance. Funds may be used for the development of a rental rehabilitation program during the five-year plan period, and a low number of beneficiaries are expected to be served by the program during development. Priority and expanded services are offered to homes within SNI neighborhoods.
3	Goal Name	Invest in Underserved Neighborhoods & Communities
	Goal Description	<p>CDBG funding under this goal is intended to revitalize underserved and historically disinvested neighborhoods and communities. This urban revitalization goal seeks to provide just enough public funding to tip communities from declining into growth. Stable, thriving neighborhoods create opportunities for residents, and benefit the city in complex and connected ways, from reducing crime to increasing economic opportunity and improving tax revenues. Most funding under this goal is targeted at the SNI neighborhoods. SNI activities under this goal are divided into two broad categories: SNI Public Facilities and SNI Public Services. SNI Public Facilities includes activities and programs such as neighborhood grants, public art, street improvements, sidewalks, parks, tree plantings, and facade improvements. SNI Public Services include activities such as after school programs, neighborhood clean-ups, and hazardous tree removal. Most SNI activities benefit the entire neighborhood, and the estimated outcomes are based on the populations of the census tracts in the neighborhood. Activities under the "other" GOI include SNI Neighborhood Clean Up Safe and Tidy.</p> <p>The city also supports non-SNI public facilities projects under this goal when they meet a need or goal in the Consolidated Plan, such as urban revitalization or serving underserved communities. These public facilities projects are referred to as General Public Facilities and benefit the entire area in which the project occurs. This goal may also include a public facility or infrastructure investment that results in the creation of additional housing, such as Walnut Infrastructure Development.</p>
4	Goal Name	Support Public Services

	Goal Description	CDBG funds are allocated to eligible public service activities that meet the needs identified in the Consolidated Plan, and which serve disadvantaged populations. Regularly funded activities include advocacy programs for foster youth (CASA) and transportation and courier services for special populations (COTPA Share-A-Fare). Activities under this goal are subject to the 15% public services cap. The city is considering adding a program to provide capacity building public service grants to eligible nonprofits under this goal. These funds would help expand program partners and services available to disadvantage populations in Oklahoma City.
5	Goal Name	Increase Economic Opportunity
	Goal Description	CDBG funds are allocated to support small businesses and job creating projects for low-income populations. Funded activities include the CAA small business training program and NewView Oklahoma, a manufacturing facility that employs individuals with low-vision or blindness. A Section 108 loan contingency (\$100,000) has been allocated to protect the CDBG investment in the event of a loan default. An estimated 40 businesses will be supported annually by CAA over the five-year Consolidated Plan Period. Estimated funding anticipates similar allocations to CAA in future program years. The Section 108 contingency is expected to be carried forward from year to year, assuming no loan defaults. Priority will be given to new activities in SNI neighborhoods.
6	Goal Name	Decrease and Prevent Homelessness
	Goal Description	ESG funding is allocated to assist the homeless population. Activities supported include ESG Rapid Rehousing, Emergency Shelter and Street Outreach, Emergency Shelter (New Beds), and Homeless Prevention. Projected funding below anticipates level funding over the five (5) years covered by this Consolidated Plan. Projected beneficiaries are estimated based on previous year's outcomes.
7	Goal Name	Support for Populations Living with HIV/AIDs
	Goal Description	This goal provides support with HOPWA funding for individuals living with HIV/AIDs. The State of Oklahoma has seen increases in the number of individuals living with HIV/AIDs. Activities under this goal include HOPWA Tenant Based Rental Assistance, Short Term Rent, Mortgage, and Utility Assistance, Permanent Housing Placement, Housing Information Services, and Supportive Services. Estimates of beneficiaries served are based on prior year accomplishments.
8	Goal Name	Elimination of Slum and Blight

	Goal Description	This goal meets the need identified in the plan of eliminating slum and blight. These investments arrest further deterioration in challenged neighborhoods or on a spot basis. CDBG funding is allocated to the Oklahoma City Urban Renewal Authority to assist in URA completions, environmental remediation, acquisition, infrastructure development and other eligible activities to assist in disposition of urban renewal properties. CDBG funds are also used to secure vacant and abandoned housing under the City's Vacant and Abandoned Buildings Program. An estimated 150 units annually will be secured. Urban Renewal beneficiaries are inconsistent from year to year and will be reported annually based upon actual assistance provided. 5,000 "other" indicated below is a rough estimate for URA activities, some of which will be area benefit. Both activities' outcomes are reported under "Other."
9	Goal Name	Administration, Planning, and Fair Housing
	Goal Description	Funding for administration is necessary to facilitate ongoing management and administration of formula grant programs. Administrative funds are used for staff support and program operations to ensure that CDBG, HOME, ESG, and HOPWA funds are allocated, tracked, disbursed and monitored in compliance with federal regulations. CDBG administrative funds are also used to support Fair Housing activities through Metro Fair Housing Council.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

During the five-year time frame covered by the Consolidated Plan, it is anticipated that the City of Oklahoma City will assist an estimated 520 households in the attainment or retention of affordable housing. This total includes new affordable units (both rental and home ownership), recipients of down payment assistance, and rehabilitation program beneficiaries. In addition, HOPWA and ESG funds for rapid rehousing, tenant-based rental assistance, short-term rent, mortgage, and utility assistance (STRMU), and permanent housing placement are expected to serve 1,200 households in the five-year period. Households served with ESG and HOPWA funding are usually very low-income. Households served with HOME and CDBG funds are usually earning 30-80% of AMI.

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

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

OCHA is not allowed to maintain a separate waiting list for accessible units; however, if an applicant's name rises to the top of the site-based waiting list, they can refuse the apartment and wait on one that is accessible without losing their place on the list. In some cases, a unit can be modified to meet the needs of the tenant at minimal cost. Approximately 10% of the units are handicapped accessible.

A summary of those in need of accessible public housing units appears on the table below. Please note that an individual can be on multiple waiting lists simultaneously; therefore, totaling each column would not provide an accurate representation of accessibility needs.

Activities to Increase Resident Involvements

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

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

No

Plan to remove the 'troubled' designation

Not applicable. OCHA is a standard performer and is not identified as a troubled agency.

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

Barriers to Affordable Housing

This section asks the City to describe actions to reduce the impacts of public policies on the development and retention of affordable housing. Such policies include tax policy affecting land and other property, land use controls, zoning ordinances, building codes, fees, growth limits, and policies that affect the return on residential investment.

The City of Oklahoma City conducted three important studies to identify the regulatory barriers that may influence housing affordability in the city: the Analysis of Impediments (2020), the Housing Affordability Study (2021), and the Housing Affordability Implementation Plan (2025). Each of these plans identified the city's current development and zoning codes as areas with a potential negative effect on housing production. Since 2021, the City has been working on a code update to address these issues.

The HAS and the City's Development Code Update process identified the following areas of potential regulatory reform to encourage more affordable housing, and reduce impediments to fair housing:

- Zoning modifications, such as allowing ADUs by right
- A reduction of minimum home and lot sizes in specified central neighborhoods in the city
- Clarify the definition of family
- Clarify the code's treatment of persons living in group homes
- Modify densities and development standards to accommodate a wide range of housing types and products to encourage affordability and discourage economic segregation.

Certain statewide public policies also have a direct effect on housing in the City. The Oklahoma Residential Landlord Tenant Act (ORLTA) offers little to no protection for tenants. Under the ORLTA, tenants who report issues with their units, complain about code violations, and participate in a tenant organization have no protection from retaliation.

The strategies above are currently being looked at as part of the HAIP process. The City expects to improve some of the unintended negative effects of these policies in the five year plan.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The Market Analysis of this plan identifies public policies that increase barriers to affordable housing in Oklahoma City. These barriers include local zoning and development code restrictions, but also statewide laws, such as the Oklahoma Residential Landlord Tenant Act, which fails to protect tenants and support safe and sanitary affordable rental housing.

The City recently adopted the Housing Affordability Implementation Plan (HAIP, 2025). The Plan outlines a comprehensive strategy with specific actions for the City to complete to increase affordable housing in Oklahoma City. The goals and actions presented in the HAIP are designed to support the following 5-point strategy developed in the Housing Affordability Study (HAS, 2021). These strategies include:

1. Increase the inventory and diversity of affordable rental units,
2. Preserve the long-term affordability and habitability of new and existing housing,
3. Increase housing and shelter-supportive services,
4. Support opportunities to obtain and sustain affordable homeownership, and
5. Refine development incentives and expand funding sources and partnerships.

In implementing these strategies, the city intends to make ongoing regulatory improvements, both at the state and local level. This includes implementing local land use and development code modifications and defining city priorities and roles in improving landlord-tenant relations and legislation. Development codes updates are already underway. The City is writing new base zones for the core of the City that will allow more housing types to be developed with smaller lot sizes, including accessory dwellings within single-dwelling neighborhoods. The rewrite is intended to provide more flexibility for housing developers to ultimately increase the affordability of housing projects. New zoning will require public input and approval processes and will continue over the next few years.

In addition, the strategies and actions laid out in the HAIP will gradually increase the number of affordable housing units in Oklahoma City. The City is committed to increasing access to affordable housing for residents using a variety of approaches.

SP-60 Homelessness Strategy – 91.215(d)

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

To identify unsheltered homeless individuals and families, the City uses ESG funds and other resources for outreach activities to help connect this population with emergency shelter, housing and 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 coordinates outreach among our numerous outreach providers so that the same teams see the same people regularly to build trust and rapport. The City day shelter operated by the Homeless Alliance can sometimes assess the needs of up to 500 people a day.

Addressing the emergency and transitional housing needs of homeless persons

ESG funds may be used to provide essential services to homeless families and individuals in emergency shelters, and to support shelter operation costs. 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 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 experiencing homelessness, 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. Once moved, clients 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 they move into permanent housing; and (2) to work with households after the move into permanent housing, to include connecting families with community based services to meet long term support/service needs, and to help solve remaining challenges that may threaten the client's tenancy (including difficulties sustaining housing or interacting with the landlord). Home-based case management remains a vital component of rapid re-housing.

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

The framework for case management in the rapid re-housing program consists of permanent housing services. This includes working with the client to identify affordable units, assisting them in accessing housing subsidies, and negotiating leases. Clients may require assistance to overcome barriers, such as poor tenant history, credit history, and discrimination based on ethnicity, gender, family make-up and income source.

Transitional programs are largely focused on people fleeing domestic violence and youth and are paired with rapid rehousing services so permanent housing is readily available once clients are ready to move on from transitional housing.

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

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

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

One of the most important factors in achieving client stability in housing is experienced case management that can help people navigate the processes required to access these systems so they can transition away from assistance when possible.

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

The ESG prevention program includes financial assistance and case management for households who are currently housed but are at imminent risk (within two weeks) of becoming homeless. These households are in immediate need of temporary rent or utility assistance, or additional financial assistance which would enable them to move to another unit. In cases where households desire to remain in housing that is substandard, it is allowable for case managers to assist in locating and moving households to other units that meet minimum housing quality standards. Households receiving prevention assistance may need 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. Generally, 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, agency staff 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 and/or 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.

The assigned case manager contacts the landlord or utility company immediately to pledge assistance in preventing or delaying imminent eviction or utility cutoff. If an inspection finds the housing to be substandard, then the case manager works with the household to locate and secure more appropriate housing. Program participants must demonstrate the ability to earn adequate 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 for monthly follow ups, or more frequently when necessary. Case managers also conduct monthly follow-ups for nine months after the assistance terminates to ensure housing stability.

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

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

As noted previously, 47% of owner-occupied residences and 56% of rental units were constructed prior to 1979, which is 125,723 units total. The City conducts rehabilitation activities in homes in the NRSA, which are primarily constructed before 1979. The City meets all the requirements of 24 CFR Part 35 and abates all lead as applicable in housing projects. City staff functioning in the positions of Risk Assessor or Inspector must be licensed by DEQ. At present, all the Oklahoma City rehabilitation specialists are licensed. The City has acquired XRF testing devices, and all rehabilitation inspectors are qualified to perform the tests required on residential structures, including the clearance certification after abatement work has been performed.

The Oklahoma City Housing Authority complies with the lead-based paint hazard reduction requirements in assisted properties. OCHA requires that all lessors disclose the presence of lead-based paint and/or lead-based paint hazards in the dwelling for all pre-1978 housing. Lessees must also receive a federally approved pamphlet on lead poisoning prevention. Housing exclusively for the elderly or disabled, or those without children under six years of age residing in the unit, are exempted from receiving the federally approved pamphlet.

In addition, The City funds the construction of new, affordable housing in this plan, thereby increasing access to housing without Lead Based Paint hazards.

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

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

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

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

The City's housing rehabilitation program reports to the (OSDH) Health Department on all children living in properties tested where the presence of lead-based paint is found. City staff communicate with the OSDH on other lead-related issues. In the past, City staff have also participated in a training workshop in cooperation with the City-County Health Department for citizens and healthcare professionals concerning lead-based paint. The workshop was held at no cost for participants.

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

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

The City does not have a formal antipoverty strategy but has implemented numerous local and federal job creation and education programs that cumulatively work to reduce poverty. In 1993, the citizens of Oklahoma City passed the first Metropolitan Area Projects initiative, a five-year, \$350 million sales tax program to construct or redevelop numerous public facilities that include a downtown library, new arena, minor league baseball stadium, river dams, and a canal in Bricktown as well as improvements to the State Fairgrounds. The successful implementation of the program resulted in the private sector construction of numerous hotels, eating establishments, and retail facilities in downtown and Bricktown areas. MAPS ultimately cost approximately \$300 million and resulted in over \$2 billion in private investment and significant job creation.

The initial MAPS initiative was followed by a larger \$514 million "MAPS for Kids" initiative that included new construction and/or renovation of virtually all public-school buildings in the Oklahoma City Public School District and provided substantial revenue for improvements in suburban school districts that educate children of Oklahoma City residents. Education serves as the cornerstone of the most effective anti-poverty strategies. The third MAPS initiative totaling \$777 million was passed by the citizens of Oklahoma City in December 2009. MAPS 3 projects are mostly completed and have continued the public facilities improvements started with the first MAPS vote. MAPS 3 provided funding for a seventy (70) acre regional park, a 4.5-mile electric streetcar route, a new downtown convention center, neighborhood sidewalks and trails, health and wellness centers for seniors, additional improvements to the Oklahoma State Fairgrounds and a white-water course on the Oklahoma River.

Voters approved a \$978 million MAPS 4 initiative in December 2019. Projects are underway and expected to be completed by 2027 and include additional transit improvements and infrastructure, public park improvements, a multi-purpose stadium, a civil rights museum, additional trails and sidewalks, a new state fair arena, improvements to the Chesapeake Arena, and a new animal shelter and funding for affordable housing. Unlike the previous MAPS initiatives which focused primarily on large capital improvement projects, MAPS 4 also provides substantial funding to support mental health services and victims of domestic violence. This increased emphasis on social services is expected to have a significant impact in terms of reducing the number of poverty-level families and preventing homelessness. The total local public investment in MAPS programs exceeds \$2.6 billion in public funding.

Significant private investment has also been made, as these projects have catalyzed economic growth. In addition to the locally funded economic development and job creation efforts to combat poverty, the City utilizes federal resources to stimulate job growth. Investments in housing can reduce housing burden and help lift families out of poverty. The City will continue to focus most of our ESG resources on

prevention and rehousing assistance, as well as HOPWA assistance for services that provide similar benefits. This can assist some individuals and families to stabilize and eventually escape from poverty.

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

The City places a high priority on mixed-income neighborhoods and on deconcentrating poverty. All funding decisions are sensitive to the highest levels of need, and the desire to allocate limited resources strategically to provide a holistic approach to neighborhood revitalization. Investments in neighborhood revitalization and housing are concentrated to transform neighborhoods into areas of opportunity, where residents can collectively reduce poverty.

SP-80 Monitoring – 91.230

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

Oklahoma City monitors all activities it funds with federal grants. A compliance review is conducted for all subrecipients on at least an annual basis.

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

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

The City has two forms of monitoring: desk and onsite. Ongoing desk monitoring occurs throughout the life of the subrecipient agreement, as the program manager requests and reviews supporting documentation with invoices. Invoices must have documentation to support costs to be paid. In addition, contracts require documentation of compliance with cross-cutting requirements during invoice processing.

Onsite monitoring is a review of all programmatic and financial documentation related to a subrecipient agreement and typically occurs at least once during the life of a subrecipient agreement. The City adheres to a Federal Award Monitoring Framework that evaluates subrecipients on capacity, experience, and risk to determine the frequency and intensity of monitoring for each subrecipient. A regular, high-performing subrecipient may require less frequent onsite monitoring than those who are new or who have very low staff capacity. All subrecipients must be monitored at least once every three years.

When subrecipients are monitored, the following procedures are followed:

- Prepare a schedule of monitoring visits.
- Notify subrecipients of date(s) set for monitoring visit(s).
- Review with subrecipient the monitoring checklist that will be used as a monitoring guide.
- Conduct the monitoring review as follows:
 - As applicable, check minutes of Board meetings for actions, authorizations affecting operations, expenditures, and personnel actions.
 - Review time records and other documents relating to time spent on program activities.
 - Check deposit records.
 - Check expenditures by examining vouchers, supporting documentation and/or canceled checks to determine eligibility of costs.
 - Determine that books of account(s) agree with the reports submitted by the funded agency.
 - Review records to determine eligibility of low- and moderate-income beneficiaries, to include examination of income source documents.
 - Determine whether requested funds are spent timely, if applicable.
 - Conduct an exit interview to review findings and/or concerns noted during the audit with relevant agency staff.
- Prepare a written report to the Board Chairperson/President relating the method of review, determination of compliance, concerns, findings or other relevant comments. The letter must identify a deadline for correction or submission of information and must offer technical assistance if appropriate.
- Subrecipient monitoring reports are presented to the Division Head of the Housing & Community Development Division for review.

Expected Resources

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

Introduction

The City of Oklahoma City expects allocations for four entitlement programs over the next five years: CDBG, HOME, ESG, HOPWA. First program year allocations are based upon level funding. CDBG allocations in future years are projected to decrease by 1% each year. The estimated HOME funding for future program years is projected to reduce by 1% per year for the next five years. ESG is projected to decrease by 1% and HOPWA funding is expected to increase by 2% each year. The City is the lead applicant for competitive Continuum of Care (CoC) funds which have been successfully obtained for several years. The City typically receives about \$3M a year in CoC funding which is awarded competitively to help those who are homeless, and it remains a critical resource.

National Housing Trust Fund (HTF) awards are administered by the State under a structure similar to Low Income Housing Tax Credits (LIHTC). It is unknown at present if the City will pursue HTF funding through the State; however, if an opportunity arises to increase affordable housing production through this resource, an application will be made. 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 has 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. Section 108 Loan Guarantee applications may be submitted to further the City's ongoing economic development initiatives if additional opportunities materialize during the term of this Consolidated Plan.

The City is planning a General Obligation (GO) Bond election 2025. Oklahoma City's 2017 GO Bond included \$10 million for affordable housing. The new package is expected to contain a proposition for more affordable housing funding. If passed, these local funds would complement HOME and CDBG funding currently used for the development of affordable housing in Oklahoma City.

Annual allocations, funds carried forward from prior program years, and program income estimates are based on the most recent data available at the time of report submission.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				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	5,130,024	0	2,986,421	8,116,445	20,012,198	Prior year resources include 2024-2025 funds obligated/under contract and distribution of funds reallocated and recaptured. Future allocations assume a 1% decrease in CDBG funding over the life of the Plan.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New	2,319,980.93	0	8,350,020.80	10,670,001.73	9,050,234	Prior year resources include 2024-2025 funds obligated/under contract and distribution of funds reallocated and recaptured. Future allocations assume a 1% decrease in HOME funding over the life of the Plan.

		construction for ownership TBRA						
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	1,419,527	0	0	1,419,527	5,967,748	Future allocations assume a 2% increase in HOPWA funding over the life of the Plan.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance	444,290	0	0	444,290	1,733,173	Future allocations assume a 1% decrease in ESG funding over the life of the Plan.

		Services Transitional housing						
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Table 56 - 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 needs in the community. In general, most programs operated under this plan require some type of match or leverage. Affordable housing developments are rarely funded more than the gap funding required.

Regarding required HOME match contributions, Presidential Disaster Declarations and HUD match reduction for severe fiscal distress has eliminated the need to provide 25% match funding for the HOME program in most recent program years. Although match reductions or waivers cannot be projected in future years, it should be noted that the City has accumulated a significant banked match credit which will ensure that adequate leverage is available for new activities. However, The City of Oklahoma City continues to prioritize funding of projects that leverage private capital and non-federal funding.

The City provides HOME funds to Community Housing Development Organizations (CHDOs) for new home construction and rehabilitation/sale activities. 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. The City facilitates the transfer at no cost, of Oklahoma County-owned vacant lots to nonprofit organizations for the construction of affordable housing. The lots are provided to the City through an agreement with Oklahoma County. The City also facilitates CHDO developments on Oklahoma City Urban Renewal Authority property at little or no cost in SNI neighborhoods. CHDO activities funded under this year's Action Plan include continued development of the Walnut Project and the development of homes in Capitol Hill. The CHDOs are bringing private financing for the projects, as well as covering certain hard and soft costs with other non-federal funds.

The City's down payment and closing cost assistance program supports the achievement of home ownership and has proven to be an attractive program that stimulates significant interest among private lenders. The City will continue to leverage its Down Payment Assistance program funds with private financial institution mortgage investments.

The City also provides local funding (general funds) to agencies that provide services to the homeless. Match for ESG programs is also required to be generated by the service providers who utilize these funds.

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 its 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, brownfield 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, Harrison Walnut and NE Renaissance.

For this Action Plan year, the City intends to leverage this land to develop housing in two SNI neighborhoods, Ross Heights/Pitts Park and MLK. These neighborhoods have a significant number of vacant OCURA lots that provide a great opportunity for the development of affordable for-sale homes. In addition, these neighborhoods contain commercial parcels owned by OCURA that are currently under development, including the Clara Luper Civil Rights Center, and a property at 23rd Street and MLK, which is involved in concept development. These developments will help address the neighborhood revitalization and affordable housing needs identified in this plan.

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. This property continues to be an opportunity for the development of housing. Major challenges to any development include a lack of necessary infrastructure serving the lots. 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. The City is working to develop a new RFP for the properties which will be released during the 5-year Plan period.

Discussion

Land costs continue to increase within the NRSA and SNI areas, hindering the development of small-scale affordable housing. Leveraging existing land, especially in new and former SNI neighborhoods for the development of affordable housing is a high priority under this strategic plan. Staff continue to explore new and innovative mechanisms for acquiring affordable and developable land, with an emphasis on SNI neighborhoods.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase Affordable Housing Opportunities	2025	2029	Affordable Housing	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative	Creation and Retention of Affordable Housing	HOME: \$1,680,000.00	Rental units constructed: 11 Household Housing Unit Homeowner Housing Added: 6 Household Housing Unit Direct Financial Assistance to Homebuyers: 15 Households Assisted
2	Retain Affordable Housing Stock	2025	2029	Affordable Housing		Creation and Retention of Affordable Housing	CDBG: \$1,850,000.00 HOME: \$520,000.00	Homeowner Housing Rehabilitated: 67 Household Housing Unit

3	Invest in Underserved Neighborhoods & Communities	2025	2029	Non-Housing Community Development		Neighborhood Revitalization	CDBG: \$2,054,164.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 14500 Persons Assisted Public service activities other than Low/Moderate Income Housing Benefit: 850 Persons Assisted Other: 1 Other
4	Support Public Services	2025	2029	Non-Homeless Special Needs Non-Housing Community Development		Support Public Services	CDBG: \$151,000.00	Public service activities for Low/Moderate Income Housing Benefit: 64775 Households Assisted

								Other: 200 Other
5	Increase Economic Opportunity	2025	2029	Non-Housing Community Development		Economic Opportunity	CDBG: \$140,000.00	Businesses assisted: 41 Businesses Assisted
6	Decrease and Prevent Homelessness	2025	2029	Homeless		Creation and Retention of Affordable Housing Decrease and Prevent Homelessness Support Public Services	ESG: \$431,333.00	Tenant-based rental assistance / Rapid Rehousing: 50 Households Assisted Homeless Person Overnight Shelter: 1858 Persons Assisted Homelessness Prevention: 200 Persons Assisted
7	Support for Populations Living with HIV/AIDs	2025	2029	Non-Homeless Special Needs			HOPWA: \$1,399,461.00	Public service activities other than Low/Moderate Income Housing

								Benefit: 361 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 67 Households Assisted Homelessness Prevention: 65 Persons Assisted
8	Elimination of Slum and Blight	2020	2024	Non-Housing Community Development	NEIGHBORHOOD STRATEGY AREA	Elimination of Slum and Blight	CDBG: \$1,038,880.00	Other: 135 Other
9	Administration, Planning, and Fair Housing	2020	2024	Program Administration		Administration and Fair Housing Activities	CDBG: \$1,011,041.00 HOME: \$220,000.00	

Table 57 – Goals Summary

Goal Descriptions

	Goal Name	Increase Affordable Housing Opportunities
1	Goal Description	Activities under this goal generally fall into one of three major programs: the Affordable Housing Development Program (AHDP), the Community Housing Development Organization Program (CHDO), and the Downpayment Assistance

	<p>Program (DPA). A Request for Proposals (RFP) is expected to be issued for new affordable housing under the HOME Affordable Housing Development Program. These activities are funded with HOME funds.</p> <p>The AHDP primarily serves the needs identified in the Housing Affordability Implementation Plan and housing in SNI areas. It is estimated that the future RFP will result in development of approximately 50 units in future program years. Available funding includes \$2,053,280 reallocation of projected unobligated funds from prior program years and \$1,060,000 in FY 2025-26 funds. Allocated projects that are carrying forward the previous year's funds include:</p> <ul style="list-style-type: none"> • \$400,000 for two homes in the SNI-targeted MLK Neighborhood • \$800,000 for Creston Park, a senior housing facility with 124 affordable units under development by the Oklahoma City Housing Authority (OCHA) • Hillcrest Green, originally allocated \$660,000 for 43 total affordable senior housing units, is under construction and will carry forward approximately \$300,000 in unspent funds. This project is expected to reach completion in the 2025-26 fiscal year • \$1,200,000 for Vita Nova, a permanent supportive housing facility with 56 units under development by OCHA • \$600,000 for Alley's End, an affordable housing project in downtown Oklahoma City with 214 total affordable housing units • ProgressOKC received funding in prior years for the construction of four new homes for sale. The homes are constructed and the last two will be sold in the 2025-26 Fiscal Year. <p>The CHDO program focuses on the construction of new homes for sale to low-income buyers, with an emphasis on SNI neighborhoods. The CHDO program has \$1,922,731 in prior year funds available to obligate. The CHDO program is receiving an additional \$400,000 in FY 2025-26 HOME funds for the development of additional housing. In the next fiscal year, the following projects are expected:</p> <ul style="list-style-type: none"> • Jefferson Park Neighborhood Association will carry forward \$121,770 to complete a home in the Walnut Development. JPNA will receive approximately \$510,000 in funds for the construction of three final homes in the Walnut Development. • Positively Paseo will carry forward \$137,712 to complete a home in the Walnut Development. Positively Paseo will receive an additional allocation of approximately \$800,000 for the construction of four new homes in the SNI
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		<p>neighborhood Capitol Hill. Positively Paseo will receive approximately \$510,000 for construction of the final three homes in the Walnut Development.</p> <p>The Downpayment Assistance Program will have \$800,000 in available funding and expects to assist 15 households purchase a home in the first Action Plan Year.</p>
2	Goal Name	Retain Affordable Housing Stock
	Goal Description	<p>Activities under this goal receive CDBG and HOME funding to support housing rehabilitation, including whole house rehabilitation, exterior maintenance, and emergency repairs for low-moderate income homeowners or renters. During this Action Plan Year, the following programs will be funded:</p> <ul style="list-style-type: none"> • The Whole House Rehab program is allocated \$520,000 in HOME funds and will serve an estimated 5 homeowners • The Emergency Home Repair program (EHR) is run by Community Action Agency, and is receiving an allocation of \$450,000. In addition, the City is standing up a City-run Emergency Home Repair program using \$325,000 of prior year funds with the intention of serving more households and clearing the program's waitlist. Approximately 37 homeowners will be assisted with emergency repairs. • The Housing Exterior Maintenance Program (HEMP) is allocated \$700,000 in 2025-26 CDBG funding and will serve 25 homeowners. • The Housing Rehabilitation Program receives \$700,000 in CDBG funding for program delivery associated with inspections, application processing, and other program delivery activities associated with Housing Rehabilitation activities. <p>Early development of a rental rehabilitation program may occur in the first Action Plan Year, to meet the needs identified in the Needs Assessment and Housing Affordability Implementation Plan. No outcomes are expected in the First Action Plan Year. Priority and expanded services are offered to homes within SNI neighborhoods.</p>
3	Goal Name	Invest in Underserved Neighborhoods & Communities
	Goal Description	<p>CDBG funding under this goal is intended to revitalize underserved and historically disinvested neighborhoods and communities. This urban revitalization goal seeks to provide just enough public funding to tip communities from declining into growth. Stable, thriving neighborhoods create opportunities for residents, and benefit the city in complex</p>

	<p>and connected ways, from reducing crime to increasing economic opportunity and improving tax revenues. Most funding under this goal is targeted to the SNI neighborhoods. SNI activities under this goal are divided into two broad categories: SNI Public Facilities and SNI Public Services. SNI Public Facilities includes activities and programs such as neighborhood grants, public art, street improvements, sidewalks, parks, tree plantings, and facade improvements. SNI Public Services include activities such as after school programs, neighborhood clean-ups, and hazardous tree removal. Most SNI activities benefit the entire neighborhood, and the estimated outcomes are based on the populations of the census tracts in the neighborhood. Activities under the "other" GOI include SNI Neighborhood Clean Up Safe and Tidy.</p> <p>The city also supports non-SNI public facilities projects under this goal when they meet a need or goal in the Consolidated Plan, such as urban revitalization or serving underserved communities. These public facilities projects are referred to as General Public Facilities and benefit the entire area in which the project occurs. This goal may also include a public facility or infrastructure investment that results in the creation of additional housing, such as Walnut Infrastructure Development.</p> <p>First Year Action Plan Allocations are as follows:</p> <ul style="list-style-type: none"> • SNI Program Delivery - \$136,000 • SNI Neighborhood Grants - \$80,000 • SNI Tree Plantings - \$20,000 • SNI MLK Sidewalks - \$329,010 • General Public Facility - \$1,139,154 • SNI After School - \$350,000 <p>Several activities will be using previous year's funds to supplement allocations received in the 2025-26 Action Plan, including:</p> <ul style="list-style-type: none"> • SNI Safe and Tidy - \$45,000 • SNI Hazardous Tree Removal and Assessments - \$170,000 • SNI Sidewalks in Capitol Hill and Metro Park - \$500,000
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		<ul style="list-style-type: none"> Alpha Community Foundation received \$200,00 in CDBG funding in a prior year and is expected to complete construction in the 2025-26 Fiscal Year. The Walnut Development received an additional \$200,000 in infrastructure funding in the 24-25 Action Plan and is expected to complete infrastructure construction in the 2025-26 Fiscal Year.
4	Goal Name	Support Public Services
	Goal Description	<p>CDBG funds are allocated to eligible public service activities that meet the needs identified in the Consolidated Plan, and which serve disadvantaged populations. Regularly funded activities include advocacy programs for foster youth (CASA) and transportation and courier services for special populations (COTPA). Activities under this goal are subject to a 15% public services cap. The city is considering adding a program to provide capacity building public service grants to eligible nonprofits under this goal. These funds would help expand program partners and services available to disadvantage populations in Oklahoma City. For this Action Plan, the following activities will be funded:</p> <ul style="list-style-type: none"> \$40,000 to Court Appointed Special Advocates of Oklahoma County (CASA) for advocacy and supportive services to children in the foster system. \$105,000 to the Central Oklahoma Transportation and Parking Authority (COTPA) for transit fares, including taxi and bus passes, for homeless populations, low-income persons, and persons with disabilities.
5	Goal Name	Increase Economic Opportunity
	Goal Description	<p>CDBG funds are allocated to support small businesses and job creating projects for low-income populations. Funded activities include the CAA small business training program and NewView Oklahoma, a manufacturing facility that employs individuals with low-vision or blindness. A Section 108 loan contingency (\$100,000) has been allocated to protect the CDBG investment in the event of a loan default. The following activities are funded under this program:</p> <ul style="list-style-type: none"> \$100,000 for the Section 108 contingency is expected to be carried forward from year to year, assuming no loan defaults. Community Action Agency will receive \$40,000 to assist an estimated 40 businesses. <p>NewView Oklahoma's allocation of \$300,000 will carry forward into the new fiscal year. This project is expected to finish in the 2025-26 Fiscal Year.</p>

6	Goal Name	Decrease and Prevent Homelessness
	Goal Description	ESG funding is allocated to assist the homeless population. Activities supported include ESG Rapid Rehousing, Emergency Shelter and Street Outreach, Emergency Shelter (New Beds), and Homeless Prevention. Projected beneficiaries are estimated based on previous year's outcomes.
7	Goal Name	Support for Populations Living with HIV/AIDs
	Goal Description	This goal provides support with HOPWA funding for individuals living with HIV/AIDs. The State of Oklahoma has seen increases to the number of individuals living with HIV/AIDs. Activities under this goal include HOPWA Tenant Based Rental Assistance, Short Term Rent, Mortgage, and Utility Assistance, Permanent Housing Placement, Housing Information Services, and Supportive Services. Estimates of beneficiaries served are based on prior year accomplishments.
8	Goal Name	Elimination of Slum and Blight
	Goal Description	<p>This goal meets the need identified in the plan of eliminating slum and blight. These investments arrest further deterioration in challenged neighborhoods or on a spot basis. CDBG funding is allocated to the Oklahoma City Urban Renewal Authority to assist in URA completions, environmental remediation, acquisition, infrastructure development and other eligible activities to assist in disposition of urban renewal properties. CDBG funds are also used to secure vacant and abandoned housing under the City's Vacant and Abandoned Buildings Program. An estimated 150 units annually will be secured. Urban Renewal beneficiaries are inconsistent from year to year and will be reported annually based upon actual assistance provided. 5,000 "other" indicated below is a rough estimate for URA activities, some of which will be area benefit. Both activities' outcomes are reported under "Other." Allocations under this goal include:</p> <ul style="list-style-type: none"> • \$250,000 for the Vacant and Abandoned Buildings Program, which is run by the City's Development Services Division. • \$788,880 for OCURA Urban Renewal Completions, including issuing RFPs for vacant land owned by OCURA.
9	Goal Name	Administration, Planning, and Fair Housing
	Goal Description	Funding for administration is necessary to facilitate ongoing management and administration of formula grant programs. Administrative funds are used for staff support and program operations to ensure that CDBG, HOME, ESG, and HOPWA funds are allocated, tracked, disbursed and monitored in compliance with federal regulations. CDBG administrative funds

		are also used to support Fair Housing activities through Metro Fair Housing Council, which receives an annual allocation of \$93,000. Outcomes are not tracked for administrative activities.
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Projects

AP-35 Projects – 91.220(d)

Introduction

The following projects and activities for the Action Plan are consistent with the needs and goals established in the new Five-Year Consolidated Plan and include:

- Affordable Housing Programs consisting of housing rehabilitation, down payment assistance, and new construction that focus on adding and improving housing opportunities for lower-income persons.
 - Neighborhood revitalization programs include the Strong Neighborhoods Initiative's public facility and public services investments in underserved neighborhoods, OCURA's activities addressing slum and blight, and general public facilities to improve underserved communities.
 - Support for the homeless and those living with HIV/AIDS through the Emergency Solutions Grant and HOPWA.
 - Economic Development activities targeting the low and moderate-income areas, and the Neighborhood Revitalization Strategy Area, including potential application(s) for Section 108 funds.
- Public 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 in this First Year Action Plan specifically relate to the goals outlined in the 2025-2029 Consolidated Plan and include:

- Increasing Affordable Housing Opportunities
- Retaining Affordable Housing Stock
- Investing in Underserved Neighborhoods and Communities
- Supporting Public Services for Disadvantaged Populations
- Increasing Economic Opportunity
- Decreasing and Preventing Homelessness
- Support for Populations Living with HIV/AIDS
- Elimination of Slum and Blight
- Administration, Planning, and Fair Housing

Oklahoma City's formula grant funding allocations, as recommended for adoption in this First Year Action Plan (fiscal year July 1, 2025, through June 30, 2026), follow the priorities established in the five-year Consolidated Plan that expires June 30, 2030. The First Year Action 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 2025-2026 First Year Action Plan were considered by the Citizen's Committee for Community Development on April 22, 2025, and received their favorable recommendation. Final Plan approval was granted by the City Council on May 20, 2025.

The City intends to expend carry-forward balances (when applicable) from this First Year Action Plan 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 before HUD approval of the future FY 2026 Second Year Action 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 58 – Project Information

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

The City continues to prioritize affordable housing and homelessness prevention and reduction activities. Affordable housing is a high priority need in the City. The City is working on multiple fronts to improve access to affordable housing for its residents. To that end, CDBG funds are primarily being used for housing rehabilitation programs for low-income residents, and HOME funds are dedicated to the construction of new affordable housing. In addition, the City is setting aside additional funds to be expended to construct new housing in SNI neighborhoods, along with a renewed focus on housing projects in SNI neighborhoods from other programs.

SNI's neighborhood revitalization activities meet many identified community needs. These programs fund public facilities and services in historically underserved and disinvested communities. The SNI program provides holistic support to these communities, often serving as an initial catalyst for further investment and comprehensive neighborhood change. These programs support housing, economic development, prevention of homelessness, and neighborhood revitalization goals and needs identified in the 2025-2029 Comprehensive Plan.

The city continues to seek ways to support small-scale affordable rental properties. Rental housing challenges with affordability and condition were identified in the HAS, HAIP, and the 2025-2029 Consolidated Plan. While this Action Plan does not provide funding for programs to support rentals apart from new construction, the Housing and Community Development Division is pursuing new and creative program designs to serve low-income renters. Administrative funds have been committed for Fair Housing Enforcement to respond to ongoing concerns about tenants' rights and evictions.

AP-38 Project Summary

Project Summary Information

1	Project Name	Affordable Housing Development Program
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Increase Affordable Housing Opportunities
	Needs Addressed	Creation and Retention of Affordable Housing
	Funding	HOME: \$8,156,791.84
	Description	<p>A Request for Proposals (RFP) is expected to be issued for new affordable housing under the HOME Affordable Housing Development Program (AHDP). The AHDP primarily serves the needs identified in the Housing Affordability Implementation Plan and housing in SNI areas. It is estimated that the future RFP will result in development of approximately 50 units in future program years.</p> <p>Available funding includes \$3,308,159 in funding earmarked for projects from prior program years and \$1,060,000 in FY 2025-26 funds. The funding available for this program also includes \$2,053,279 in funding from the previous year that is available for solicitation.</p> <p>Allocated projects that are carrying forward the previous year's funds include:</p> <ul style="list-style-type: none"> • \$400,000 for two homes in the SNI-targeted MLK Neighborhood. • \$800,000 for Creston Park, a senior housing facility with 124 affordable units under development by the Oklahoma City Housing Authority (OCHA). • Hillcrest Green, originally allocated \$660,000 for 43 total affordable senior housing units, is under construction and will carry forward approximately \$300,000 in unspent funds. This project is expected to reach completion in the 2025-26 fiscal year. • \$1,200,000 for Vita Nova, a permanent supportive housing facility with 56 units under development by OCHA. This project is expected to break ground in the 2025-26 FY. • \$600,000 for Alley's End, an affordable housing project in downtown Oklahoma City with 214 total affordable housing units.

		<ul style="list-style-type: none"> ProgressOKC received funding in prior years for the construction of four new homes for sale. The homes are constructed and the last two will be sold in the 2025-26 Fiscal Year. <p>The CHDO program focuses on the construction of new homes for sale to low-income buyers, with an emphasis on SNI neighborhoods. The CHDO program has \$1,922,731 in prior year funds available to obligate. The CHDO program is receiving an additional \$400,000 in FY 2025-26 HOME funds for the development of additional housing. In the next fiscal year, the following projects are expected:</p> <ul style="list-style-type: none"> Jefferson Park Neighborhood Association will carry forward \$121,770 to complete a home in the Walnut Development. JPNA will receive approximately \$510,000 in funds for the construction of three final homes in the Walnut Development. Positively Paseo will carry forward \$137,712 to complete a home in the Walnut Development. Positively Paseo will receive an additional allocation of approximately \$800,000 for the construction of four new homes in the SNI neighborhood Capitol Hill. Positively Paseo will receive approximately \$510,000 for construction of the final three homes in the Walnut Development.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	<p>For the CHDO program, it is expected that at least six more homes will begin construction in the Walnut Street project, in addition to the homes already completed and sold in this development. Four additional CHDO homes will be constructed in Capitol Hill. All homes will be sold to homebuyers earning less than 80% of AMI.</p> <p>For the AHDP, 170 affordable units for seniors at Creston Park are expected, and will be reported in a future program year. Forty-three LIHTC units for seniors are expected at Hillcrest Green II in the FY 2025-26 program year. Seventy-Five (75) studio units for chronically homeless persons are expected to be completed at the Vita Nova facility in the FY 2026-27 program year. 214 affordable LIHTC units are currently under construction at Alley's End. Two affordable homes for sale will be constructed in the MLK Neighborhood.</p>
	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 28th St and MLK. The Vita Nova project is located at 1800 E. Reno

		Avenue. Hillcrest Green is located at 3339 SW 74th. The Capitol Hill homes will be in the Capitol Hill Neighborhood. MLK Homes will be in the MLK Neighborhood. Future projects allocated under an RFP will prioritize SNI neighborhoods.
	Planned Activities	New construction of proposed affordable housing projects at Hillcrest Green II, Vita Nova, Creston Park Suites, Alley's End, Walnut Street, Capitol Hill, MLK, and TBD sites.
2	Project Name	Affordable Housing Rehabilitation and Retention
	Target Area	NEIGHBORHOOD STRATEGY AREA Strong Neighborhoods Initiative
	Goals Supported	Retain Affordable Housing Stock
	Needs Addressed	Creation and Retention of Affordable Housing Decrease and Prevent Homelessness
	Funding	CDBG: \$2,625,000.00 HOME: \$850,000.00
	Description	<p>A total budget of \$850,000 in HOME funding is provided for the Whole House Rehabilitation Program to rehab an estimated five homes for low to moderate income households. CDBG funds support multiple housing retention programs:</p> <ul style="list-style-type: none"> • The Emergency Home Repair program (EHR) is run by Community Action Agency, and is receiving an allocation of \$450,000. • In addition, the City is standing up a City-run Emergency Home Repair program using \$325,000 of prior year funds with the intention of serving more households and clearing the program's waitlist. Approximately 37 homeowners will be assisted with emergency repairs. • The Housing Exterior Maintenance Program (HEMP) is allocated \$1,000,000 and will serve 25 homeowners. • The Housing Rehabilitation Program receives \$700,000 in CDBG funding for program delivery associated with inspections, application processing, and other program delivery activities associated with Housing Rehabilitation activities.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	An estimated twenty-five homeowners will receive exterior maintenance repairs, five homeowners will receive whole-house rehabilitations, thirty-seven homeowners will receive emergency repairs.

	Location Description	City wide, with emphasis in the NRSA and SNI Areas.
	Planned Activities	Exterior maintenance repairs, emergency home repairs, whole-house rehabilitation.
3	Project Name	Down Payment Assistance Program
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Increase Affordable Housing Opportunities
	Needs Addressed	Creation and Retention of Affordable Housing
	Funding	HOME: \$850,000.00
	Description	HOME funds in the amount of \$850,000 will be used to assist approximately 15 low to moderate income homebuyers.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	An estimated fifteen low-income homebuyers will be provided with 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.
	Planned Activities	Down Payment and Closing Costs assistance to low and moderate-income homebuyers.
4	Project Name	SNI Public Facilities Activities
	Target Area	Strong Neighborhoods Initiative
	Goals Supported	Invest in Underserved Neighborhoods & Communities
	Needs Addressed	Neighborhood Revitalization
	Funding	CDBG: \$1,200,000.00
	Description	<p>Funds in the amount of \$1.2 million are allocated for SNI public facilities projects. These funds will support:</p> <ul style="list-style-type: none"> • \$120,990 for Neighborhood Grant projects, which often include public art, street improvements, and other neighborhood-led improvements. • \$20,000 for tree planting. • \$136,000 for Program Delivery. • \$200,000 for Metro Park Sidewalks • \$300,000 for Capitol Hill Sidewalks • \$329,010 for MLK Sidewalks <p>Other neighborhood projects may be funded from this allocation as identified, as long as they improve public facilities in an SNI neighborhood.</p>

	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Improvements under this project will provide community-wide benefit to approximately 4,500 households. The population of each SNI neighborhood is estimated to be 1,500, and there are three neighborhoods. Each SNI neighborhood has more than 51% low- to moderate-income households.
	Location Description	Activities are limited to designated Strong Neighborhoods Initiative neighborhoods - Metro Park, Capitol Hill, Ross Heights/Pitts Park, Stockyards, and MLK Jr. Capitol Hill and Metro Park are graduating this fiscal year, and projects in these areas will wind down.
	Planned Activities	Sidewalk installation, park improvements, tree planting, other community improvements as identified.
5	Project Name	SNI Public Services Activities
	Target Area	Strong Neighborhoods Initiative
	Goals Supported	Invest in Underserved Neighborhoods & Communities
	Needs Addressed	Neighborhood Revitalization
	Funding	CDBG: \$565,000.00
	Description	<p>\$565,000 in CDBG funds is provided to support public service activities in our SNI neighborhoods. This allocation includes \$350,000 from FY 2025-26 entitlement funds. This program provides:</p> <ul style="list-style-type: none"> • \$350,000 for After School Programs • \$45,000 for Neighborhood Cleanup Safe and Tidy • \$160,000 for Hazardous Tree Removal • \$10,000 for Hazardous Tree Assessments <p>Other neighborhood projects may be funded from this allocation as identified, as long as they provide a public service to SNI neighborhoods.</p>
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 850 students will be served through the After School Program. Approximately forty (40) hazardous trees will be removed. Hazardous tree removals and neighborhood clean-ups benefit the community and are each reported as an area-wide benefit serving approximately 4,500 people.
	Location Description	Designated Strong Neighborhoods Initiative neighborhoods (Stockyards, Ross Heights/Pitts Park, and MLK Jr).
	Planned Activities	After school programming, neighborhood cleanup, and hazardous tree removals.
6	Project Name	Community Development - Public Facilities Activities
	Target Area	NEIGHBORHOOD STRATEGY AREA
	Goals Supported	Invest in Underserved Neighborhoods & Communities

	Needs Addressed	Neighborhood Revitalization
	Funding	CDBG: \$1,069,605.52
	Description	CDBG funds are allocated for the support of various public facilities activities. \$629,846.34 has been allocated from previously unobligated funds to support an undetermined community development public Facilities project. Support is also provided to Alpha Community Foundations for the Garden Oaks Community Center. The Alpha project is allocated \$200,000 from previously unobligated funds to support construction. The Walnut Development retains \$239,759 for infrastructure improvements.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	The Garden Oaks Community Center will serve approximately 1,000 residents of the census tract in which the center is located, with more than 51% of the residents being low- to moderate-income. There will be an area wide benefit.
	Location Description	The Garden Oaks Community Center is located at NE 16th and Redbud Drive.
	Planned Activities	Infrastructure development, neighborhood centers, and other eligible public facilities activities.
7	Project Name	Community Development - Public Services Activities
	Target Area	
	Goals Supported	Support Public Services
	Needs Addressed	Decrease and Prevent Homelessness Support Public Services
	Funding	CDBG: \$151,000.00
	Description	CDBG funds in the amount of \$105,000 are allocated to COTPA to provide discounted bus and taxi fares, and courier services to special populations. \$40,000 is provided to CASA for child advocacy services within the foster care system.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 73 foster youth will be provided with advocacy resources. Approximately 64,702 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, transportation and courier services to special populations, and other eligible public service activities.
8	Project Name	Economic Development
	Target Area	

	Goals Supported	Increase Economic Opportunity
	Needs Addressed	Economic Opportunity
	Funding	CDBG: \$440,000.00
	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.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 40 small businesses will receive training and technical assistance. It is not expected that any jobs will be created in this Action Plan year from Section 108 loan activities. An estimated 100 LMI 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.
9	Project Name	Slum and Blight Remediation
	Target Area	
	Goals Supported	Elimination of Slum and Blight
	Needs Addressed	Elimination of Slum and Blight
	Funding	CDBG: \$1,038,880.00
	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.
	Target Date	6/30/2026
	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 113 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.
10	Project Name	Homeless Programs
	Target Area	

	Goals Supported	Decrease and Prevent Homelessness
	Needs Addressed	Decrease and Prevent Homelessness
	Funding	ESG: \$444,290.00
	Description	ESG funds are used to provide services, emergency and transitional housing, and case management resources for the prevention of homelessness. Funded activities include, but are not limited to rapid rehousing, homelessness prevention, and emergency shelter. The FY 2025-26 ESG allocation is \$444,290.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 2,100 households will receive various services targeted to the homeless or at risk of becoming homeless.
	Location Description	City-Wide
	Planned Activities	Rapid rehousing, services to the homeless, emergency shelter, homelessness prevention activities.
11	Project Name	HOPWA Programs
	Target Area	
	Goals Supported	Support for Populations Living with HIV/AIDs
	Needs Addressed	Support those Living with HIV/AIDs
	Funding	HOPWA: \$1,419,527.00
	Description	Activities under this project include HOPWA Tenant Based Rental Assistance, Short Term Rent, Mortgage, and Utility Assistance, Permanent Housing Placement, Housing Information Services, and Supportive Services. Estimates of beneficiaries served are based on prior year accomplishments.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 500 households will receive various services.
	Location Description	City-Wide
	Planned Activities	Tenant Based Rental Assistance, Short Term Rent, Mortgage, and Utility Assistance, Permanent Housing Placement, Housing Information Services, and Supportive Services
11	Project Name	Administration, Planning, and Fair Housing
	Target Area	Citywide (Fair Housing)

	Goals Supported	Administration and Planning
	Needs Addressed	Administration and Fair Housing Activities
	Funding	CDBG: \$1,026,004.80 HOME: \$248,348.09
	Description	<p>HOME and CDBG funds are allocated for the management and administration of federal programs. CDBG administration funds in the amount of \$45,000 are allocated to support planning activities. An allocation of \$93,000 is for Fair Housing investigations. \$888,004.80 in CDBG funds are allocated for administration (exclusive of Planning and Fair Housing allocations).</p> <p>The HOME program administrative allocation provides \$248,348.09 in funding. This includes \$16,350 in carry-forward funds and \$231,998.09 in FY 2025-26 funding.</p>
	Target Date	6/30/2026
	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 through the Metro Alliance with CDBG administration funding.
	Location Description	City-wide
	Planned Activities	CDBG and HOME program administration, CDBG planning support, and Fair Housing program activities.

AP-50 Geographic Distribution – 91.220(f)

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

The City of Oklahoma City 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 City concentrates a minimum of 80% of CDBG and HOME funds in the NRSA.

Within the NRSA, the City's SNI program has designated three neighborhoods as target areas for funding: Ross Heights/Pitts Park, MLK, and Stockyards. These three neighborhoods will receive concentrated investments and priority for programs such as housing rehabilitation. All three neighborhoods have significant challenges and are areas of low-income concentration and historical disinvestment. The City aims to concentrate most funds in the SNI neighborhoods, to achieve comprehensive and targeted neighborhood revitalization.

The City of Oklahoma City is the largest city in the State of Oklahoma in both population and land area. The community is racially diverse with a total minority population exceeding 38.6%. 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. Low-income areas of the city are primarily central.

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 59 - 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 needs. 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 to end decline and restore them to economically viable and sustainable communities. Rather than allocating 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 are all 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. The City's SNI program has designated three neighborhoods as target areas for funding: Ross Heights/Pitts Park, MLK, and Stockyards.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City is prioritizing affordable housing in this Action Plan year, and throughout the five-year Consolidated Plan. This aligns the Consolidated Plan and Action Plan with the Housing Affordability Study (2021) and Housing Affordability Implementation Plan (2025), which outline actions and needs for housing in Oklahoma City. The following tables outline the goals for households supported with federal funding, separated by type of household. The estimates in the following table do not include emergency shelter, transitional shelter, or supportive services, but focus on permanent housing.

Current programs to assist households retain affordable housing through rehabilitation and repair include Emergency Home Repair Program, Housing Exterior Maintenance, and Whole House Rehabilitation. Programs to construct new affordable housing are the Affordable Housing Development Program (AHDP) and the Community Housing Development Organization Program (CHDO). Both programs support the development of quality affordable housing for rent or sale to low-income households (earning less than 80% AMI). In the 2025-26 Fiscal Year, the CHDO program is expected to create ten new homes for sale, and the AHDP is expected to create ten new housing units to rent. In addition, the city funds downpayment assistance for low-income households to purchase a home through the Down Payment Assistance Program.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	102
Special-Needs	132
Total	234

Table 60 - One Year Goals for Affordable Housing by Support Requirement

One-Year Goals for the Number of Households Supported Through	
Rental Assistance (TBRA/STRMU)	132
The Production of New Units	20
Rehab of Existing Units	67
Acquisition of Existing Units	15
Other	0
Total	234

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

Discussion

The City generally provides housing to non-homeless populations, as housing for the homeless presents many challenges. However, the City currently has one project in development with OCHA, Vita Nova, which would provide permanent supportive housing to formerly homeless households. This project is not expected to complete construction in the 2025-26 Fiscal Year.

AP-60 Public Housing – 91.220(h)

Introduction

The Oklahoma City Housing Authority owns 2,716 public housing units in projects and scattered rental units. The units are divided among senior and general occupancy units. Section 8 Vouchers are provided to 4,216 families, of which 181 are project-based and 4,035 are tenant-based. OCHA's public housing units range in age from 31 to 100+ years old and typically have a vacancy rate of 3-9%. All residents are low income, and the vast majority of residents have incomes below 30% AMI.

OCHA administers a total of 7,717 housing units. The tenant share of rent is based on household income and a subsidized tenant may make a choice to pay more of their own money to have a more expensive rental unit. OCHA is working to convert many units to RAD conversions, remove some old, scattered site properties from their portfolio, and develop new high-quality mixed income housing.

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. All housing is considered "average" by the Housing Authority. The City currently has \$2 million in HOME funds set aside for two OCHA projects, Vita Nova and Creston Park. Each project is under development and construction is intended to begin in this action plan year. Creston Park would result in 124 new affordable units, with an emphasis on units for the elderly. Vita Nova would create 75 new units for formerly homeless individuals.

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. OCHA is an active partner in the affordable

housing landscape in Oklahoma City. Many OCHA properties are aging, and OCHA is in the process of building new units and decommissioning old units.

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

Introduction

The City manages a community-wide effort to prevent and end homelessness within the Continuum of Care by building inter-agency partnerships and coordinating services. 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. The City is also refining standards for case management that will become part of the annual trainings provided by CoC lead staff. This along with performance tracking should help ensure all clients receive the same, high-quality level of service regardless of what program they access.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

To reach unsheltered homeless individuals and families, ESG funds are used for outreach activities to 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.

Activities supported in the First Year Action Plan to prevent 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 to 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. 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 First Year Action Plan, ESG funds are used to provide essential services to homeless families and individuals in emergency shelters as well as to support shelter operation costs. Seeing a need for more low barrier shelter beds, the City funded the development of a low-barrier facility with CDBG funds that was completed in early 2021. While ESG funds are used to assist shelter operations, the bulk of shelter operations funding comes from other resources. As shelter utilization has increased significantly over the last several years, the City has focused most funds from all resources on permanent housing options such as rapid rehousing and stabilization services. However, the City Homeless Services team coordinates emergency shelter planning during events or times of year, such as winter. Additionally, the City allocates local resources to facilities during the winter to provide overflow services and provides bus transit between the facility in the morning and evening.

Transitional housing programs have largely been targeted towards youth and people fleeing domestic violence and have a rapid rehousing component attached. This allows clients to move quickly into permanent housing once they are ready to move out of a transitional program.

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 needed to access the housing best suited to their needs. 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 the length of time spent 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

Every person assisted through any of the City's service programs is provided with case management. The intent of this case management is to help clients access housing, navigate the complicated systems that are required for accessing other service and financial assistance and access employment when able. Many chronically homeless individuals do require ongoing assistance or higher levels of care, but clients are moved on when possible.

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 allocations include 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. 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.

In addition to these services, the City is also currently contracting a pilot diversion program that will help keep people with low barriers out of the homeless services system by providing light touch services.

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 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 within 72 hours of program entry. To

meet this requirement, agencies run and/or review appropriate reports weekly to ensure consistent compliance. Agencies are required to correct inaccurate or incomplete data timely. The City's HMIS administrator and performance manager provide technical assistance when needed.

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 and access appropriate and affordable housing. Since not all participants have the same level of need, not all persons receive identical levels of assistance. Many activities funded for the homeless are not intended to provide long-term support for program participants, nor can funded programs address all the financial and supportive services needs of beneficiaries that may be required to ensure future housing stability. Rather, much of the assistance provided is focused on accessing housing or 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	80
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	0
Total	160

AP-75 Barriers to Affordable Housing – 91.220(j)

Introduction:

This section asks the City to describe actions to reduce the impacts of public policies on the development and retention of affordable housing. Such policies include tax policy affecting land and other property, land use controls, zoning ordinances, building codes, fees, growth limits, and policies that affect the return on residential investment.

The City of Oklahoma City conducted three important studies to identify the regulatory barriers that may influence housing affordability in the city: the Analysis of Impediments (2020), the Housing Affordability Study (2021), and the Housing Affordability Implementation Plan (2025). Each of these plans identified the city's current development and zoning codes as areas with a potential negative effect on housing production. Since 2021, the City has been working on a code update to address these issues.

The HAS and the City's Development Code Update process identified the following areas of potential regulatory reform to encourage more affordable housing, and reduce impediments to fair housing:

- Zoning modifications, such as allowing ADUs by right
- A reduction of minimum home and lot sizes in specified central neighborhoods in the city
- Clarify the definition of family
- Clarify the code's treatment of persons living in group homes
- Modify densities and development standards to accommodate a wide range of housing types and products to encourage affordability and discourage economic segregation.

Certain statewide public policies also have a direct effect on housing in the City. The Oklahoma Residential Landlord Tenant Act (ORLTA) offers little to no protection for tenants. Under the ORLTA, tenants who report issues with their units, complain about code violations, and participate in a tenant organization have no protection from retaliation.

The strategies above are currently being looked at as part of the HAIP process. The City expects to ameliorate some of the unintended negative effects of these policies during the five-year plan.

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

The City recently adopted the Housing Affordability Implementation Plan (HAIP, 2025). The Plan outlines a comprehensive strategy with specific actions for the City to complete to increase affordable housing in

Oklahoma City. The goals and actions presented in the HAIP are designed to support the following 5-point strategy developed in the Housing Affordability Study (HAS, 2021). These strategies include:

1. Increase the inventory and diversity of affordable rental units,
2. Preserve the long-term affordability and habitability of new and existing housing,
3. Increase housing and shelter-supportive services,
4. Support opportunities to obtain and sustain affordable homeownership, and
5. Refine development incentives and expand funding sources and partnerships.

In implementing these strategies, the city intends to make ongoing regulatory improvements, both at the state and local level. This includes implementing local land use and development code modifications and defining city priorities and roles in improving landlord-tenant relations and legislation. Development codes updates are already underway. The City is writing new base zones for the core of the City that will allow more housing types to be developed with smaller lot sizes, including accessory dwellings within single-dwelling neighborhoods. The rewrite is intended to provide more flexibility for housing developers to ultimately increase the affordability of housing projects. New zoning will require public input and approval processes and will continue over the next few years.

Currently, the City also contracts with Metro Fair Housing Council (MFHC) every year for fair housing services. MFHC processes potential Fair Housing complaints, the majority which are generally filed based on discrimination due to disability. MFHC files some complaints with HUD's Office of Fair Housing & Equal Opportunity for Oklahoma City. In addition, MFHC collects funds for Oklahoma City residents who contact MFHC with complaints of unfair treatment by housing providers. These processes raise the awareness of Fair Housing Law.

In addition, MFHC conducts Fair Housing/Fair Lending/Renters Rights Seminars and publishes Fair Housing Forum newsletters, fair housing training materials, and ads in minority newsletters serving Oklahoma City. These activities speak directly to improving the understanding of and enhance attention to compliance with fair housing law. These important activities will continue in the upcoming year.

In addition, the strategies and actions laid out in the HAIP will gradually increase the number of affordable housing units in Oklahoma City. The City is committed to increasing access to affordable housing for residents using a variety of approaches.

Discussion:

The City of Oklahoma City remains committed to ensuring equal housing opportunity for all persons. Proposed Action Plan activities for the First Year Action Plan provide direct funding to the Metropolitan Fair Housing Council for the provision of fair housing training, compliance, and complaint processing functions. In addition, other divisions of the Planning Department are working on a Development Codes Update that would allow for more housing to be developed by right and reduce burdens to developing

housing. Continued implementation of the HAIP through this Action Plan will begin to improve housing conditions in Oklahoma City.

AP-85 Other Actions – 91.220(k)

Introduction:

This section of the Action Plan describes the City's planned actions to carry out the following strategies outlined in the Consolidated Plan:

- Foster and maintain affordable housing
- Evaluate and reduce lead-based paint hazards
- Reduce the number of poverty-level families
- Develop institutional structure
- Enhance coordination

In addition, the jurisdiction must identify obstacles to meeting underserved needs and propose actions to overcome those obstacles.

Actions planned to address obstacles to meeting underserved needs

The City's SNI funds are dedicated to underserved communities. This year, SNI will focus on implementing the five-year revitalization plans created for each of the three SNI neighborhoods. This will result in infrastructure investments in the neighborhoods, including sidewalks, tree plantings, and neighborhood grants.

The city continues to seek ways to support small-scale affordable rental properties. Rental housing challenges with affordability and condition were identified in the HAS and the 2025-2029 Consolidated Plan. While this Action Plan does not provide funding for programs to support rentals apart from new construction, the Housing and Community Development Division is pursuing new and creative program designs to serve low-income renters. Administrative funds have been committed to Fair Housing Enforcement to respond to ongoing concerns about tenants' rights and evictions.

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 housing. The Consolidated Plan rental housing objectives call for the creation of affordable rental housing.

Funds for activities that support new housing construction under the HOME program are provided to the Community Housing Development Organization Program (CHDO), and the Strong Neighborhoods Initiative (SNI). 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. Occasionally, if unanticipated

funding becomes available, The City may release Requests for Proposals for eligible affordable housing project proposals. Housing rehabilitation activities are also funded in this Action Plan, allowing low-income residents to remain in their affordable homes.

Actions planned to reduce lead-based paint hazards

The City conducts rehabilitation activities in homes in the NRSA, which are primarily constructed before 1979. The City meets all the requirements of 24 CFR Part 35 and abates all lead as applicable in housing projects. City staff functioning in the positions of Risk Assessor or Inspector must be licensed by DEQ. At present, all the Oklahoma City rehabilitation specialists are licensed. The City has acquired XRF testing devices, and all rehabilitation inspectors are qualified to perform the tests required on residential structures, including the clearance certification after abatement work has been performed.

The Oklahoma City Housing Authority complies with the lead-based paint hazard reduction requirements in assisted properties. OCHA requires that all lessors disclose the presence of lead-based paint and/or lead-based paint hazards in the dwelling for all pre-1978 housing. Lessees must also receive a federally approved pamphlet on lead poisoning prevention. Housing exclusively for the elderly or disabled, or those without children under six (6) years of age residing in the unit, are exempted from receiving the federally approved pamphlet.

In addition, The City funds the construction of new, affordable housing in this plan, thereby increasing access to housing without Lead Based Paint hazards.

Actions planned to reduce the number of poverty-level families

The City does not have a formal anti-poverty 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.

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 the development and retention of affordable housing. Additionally, funding from MAPS 4 will assist projects addressing domestic violence, mental health, and people exiting incarceration to reduce the number of people entering poverty and homelessness.

Actions planned to develop institutional structure

The City works to form relationships with a variety of organizations to better serve the needs of the residents, recognizing that certain non-profits, organizations, or private companies may be better suited

to delivering specific projects or programs than the City. To that end, city staff work with all developers, subrecipients, and contractors to ensure that the organization is given the necessary support to succeed with federal funds.

Active partners 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.

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. The 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:

The City works to accomplish as much holistic revitalization and community improvement as possible, while considering limited resources and high regulatory requirements. The Housing and Community Development Division is working to streamline processes and refocus priorities and goals as part of the Consolidated Plan and Housing Affordability Implementation Plan.

Program Specific Requirements

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

Introduction:

This section addresses the program-specific requirements for the Annual Action Plan. The Consolidated Plan Final Rule contains requirements regarding program-specific narratives in the Action Plan for CDBG and HOME. This section also includes program-specific narrative for HOPWA, ESG, and HTF.

Regarding Program Income, 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.

The City calculates the overall benefit of its CDBG expenditures on a three-year basis. 2025-26 is year two of the three-year period.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

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	

Other CDBG Requirements

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

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

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

No other forms of investment are contemplated for the use of the HOME funds except as identified in 92.205.

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. 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.

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, 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.

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

The 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.

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, subject to the availability of net proceeds. The direct subsidy provided to the homebuyer 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.

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 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 this 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(l)(2)(vii)).**

Not applicable.

- 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(l)(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 current program year.

Emergency Solutions Grant (ESG)

Reference 91.220(l)(4)

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

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

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

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

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

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

The City works with numerous nonprofit social service providers through the 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 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: Identify the method of selecting project sponsors, including providing full access to grassroots faith-based and other community organizations.

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) listserv. 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.

Appendix - Alternate/Local Data Sources

1	<div data-bbox="261 289 1422 405"> <p>Data Source Name</p> <p>Comprehensive Economic Development Strategy</p> </div> <div data-bbox="261 405 1422 520"> <p>List the name of the organization or individual who originated the data set.</p> <p>The CEDS was produced by the Association of Central Oklahoma Governments (ACOG).</p> </div> <div data-bbox="261 520 1422 884"> <p>Provide a brief summary of the data set.</p> <p>The CEDS provides a regional economic and demographic assessment of central Oklahoma communities within four (4) metro counties (Canadian, Cleveland, Logan and Oklahoma Counties). The purpose of this assessment was to arrive at a common understanding of the region's unique economic strengths, weaknesses, opportunities, and threats. Preliminary data analysis represents the first step in the planning process and forms part of the foundation for subsequent economic development plans. The socio-economic assessment for the region includes demographics, migration, economy, innovation, workforce, and occupational data.</p> </div> <div data-bbox="261 884 1422 1430"> <p>What was the purpose for developing this data set?</p> <p>The Comprehensive Economic Development Strategy (CEDS) was created to provide guidance on enhancing the efforts of existing organizations and redefining the role of ACOG in becoming a vital economic development partner for the central Oklahoma region. The CEDS has identified three primary goals to enhance regional economic development:</p> <ul style="list-style-type: none"> 5. Affordable Living and Quality of Life 6. Workforce Development 7. Economic Diversification <p>While each of these goals was chosen for their ability to leverage distinct opportunities in central Oklahoma, they are also intentionally chosen for their ability to support one another.</p> </div> <div data-bbox="261 1430 1422 1581"> <p>Provide the year (and optionally month, or month and day) for when the data was collected.</p> <p>The Comprehensive Economic Development Strategy for Central Oklahoma was completed in 2024.</p> </div>
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	<p>Briefly describe the methodology for the data collection.</p> <p>A number of data sources were used in preparation of the report, including:</p> <ul style="list-style-type: none"> Population: Historical estimates of population by county from the U.S. Census Bureau Unemployment: Data from the U.S. Bureau of Labor Statistics' household survey Employment and Occupation: Employment and occupational analyses were performed. Employment data in the report is presented in accordance with the North American Industry Classification System (NAICS). the system was developed under the direction of the Office of Management and Budget (OMB) as the standard for use by federal statistical agencies in classifying business establishments for the collection, tabulation, presentation, and analysis of statistical data describing the U.S. economy. Occupation data in the report is categorized using the Standard Occupational Classification (SOC) system.
	<p>Describe the total population from which the sample was taken.</p> <p>Economic data was gathered from all four (4) counties in the Central Oklahoma region.</p>
	<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>Demographics were mapped based upon age distribution, occupational trade, net migration and major economic employment sectors for the entire four-county population</p>
2	<p>Data Source Name</p> <p>The City of OKC CoC and ESG Service Providers</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>The City of Oklahoma City, Planning Department, Community Development Staff</p>
	<p>Provide a brief summary of the data set.</p> <p>HMIS, CoC and ESG Service provider records and reporting</p>
	<p>What was the purpose for developing this data set?</p> <p>Did not autopopulate in the IDIS tables</p>
	<p>Provide the year (and optionally month, or month and day) for when the data was collected.</p> <p>Ongoing data collection. Data reported is current as of March 1, 2025.</p>
	<p>Briefly describe the methodology for the data collection.</p> <p>Various methodologies, client intake and case-management</p>

	<p>Describe the total population from which the sample was taken.</p> <p>City-Wide</p>
	<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>Homeless households, domestic violence victims, unsheltered youth, and persons' experiencing addiction and mental health challenges.</p>
3	<p>Data Source Name</p> <p>Vacant and Abandoned Buildings Study- OKC</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>GSBS Richman Consulting</p>
	<p>Provide a brief summary of the data set.</p> <p>Data provided in the Richman study includes vacant, abandoned buildings (VAB's), percentages of VAB's in relation to other housing stock, length of vacancy, and geographical concentrations.</p>
	<p>What was the purpose for developing this data set?</p> <p>In response requests from citizens for action on vacant properties, the City of Oklahoma City contracted with GSBS Richman Consulting to identify the scope of the problem, assess monetary costs, and provide a range of possible solutions.</p>
	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>The study provides comprehensive data related to the number of vacant properties, both residential and commercial. An assessment of actual cost to the City for services provided is included in the report. The report also provides a geographic summary of the data by Wards.</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>The study was commissioned in 2012 and completed in June 2013. Calls in the City's E911 database were evaluated for the period from July 2007 thru June 2011. Employment and Foreclosures were evaluated for the years 2002-2011. Census data was analyzed for 2000 and 2010.</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>The study was completed on June 26, 2013.</p>
4	<p>Data Source Name</p> <p>Analysis of Impediments to Fair Housing Choice</p>

	List the name of the organization or individual who originated the data set.
	Root Policy Research
	Provide a brief summary of the data set.
	The 2020 Analysis of Impediments to Fair Housing Choice was prepared by Root Policy Research as part of the 2020-2025 Consolidated Plan planning process, and as a requirement for receiving formula grants funding from the U.S. Department of Housing and Urban Development (HUD). The report addresses actions in Oklahoma City related to actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choice; and any actions, omissions, or decisions which have this effect.
	What was the purpose for developing this data set?
	As a requirement of receiving funds under the Community Development Block Grant (CDBG), the HOME Investment Partnership program (HOME), and the Emergency Solutions Grant (ESG), entitlement jurisdictions are required to submit certification to HUD of affirmatively furthering fair housing, including an Analysis of Impediments to Fair Housing Choice (AI), proposed actions to overcome the effects of impediments identified, and to maintain records reflecting the actions taken in response to the analysis. Impediments identified in the AI report and possible course of action to remedy are discussed in more detail in the Barriers to Affordable Housing section of this report.
	Provide the year (and optionally month, or month and day) for when the data was collected.
	The 2020 City of Oklahoma City Analysis of Impediments to Fair Housing Choice was completed on January 31, 2021.

	<p>Briefly describe the methodology for the data collection.</p> <p>The Analysis of Impediments was conducted through the assessment of several quantitative and qualitative sources. Quantitative sources used in analyzing fair housing choice included:</p> <ul style="list-style-type: none"> • Socio-economic and housing data from the U.S. Census Bureau • Employment data from the U.S. Bureau of Labor Statistics • Economic data from the U.S. Bureau of Economic Analysis • Housing complaint data from the U.S. Department of Housing and Urban Development (HUD) <p>Qualitative research included evaluation of relevant existing fair housing research and national and city fair housing legal cases. Geographic analysis of racial and ethnic distribution were conducted by calculating race or ethnicity as the percentage of the total population and then plotting the data on a geographic map of Census tracts in the City of Oklahoma City. Ultimately, a list of potential impediments was drawn from the above referenced sources and further evaluated based on HUD's definition of impediments to fair housing choice. Potential impediments to fair housing choice present within The City of Oklahoma City were identified; along with actions the city may consider in attempting to address possible impediments.</p> <p>Describe the total population from which the sample was taken.</p> <p>As part of the essential review of the background context of the City of Oklahoma City markets in which housing choices are made, detailed population and demographic data were included to describe the City's residents. The data summarized not only the protected class populations, but also characteristics of the total population for the entire city. The data assisted in determining whether over-concentrations of racial and ethnic minorities exist, and if so, which areas of the City are most affected.</p> <p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>City-wide survey</p>
5	<p>Data Source Name</p> <p>2018-2023 American Community Survey</p> <p>List the name of the organization or individual who originated the data set.</p> <p>U.S. Census Bureau</p> <p>Provide a brief summary of the data set.</p> <p>2023 American Community Survey 5-Year Estimates provide relevant and up to date data on housing, income, and demographics in Oklahoma City.</p>

	<p>What was the purpose for developing this data set?</p> <p>The ACS was developed to provide communities with relevant data on communities.</p>
	<p>Provide the year (and optionally month, or month and day) for when the data was collected.</p> <p>Report was accessed via data.census.gov from January - March 2025.</p>
	<p>Briefly describe the methodology for the data collection.</p> <p>Although the American Community Survey (ACS) produces population, demographics and housing unit estimates, it is the U.S. Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties. Access to this data was obtained through the internet at: data.census.gov.</p>
	<p>Describe the total population from which the sample was taken.</p> <p>Data was collected for Oklahoma City.</p>
	<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>The report includes total households, number of families and summary of children by age, selected household type and housing tenure.</p>
6	<p>Data Source Name</p> <p>Housing Affordability Study</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>City of Oklahoma City, Economic Planning Systems, Inc.</p>
	<p>Provide a brief summary of the data set.</p> <p>The City of Oklahoma City commissioned the Housing Affordability Study to obtain a clearer picture of the current conditions and availability of housing in our community with consideration of the needs of our residents. Findings show at present we are fortunate that there is sufficient, affordable, and adequate housing available for those in our community who make at or above the median income in Oklahoma City. However, for the 44 percent of city residents that do not enjoy this level of income, the picture is different. For those at the lower end of the income spectrum, housing that is affordable becomes increasingly hard to find. Additionally, many of these units are poorly maintained and may even pose a health or safety risk for the women, men and children who reside within. It is also worth noting that over the last decade, housing costs in Oklahoma City have risen at a faster rate than wages, creating an affordability gap.</p>

	<p>What was the purpose for developing this data set?</p> <p>To obtain a clearer picture of the current conditions and availability of housing in our community with consideration of the needs of our residents. Specifically, the objectives of the Housing Affordability Study were to research and analyze housing affordability, supply conditions, and demand drivers, to:</p> <ul style="list-style-type: none"> • Better understand current state of supply and condition • Develop homeownership and rental strategies for (at least) the next five years • Pursue housing program opportunities that benefit lower-income households • Leverage these findings and recommendations to inform development-related code changes <p>Provide the year (and optionally month, or month and day) for when the data was collected.</p> <p>August 2021</p>
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	<p>Briefly describe the methodology for the data collection.</p> <ul style="list-style-type: none"> • An Advisory Group of housing industry representatives, stakeholders, the community, and advocates was convened throughout the process to explore data and information as it was gathered, to guide the fielding of the community-wide survey and discuss the issues and potential approaches to addressing issues. • Focus Groups were held with a diversity of community members, advocates, business representatives, economic developers, housing developers and homebuilders, neighborhood association representatives, realtors, fair housing, human and social services providers, and finance and lending industry representatives. Conversations were often targeted on specific topics but also allowed for free exchange of questions and ideas to gain perspectives on challenges, solutions, and obstacles for housing challenges facing owners, renters, businesses, and diverse populations. • A Community Survey was fielded through a combination of direct mailings and an open weblink and yielded a 15 percent response rate, representing nearly 6,000 residents. The purpose of the survey was to probe into issues of current resident housing satisfaction, conditions, preferences, perceptions, as well as economic and social vulnerabilities. The objective was to look deeper into housing issues, such as housing stability, across the spectrums of income and population. • Data Analysis of industry-standard local and national data sources was used to document trends and conditions of housing market supply, demand, and affordability. The objective was to present common metrics of housing market analysis. Timeframes throughout the document generally identify annual metrics, and some trends represent monthly patterns. • Best Practice Research is included to frame the understanding of Oklahoma City's regulatory and policy context. The purpose is to identify the full spectrum of approaches that can be applied to address a wide range of issues by delineating local versus state-level purview, alternative funding or resource approaches, programs, and partnerships. <p>Describe the total population from which the sample was taken.</p> <p>City wide, including a community survey, data analysis, and focus groups.</p>
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	<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>In addition to participants of the Advisory Group, interviews, and focus groups, the broader community is represented in this study through a random-sample survey. Fielded in January 2020, 2,637 responses were obtained through a combination of direct mailings and an open weblink. While it is not possible to track the number of individuals who saw and did or did not respond to the weblink survey, approximately 12,000 mail surveys were sent out and generated a 15.2 percent response rate. When including the number of individuals within each household, a total of 5,955 persons are represented by this survey. The Report includes figures to illustrate the distribution of raw survey responses by age and income against actual distributions of the population using 5-year 2019 U.S. Census American Community Survey (ACS) data.</p> <ul style="list-style-type: none"> • Age Distribution. Typical of survey response patterns, the survey is slightly under-representative of populations younger than 35 years, and slightly over-representative of populations over 35 years. • Income Distribution. Typical of survey response patterns, the raw survey responses are under-representative of households below \$50,000 and over-representative of households with incomes over \$50,000. • Survey Response Weighting. When survey response distributions differ even slightly from actual distributions, this technique is appropriate to give greater weight to the answers from respondents of under-represented groups, such as lower-income households. Data are available from the ACS to construct weights by households by income and tenure, but not by all three variables – income, tenure, and age. For the purposes of the housing affordability analysis, where income plays a major role in understanding needs and identifying solutions, weights were constructed by income and tenure. A complete discussion of the survey results is found in the Challenges and Issues chapter.
7	<p>Data Source Name</p> <p>Oklahoma City Hazard Mitigation Plan</p> <p>List the name of the organization or individual who originated the data set.</p> <p>The City’s Office of Emergency Management and Planning Department were the lead entities for the 2022 Plan Update. This collaboration was an effort to better synchronize the Plan with the City’s other planning efforts including PlanOKC and sustainability. The Plan Update was a collaborative effort of internal and external partners and public outreach. The Plan Update was completed by City staff and without the use of a contractor or consultant.</p>

	<p>Provide a brief summary of the data set.</p> <p>Hazard mitigation is any sustained action taken to reduce or eliminate long-term risk to people and property from natural hazards and their effects. This definition distinguishes actions that have a long-term impact from those that are more closely associated with immediate preparedness, response, and recovery activities. Hazard mitigation is the only phase of emergency management specifically dedicated to breaking the cycle of damage, reconstruction, and repeated damage. The purpose of this plan is to evaluate natural hazard threats to the City and determine appropriate hazard mitigation strategies.</p>
	<p>What was the purpose for developing this data set?</p> <p>The purpose of this plan is to evaluate natural hazard threats to the City and determine appropriate hazard mitigation strategies. The requirement for communities to prepare a hazard mitigation plan is established in the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1988, P.L. 93-288 (Stafford Act), as amended by the Disaster Mitigation Act of 2000, P.L. 106-390 (DMA 2000). DMA 2000 was signed into law on October 30, 2000. DMA 2000 amended the Stafford Act to include a new section on Mitigation Planning. DMA 2000 requires state and local governments to develop and formally adopt a natural hazard mitigation plan to be eligible to apply for and receive federal assistance under the various federal hazard mitigation grant programs such as the Hazard Mitigation Grant Program (HMGP), the Building Resilient Infrastructure and Communities (BRIC), and the Flood Mitigation Assistance Grant Program (FMA). DMA 2000 requires local hazard mitigation plans be updated every five years.</p>
	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>This Hazard Mitigation Plan (Plan) is a hazard mitigation plan update for the City of Oklahoma City (City). This is a single jurisdiction plan. The term “Planning Area” as used in this Plan refers to the jurisdictional boundaries of the City. The City covers about 621 square miles and stretches into four different counties – Canadian, Cleveland, Oklahoma, and Pottawatomie. The majority of the City and the seat of City government are located in Oklahoma County.</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>This plan is to be updated at least every 5 years. It was completed in 2022.</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Complete</p>
8	<p>Data Source Name</p> <p>Oklahoma City Housing Authority 5-Year Plan</p>

	List the name of the organization or individual who originated the data set.
	Oklahoma City Housing Authority (OCHA)
	Provide a brief summary of the data set.
	<p>The plan outlines OCHA's Five-Year goals, including:</p> <ul style="list-style-type: none"> • increase the number of affordable housing units • increase sustainable cash flows through Community Enhancement Corporation (CEC) • Resident Self-Sufficiency and Quality of Life
	What was the purpose for developing this data set?
	The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low-income families.
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?
9	The data is focused on public housing units in Oklahoma City.
	What time period (provide the year, and optionally month, or month and day) is covered by this data set?
	The plan is in effect from 2025-2030.
	What is the status of the data set (complete, in progress, or planned)?
	Complete
	Data Source Name
	2025 Greater Oklahoma City Economic Outlook
	List the name of the organization or individual who originated the data set.
	Greater Oklahoma City Chamber

	<p>Provide a brief summary of the data set.</p> <p>The Oklahoma City MSA economy continues to power state economic outcomes. The MSA now accounts for nearly 40% of the state’s GDP and more than a third of the state population. But activity is dispersing across the metro area with Oklahoma County’s share of MSA GDP falling to 70% while its share of MSA population dips below 55%. Much of the population and economic activity gains are on the south and west side of the metro area. Canadian and McLain counties have averaged 3.3% and 2.5% population growth annually since 2013 while their respective economies have expanded at an annual average rate of 6.5% and 7.2%. Expect this broad pattern to continue as Oklahoma City drives state economic growth with Oklahoma County’s share slowly receding.</p> <p>What was the purpose for developing this data set?</p> <p>To estimate the economic outlook for Oklahoma City in the coming years.</p> <p>Provide the year (and optionally month, or month and day) for when the data was collected.</p> <p>2024</p> <p>Briefly describe the methodology for the data collection.</p> <p>The forecast is an econometric exercise and is not a consensus forecast of business and civic leaders. All models are constructed from publicly available data sources including datasets from the Bureau of Economic Analysis and Bureau of Labor Statistics. The forecasts are entirely determined by the past information contained in the dataset and the econometric specification of the models. No attempt has been made to “adjust” the forecast for the beliefs or anticipation of the modeler. The forecast does not take into account anticipated growth from relocations or “newto-market” firms. In addition, announced expansions of existing companies may take place over a multi-year timeframe and not be fully recognized in the next year. Announced projects that have not taken place are not reflected in forecasted job numbers.</p> <p>Describe the total population from which the sample was taken.</p> <p>All models are constructed from publicly available data sources including datasets from the Bureau of Economic Analysis and Bureau of Labor Statistics. The forecasts are entirely determined by the past information contained in the dataset and the econometric specification of the models.</p> <p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>All models are constructed from publicly available data sources including datasets from the Bureau of Economic Analysis and Bureau of Labor Statistics. The forecasts are entirely determined by the past information contained in the dataset and the econometric specification of the models.</p>
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10	Data Source Name
	Housing Affordability Implementation Plan
	List the name of the organization or individual who originated the data set.
	SGS Economic and Planning Systems
	Provide a brief summary of the data set.
	The Housing Affordability Implementation Plan (HAIP) outlines an action plan of strategies that leverage partnerships and resources and guide the City staff and its partners in developing the policies and programs that will address the evolving needs for affordable housing options in Oklahoma City. The Plan also articulates objectives, identifies priorities and funding sources, defines partner roles and responsibilities, and provides a timeline for implementation based on technical, financial, and policy feasibility. The Plan is the culmination of multiple case studies, housing data analyses, and subject matter expertise gathered over several years. The goals and actions presented in this plan are designed to support this 5-point strategy developed in the HAS: 1. Increase the inventory and diversity of affordable rental units, 2. Preserve the long-term affordability and habitability of new and existing housing, 3. Increase housing and shelter-supportive services, 4. Support opportunities to obtain and sustain affordable homeownership, and 5. Refine development incentives and expand funding sources and partnerships.
	What was the purpose for developing this data set?
	Building on recommendations from the City's 2021 Housing Affordability Study, the City's Housing Affordability Implementation Plan (HAIP) is the springboard for tackling housing affordability challenges in our city. The guidance and sequence of actions in the HAIP are designed to be tailored to emerging opportunities and evolving needs in our city's housing environment.
11	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?
	The data is focused on the City of Oklahoma City.
	What time period (provide the year, and optionally month, or month and day) is covered by this data set?
	January 2025
11	What is the status of the data set (complete, in progress, or planned)?
	Complete.
11	Data Source Name
	Oklahoma Housing Needs Assessment

	List the name of the organization or individual who originated the data set.
	The Oklahoma Housing Finance Agency
	Provide a brief summary of the data set.
	The Housing Needs Assessment offers comprehensive data, maps, and statistical graphics that illustrate local demand, supply trends, and housing affordability metrics in the State of Oklahoma. The housing needs assessment is a public web portal that estimates the supply of housing units and demand for housing in Oklahoma. The assessment has been designed to be a flexible tool for users to query data, conduct their own research, and draw their own conclusions. The assessment provides housing data and analysis for the Oklahoma Housing Finance Agency (OHFA), its partners and grantees, and a host of other potential users. The data and analysis in the needs assessment can be used by decision makers and officials at the state and local levels to develop policy and programs for improving housing conditions and supply to make housing more available and more affordable for residents.
	What was the purpose for developing this data set?
	Like much of the country, Oklahoma faces challenges to provide adequate housing for its citizens. Shelter is a fundamental need for state residents to build a safe, healthy, and prosperous life. The first steps to meeting the housing needs are to understand the past and current conditions of housing units, the estimated need for new housing units, and the costs of providing housing. The housing needs assessment was created to serve this purpose.
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?
12	The data is concentrated on the state of Oklahoma.
	What time period (provide the year, and optionally month, or month and day) is covered by this data set?
	The data is compiled using 2018 ACS data.
	What is the status of the data set (complete, in progress, or planned)?
	Complete. Regular updates are planned.
	Data Source Name
	HOPWA CAPER
	List the name of the organization or individual who originated the data set.
	The City of Oklahoma City and the Homeless Alliance
	Provide a brief summary of the data set.
	Summarizes program year beneficiaries and activities for the HOPWA program.

	What was the purpose for developing this data set?
	To report on the beneficiaries and activities funded by Oklahoma City's HOPWA programs.
	Provide the year (and optionally month, or month and day) for when the data was collected.
	2024
	Briefly describe the methodology for the data collection.
	Program data is collected at the time of intake.
13	Describe the total population from which the sample was taken.
	HOPWA beneficiaries and households.
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.
	HOPWA beneficiaries
	Data Source Name
	2022 Longitudinal Employer Household Dynamics
	List the name of the organization or individual who originated the data set.
	US Census Bureau
	Provide a brief summary of the data set.
	Provides a comprehensive view of employment and job flows in the United States.
	What was the purpose for developing this data set?
	Enables the analysis of employment patterns and trends
	Provide the year (and optionally month, or month and day) for when the data was collected.
	2022
	Briefly describe the methodology for the data collection.
	Collected by the Census Bureau
	Describe the total population from which the sample was taken.
	City of Oklahoma City
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.
	general population

Appendices Contents

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APPENDIX 1

Budget

25-26 Budget Including Carryover

Budget FY 24-25 Actual and FY 25-26 Estimate	OBLIGATED EST (CARRYOVER)	PROPOSED RE- ALLOCATION OF UNOBLIGATED 24- 25 FUNDS	PROPOSED ALLOCATION OF 25- 26 FUNDS	TOTAL AVAILABLE 25-26
COMMUNITY DEVELOPMENT BLOCK GRANT	\$ 2,014,470.09	\$ 971,951.48	\$ 5,130,024.00	\$ 8,116,445.57
Affordable Housing Development	\$ 280,884.00	\$ 494,116.00	\$ 1,850,000.00	\$ 2,625,000.00
Housing Services	\$ -	\$ -	\$ -	\$ -
Pest Inspection / Treat for HOME Program Owner Occupied Housing	\$ -	\$ -	\$ -	\$ -
OCHA Inspections	\$ -	\$ -	\$ -	\$ -
Affordable Housing Rehab/Retention	\$ 280,884.00	\$ 494,116.00	\$ 1,850,000.00	\$ 2,625,000.00
OKC Housing Assistance Program-Ext. Maintenance	\$ 280,884.00	\$ 19,116.00	\$ 700,000.00	\$ 1,000,000.00
Program Delivery	\$ -	\$ -	\$ 700,000.00	\$ 700,000.00
Pilot City of OKC Emergency Home Repair		\$ 325,000.00		\$ 325,000.00
CAA Emergency Home Repair	\$ -	\$ 150,000.00	\$ 450,000.00	\$ 600,000.00
Oklahoma City Housing Authority Mod Rehab	\$ -	\$ -	\$ -	\$ -
Public Facility Total	\$ 1,075,704.43	\$ 364,050.48	\$ 830,805.86	\$ 2,270,560.77
SNI Public Facility	\$ 635,945.25	\$ -	\$ 565,010.00	\$ 1,200,955.25
Program Delivery (Staff Salary, PW Charge-backs, Art Consultant)	\$ -	\$ -	\$ 136,000.00	\$ 136,000.00
SNI Neighborhood Grants	\$ 40,990.00	\$ -	\$ 80,000.00	\$ 120,990.00
Tree Plantings	\$ -	\$ -	\$ 20,000.00	\$ 20,000.00
FY 24-25 Sidewalks	\$ -	\$ -	\$ -	\$ -
Proposed Sidewalks (Metro Park Phase 3)	\$ 200,000.00	\$ -	\$ -	\$ 200,000.00
Proposed Sidewalks (Cap Hill Phase 4)	\$ 300,000.00	\$ -	\$ -	\$ 300,000.00
MLK Sidewalks	\$ -	\$ -	\$ 329,010.00	\$ 329,010.00
SNI PF Existing Projects with Open POs	\$ 94,955.25	\$ -	\$ -	\$ 94,955.25
General Public Facility	\$ 439,759.18	\$ 364,050.48	\$ 265,795.86	\$ 1,069,605.52
Jeff Park / Paseo Joint Venture Walnut Development Infrastructure	\$ 239,759.18	\$ -	\$ -	\$ 239,759.18
Alpha Community Foundation (Garden Oaks Community Center)	\$ 200,000.00	\$ -	\$ -	\$ 200,000.00
General PF Activity Allocation with Line Item Detail Undefined	\$ -	\$ 364,050.48	\$ 265,795.86	\$ 629,846.34
Public Service Total	\$ 221,666.66	\$ -	\$ 494,333.34	\$ 716,000.00
SNI Public Service	\$ 215,000.00	\$ -	\$ 350,000.00	\$ 565,000.00
After School Program	\$ -	\$ -	\$ 350,000.00	\$ 350,000.00
Neighborhood Cleanup Safe and Tidy (Int Assist)	\$ 45,000.00	\$ -	\$ -	\$ 45,000.00
Hazardous Tree Removal FY 25-26	\$ 160,000.00	\$ -	\$ -	\$ 160,000.00
Hazardous Tree Assessments FY 25-26	\$ 10,000.00	\$ -	\$ -	\$ 10,000.00
General (non-SNI) Public Service	\$ 6,666.66	\$ -	\$ 144,333.34	\$ 151,000.00

25-26 Budget Including Carryover

Healing Hands Health Service (CHCI)	\$ -	\$ -	\$ -	\$ -
Share-A-Fare (Bus and Taxi Fares)	\$ -	\$ -	\$ 105,000.00	\$ 105,000.00
CASA	\$ 6,666.66	\$ -	\$ 39,333.34	\$ 46,000.00
Slum and Blight Remediation	\$ 136,215.00	\$ 113,785.00	\$ 788,880.00	\$ 1,038,880.00
Secure Vacant & Abandoned Properties	\$ 136,215.00	\$ 113,785.00	\$ -	\$ 250,000.00
OCURA Urban Renwal Completions	\$ -	\$ -	\$ 788,880.00	\$ 788,880.00
Economic Development	\$ 300,000.00	\$ -	\$ 140,000.00	\$ 440,000.00
CAA Small Business Services	\$ -	\$ -	\$ 40,000.00	\$ 40,000.00
New View Business Assistance	\$ 300,000.00	\$ -	\$ -	\$ 300,000.00
Section 108 Repayment Fund	\$ -	\$ -	\$ 100,000.00	\$ 100,000.00
Administration Activities	\$ -	\$ -	\$ 1,026,004.80	\$ 1,026,004.80
General Program Administration	\$ -	\$ -	\$ 888,004.80	\$ 888,004.80
Planning	\$ -	\$ -	\$ 45,000.00	\$ 45,000.00
Fair Housing Activities	\$ -	\$ -	\$ 93,000.00	\$ 93,000.00
Re-allocated to Program Needs	\$ -	\$ -	\$ -	\$ -
TOTAL CDBG BUDGET	\$ 2,014,470.09	\$ 971,951.48	\$ 5,130,024.00	\$ 8,116,445.57
			\$ -	

25-26 Budget Including Carryover

Budget FY 24-25 Actual and FY 25-26 Estimate	OBLIGATED EST (CARRYOVER)	PROPOSED RE- ALLOCATION OF UNOBLIGATED 24- 25 FUNDS	PROPOSED ALLOCATION OF 25- 26 FUNDS	TOTAL AVAILABLE 25-26
HOME INVESTMENT PARTNERSHIPS PROGRAM	\$ 1,705,119.13	\$ 6,030,039.87	\$ 2,319,980.93	\$ 10,055,139.93
Affordable Housing Development Program	\$ 1,088,769.13	\$ 5,500,039.87	\$ 1,567,982.84	\$ 8,156,791.84
AHDP	\$ 708,158.73	\$ 3,577,308.73	\$ 1,167,982.84	\$ 5,453,450.30
Uncommitted	\$ -	\$ 977,308.73	\$ 1,167,982.84	\$ 2,145,291.57
SNI MLK New Construction SF Homes	\$ 400,000.00	\$ -	\$ -	\$ 400,000.00
Creston Park Phase I (OCHA)	\$ -	\$ 800,000.00	\$ -	\$ 800,000.00
Hillcrest Green Apts.	\$ 308,158.73	\$ -	\$ -	\$ 308,158.73
FY 24-25 OCHA Vita Nova	\$ -	\$ 1,200,000.00	\$ -	\$ 1,200,000.00
Alley's End	\$ -	\$ 600,000.00	\$ -	\$ 600,000.00
CHDO	\$ 380,610.40	\$ 1,922,731.14	\$ 400,000.00	\$ 2,703,341.54
Jefferson Park	\$ 69,405.73	\$ -	\$ -	\$ 69,405.73
Paseo	\$ 85,451.86	\$ -	\$ -	\$ 85,451.86
Neighborhood Housing Services	\$ 225,752.81	\$ -	\$ -	\$ 225,752.81
Unallocated CHDO	\$ -	\$ 1,922,731.14	\$ 400,000.00	\$ 2,322,731.14
Affordable Housing Rehab/Retention	\$ 200,000.00	\$ 130,000.00	\$ 520,000.00	\$ 850,000.00
Whole House Rehab	\$ 200,000.00	\$ 130,000.00	\$ 520,000.00	\$ 850,000.00
Down Payment Assistance Program	\$ 400,000.00	\$ 400,000.00	\$ -	\$ 800,000.00
Administration	\$ 16,350.00	\$ -	\$ 231,998.09	\$ 248,348.09
TOTAL HOME BUDGET	\$ 1,705,119.13	\$ 6,030,039.87	\$ 2,319,980.93	\$ 10,055,139.93
			\$ (0.00)	

Budget by Consolidated Plan Goal

Affordable Housing Rehabilitation and Retention

Agency	Program Name	Amount Available	Funding Source
City of Oklahoma City	Housing Exterior Maintenance Program*	\$1,700,000	CDBG
City of Oklahoma City	Emergency Home Repair Pilot*	\$325,000	CDBG
Community Action Agency of OKC	Emergency Home Repair	\$600,000	CDBG
City of Oklahoma City	Whole House Rehabilitation	\$850,000	HOME

Affordable Housing Development

Agency	Program Name	Amount Available	Funding Source
City of Oklahoma City	Affordable Housing Development Program*	\$2,113,279	HOME
City of Oklahoma City	SNI MLK Neighborhood New Construction*	\$400,000	HOME
Oklahoma City Housing Authority	Creston Park	\$800,000	HOME
Oklahoma City Housing Authority	Vita Nova	\$1,200,000	HOME
Hillcrest Green, LP	Hillcrest Green Senior Living*	\$308,159	HOME
Alley's End LP	Alley's End*	\$600,000	HOME
City of Oklahoma City	Community Housing Development Organization Program*	\$2,783,822	HOME
Community Action Agency of OKC	Down Payment Assistance Program*	\$800,000	HOME

Public Facilities

Agency	Program Name	Amount Available	Funding Source
City of Oklahoma City	Strong Neighborhoods Initiative Public Facilities*	\$1,200,000	CDBG
City of Oklahoma City	Walnut Development Infrastructure*	\$239,760	CDBG
Alpha Community Foundation	Garden Oaks Community Center*	\$200,000	CDBG
City of Oklahoma City	General Public Facility*	\$825,764	CDBG

Public Services

Agency	Program Name	Amount Available	Funding Source
City of Oklahoma City	SNI Public Services*	\$565,000	CDBG
COTPA	Share-A-Fare	\$105,000	CDBG
CASA	Child Advocacy	\$46,000	CDBG

Economic Development

Agency	Program Name	Amount Available	Funding Source
Community Action Agency of OKC	Small Business Services	\$40,000	CDBG
NewView Oklahoma	Business Assistance*	\$300,000	CDBG
City of Oklahoma City	Section 108 Repayment Contingency*	\$100,000	CDBG

Slum and Blight Remediation

Agency	Program Name	Amount Available	Funding Source
City of Oklahoma City	Secure Vacant and Abandoned Buildings*	\$250,000	CDBG

Budget by Consolidated Plan Goal

Oklahoma City Urban Renewal Authority Urban Renewal Completions* \$788,880 CDBG

Administration, Planning, and Fair Housing			
Agency	Program Name	Amount Available	Funding Source
City of Oklahoma City	General Program Administration	\$873,041	CDBG
City of Oklahoma City	Planning	\$45,000	CDBG
Metropolitan Fair Housing Council	Fair Housing Activities	\$93,000	CDBG
* funding amount includes prior year allocations (carryover)			
HOME total		\$9,855,260	

APPENDIX 2

CONSOLIDATED PLAN TIMELINE

Timeline

2024

- October Schedule and meet with consultants, governmental organizations, housing agencies, advocates and service providers to discuss barriers, gaps and priority needs
- November 1 Confirm and reserve facilities for public meetings in December. PO set up for over the phone interpretation.
- November 1 **Submit** notice of Public Meeting/Planning input sessions ad to OPUBCO and/or minority and Hispanic news publications
- November 6 **Publish** notice of Public Meeting/Planning input session to be held at the following locations (or other times and locations as needed/desired):
- Downtown Library, Classroom AB, 300 Park Ave, at 3:30 PM on Tuesday, December 10, 2024
 - Belle Isle Library, Meeting Room A, 5501 N. Villa Ave, at 6:30 PM on Thursday, December 12, 2024
 - Ralph Ellison Library, 2000 NE 23rd St, at 6:30 PM on Thursday, January 9, 2025
 - Capitol Hill Library, 327 SW 27th St, at 6:30 PM on Tuesday, January 14, 2025
- December 1 Confirm and reserve facilities for public meetings in January. Arrange for bilingual staff representation if possible.
- December 10 Conduct Public Hearing/Planning input session, Downtown Library, 3:30 PM
- December 12 Conduct Public Hearing/Planning input session, Belle Isle Library, 6:30 PM

2025

- January 9 CANCELLED due to weather. Conduct Public Hearing/Planning input session, Ralph Ellison Library, 6:30 PM.
- January 14 Conduct Public Hearing/Planning input session, Capitol Hill Library, 6:30 PM
- January 21 Virtual Public Input Session with Neighborhood Alliance of Central Oklahoma, 6:00 PM
- February Staff to finalize strategic goals and funding recommendations based on available numbers. Draft Plan to be completed. Schedule and meet with consultants, governmental organizations, housing agencies, advocates, and service providers to discuss barriers, gaps and priority needs.
- April 14 Combined Notice to be **submitted** to OPUBCO and/or minority and Hispanic news sources for publication (*Combined Notice for 30-day comment period and Notice of Public Hearing at Council on 5/20*)

April 15	Staff reports due for CCCD meeting
April 18	Publication of Combined Notice of 30-day comment period and Notice of Public Hearing.
April 22	Citizens Committee for Community Development meeting- Presentation to discuss and approve funding priorities for the 2025-29 Five-Year Consolidated Plan, and the 2025-26 Consolidated Plan First Year Action Plan; and to address any last-minute concerns or recommendations for each.
May 1	Written and electronic public comments are due to Staff by 5:00 p.m. for inclusion in Council presentation. Additional feedback may be provided on or before the May 20th public hearing for inclusion in the final HUD document.
May 6	Begin routing process for documents in PrimeGOV. Director Deadline is 5/6 for 5/20 Council Meeting. Includes a final draft of the plan that will be submitted to HUD.
May 14	Final allocations announced by HUD
May 20	City Council public hearing and action on the Five-Year Consolidated Plan and First Year Action Plan.
May 30	Submit 2025-30 Consolidated Plan and First Year Action Plan to HUD (<i>Due to HUD 45 days before the start of FY or 60 days after the date of HUD funding allocation announcement</i>).

APPENDIX 3

CITIZEN PARTICIPATION PLAN

CITY OF OKLAHOMA CITY

CITIZEN PARTICIPATION PLAN

This Citizen Participation Plan (CPP) outlines the City of Oklahoma City's (City) procedures for engaging citizens in developing the Consolidated Plan, Annual Action Plan, Substantial Amendments, and the Consolidated Annual Performance and Evaluation Report (CAPER), hereafter collectively, the Plans, or individually, the Plan. This CPP ensures compliance with the U.S. Department of Housing and Urban Development (HUD) requirements and promotes transparent governance. The City must submit Plan documents to HUD as a condition of receiving federal grant funding under the following programs: Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) Program, Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA).

By adhering to these procedures, the City aims to foster inclusive and effective citizen participation in its planning processes, ensuring that community development initiatives align with the needs and priorities of all residents.

Availability and Accessibility

The City will publish the Plans and Amendments in a manner that offers its residents, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments. The Consolidated Plan, current Action Plan, CAPER, and CPP will be made available on the City website at <https://www.okc.gov/departments/planning/programs/housing-neighborhood-programs>. In addition, the City will provide a reasonable number of hard copies of the Plans to residents and groups that request it. Citizens may request a digital copy via email.

The Consolidated Plan, current Action Plan, CAPER, and CPP will be provided in accessible formats upon request. The City will also strive to accommodate non-English-speaking residents by offering translation services for notices and plan documents, ensuring meaningful participation from all community members.

Encouragement of Citizen Participation

The City encourages public participation in the development of the Plans and any Substantial Amendment to the Plans. In particular, the City encourages participation by low- and moderate-income people, particularly those people living in areas designated by the jurisdiction as a revitalization area or in a slum and blighted area and in areas where CDBG funds are proposed to be used, and by residents of predominantly low- and moderate-income neighborhoods.

Generally, the City accomplishes this through public meetings where citizens have an opportunity to participate in planning for expenditure of federal funds and to gain information on the results from prior year use of these funds. In addition to inviting the public to participate, specific documents may require engagement of particular groups, such as housing providers, non-profit agencies, and neighborhood organizations to participate in focused input sessions. While the final authority for decision-making rests with the City Council, the City recognizes that public input can promote a stronger, more responsive community development effort.

In addition to citizen input, the City will invite or consult with organizations (including businesses,

developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations) in the process of developing and implementing Plan documents.

Information will also be shared with the local public housing agency (PHA) to encourage participation of residents of public and assisted housing developments (including any resident advisory boards, resident councils, and resident management corporations) in the process of developing and implementing the Plans, along with other low-income residents of targeted revitalization areas in which the developments are located. The City provides information to the PHAs about the Plan strategy and activities related to PHA developments and surrounding communities so that the PHAs can make this information available at their annual public hearing(s).

Mechanisms for Public Engagement

Planning Meetings

When creating the Consolidated Plan and Annual Action Plans, the City will hold at least one public meeting to obtain citizen input. The meeting(s) shall be held before the Plan or Annual Action Plan is written and shall be considered a planning meeting.

For the Consolidated Plan, there should be a minimum of two planning meetings, and four planning meetings are recommended. For the annual Action Plan, one planning meeting is acceptable.

Citizens will be provided at least a thirty (30) day notice of the meetings via publication in a widely circulated newspaper and a post on the City's Housing and Neighborhood Programs website. When possible, the City will also notify the public of meetings via news releases, TV appearances, and social media posts.

CCCD Public Meetings

The City will discuss the Consolidated Plan, Annual Action Plan, Substantial Amendments, and CAPER drafts at a public meeting of the Citizen's Committee for Community Development ("CCCD"). Established over 25 years ago, the CCCD is an official advisory committee to the City Council with members appointed by the Mayor and City Council to represent the interests of lower-income people. Two representatives are appointed from each Ward, and the Mayor appoints four members at large.

CCCD meetings are open public meetings held several times a year and provide a forum for citizens to discuss issues or concerns about activities funded by federal grant programs. The CCCD considers and makes recommendations to the City Council on all Plan matters and is an important step in the citizen review process.

CCCD meeting dates where Plans will be discussed will be included in public notices, website notices, and social media posts if known.

Public Hearing and Public Comment Period

The City will provide a reasonable opportunity for citizens to comment on the Consolidated Plan, Annual Action Plan, and any Substantial Amendments before final adoption by publishing notice in a widely distributed area newspaper and on the City's Housing and Neighborhood Programs website. The full Plan draft will be published on the City's Housing and Neighborhood Programs

website at this time. The City will provide a minimum 30-day public comment period to review and comment on the proposed Plan or Amendment. The notice will also provide the date of the applicable public hearing to be held at a regularly scheduled meeting of the City Council. During the public hearing, comments can be made about the proposed Plan or Amendment.

Comments Received During the Public Hearings and During the Comment Period

When the City publishes notices requesting public comment for Plan documents, the City shall include the following address for the submission of written comments:

Housing and Community Development Division Manager, Planning Department
City of Oklahoma City
420 W Main St., Ste. 920
Oklahoma City, 73102

The City shall consider and respond to all comments received during public hearings and the comment period. A summary of comments or views received and the determination of acceptance or non-acceptance, and reasons for the non-acceptance (when applicable) will be attached and made a part of the final Plan document(s).

The Plans

The Consolidated Plan

The Consolidated Plan serves as the five-year planning framework and application for HUD funding under the CDBG, HOME, ESG, and HOPWA programs. The City uses HUD-provided data available to the public on HUD's website, data.hud.gov, to develop the Consolidated Plan. The five-year Plan will include the first-year Action Plan, followed by annual one-year Action Plans prepared and made available to the public each subsequent year. This Plan makes available to citizens, public agencies and interested parties the following information:

- The estimated amount of assistance the City expects to receive during a given funding year, including program income.
- The range of activities that may be undertaken including the estimated activities and funding levels that will benefit persons with low- and moderate-income.

When creating the Consolidated Plan, the City will hold at least two public meetings to obtain citizen input. The meeting(s) shall be held before the Plan is written and shall be considered a planning meeting. For the Consolidated Plan, there should be a minimum of two planning meetings, and four planning meetings are recommended. Citizens will be provided with at least a thirty (30) day notice of the planning meetings via publication in a widely circulated newspaper and a post on the City's Housing and Neighborhood Programs website. When possible, the City will also notify the public of meetings via news releases, TV appearances, and social media posts.

The City will discuss the Consolidated Plan at a public meeting of the Citizen's Committee for Community Development ("CCCD"). The CCCD considers and makes recommendations to the City Council on all Plan matters and is an important step in the citizen review process. CCCD meeting dates where the Consolidated Plan will be discussed will be included in public notices, website notices, and social media posts if known.

The City will provide a reasonable opportunity for citizens to comment on the Consolidated Plan,

Annual Action Plan, and any Substantial Amendments before final adoption by publishing notice in a widely distributed area newspaper and on the City’s Housing and Neighborhood Programs website. The full Plan draft will be published on the City’s Housing and Neighborhood Programs website at this time. The City will provide a minimum 30-day public comment period to review and comment on the proposed Plan or Amendment. The notice will also provide the date of the applicable public hearing to be held at a regularly scheduled meeting of the City Council. During the public hearing, comments can be made about the proposed Plan or Amendment.

Any comments or views of residents of the community received in writing, or orally at the public meetings or hearing will be considered in preparing the final consolidated plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, shall be attached to the final consolidated plan.

Annual Action Plan

The Annual Action Plan states the amount of assistance the City expects to receive from each of the federal programs and includes a description of the activities and related funding allocations that the City will undertake to address the needs and priorities established in the five-year Consolidated Plan.

When creating the annual Action Plan, the City will hold at least one public meeting to obtain citizen input. The meeting(s) shall be held before the annual Action Plan is written and shall be considered a planning meeting. For the annual Action Plan, one planning meeting is required. Citizens will be provided at least a thirty (30) day notice of the planning meeting via publication in a widely circulated newspaper and a post on the City’s Housing and Neighborhood Programs website. When possible, the City will also notify the public of meetings via news releases, TV appearances, and social media posts.

The City will discuss the annual Action Plan draft at a public meeting of the Citizen’s Committee for Community Development (“CCCD”). The CCCD considers and makes recommendations to the City Council on all Plan matters and is an important step in the citizen review process.

CCCD meeting dates where Plans will be discussed will be included in public notices, website notices, and social media posts if known.

The City will provide a reasonable opportunity for citizens to comment on the Annual Action Plan before final adoption by publishing notice in a widely distributed area newspaper and on the City’s Housing and Neighborhood Programs website. The full Plan draft will be published on the City’s Housing and Neighborhood Programs website at this time. The City will provide a minimum 30-day public comment period to review and comment on the proposed Plan. The notice will also provide the date of the applicable public hearing to be held at a regularly scheduled meeting of the City Council. During the public hearing, comments can be made about the proposed Plan.

Any comments or views of residents of the community received in writing, or orally at the public meetings or hearing will be considered in preparing the final Action Plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, shall be attached to the final Action Plan.

Substantial Amendments

The Action Plan will be amended whenever there is a Substantial Amendment, defined as:

- Changing the goals or priority needs contained in the Five-Year Strategy.
- Funding of an activity type not described in the Annual Action Plan.
- Increasing funding allocated to an activity by more than 25%

A Minor Amendment is a change to the Consolidated Plan or Action Plan that does not meet the threshold criteria for a Substantial Amendment. Minor Amendments are administrative and do not require public notice.

The City will discuss the Substantial Amendment draft at a public meeting of the Citizen's Committee for Community Development ("CCCD"). The CCCD considers and makes recommendations to the City Council on all Plan matters and is an important step in the citizen review process. CCCD meeting dates where the Substantial Amendment will be discussed will be included in public notices, website notices, and social media posts if known.

The City will provide a reasonable opportunity for citizens to comment on the Substantial Amendment before final adoption by publishing notice in a widely distributed area newspaper and on the City's Housing and Neighborhood Programs website. The full Substantial Amendment draft will be published on the City's Housing and Neighborhood Programs website at this time. The City will provide a minimum 30-day public comment period to review and comment on the proposed Plan. The notice will also provide the date of the applicable public hearing to be held at a regularly scheduled meeting of the City Council. During the public hearing, comments can be made about the proposed Plan.

Any comments or views of residents of the community received in writing, or orally at the public meetings or hearing will be considered in preparing the final Substantial Amendment. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, shall be attached to the final Substantial Amendment.

Consolidated Annual Performance and Evaluation Report (CAPER)

This report describes the accomplishments achieved with federal funds during the previous funding year, including how funds were actually used and the extent to which these funds were used for activities that benefited low- and moderate- income residents. The City's fiscal year for expenditure of HUD funds begins July 1 and ends June 30 of the following year. This report is submitted to HUD within 90 days of the close of the program year, that is, no later than September 30 of each year.

The City will discuss the CAPER draft at a public meeting of the Citizen's Committee for Community Development (CCCD). The CCCD considers and makes recommendations to the City Council on all Plan matters and is an important step in the citizen review process. CCCD meeting dates where the Substantial Amendment will be discussed will be included in public notices, website notices, and social media posts if known.

The City will provide a reasonable opportunity for citizens to comment on the CAPER before final adoption by publishing notice in a widely distributed area newspaper and on the City's Housing and Neighborhood Programs website. The full CAPER draft will be published on the City's Housing and Neighborhood Programs website at this time. The City will provide a minimum 15-day public comment period to review and comment on the proposed CAPER. The notice will also provide the date of the applicable public hearing to be held at a regularly scheduled meeting of the City Council. During the public hearing, comments can be made about the proposed CAPER.

Any comments or views of residents of the community received in writing, or orally at the public meetings or hearing will be considered in preparing the final CAPER. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, shall be attached to the final CAPER.

Substantial Changes to the Citizen Participation Plan

Substantial changes to the CPP will be noticed in newspapers of wide circulation and on the City's website. The full amended CPP will be posted on the City's website, and hard copies will be available upon request. Citizens will have thirty (30) days to review the amended Citizen Participation Plan.

Technical Assistance

Groups representative of persons with low and moderate incomes may seek assistance and information regarding activities addressed in this Citizen Participation Plan or funding opportunities that may be available through the Housing & Community Development Division.

Complaints

A citizen or organization that wishes to file a complaint or grievance concerning Consolidated Plan activities or programs may contact the City at the address listed in Section C above. The City will provide a written response to every written citizen complaint within 15 working days where practicable. If not satisfied with the response, the citizens or organization concerned may contact the Planning Director describing the problem, the response of the Department concerned, and what further action is believed needed.

Anti-Displacement

The City's overall goal is to minimize the displacement of its residents. However, when displacement is unavoidable, the City will develop an Anti-Displacement and Relocation Plan in accordance with federal regulations. Specifically, the City will comply with the anti-displacement and relocation requirements of the Uniform Relocation Act and the Housing & Community Development Act of 1974, as amended, and implementing regulations of 24 CFR Part 42.

APPENDIX 4

PUBLIC COMMENTS

Public Input Session

Downtown Library

3:30 pm, Dec 10, 2024

Attendees: 13 (7 community members, 6 staff)

Comments:

Question: Is bond money or other sources of funding going to housing?

Staff Response: The City is looking to leverage all sources of funding for affordable housing, including bond money. The 2025 Bond package has not been formally announced.

Question: The Housing Stability Program provides a loan pool to developers. That is something to consider in structuring a program to entice developers.

Staff Response: The comment is noted and staff will look into the loan pool idea. The HOME program already structures all new construction grants as loans or forgivable loans.

Question: Question related to land banks and GO Bonds. Land is hard to find and OCURA lots can be challenging to develop. It would be nice to have access to land.

Staff Response: The concern is noted. Land acquisition is increasingly challenging in the NRSA.

Question: Has the city considered working more closely with the school district? The School District is bad at disposing of property. Is there a possibility of adaptive re-use of old school buildings into housing? Could the school district donate the land, instead of selling it?

Staff Response: Abandoned schools bring down the neighborhood surrounding them. Abandoned schools have challenges to redevelop and require additional resources, not just the land. The City is working with multiple partners to address abandoned schools.

Question: Request for stronger housing strategy across the city. Use data on affordable housing and LIHTC properties to target resources in the hottest areas. Use all the available tools to develop affordable housing.

Staff Response: Staff are working towards a more data-driven approach to administering the formula grants.

Public Input Session

Belle Isle Library

6:30 pm, Dec 12, 2024

Attendees: 11 (7 community members, 4 staff)

Comments:

Question: Question about the involvement of Key to Home in this plan

Staff Response: Key to Home is involved in crafting the plan. ESG and HOPWA funding primarily go to member organizations.

Question: Homelessness is the largest allocation. Is progress being made in spending these resources?

Staff Response: Yes, homeless funds are frequently fully spent by the end of the fiscal year.

Question: Comment on a lack of knowledge about the DPA and Homebuyer Assistance programs. Can these be marketed more effectively?

Staff Response: The concern is noted. The programs receive limited administrative funds, but do advertise the programs with brochures and by attending community events.

Question: Question on previous plan goals and activities.

Staff Response: The goals and activities shown are the previous goals and activities, but will likely remain somewhat similar, as the needs in the community have not changed significantly.

Public Input Session

**Capitol Hill Library
Jan 14, 2025, 6:30 pm**

Attendees: 18 (14 community members, 4 staff)

Comments:

Question: Question about the role of investors in Oklahoma City's housing market, and the tie to increased cost burdens among renters.

Staff Response: It is hard to pinpoint the amount of rising housing costs attributable to investors and speculation.

Question: Comment on the lack of available high paying jobs.

Staff Response: Economic development is among the City's draft goals in this plan. Other agencies such as OCURA and the Greater Oklahoma City Chamber of Commerce focus heavily on economic development.

Question: Comment that the assumptions regarding the amount of home an LMI person can afford (tax rate, 10% downpayment) is not accurate. Usually, homebuyers have the lowest allowable down payment. Taxes are higher. The gap between the market and what an LMI person can afford is actually larger.

Staff Response: That is true and further demonstrates the need for these funds to develop affordable housing.

Question: Comment that homes between \$150,000 - \$185,000 is what people need and can afford.

Staff Response: That is an ideal home price, especially for low-income buyers. The challenge is building new homes that can be sold for that low of a price. We have to sell homes at their appraised value, and because of the market, new homes in the city are often appraised at \$200,000.

Question: Comment that the median incomes used to determine affordability and access to programs have not caught up to the market and inflation.

Staff Response: That is true and further demonstrates the current housing affordability challenges.

Question: Comment on using the median versus the average sales price to determine housing costs in Oklahoma City. The slide says average. This number can be skewed.

Staff Response: This statistic comes from the Housing Affordability Implementation Plan.

Question: Comment that the data indicates that what a person can afford now is actually lower than it was in 2020 due to inflation and high interest rates. The subsidies need to be increased to make the homebuyer programs work.

Staff Response: Yes, the data indicates that housing is even less affordable than in 2020. Currently staff are not considering increasing the DPA subsidy, but if the program is unable to serve households, the subsidy may be increased.

Question: Comment on homelessness. The cause of homelessness is a lack of housing units, but also the lack of jobs and economic opportunities accessible to these populations. What is the city doing to address economic development? New jobs created by Section 108 loans are not providing jobs to currently/formerly homeless individuals. Now that the city is improving the pipeline from homeless to housed, the next step is stable and employed.

Staff Response: The city is not currently funding economic development for formerly homeless persons with these formula grants.

Question: Question on homelessness and mental health issues. How can homeless people with mental health issues be helped? What is the city doing to address these needs?

Staff Response: For individuals who may be a danger to themselves or others and are in the midst of a crisis, the city has established a mental health crisis response team with the Mental Health Association of Oklahoma. These services can be accessed by calling 911. An individual in crisis can also call 988 Lifeline, which is available 24/7.

Question: Comment on lack of available housing for those formerly incarcerated and with sex offender status. There are very few homes available to those with sex offender status. The citizen knew someone who was trying to get housing, living in a shelter under an assumed name because of the lack of available housing. This person then committed another crime and went back to jail after being unable to find housing. There is a mobile home park on the southside that is a "green zone" but it has a very long waitlist.

Staff Response: The lack of available areas for this population is known. The City is currently working with the Oklahoma City Housing Authority on permanent supportive housing that would be available for those on a sex offender registry.

Question: Another citizen commented that the lack of available places for sex offenders to live is a state legislative issue and that there is very little interest in changing those restrictions at the Capitol.

Staff Response: Thank you.

Question: Question on the city's efforts to pool the many available resources to focus on the greatest need. For example, TIF funding often goes to high income housing that has vacancies, whereas affordable housing is 90-100% occupied.

Staff Response: This is an interesting idea, and one that staff will look into.

Question: Question about what a rental rehabilitation program would look like.

Staff Response: Staff is still determining what those programs would look like. It is likely that a rental rehabilitation program would not roll out until the Second Year Action Plan at the earliest.

Question: Question about ADUS. The commenter noted that he feels that ADUS will create concentrated poverty.

Staff Response: That is a valid concern; however, the city's research has indicated that most ADUs would be occupied by family members of the primary home. In addition, ADUs are often located in older, well-established neighborhoods, not high-poverty areas. This is in part because the ADUs are very expensive to build.

Question: Question about tiny homes. The commenter has a large acreage and would like to build tiny homes on her property.

Question: Another commenter also mentioned container homes on infill lots.

Question: Comment that people would like to help address housing and homelessness issues, but the city is not being open-minded about new housing types.

Question: Comment that tiny homes and other homelessness solutions face a lot of "not in my backyard" pushback from neighbors when these plans are proposed.

Staff Response: Tiny homes that the city has attempted to fund in the past have faced a great deal of pushback from surrounding neighborhoods. New housing types are one valuable tool available for increasing affordable housing and have worked in some instances. Pivot is a great example. However, our priority is often on standard home types because they retain value, last a long time, build wealth for families, and fit cohesively in an existing neighborhood. These homes meet multiple departmental goals of increasing housing opportunities, decreasing homelessness, revitalizing communities, and eliminating blight.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Kierston W. <kierstonw@live.com>

Sent: Monday, November 18, 2024 11:33 AM

To: Davis, Benjamin E <benjamin.davis@okc.gov>

Subject: Input on HUD Fund Priorities – Lessons from Other Cities for Addressing Homelessness

You don't often get email from kierstonw@live.com. [Learn why this is important](#)

Dear Mr. Davis,

Thank you for inviting resident input for the City's five-year Consolidated Plan. As a resident of Ward 8 in the Deer Creek Public Schools district, I want to express my deep concern about Oklahoma City's approach to the housing crisis for our homeless population. This is an area where we have historically fallen short, and it's vital that we use HUD funds to implement strategies that work—learning from cities that have succeeded and avoiding the pitfalls of those that haven't. The time to act is now.

Cities like Houston offer a clear example of how to address homelessness effectively. By prioritizing permanent housing solutions through programs like Housing First, Houston has reduced homelessness by 63% since 2011. Their model of collaboration between public and private entities, coupled with supportive services like mental health care and employment assistance, shows what's possible when a city takes a comprehensive approach.

Similarly, Salt Lake City initially saw great success by implementing Housing First, significantly reducing chronic homelessness. However, progress stalled when funding for housing and services didn't keep pace with demand. This highlights the importance of sustained investment and long-term commitment.

In contrast, cities like San Francisco demonstrate the dangers of focusing heavily on temporary solutions without addressing the root causes of homelessness. Despite significant spending, San Francisco struggles with persistent homelessness due to its failure to prioritize permanent housing and adequate support systems.

For Oklahoma City, I urge the City to:

- Expand permanent, affordable housing options to provide stability for our most vulnerable residents.
- Invest in Housing First programs to break the cycle of homelessness.
- Ensure wraparound services, such as mental health care and job placement programs, are integrated with housing initiatives.

We must recognize that addressing homelessness isn't just a moral imperative; it also benefits the broader community by reducing emergency service costs, improving public health, and fostering economic growth. By addressing this issue, we can create a more vibrant and healthy community for all.

Oklahoma City has an opportunity to turn the page on its track record by adopting proven strategies that have worked elsewhere. The decisions we make now will determine whether we create lasting solutions—or fall into the traps that have hindered progress in other cities. With the right approach, we can significantly impact our homeless population.

Thank you for considering this input as you shape the Consolidated Plan. I look forward to seeing how our community rises to meet this challenge.

Sincerely,
Kierston Willoby
Ward 8 Resident
405-503-4263

[REDACTED]

[REDACTED]

[REDACTED]

From: Michele Guzman <MicheleGuzman777@outlook.com>
Sent: Friday, November 22, 2024 2:29 AM
To: Davis, Benjamin E <benjamin.davis@okc.gov>
Subject: My input on HUD. Your Oklahoma Bug A Boo Michele

You don't often get email from micheleguzman777@outlook.com. [Learn why this is important](#)

Hi,

Oh I got input. Shame on HUD. You guys REALLY need to step up the game.

FIRST AND MOST IMPORTANT

You need to watch those court cases better. I know Kay Sewell is the attorney that handles the HUD cases. Just because you are not required to, you have a professional, moral and ethical responsibility by the principle alone of the federal back mortgage protection standard. Do you know what that is? That if I see a foreclosure and one little penny is over I will be displeased. Not one single penny should be taken unfairly. Default judgment or not. Oh yes I went there.

That is right, so pay attention people. I have high expectations and will not lower the bar. If a purchaser takes out ANY GOVERNMENT BACKED LOANS, like FHA, (but let's just say all that I can possibly include under your umbrella), then you have a ethical, moral and professional duty to ensure if foreclosed upon, REGARDLESS IF THE DEFENDANT SHOWS UP OR NOT, to ensure accuracy in the petitioners filings. Not only that, but you guys are slipping all over. When was the last time you defend someone? Ever? Never?

Shock me and tell me the truth. So you got people BECOMING HOMELESS from you. You want to see some fun stuff? Want to see a case a month or two ago a government backed loan, where all the equity was repeatedly taken out, but guess what? The house had been vacant for YEARS. Why would a mortgage company not foreclosure? Why wait? Well if they took out equity on that vacant or abandoned property but knew they could keep it as collateral. The federal government requires more liquidity now

for lenders. Well that mortgage servicer, maybe unbeknownst to the lender, but maybe the lender knew. They would have the property, but get the equity. Now what struck me was the filings. It was peculiar, multiple home equity refilling. The last one specifically was stated as investor and had an investor number. From my research it is my understanding this means it was a pool loan. There is no reason that the property would be abandoned with squatters living in it for YEARS. The mortgage obviously was not being paid. I was told by the neighbors that it was sunken in or caved in on the inside. I walked up to the porch, but the front door was open and it was creepy as all get out. I left my note and ran back to my car. I was looking at mortgages, physically looking at these properties and finding owners. I was doing this because they were possibly being screwed by their servicer. My escrow surplus checks on my mortgage has not been received in many years. They even verified this on the phone and offered to resend the checks out. I said okay, waited and nothing. So emailed a few months later. Guess what? They have gone back and added it, so it looks like it was taken from principal. It wasn't. It does not match my IRS records, they had verbally confirmed the checks had never been cashed and my balance somehow miraculously stayed the same. The checks were for thousands of dollars. Every person I spoke with being foreclosed upon with that servicer had never received an escrow surplus check. Not only that, but the amortization is not appearing to calculate to the FHA loan that is beneficial as it is supposed to be. I get amortization. I have lots of questions about interest bearing loans mortgages and why it contradicts what FHA and HUD information in regards to federal backed loans. You say we should have 20% equity in home in 6 years. Ummm. Not on your interest only loans. We are paying interest on interest. I do not trust this servicer's for a reason. They aren't giving escrow surplus payments like they are supposed to and try to cover it up after admitting the checks weren't cashed or applied to principal. They sure did change my history on payment on the app after I emailed them. I have before and after information to back this up too. I don't play. I have proof of everything that I have and will say. Irrefutable, hard and exact proof. You have no idea how serious I am about this issue. I will never let it go, until it is corrected.

So, even if you just sign off that plaintiff can proceed as you have no interest in the property during the foreclosure, you have to check the accounting. You and the judge need to. If one attorney tries to over collect with inflated charges, they shouldn't get a chance to foreclose again on same loan. This is not a let's keep foreclosing game. People can't be expected to keep fighting endlessly the same lawsuit, they can't afford it. Most can't afford an attorney. If it is a federal backed loan whether you do or do not have an interest in this property, you still have an obligation from the creation of the loan originally. You promised to make sure we were treated fair. That means in foreclosure too. All the way, no halving it with me. So whether you are collecting or not. Whether the defendant shows up or not, you need to be double checking the accounting and accuracy. You should be double checking stuff or auditing anyway, but we will get there one step at a time. If you are on a lawsuit, then you better spend the time to double check things. I will be expecting this soon.

Oh I can tell you what to do about HOUSING, but how about first you clean up the mess you have made?

Maybe your fraud foreclosures, lack of oversight, unethical regulatory processes of what no auditing or fines on lenders, maybe just maybe you are part of the problem right now. What happens during the foreclosure? Say they get default judgement. They lose their possessions? Yes, because no one accounts for assets or sale of cars, washers, refrigerators, personal property. Now they might get their identity stolen. Why because no one shreds anything. Just throws people's stuff in trash or sell it on the dark web probably. Then what? Then these depressed, financially struggling people are on the streets with very bad credit and foreclosure history. Now no one wants to let them rent.

Wait!

Found somewhere for them to live. It is higher than the mortgage, because the other property owner has mortgage and is trying to profit too, so it won't be lower than their great FHA interest bearing loan. Now add up all the pet fees, application fees, move in fees, security deposits for utilities, gas, electricity and internet. Plus double or triple the security deposit thanks to the mortgage foreclosure history. Unfortunately they are being garnished because those debt collection companies, (also now becoming servicing companies for mortgages or lenders themselves), they are collecting from their inflated fees and got default judgement for any amount they please. I am pretty sure they just make up numbers for maximizing profitability. So the dad leaves the home and is back on the streets with his wife and small children. Feels like a failure and can't stand to see them suffering. He kills himself. Wife dies of exposure after the children were put in DHS custody.

That one is not as bad as the two parents dying and the orphan, after guardian ad litem requested to be removed from case after stating belief there would be surplus from sale of property. The kid got nothing. Not even a hug, too young to know his inheritance was taken from him with no one caring. Well me.

So maybe you should consider this. Go home and watch this movie. It is called 99 homes.

If you really want to learn more read this book. Chain of Title. You might find it enlightening. We will get to the housing, but this should come first please.

Thank you.

Respectfully,
Michele Guzman
405-531-7775

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Cory Roessler <corycpr05@yahoo.com>
Sent: Thursday, December 12, 2024 5:43 PM
To: Davis, Benjamin E <benjamin.davis@okc.gov>
Subject: Regarding funding ideas

You don't often get email from corycpr05@yahoo.com. [Learn why this is important](#)

Dear Mr. Davis,

Hi, my name is Angela Roessler, I have been a resident since September 2002. In 2008 I became disabled, and went onto disability. By 2013, with my family moving on and my needs increasing, I moved into Superbia Retirement Village in OKC. The good thing is unlike Baptist Village and other like places, me being disabled and benefiting living in a place that accommodates handicap needs. Like walkers, wheelchairs, and so much more.

I also, upon moving on, my income qualified me for rent assistance. I went through the complex and not the housing office to qualify and receive assistance with my rent. Fast forward to today. I'm still here. I just recertified, like I do every year, for my housing assistance.

What I would like to suggest is this. I had just turned 39, when I moved in. I can't stay in any other facilities like these cause I'm not old enough. I use a walker and wheelchair. Equipment is also in my home I make certain things more available for use, as regards to my individual personal needs. Other than physical. I am more than capable of living on my own. I can cook, do some housework, handle budget, obtain insurance and resources to maintain a semi comfortable life. My biggest challenge is my age. 95% of the residents here are over 65 yrs old. I just turned 50. With declining health and financial hardship. I'm more homebound then ever before.

I would love a place I could live, with a more diversified neighbors. I've already had more than 8 friends here, pass from old age. But I'm unable to move to housing in the lower income options, do to my medical needs. They also have some social options here as well. But being one of three people under 52. You kind of stand out way to much. I'm 50. It may not change for me. But I'm not the only one. I wouldn't

also feel safe in lower income housing with the crime and violence. Being disabled tends to turn you into an easier target.

Please consider housing being made available for the independent disabled individuals that may vary rent prices based on all incoming income. It would not deny opportunity to those who could pay market rate, or help those who need a little assistance with rent.

I know Diane Blaney has been the primary Manager here for over 20 yrs. She could more than I, help provide ideas to a workable plan that is used here. We've changed management company since I've lived here. We're now under Gorman Management. I'll provide numbers and addresses below. Thank you for your time.

Sincerely,
Angela Cory Roessler
973 Stacy CT
OKC, OK 73162
405-404-2110

Superbia Retirement Village
9720 Stacy CT.
OKC, OK 73162.
405-721-5656
Managed by Diane Blaney

[Yahoo Mail: Search, Organize, Conquer](#)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Deborah Oakes <d.oakes.me@gmail.com>

Sent: Thursday, January 9, 2025 11:40 AM

To: HCD <HCD@okc.gov>

Subject: .Homeless in OKC

You don't often get email from d.oakes.me@gmail.com. [Learn why this is important](#)

Hi, I heard about a program in Ft. Worth for the homeless. They hire the homeless to pick up trash and keep streets clean.

They pay \$10 an hour and help them find temporary housing.

I used to be a social worker in Georgia. I had a program to get people off welfare and back into the job market.

They got 12 hours of tutoring, clean clothes and a graduation ceremony with a certificate. Some of them turned out to be good employees. I followed up with them for a year, making sure they were keeping their jobs.

The highlight for me was seeing the change in them. It was obvious some of them had never been honored before.

What a disgrace to have these forlorn people at our intersections, year after year. I know some are mentally ill but let's start where we can. Some of them might be able to help us solve the worse case problems

I had one client that we put into an auxiliary type program. She went into homes and helped some of the people none of us wanted to be around.

Please, OKC, let's do something. The problem only gets worse.

Thank you,
Deborah Oakes
405-923-0300

LaVictoire, Rebecca

From: Davis, Benjamin E
Sent: Tuesday, November 19, 2024 1:32 PM
To: Franklin Warner
Cc: Varga, Christopher R; LaVictoire, Rebecca
Subject: RE:

Follow Up Flag: Follow up
Flag Status: Flagged

Hello,

Thank you for taking time to provide your input. Staff will include your comments in our planning process.

Sincerely,

Ben Davis, AICP
City of Oklahoma City
(405) 297-1602 office
(405) 902-0425 mobile

From: Franklin Warner <fwhoneyman284d@gmail.com>
Sent: Monday, November 18, 2024 12:28 PM
To: Davis, Benjamin E <benjamin.davis@okc.gov>
Subject:

You don't often get email from fwhoneyman284d@gmail.com. [Learn why this is important](#)

For the okc area people who lives in their vehicles.

We would needs these items.

A secure building that would have both women,men showers and rest rooms.Have security people inside,so no one could use drugs inside..

Secure fencing around the parking lot ..one way in ,one way out..no walk in allowed...

2 parking spots for each residence...

You can't trash your parking spots..IT ISN'T A DUMP OR DUMP SITE. IF THE RESIDENCE DORS,THEY WILL BE FORCED TO LEAVE AND CAN'T COME BACK IN..

Put in electricity, so the residence can use the 110v appliances they may have in their vehicals ...this would include fans,heaters,tv,fridge ,lights ,phone chargers..NO generator can be run at night. Cutoff time is 6 pm -6am...

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Allison Takeda Flaig <takedaflaig@gmail.com>
Sent: Friday, November 22, 2024 2:23 PM
To: Davis, Benjamin E <benjamin.davis@okc.gov>
Subject: Resident Feedback for the Consolidated Plan

You don't often get email from takedaflaig@gmail.com. [Learn why this is important](#)

Good afternoon Mr. Davis,

I recently reviewed the press release regarding the city's invitation for resident feedback that will go towards the five-year Consolidated Plan. As a resident of Oklahoma City for the last 3 years via Southern California and Chicago, I've noticed a significant lack of sidewalks. I firmly believe that providing more sidewalks in the city will encourage the following:

- **Fitness:** Residents will use the sidewalks for running, walking, and biking. Families will be more active and employees will find respite in an active break during a long workday.
- **Safety:** As a city with children who walk to school or bus stops, sidewalks would provide a safe path for students instead of walking on front lawns or worse, in the streets.
- **Community:** When residents step outside, they'll be more encouraged to participate in activities such as family walks, neighborhood 5Ks, and bike parades.
 - Anecdote: the only reason why our neighborhood was fun this year for Halloween was because there was a localized power outage and everyone was outside. We met half a dozen neighbors for the first time.

As a state in the bottom 20% of fitness and activity in America and with fewer days in the year that can be enjoyed outside, sidewalks would support a more outgoing city and be more welcoming towards future residents.

Thank you,

APPENDIX 5

CITY COUNCIL

RESOLUTION AND MEMO



MEMORANDUM

Council Agenda
Item No. XI. Q
5/20/2025

The City of OKLAHOMA CITY

TO: Mayor and City Council

FROM: Craig Freeman, City Manager

1. Public hearing regarding Resolution approving the 2025-2029 Consolidated Plan and 2025-2026 First Year Action Plan.
2. Resolution approving the 2025-2029 Consolidated Plan and 2025-2026 First Year Action Plan, and approving new formula grant funding allocations for the Community Development Block Grant \$5,055,205; The HOME Investment Partnerships Program \$2,236,659; Emergency Solutions Grant Program \$431,333; The Housing Opportunities For Persons With AIDS \$1,399,461; providing for allocation of 2024-2025 Community Development Block Grant unallocated program funds, Program Income, and recaptured program funds in the amount of \$3,090,239; HOME Investment Partnerships Program 2024-2025 unallocated program funds, Program Income, and recaptured program funds in the amount of \$7,891,467; approving submission of application documents and certifications to U.S. Department of Housing and Urban Development grant agreements; approving operating agreements with subrecipients including Community Action Agency of Oklahoma City and Oklahoma and Canadian Counties, Inc., Court Appointed Special Advocates of Oklahoma County, Oklahoma City Urban Renewal Authority, NewView Oklahoma, Inc., Metropolitan Fair Housing Council, and Central Oklahoma Transportation and Parking Authority; providing that said operating agreements are brought back to City Council for ratification; providing that proceeds from Section 108 loan accounts shall be used for debt service on Section 108 loans; and authorizing execution of necessary documents.

Background:

The City's Consolidated Plan is updated every five years and considers local needs in housing and community development. The Plan establishes program priorities for the use of U.S. Department of Housing and Urban Development (HUD) entitlement program funds, which include Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons With AIDS (HOPWA) funds. The proposed five year Consolidated Plan retroactive to July 1, 2025, and is effective through June 30, 2030.

Each year, the City must submit an Annual Action Plan to HUD detailing goals, priorities and funding allocations for the new fiscal year as an application for grant funding. The Action Plan is developed with citizen input and addresses Consolidated Plan priorities. The Action Plan enumerates program activities to be funded during the Plan year beginning July 1, 2025, and ending on June 30, 2026. When a new Consolidated Plan is developed, it includes the First Year Action Plan (the Plans).

Development of the proposed Plans began with the publication of a Notice of Public Meetings in *The Oklahoman* on November 6, 2024. Three public meetings were held in various geographic locations and online to obtain citizen comments for the Plans. Comments and questions were accepted relating to community needs, strategic goals for the use of these federal funds, and immediate funding priorities. The meetings were held at the Downtown Library at 3:30 p.m. on December 10, 2024, the Belle Isle Library at 6:30 p.m. on December 12, 2024, and the Capitol Hill Library at 6:30 p.m. on January 14, 2025. A planned fourth meeting, scheduled for January 9, 2025, at the Ralph Ellison Library, was cancelled due to inclement weather. Staff also held an online meeting hosted by Neighborhood Alliance of Central Oklahoma on January 21, 2025. City staff sent out email notifications and appeared on the news to let the public know about the meetings.

Comments received during presentations of the proposed Consolidated Plan and Action Plan at public meetings will be included in the report to HUD. The approved Plan will be submitted to HUD 60 days after HUD announces the final funding allocations. The City must publish notice of the public hearing and the recommended funding allocations at least 30 days before Council consideration, in accordance with the Citizen Participation Plan. This notice was published on April 19, 2025, in *The Oklahoman*.

The Citizens' Committee for Community Development (CCCD) convened an additional public meeting on April 22, 2025, at which time Community Development Staff discussed the proposed Consolidated Plan strategies and objectives, programs, and funding levels for the 2025-2026 Action Plan. The Citizens' Committee approved the funding recommendations and strategic priorities for both Plans and endorsed the item for presentation to City Council for final approval.

In addition to approving the Plan and funding allocations, the Resolution authorizes the Mayor to sign the HUD Request for Release of Funds and Certification (RROF) forms on an ongoing basis throughout the year. A RROF must be completed prior to expenditure of funds for a HUD-assisted project that requires an Environmental Assessment or Environmental Impact Statement but is not a City commitment or guarantee for use of HUD funding. Rather, submission is required as part of an administrative process (defined in 24 CFR Part 58) to determine the environmental impact of a potential HUD-assisted project and would be completed prior to any related Council action. The Resolution provides authorization for City Housing and Community Development staff assigned environmental review responsibilities to sign applicable determinations for exempt and categorically excluded activities under 24 CFR part 58, which do not require a RROF. Additionally, the City is required by regulation to complete the environmental review process and RROF documents for the Oklahoma City Housing Authority (OCHA) whenever they use federal dollars - whether passed through the City to OCHA as a subrecipient, or whether those funds go directly from federal agencies to OCHA. This Resolution authorizes the Mayor's signature on those items as well.

Attachment A to the Resolution summarizes recommended allocations for programs and projects for the 2025-2026 Action Plan. Carry forward funding has been projected based on the current project spending rates and available information; these numbers will fluctuate as spending continues through June 30, 2025, and final numbers may not be available prior to Plan submission to HUD.

The allocation of formula grant funds to program activities will be paid through the individual grants for which an application is authorized in the Resolution. The funds will be set up in the new fiscal year categories when the Grant Agreements are approved and returned to The City by HUD. Subsequent adjustments necessitated by changes in projected carry-forward and recaptured balances and/or changes to the announced formula grant funding by HUD will be made to the uncommitted General Public Facilities line item for Community Development Block Grant activities, and to the uncommitted funds in the Affordable Housing Development Program line item for the HOME Investment Partnerships Program.

Source of Funds:

GRANTS MANAGEMENT – DEPT OF HSG & URB DEVEL-RSTR – HOME Investment Partnerships Program – M-25-MC-40-0203 (1906-2408030-G9998-G80479)

GRANTS MANAGEMENT — DEPT OF HSG & URB DEVEL-RSTR – Community Development Block Grant – B-25-MC-40-0003 (1906-2408000-G9998-G80478)

GRANTS MANAGEMENT– DEPT OF HSG & URB DEVEL-RSTR-EMERGENCY SHELTER – E25-MC-40-0003 (1906-2408010-G9998-G80480)

GRANTS MANAGEMENT– DEPT OF HSG & URB DEVEL-RSTR-HOPWA – OKH25-F001 (1906-2408035-G9998-G80481)

Review:

Planning Department

Recommendation: Resolution be adopted.

RESOLUTION

RESOLUTION APPROVING THE 2025-2029 CONSOLIDATED PLAN AND 2025-2026 FIRST YEAR ACTION PLAN, AND APPROVING NEW FORMULA GRANT FUNDING ALLOCATIONS FOR THE COMMUNITY DEVELOPMENT BLOCK GRANT \$5,055,205; THE HOME INVESTMENT PARTNERSHIPS PROGRAM \$2,236,659; EMERGENCY SOLUTIONS GRANT PROGRAM \$431,333; THE HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS \$1,399,461; PROVIDING FOR ALLOCATION OF 2024-2025 COMMUNITY DEVELOPMENT BLOCK GRANT UNALLOCATED PROGRAM FUNDS, PROGRAM INCOME, AND RECAPTURED PROGRAM FUNDS IN THE AMOUNT OF \$3,090,239; HOME INVESTMENT PARTNERSHIPS PROGRAM 2024-2025 UNALLOCATED PROGRAM FUNDS, PROGRAM INCOME, AND RECAPTURED PROGRAM FUNDS IN THE AMOUNT OF \$7,891,467; APPROVING SUBMISSION OF APPLICATION DOCUMENTS AND CERTIFICATIONS TO U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT GRANT AGREEMENTS; APPROVING OPERATING AGREEMENTS WITH SUBRECIPIENTS INCLUDING COMMUNITY ACTION AGENCY OF OKLAHOMA CITY AND OKLAHOMA AND CANADIAN COUNTIES, INC., COURT APPOINTED SPECIAL ADVOCATES OF OKLAHOMA COUNTY, OKLAHOMA CITY URBAN RENEWAL AUTHORITY, NEWVIEW OKLAHOMA, INC., METROPOLITAN FAIR HOUSING COUNCIL, AND CENTRAL OKLAHOMA TRANSPORTATION AND PARKING AUTHORITY; PROVIDING THAT SAID OPERATING AGREEMENTS ARE BROUGHT BACK TO CITY COUNCIL FOR RATIFICATION; PROVIDING THAT PROCEEDS FROM SECTION 108 LOAN ACCOUNTS SHALL BE USED FOR DEBT SERVICE ON SECTION 108 LOANS; AND AUTHORIZING EXECUTION OF NECESSARY DOCUMENTS.

WHEREAS, The City of Oklahoma City (City) has received allocations of Community Development Block Grant (CDBG) funds since 1975, Home Investment Partnerships Program (HOME) funds since 1992, Housing Opportunities for Persons with AIDS (HOPWA) funds since 2000, and Emergency Solutions Grant (ESG) funds since 1987 to primarily benefit persons of low income; and

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

WHEREAS, the City desires to execute operating agreements and memorandums of understanding to implement the direct funding allocations to sub-grantees named in Attachment “A”; and

WHEREAS, the City is required to perform environmental review per 24 CFR Part 58 on all federally funded projects, and is also required to do so on behalf of the Oklahoma City Housing Authority (OCHA) for use of federal funds, whether those are received directly by OCHA or passed through the City as a subrecipient; and

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

WHEREAS, Fiscal Year 2025-26 is the first year of a three-year averaging period to achieve the requirement to spend 70% of CDBG funds to benefit low/moderate income persons in the NRSA area; and

WHEREAS, the City has adhered to all required federal public participation requirements;

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

1. The proposed 2025-2029 Consolidated Plan is adopted for the period July 1, 2025, through June 30, 2030.
2. The proposed 2025-2026 Action Plan is adopted for the period July 1, 2025, through June 30, 2026.
3. The allocations of funds for the CDBG, HOME, ESG and HOPWA programs, program income, unobligated funds, and recaptured funds from prior years as reflected in the documents attached hereto and reflected in the 2025-2026 Action Plan are hereby approved.
4. Subsequent adjustments to CDBG funds due to changes in projected balances recaptured and/or carried forward, and/or changes to formula grant funds announced by HUD will be made to the Unspecified General Public Facilities line item.
5. Subsequent adjustments to the HOME funds, due to changes in projected balances recaptured and/or carried forward, and/or changes to formula grant funds announced by HUD, will be made to the Affordable Housing Development Program line item.
6. The Mayor is hereby authorized to execute all necessary SF-424 application documents, to make the required certifications related to such documents, and to execute HUD grant agreements related to the programs listed herein.

7. The Mayor is authorized to execute operating agreements with subrecipients to whom funds have been allocated in Attachment A to include Community Action Agency of Oklahoma and Canadian Counties, Court Appointed Special Advocates of Oklahoma County, Oklahoma City Urban Renewal Authority, NewView Oklahoma, Inc, Metropolitan Fair Housing Council, and Central Oklahoma Transportation and Parking Authority provide said agreements are brought back to City Council for ratification.
8. The Mayor is authorized to sign HUD Form 7015.15 Requests for Release of Funds forms, which includes certification of environmental compliance required by 24 CFR Part 58 for projects that may be funded with HUD funds, including any required for OCHA projects.
9. The Mayor and/or his designee, the Planning Department's Housing and Community Development Manager or City management staff overseeing environmental reviews are authorized to sign all applicable Environmental Review determinations and statutory checklists for "exempt", "categorically excluded, not subject to", and "categorically excluded, subject to" activities under 24 CFR Part 58 which do not require HUD Form 7015.15 Request for Release of Funds during the program year.
10. The Mayor and/or his designee, the Housing and Community Development Division Manager in The City of Oklahoma City's Planning Department, are authorized to sign documents certifying that a project is in conformance with the Consolidated Plan.


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

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

ADOPTED by the Council and **SIGNED** by the Mayor of The City of Oklahoma City this 20TH day of MAY, 2025.

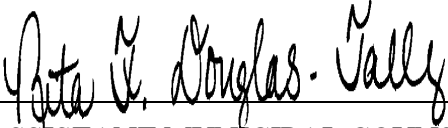
ATTEST: [SEAL]


CITY CLERK




MAYOR

REVIEWED FOR FORM AND LEGALITY.



ASSISTANT MUNICIPAL COUNSELOR

ATTACHMENT A

FY 2025-26 FUNDING RECOMMENDATIONS

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG): \$5,055,205

CDBG allocations, including carry forward funds and program income, are described in the table below. The annual CDBG grant is estimated to be \$5,055,205. Carryforward and reallocated prior year funds are estimated to be \$3,090,239.

HOME INVESTMENTS PARTNERSHIP PROGRAM (HOME): \$2,200,000

HOME allocations, including carry forward funds and program income, are described in the table below. The annual HOME grant is estimated to be \$2,200,000. Carryforward and reallocated prior year funds are estimated to be \$7,891,467.

Affordable Housing Rehabilitation and Retention			
Agency	Program Name	Amount Available	Funding Source
City of Oklahoma City	Housing Exterior Maintenance Program*	\$1,700,000	CDBG
City of Oklahoma City	Emergency Home Repair Pilot*	\$325,000	CDBG
Community Action Agency of OKC	Emergency Home Repair	\$600,000	CDBG
City of Oklahoma City	Whole House Rehabilitation	\$850,000	HOME
Affordable Housing Development			
Agency	Program Name	Amount Available	Funding Source
City of Oklahoma City	Affordable Housing Development Program*	\$2,113,279	HOME
City of Oklahoma City	SNI MLK Neighborhood New Housing Construction*	\$400,000	HOME
Oklahoma City Housing Authority	Creston Park	\$800,000	HOME
Oklahoma City Housing Authority	Vita Nova	\$1,200,000	HOME
Hillcrest Green, LP	Hillcrest Green Senior Living*	\$308,159	HOME
Alley's End LP	Alley's End*	\$600,000	HOME
City of Oklahoma City	Community Housing Development Organization Program*	\$2,783,822	HOME
Community Action Agency of OKC	Down Payment Assistance Program*	\$800,000	HOME

Public Facilities			
Agency	Program Name	Amount Available	Funding Source
City of Oklahoma City	Strong Neighborhoods Initiative Public Facilities*	\$1,200,000	CDBG
City of Oklahoma City	Walnut Development Infrastructure*	\$239,760	CDBG
Alpha Community Foundation	Garden Oaks Community Center*	\$200,000	CDBG
City of Oklahoma City	General Public Facility*	\$825,764	CDBG
Public Services			
Agency	Program Name	Amount Available	Funding Source
City of Oklahoma City	SNI Public Services*	\$565,000	CDBG
COTPA	Share-A-Fare	\$105,000	CDBG
CASA	Child Advocacy	\$46,000	CDBG
Economic Development			
Agency	Program Name	Amount Available	Funding Source
Community Action Agency of OKC	Small Business Services	\$40,000	CDBG
NewView Oklahoma	Business Assistance*	\$300,000	CDBG
City of Oklahoma City	Section 108 Repayment Contingency*	\$100,000	CDBG
Slum and Blight Remediation			
Agency	Program Name	Amount Available	Funding Source
City of Oklahoma City	Secure Vacant and Abandoned Buildings*	\$250,000	CDBG
Oklahoma City Urban Renewal Authority	Urban Renewal Completions	\$788,880	CDBG
Administration, Planning, and Fair Housing			
Agency	Program Name	Amount Available	Funding Source
City of Oklahoma City	General Program Administration	\$873,041	CDBG
City of Oklahoma City	Planning	\$45,000	CDBG
Metropolitan Fair Housing Council	Fair Housing Activities	\$93,000	CDBG
* funding amount includes prior year allocations (carryover)			

HOUSING OPPORTUNITIES FOR PERSONS WITH HIV/AIDS (HOPWA): \$1,399,461

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

EMERGENCY SOLUTIONS GRANT (ESG): \$431,333

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

CHANGES TO ALLOCATION AMOUNTS

Final allocations of funding from the U.S. Department of Housing and Urban Development (HUD) have yet to be announced for the 2025-26 Fiscal Year. Allocations described in the Action Plan are based on an estimate of flat funding from the previous year. When formula grant allocations are announced by HUD, the City will update the Plan to reflect the actual allocation amounts.

If funding amounts announced by HUD change significantly, defined as an increase or decrease to total CDBG or HOME funding of more than 20%, the City will conduct a new public hearing with the actual funding amounts. If actual allocation amounts do not change significantly, but change some, the following actions will be taken:

- CDBG: For a non-significant decrease in funding, the city will reduce funding currently allocated to General Public Facilities and will keep other line items the same. For a non-significant increase in funding, the city will increase funding to General Public Facilities.
- HOME: For a non-significant decrease in HOME funding, the city will reduce funding currently allocated to the Affordable Housing Development Program and will keep other line items the same. For a non-significant increase in funding, the city will increase funding to the Affordable Housing Development Program.
- HOPWA: Non-significant increases or decreases to HOPWA funding will increase or reduce the total funds available for The Continuum of Care Committee's distribution process.
- ESG: Non-significant increases or decreases to ESG funding will increase or reduce the total funds available for The Continuum of Care Committee's distribution process.

PROGRAM INCOME

Program income in the 2025-26 First Year Action Plan will be allocated as follows:

- Section 108 Loan payment proceeds from Section 108 Loan investment and repayment accounts will be used to pay Section 108 principal and interest.

- If any funding rebates are provided by material suppliers resulting from Oklahoma City Housing Assistance Program CDBG activities, those funds will be allocated to the Oklahoma City Housing Assistance Program to assist with funding additional Housing Exterior Maintenance projects.
- Subject to 20% regulatory caps, CDBG program income may be used to fund administrative expenses or create additional administrative capacity during the program year in which it is realized.
- Program income that is generated by the Oklahoma City Urban Renewal Authority (OCURA) activities during the 2025-26 program year *may be* reallocated back to OCURA for use in CDBG eligible activities.
- In accordance with CPD Notice 97-9, III.J., HOME Program Income that is deposited to the City's letter of credit, and that creates additional administrative capacity, may be used by the City for HOME administrative expenses incurred during the Action Year, and excess administrative capacity may be carried forward to subsequent years.
- Unallocated CHDO funds may be used as loan funds available to CHDOs or reallocated to CHDO set-aside activities as needed to ensure timely allocation and efficient use of these resources in the production of affordable units.

APPENDIX 6

GLOSSARY OF TERMS

Glossary

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

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

APPENDIX 7

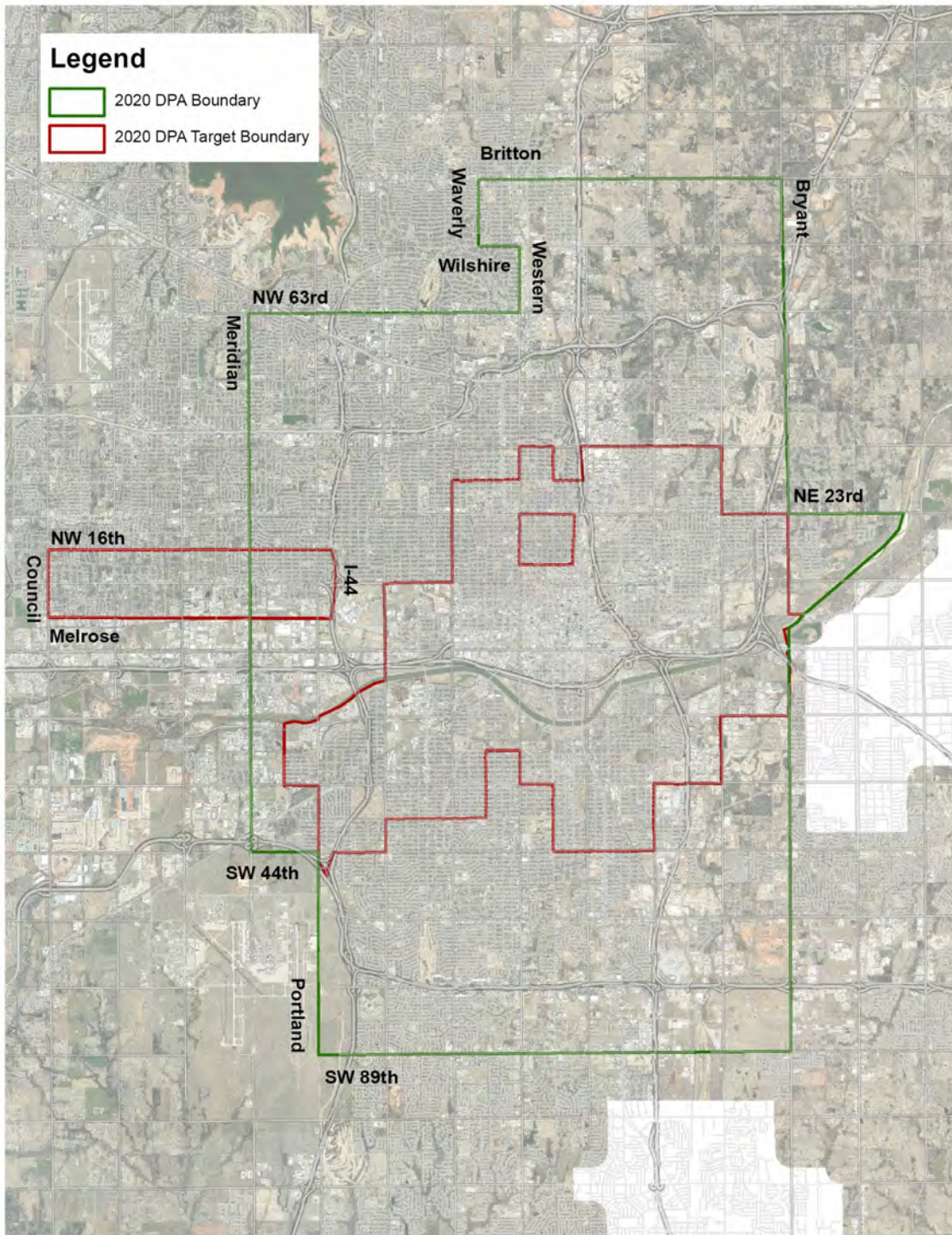
DOWNPAYMENT ASSISTANCE PROGRAM

BOUNDARIES

APPENDIX 7

DOWN PAYMENT ASSISTANCE PROGRAM BOUNDARIES

(last revised 2020)



APPENDIX 8

ESG POLICIES AND PROCEDURES



Oklahoma City Continuum of Care

CoC/ESG

Written Standards

OVERVIEW

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

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

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

CONTINUUM OF CARE PURPOSE

The primary purpose of the Continuum of Care is to:

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

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

FUNDING AWARD PROCESS OVERVIEW

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

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

UNIVERSAL STANDARDS

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

PARTICIPANT ELIGIBILITY

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

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

- **Homelessness Prevention** – Individuals and families who qualify as ‘at risk of homelessness,’ based on categories (2 or 4) of the “homeless” definition or based on the “At risk of homelessness” definition found at 24 CFR 576.2 and who reside in a housing unit that meets HUD’s habitability and lead-based paint standards and have an annual income below 30% of Area Median Income (AMI), are eligible for up to 24 months total rental assistance in tenant-based or project-based housing. The 24 months may include a one-time payment for up to 6 months of rent arrears on the tenant’s portion of the rent. The rent amount must meet the federal requirements for Fair Market Rent and the HUD standard for rent reasonableness. There must be a rental agreement between the landlord and agency and a written lease between tenant and landlord. Prevention activities are exclusive to **ESG**.
- **Rapid Re-housing** – Individuals and families who qualify as homeless, based on categories (1 or 4) and who are moving into a housing unit that meets HUD’s habitability and lead-based paint standards are eligible for the following activities, in compliance with federal **ESG and CoC** rules (24 CFR 576.104, 576.105, 576.106, 578.37, 578.51, 578.77). Additionally persons receiving rapid re-housing through the ESG program must have incomes at or below 30% of the area median income (AMI).
- **Transitional Housing** – Individuals and families who qualify as homeless, based on categories (1, 2, and 4) are eligible for transitional housing. Providers of transitional housing services shall arrange for or make available services to participants to assist them in securing permanent housing within the time frame of the program. Transitional Housing may be provided in scatter site or single site locations. Individuals and families assisted in transitional housing shall be provided housing accommodations as well as services intended to address issues that may hinder the household from obtaining or maintaining stable long term housing. Transitional Housing activities are excluded to the **CoC program grant**.
- **Permanent Supportive Housing** – Individuals and families who qualify as homeless, based on categories (1 and 4) and at least one adult or child has a disability. Supportive services designed to meet the needs of program participants must be made available to participants. Permanent supportive housing may be provided on a scatter site or single site basis using tenant based rental assistance, leasing, or operating costs to support the operations of a supportive housing facility as well as supportive services to meet the needs of the residents. Permanent Supportive Housing activities are exclusive to the **CoC program grant**.

COORDINATED INTAKE AND REFERRAL SYSTEM

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

EMERGENCY TRANSFER PLAN

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

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

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

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

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

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

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

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

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

HOUSING FIRST

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

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

HMIS

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

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

INCOME DETERMINATION

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

COORDINATION WITH MAINSTREAM AND TARGETED HOMELESS PROVIDERS

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

DISCHARGE PLANNING

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

EDUCATIONAL ASSURANCES

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

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

INVOLUNTARY FAMILY SEPERATION

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

TERMINATION OF ASSISTANCE

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

OCCUPANCY STANDARDS

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

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

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

LEAD-BASED PAINT

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

HOMELESS PARTICIPATION

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

FAITH-BASED ACTIVITIES

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

NON-DISCRIMINATION

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

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

PROGRAM INCOME

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

RECORDKEEPING

Program participant records shall include written:

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

Program policies and procedures shall indicate:

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

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

Financial records shall include:

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

CONFIDENTIALITY

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

PREVENTION AND RAPID RE-HOUSING STANDARDS

ELIGIBILITY

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

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

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

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

PRIORITY POPULATIONS

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

SERVICE TYPE, AMOUNT & DURATION

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

a) Financial Assistance:

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

b) Rental Assistance

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

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

PERMANENT SUPPORTIVE HOUSING STANDARDS

ELIGIBILITY

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

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

DOCUMENTS REQUIRED AT INTAKE

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

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

2. Homeless Status – Providers should make every effort to meet the federal standards of documentation. Providers should make every effort to receive 3rd party documentation. If 3rd party documentation is not available 2nd party documentation or observation by a homeless services provider is acceptable. At a minimum, client self-certification will be accepted with documentation of 3rd and 2nd party attempts. Records contained in HMIS or comparable database used by a victim service or legal service provider are acceptable evidence of 3rd party documentation.
3. Disability – Documentation of disability can include verification of disability benefits or a written signed statement from a qualified source. Written documentation should: (a) identify the physical mental or emotional impairment, why it is expected to be of long-continued or indefinite duration, how it impedes the individual's ability to live independently, and how the individual's ability to live independently could be improved by more suitable housing conditions; or (b) identifies a developmental disability; or (c) identifies AIDS or related conditions. Lack of disability documentation must not prevent an individual or family from being admitted to a permanent supportive housing program. Programs may enroll the person or family without such documentation, but documentation must be obtained within 45 days of date of intake. A copy of a disability check is adequate documentation. Permanent Supportive Housing providers can serve households in which either an adult, or a child, has a disability.
4. Chronically Homeless Status – Providers must gather evidence of length of homelessness or number of times an individual or family has been homeless. HMIS provides an official 3rd party record of homelessness that can be used for this purpose.
5. Income verification – Even though the program may not have an income requirement at entry documentation of the client's income must be obtained from all sources if a client is responsible for paying a portion of the rent.

PRIOTIZATION FOR PSH BEDS DEDICATED OR PRIORTIZED FOR CHRONIC HOMELESSNESS

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

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

PRIOTIZATION FOR PSH BEDS NOT DEDICATED OR PRIORTIZED FOR CHRONIC HOMELESSNESS

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

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

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

PARTICIPANT CONTRIBUTION

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

TRANSITIONAL HOUSING STANDARDS

ELIGIBILITY

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

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

DOCUMENTS REQUIRED AT INTAKE

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

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

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

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

PRIORITY POPULATIONS

In providing transitional housing providers shall prioritize the following populations:

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

MINIMUM STANDARDS

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

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




Homeless Definition

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



Homeless Definition

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

Commonly Referred to Links

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

APPENDIX 9

ANALYSIS OF IMPEDIMENTS



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Oklahoma City

Analysis of Impediments to Fair Housing Choice

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EXECUTIVE SUMMARY

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE
OKLAHOMA CITY

Executive Summary

Oklahoma City Analysis of Impediments to Fair Housing Choice

The Analysis of Impediments to Fair Housing Choice, or AI, is a planning process for local governments and public housing agencies (PHAs) to take meaningful actions to overcome historic patterns of segregation, promote fair housing choice, and foster inclusive communities that are free from discrimination.

Primary Findings

The analyses of demographics (Section I), disproportionate housing needs (Section II), land use and zoning (Section III), and access to opportunity (Section IV), yield the following primary findings.

Demographic patterns—segregation and integration:

- African American residents have historically faced the most housing and economic exclusion in the region. This is manifest in the city's concentrated areas of poverty, which continue to be disproportionately occupied by African American residents. However, recent demographic trends show African Americans moving from traditionally higher poverty areas into more suburban areas with the city.
- Hispanic residents, whose population has increased significantly in recent decades, are increasingly concentrated within the city's highest poverty areas.
- Oklahoma City has 19 Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs). These are neighborhoods that have a poverty rate of 40 percent and higher and are more than 50 percent Non-White and Hispanic residents. All of the R/ECAPs in the greater region are located within Oklahoma City's boundaries.
- Segregation, which has historically been most prominent for African American residents, has decreased modestly since 1990 as measured by the Dissimilarity Index (DI). Segregation of Asian residents, which has been historically low, has also been declining. In contrast, segregation, as measured by the DI has been increasing for Hispanic residents.

Disproportionate housing needs:

- Rising rents and tightening of the rental market has disproportionately hurt very low income single-person households and families, many of whom are racial and ethnic minorities, persons with disabilities, and elderly residents.

- Similarly, rising home prices has introduced predatory lending and home purchase activity—e.g., “we’ll buy your house as is” offers, rent to own scams, and predatory lending.
- Weak state laws to protect tenants from evictions without just cause exacerbates their vulnerability and increases homelessness, an undesirable outcome which is costly for the public sector.
- Residents and landlords would benefit from increased education and training, including fair housing laws and requirements and “good tenant” classes. Fair housing information should be more intentionally marketed through social service agencies and in grassroots newspapers and social media networks.
- There is growing concern about the effect of city-facilitated redevelopment efforts on displacement of low income and minority residents and skepticism that leadership is working in the best interest of these residents.
- Multifamily developments are not being built to comply with the accessibility requirements under the Fair Housing Act due to lack of inspection/testing and enforcement.

Land use and zoning. The regulatory review of Oklahoma City’s zoning and land use policies found many areas where the code could be clarified or strengthened to avoid fair housing challenges. Areas to clarify or strengthen include: the code’s definition of family; the code’s treatment of persons living in group homes; and densities and development standards to accommodate a wide range of housing types and products to encourage affordability and discourage economic segregation.

Access to opportunity:

- Compared to other cities in the Oklahoma City region and Tulsa, African American and Hispanic residents in Oklahoma City are more likely to live in high poverty neighborhoods. In fact, Non-Hispanic White and Asian residents living below poverty in Oklahoma City have better access to low poverty neighborhoods than do African American and Hispanic residents overall. This is a factor of the concentration of many African American and Hispanic residents in a handful of high-poverty neighborhoods within the city.
- African American, Hispanic, and Native American children have lower access to high performing elementary schools relative to Non-Hispanic and Asian children. This is true for many cities in the region and for Tulsa. Only Edmond demonstrates high levels of proficiency for students across races and ethnicities and income levels.
- Oklahoma City offers equal access to jobs among races and ethnicities and income levels. Yet there is significant disparity in unemployment and educational attainment among residents, meaning that not all residents can benefit from city’s labor market. Expanding employment access and opportunities for Hispanic, African American, and Native American residents would benefit these residents and the city overall.

- Residents and stakeholders who participated in focus groups about barriers in access to economic opportunity focused on inadequate transportation—especially public transit to serve persons with disabilities; needed accessibility improvements and more equitable distribution of quality parks; and equity in education.

Priority Areas for 2020-2024

Decades of exclusionary policies at the federal, state, and local level limited the ability of many racial and ethnic minorities, people with disabilities, women, and non-traditional households from exercising housing choices and building wealth. The effects of these policies are challenging to reverse—yet, as demonstrated by many of the indicators in this AI, and the discussion city efforts in Section V, progress is being made within Oklahoma City. The areas where the city should continue to work to break down barriers to housing choice and economic opportunity include:

- **Expand affordable rental housing options** for extremely low income residents who are most vulnerable to discrimination, evictions, displacement, severe cost burden, and homelessness. These residents are disproportionately likely to be racial and ethnic minorities, women/single mothers, persons with disabilities, and persons with mental illness challenges;
- **Improve resident and landlord understanding of fair housing rights** and responsibilities, as well as good tenant and good landlord practices;
- **Narrow the gap in mortgage loan denials and subprime loans** among minority residents, improving low homeownership rates, and combatting predatory lending activity. Work with partners to narrow the gap in mortgage loan denials and subprime loans among minority residents through education and outreach activities that combat predatory lending and expand alternative ownership products (e.g., attached and land trust products).
- **Mitigate displacement** as part of urban renewal and revitalization efforts. Some residents and stakeholders view urban renewal activity as a threat to affordable housing and neighborhoods that have historically housed people of color. The city should be proactive with future urban renewal activities to ensure urban renewal does not result in displacement of low income residents, residents of color, and cultural enclaves;
- **Address gaps in economic opportunity** by lowering concentrated poverty and improving access of African American and Hispanic children to high quality schools; and
- **Improve access to public transit and parks** for underserved areas and residents, including persons with disabilities.

MAPS 4 and fair housing. The recently approved MAPS 4 initiative will be instrumental in addressing barriers. Many MAPS 4 priorities—e.g., developing 500 new ADA-accessible bus shelters—will address some of the barriers identified in this report.

Implementation of MAPS 4 should be viewed through an equity lens and consider the barriers identified in this study. For example, the \$87 million in funds to transform the public transit system should prioritize expanding access to low income households and families and improve the effectiveness of para- and accessible transit. Similarly, investments in sidewalks and placemaking should improve equitable distribution of parks and trails, including accessibility improvements, and yet be mindful of the risk of stimulating market investment that leads to gentrification.

Current Impediments and Fair Housing Action Items

This section details the current impediments to fair housing choice and outlines a recommended set of action items to address the impediments.

Impediment No. 1—Homeownership barriers.

African American, Hispanic, and Native American households find it more difficult to access credit to purchase homes, refinance existing mortgage loans, and/or improve their homes. African American borrowers face high denials even after adjusting for income levels, and Hispanic borrowers are more likely to get high-rate loans. These practices not only have the effect of limiting homeownership opportunities, they also negatively affect housing conditions in certain neighborhoods and perpetuate inequities caused by historic discrimination.

As the city's market has improved, speculative purchases have raised the cost of entry-level ownership housing and property taxes.

Action steps:

- Monitor HMDA data on mortgage loan denials and subprime lending activity including the disproportionate impact on minority borrowers. Fund education and outreach to teach vulnerable residents how to avoid predatory lending, rent to own scams, and high-risk loans.
- Eliminate rezoning requirements for homeownership developments and land trust communities that add affordable products through gentle infill.
- Integrate land trusts into redevelopment activities to mitigate resident displacement and expand affordable homeownership options. While several land trust models exist nationally, the common element is that the land trust retains ownership of the land, thus buying down the cost of homeownership by taking expensive land values out of the equation. The Lowry neighborhood in Denver, a major urban

redevelopment/urban infill project, integrated land trust homes into the new neighborhood to expand homeownership across the income spectrum.¹

- Fast track approval of affordable housing developments. Waive, discount, or defer fees for affordable housing, with greater discounts for deeper levels of affordability. Consider exempting affordable units from property taxes.
- Ensure that city-funded rental and ownership developments built in high opportunity areas exercise affirmative marketing to encourage applications from racial and ethnic minorities living in areas of concentrated poverty.

Impediment No. 2—Discrimination in rental transactions and lack of affordable rental and accessible housing.

The city's shortage of affordable rental options disproportionately affects residents with low incomes who include racial and ethnic minorities, single mothers, residents with disabilities, residents with mental health challenges, and residents with substance abuse challenges. These residents are very vulnerable to being denied housing, being evicted, facing challenges finding housing near quality schools, facing challenges finding accessible and affordable housing, and falling into homelessness—all of which are outcomes that negatively affect the public sector.

Action steps:

- Prioritize city funding to greatly expand the number of affordable housing units with supportive services to serve households who are most vulnerable to discrimination, evictions, and homelessness.
- Fund nonprofit legal representation for renters in the process of eviction to negotiate solutions other than eviction and avoid homelessness. Connect city code enforcement officers with nonprofit legal representation to help negotiate improvements to rental properties without eviction threats.
- Improve the city inspection process for accessibility requirements of the Fair Housing Act to ensure that developers are creating accessible units.
- Consider funding a local program similar to that in Reno, Nevada (administered by Silver State Fair Housing) in which developers are notified of their accessibility requirements at the permitting stage and are regularly inspected during construction.
- Fast track approval of affordable housing developments. Waive, discount, or defer fees for affordable housing, with greater discounts for deeper levels of affordability. Consider exempting affordable units from property taxes.

¹ <https://coloradoclt.org>

- Ensure that city-funded rental and ownership developments built in high opportunity areas exercise affirmative marketing to encourage applications from racial and ethnic minorities living in areas of concentrated poverty.

Impediment No. 3—Lack of understanding of fair housing laws and good tenant practices by residents and fair housing compliance by landlords.

Residents are increasingly reluctant to report fair housing violations for fear of losing their housing and facing retaliation. Fair housing complaints and cases processed by the Metropolitan Fair Housing Council demonstrate a continued need to enhance tenant and landlord fair housing awareness and enforce fair housing laws.

Action steps:

- Continue the commitment to fund the Metropolitan Fair Housing Council to assist residents with fair housing complaints and to conduct fair housing education and training.
- Include fair housing and general housing services on the city's website, including links to the Metropolitan Fair Housing Council's webpage and Legal AidOK. A current search for "fair housing" on the city's homepage returned no fair housing information.
- Ensure that outreach and educational announcements are positioned in newspapers and social media sites that are visited and viewed by vulnerable residents. Continue working with neighborhood groups to raise awareness and transmit fair housing rights information.
- Build public understanding, awareness and support for housing affordability, integration, diversity and inclusion. Recruit a public relations firm to donate or discount time to test messaging to residents and landlords and develop a campaign for execution by the Council and city staff. The city already has an excellent webpage with messaging for some areas ("Snow routes & winter weather tips") and could easily rotate a fair housing campaign through its resident messaging efforts.

Impediment No 4—Zoning code and land use regulations discourage housing type diversity.

As detailed in Section III of this report, there are many areas in the city's zoning code that could be improved to facilitate affordability and more housing type diversity.

Action steps:

- Adopt the recommendations from the zoning review in this AI. Briefly, 1) add flexibility to the definition of family; 2) conduct a legal review on potential fair housing challenges associated with treatment of persons with disabilities living in group homes; and, 3) as part of the code update, consider revising densities and development standards to ensure they accommodate a wide range of housing types and products that are typically more affordable and avoid indirect effects of segregating protected classes into certain neighborhoods.

- As part of continued efforts to update the city’s code and add flexibility in residential development consider incorporating the best practices referenced in the zoning review: 1) include a definition of disability consistent with the Federal Fair Housing Act; 2) establish standard processes for reasonable accommodation requests; and 3) allow ADUs and other types of gentle density in some single family districts, potentially in exchange for affordability commitments.

Impediment No. 5—Challenges with affordable and reliable transit access for low income residents and residents with disabilities.

Action steps:

- Assess the results of investments in transit to ensure that they have expanded access in underserved neighborhoods. MAPS 4 should expand transit access to low income households and families and improve the effectiveness of para- and accessible transit.

Impediment No. 6—Limited access to high performing schools for African American and Hispanic students.

Action steps:

- Work with Oklahoma City Public Schools to monitor the results of the P2G transformation on improving access to high performing schools for African American and Hispanic children.
- Continue to invest CDBG public service dollars in afterschool and summer programming and academic activities in low income neighborhoods; increase as resources allow.

SECTION I.

DEMOGRAPHIC PATTERNS

SECTION I.

Demographic Patterns

This section examines demographic patterns that are associated with residential settlement, housing availability and affordability, and access to opportunity. It also provides context for sections that follow—particularly Disproportionate Housing Needs and Access to Opportunity—and informs the identification of Impediments and the Fair Housing Action Plan.

This section follows the framework recommended in the U.S. Department of Housing and Urban Development’s Analysis of Impediments to Fair Housing Choice (AI) guidebook. It also incorporates the most current approach to analyzing the demographic data that are indicative of housing barriers, borrowing in part from the Assessment of Fair Housing (AFH) template.

The core components of this section include:

- An analysis of demographic patterns and trends in Oklahoma City, cities in the broader region, and the peer city of Tulsa;
- An examination of geographic segregation, as well as the racial and ethnic groups that experience the highest levels of segregation, and;
- An identification of racially and ethnically concentrated areas of poverty (R/ECAPs) and the location and predominant protected classes residing in R/ECAPs.

Primary Findings

- African American residents have historically faced the most housing and economic exclusion in the region. This is manifest in the city’s concentrated areas of poverty, which continue to be disproportionately occupied by African American residents. However, recent demographic trends show African Americans moving from traditionally higher poverty areas into more suburban areas with the city.
- Hispanic residents, whose population has increased significantly in recent decades, are increasingly concentrated within the city’s highest poverty areas.
- Oklahoma City has 19 Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs). These are neighborhoods that have a poverty rate of 40 percent and higher, and are more than 50 percent Non-White and Hispanic residents. All of the R/ECAPs in the greater region are located within Oklahoma City’s boundaries.
- Segregation, which has historically been most prominent for African American residents, has decreased modestly since 1990 as measured by the Dissimilarity Index

(DI). Segregation of Asian residents, which has been historically low, has also been declining. In contrast, segregation, as measured by the DI has been increasing for Hispanic residents.

History of Residential Settlement and Segregation

Similar to many cities in the U.S., segregation, income inequality, and differences in access to economic opportunity in Oklahoma City are rooted in historic regulations, policies, and practices. This initial section briefly explores those to set the context for the demographic analysis.

Segregation ordinances and race covenants. Oklahoma City was one of the many Southern and border cities (including Atlanta, Birmingham, Miami, Charleston, Dallas, Louisville, New Orleans, Richmond, and St. Louis) to follow Baltimore City's establishment of segregation ordinances in the early 20th century. In addition to zoning ordinances, racially restrictive covenants were also used to restrict African American homebuyers from buying homes with deed restrictions based on race.

The State of Oklahoma upheld segregation practices even when federal legal standing became dubious: In 1948, the U.S. Supreme Court ruled that the government could not enforce racial clauses in deeds, yet the Oklahoma Supreme Court upheld that White owners could sue seller and buyers for conspiring to diminish property values if a racial covenant was broken.¹

These policies limited residence of African Americans to the neighborhoods of Stoughton, Sandtown, Deep Deuce, and Bricktown. Oklahoma City's African American community thrived in these areas. Bricktown became the site of the city's branch of the National Association for the Advancement of Colored People (NAACP); the home of the *Black Dispatch*—the city's first newspaper written for the city's Black community; and the site of the highly regarded Frederick Douglass High School. The area also had a number of entertainment venues.

The Great Depression, expansion of highways to accommodate automobiles, and urban renewal efforts all disrupted the thriving economy in these neighborhoods. African Americans were displaced to the more suburban east side of the city, which remains an area of African American concentration.

Redlining. The term “redlining” refers to a practice of the Federal Home Owner's Loan Corporation (HOLC), which was established in 1933 to stabilize the housing market. Prior to the HOLC, homeownership was unusual for all but the very wealthy, as lenders required very large downpayments (e.g., 50% of home value), interest only payments with a “balloon” payment at the end of the loan term requiring additional financing, and a loan

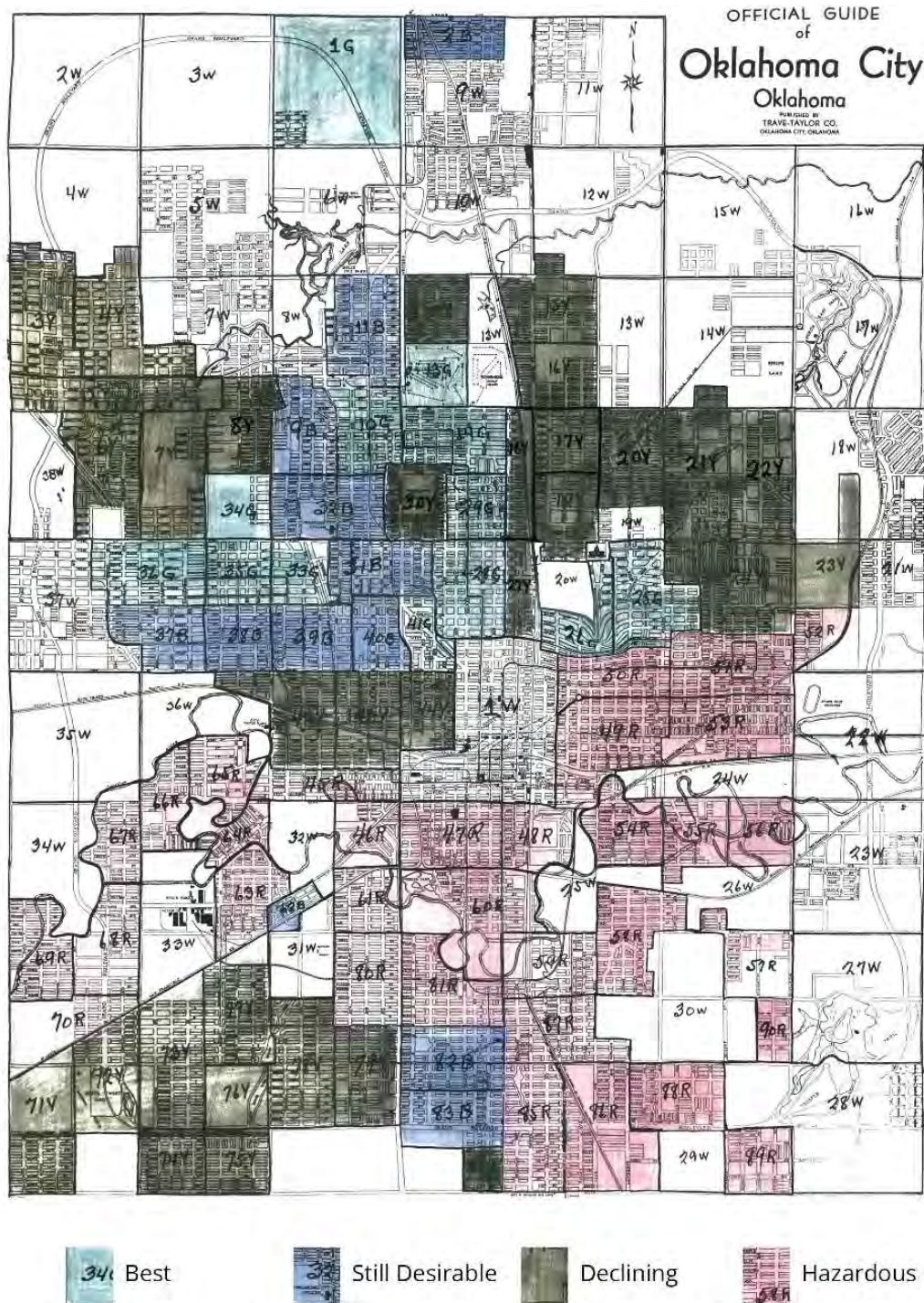
¹ “The Color of Law” Richard Rothstein.

term of just five to seven years. The HOLC offered more reasonable terms, allowing middle and upper middle class households to become owners.

To evaluate loan risk, the HOLC hired local real estate agents to develop maps depicting neighborhood quality, on which loan pricing would be based. Lacking data or historical trends to evaluate risk, these agents employed racial and ethnic prejudice to risk-rate residential blocks and neighborhoods. This not only had the effect of segregating non-White residents into certain areas in cities, it also prevented non-White residents from obtaining ownership by artificially raising the cost of purchasing an inner city home.

An example of redlining in Oklahoma City is shown in the following map, Figure I-1. Teal and dark blue areas were rated lower risk (“best and still desirable”), while dark green and red areas were rated high risk (“declining and hazardous”). It is likely that areas designated hazardous could not receive conventional mortgage loans. The effect of this risk-rating system was to drive capital into higher grade neighborhoods and away from lower grade neighborhoods—and to limit ownership to a select group of residents.

Figure I-1.
Oklahoma City Redlining Map, Date Unknown



Source: Mapping Inequality, University of Richmond's Digital Scholarship Lab, <https://dsl.richmond.edu/panorama/redlining>.

The Federal Housing Administration (FHA), which insures residential mortgages, was formed shortly after the HOLC and continued the federal effort to continue to expand

homeownership for the middle class. This opportunity was effectively only available to White renters, as the FHA underwriting manual instructed against positive risk ratings for neighborhoods with mixed race or social class. The FHA also actively denied lending in urban neighborhoods, favoring lending in suburbs. In effect, the FHA rewarded racial covenants and cut off racial and ethnic minorities from conventional mortgages, denying them America's most successful wealth-building tool: ownership of one's home.

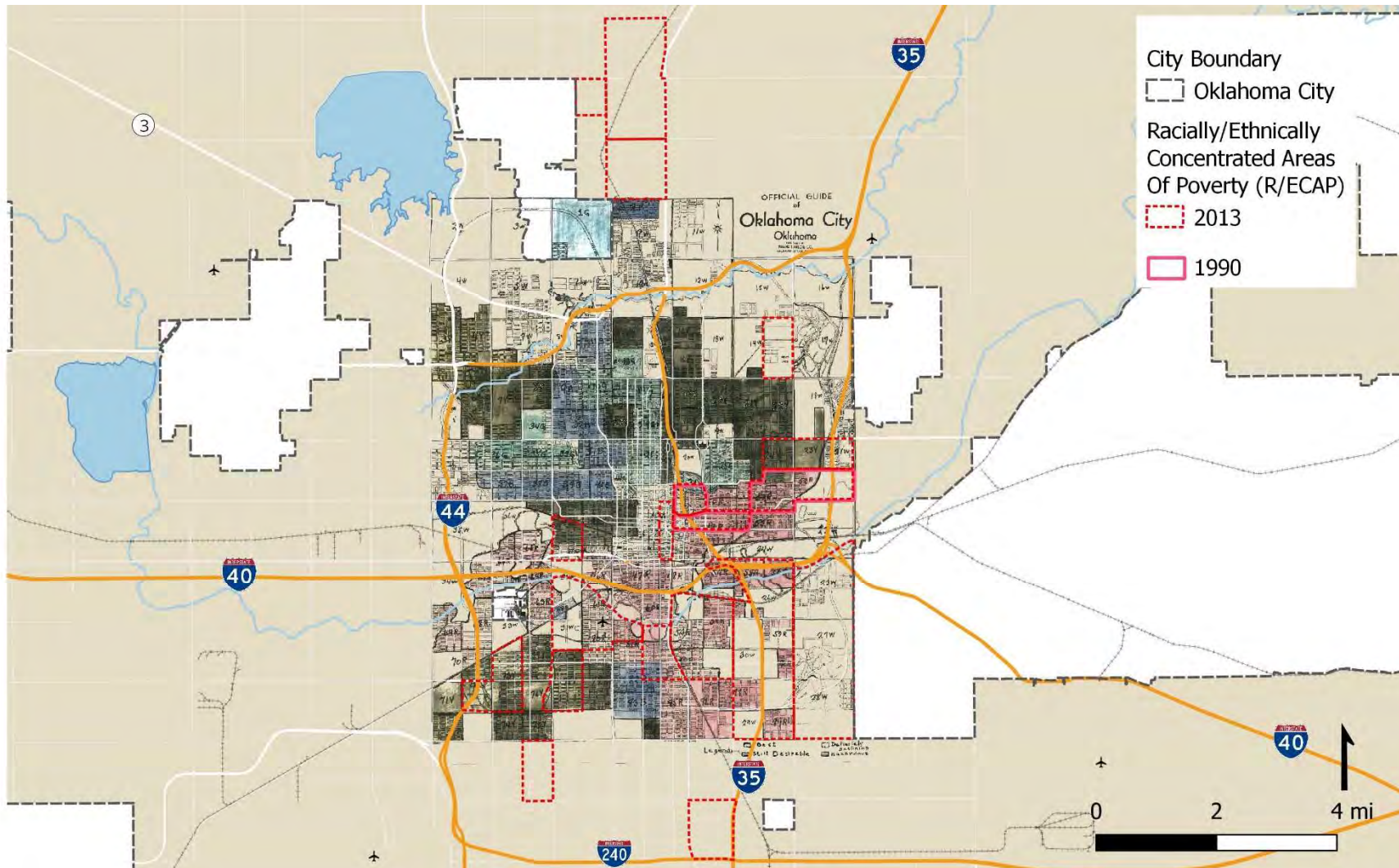
Discrimination in mortgage lending provided an opportunity for predatory lenders to take advantage of would-be minority owners. This took two forms: Predatory lenders convinced White owners to sell at below market prices (often based on threats that minority buyers were moving into the neighborhood) and then offered minority buyers inflated prices with unfavorable lending terms.

Laws prohibiting discrimination in lending were passed in 1974, much later than the prohibition of other discriminatory actions. As such, for decades these restrictions on mortgage lending—mostly for African Americans, immigrants, and women—significantly limited access to economic growth which, in the U.S., is primarily achieved through homeownership.

The map below, Figure I-2, shows the enabling effects of redlining on segregation in Oklahoma City. Areas in a dark red outline are designated "Racially/Ethnically Concentrated Areas of Poverty" or "R/ECAPs" as of 1990—these are neighborhoods with high rates of poverty and more than 50 percent racial and ethnic minorities. In 1990, all R/ECAPs were also areas that had been ranked as "hazardous" by the HOLC. The current R/ECAPs (shown by the dotted red line) include many "hazardous" areas as well as "declining" areas. No R/ECAPs are located in "best" or "still desirable" areas.

In sum, the federal designation of neighborhoods as lower quality perpetuated segregation by intentionally dividing cities across racial and class lines, encouraging White upper and middle income residents to located in "approved" neighborhoods and discouraging private sector investment in "unapproved" neighborhoods. As demonstrated throughout this section, these divisions persist today.

Figure I-2.
Racially and Ethnically Concentrated Areas of Poverty (R/ECAP) and Historic Redlining



Source: HUD AFFH Raw Data, February 2018, and Mapping Inequality, University of Richmond's Digital Scholarship Lab, <https://dsl.richmond.edu/panorama/redlining>.

Demographic Context

The city of Oklahoma City is the capital of Oklahoma and is located in the center of the state. The city is surrounded by several municipalities, including Norman to the south, home to Oklahoma University, the largest institution of higher education in the state. For Norman and other cities in the HUD-defined Oklahoma City region (the CBSA), comparative data are provided in this and other AI sections. Tulsa—the second most populous city in Oklahoma—shares many characteristics of Oklahoma City and is also included as a comparative city. Enid, Lawton, and Shawnee are not included in comparative analyses except where relevant (R/ECAP analysis) due to their distance from Oklahoma City and relatively small size.

Figure I-3.
Oklahoma City and Peer Cities in Analysis



Source: Root Policy Research.

As demonstrated in the figure below, Oklahoma City's population grew by 43 percent between 1990 and 2018, an increase of 192,565 persons. This growth was much lower than nearby Edmond, but much higher than Tulsa. As of 2018, Oklahoma City contained 16 percent of all residents in the state, up from 14 percent in 1990. Oklahoma City is by far the largest city in the state; the second largest city, Tulsa, trails by more than 200,000 residents.

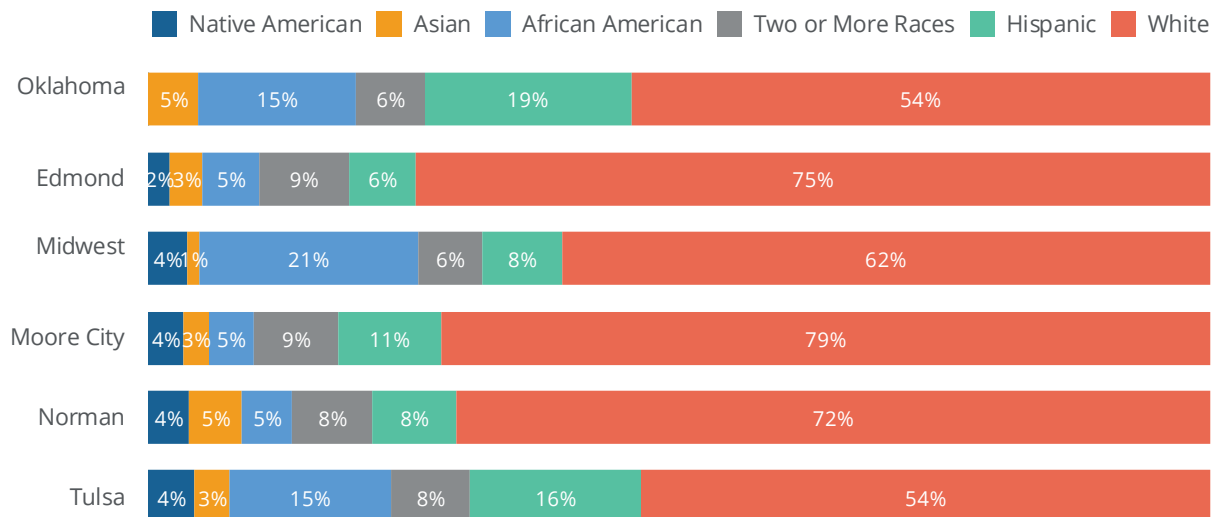
Figure I-4.
Population Change by Jurisdiction, 1990-2018

	1990	2018	Change		Proportion of State	
			Number	Percent	1990	2018
Oklahoma City	444,719	637,284	192,565	43%	14%	16%
Edmond	52,315	91,053	38,738	74%	2%	2%
Midwest City	52,267	57,292	5,025	10%	2%	1%
Moore City	40,318	60,807	20,489	51%	1%	2%
Norman	80,071	121,090	41,019	51%	3%	3%
Tulsa	367,302	402,223	34,921	10%	12%	10%

Source: 2018 ACS 5 year estimates, 1990 Decennial Census

Racial/ethnic distribution differs by jurisdiction, as shown in Figure I-5 below. Oklahoma City and Tulsa are the most diverse racially and ethnically, with 46 percent and 48 percent of their populations, respectively, being Non-White. Only Midwest City has a larger share of African American residents than Oklahoma City.

Figure I-5.
Race and Ethnicity Distribution by Jurisdiction, 2018



Source: 2018 ACS 5 year estimates

Segregation and Integration

The following maps show Oklahoma City's racial and ethnic concentrations geographically, as well as the change in concentrations since 1990, beginning with the distribution of African American residents, and followed by residents of Hispanic descent, Asian residents, Native American residents, and Non-Hispanic White residents.

The spatial analysis reveals, for African Americans:

- African American residents are most likely to live in the east central and northeastern portions of the city and least likely to live west central and northwest.
- With two exceptions, neighborhoods with the highest concentrations of African American residents are not also areas of very high poverty (>40%).
- Between 1990 and 2018, areas around the Medical Center and north of the Capitol experienced significant declines in African American residents.
- Growth in African Americans occurred in the in the far northwest, southwest, and southeast.

Notable is the nearly inverse relationship between African American and White population change. For Non-Hispanic White residents, population growth has occurred in the central part of the city. Declines or stabilization of Non-Hispanic White residents has occurred outside of central Oklahoma City.

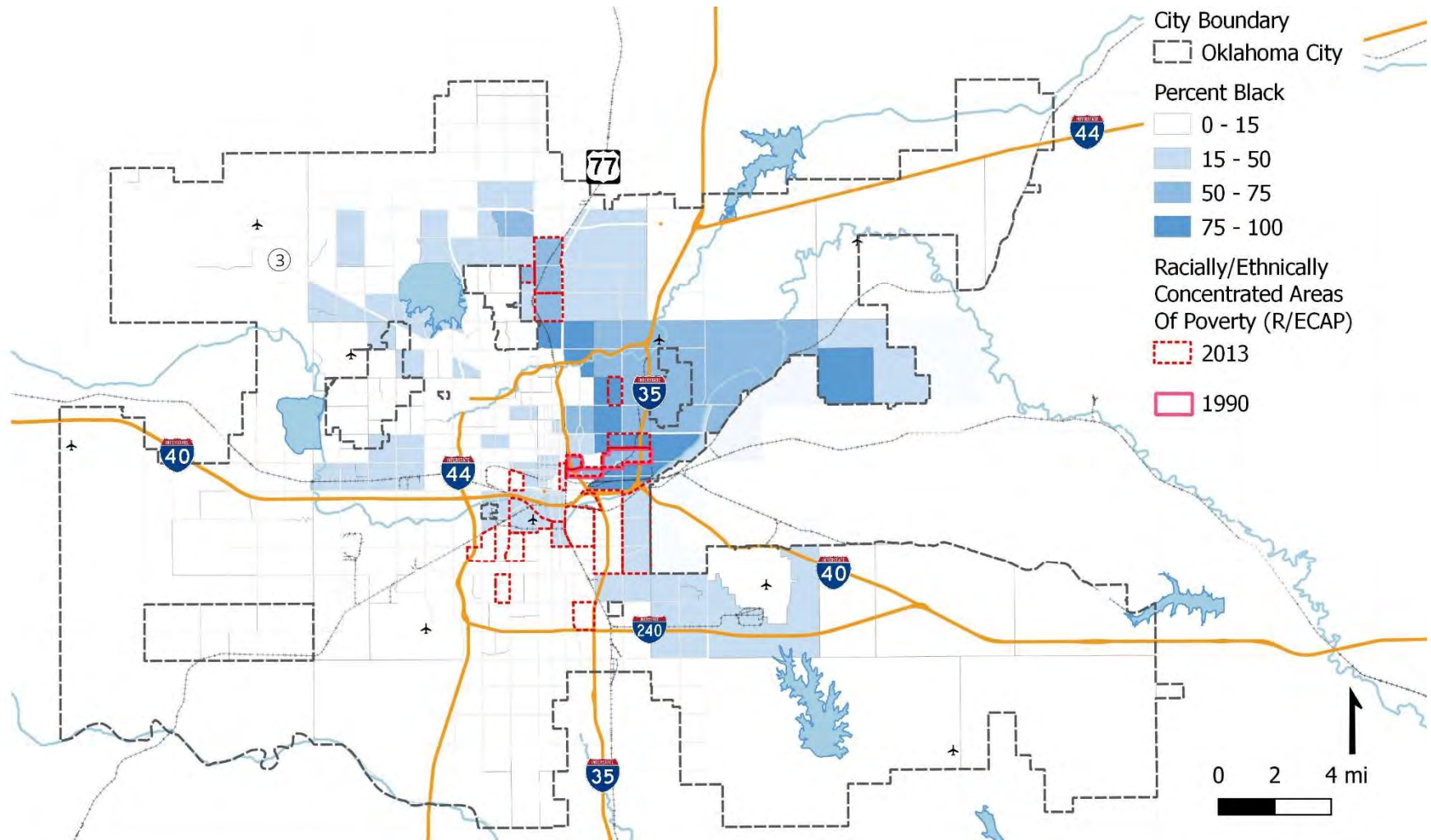
The spatial analysis reveals, for residents of Hispanic descent:

- Residents of Hispanic descent are most likely to live in the southeastern portion of the city.
- Unlike African Americans, for Hispanic residents, the neighborhoods where concentration is the highest are also areas of concentrated poverty.
- High growth areas are almost exclusively south and southeast of downtown, with population declines in outlying areas and near the Medical Center.

Patterns of population change for Asian residents differ than those of other groups, especially Hispanic residents, with growth in the outlying areas and decline or stabilization south of downtown, including-poverty-concentrated areas.

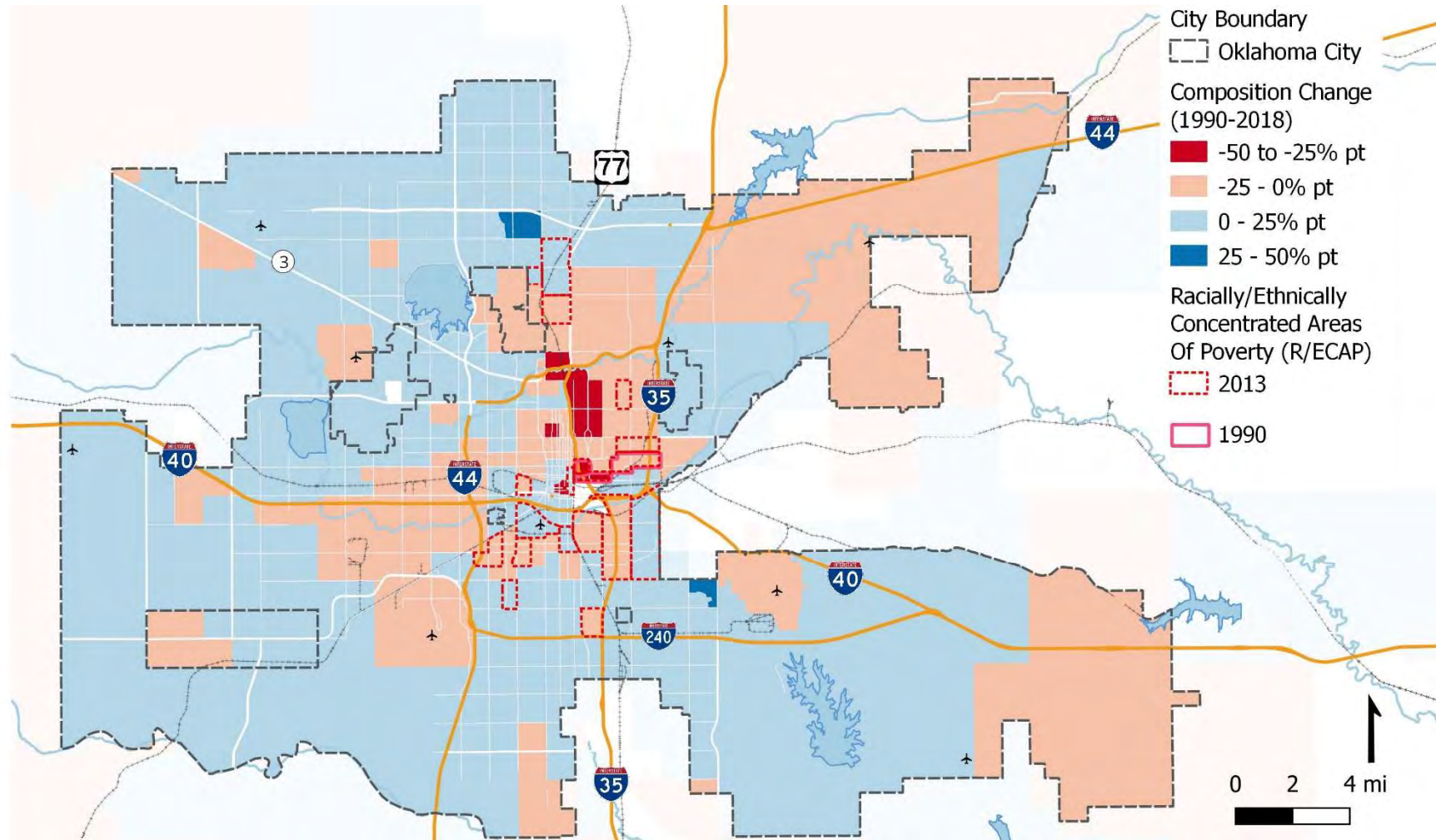
Residential distribution and patterns of change for Native Americans are less distinct. Native Americans live throughout the city with no strong areas of population growth or decline.

Figure I-6.
Percent African American by Census Tract, 2018



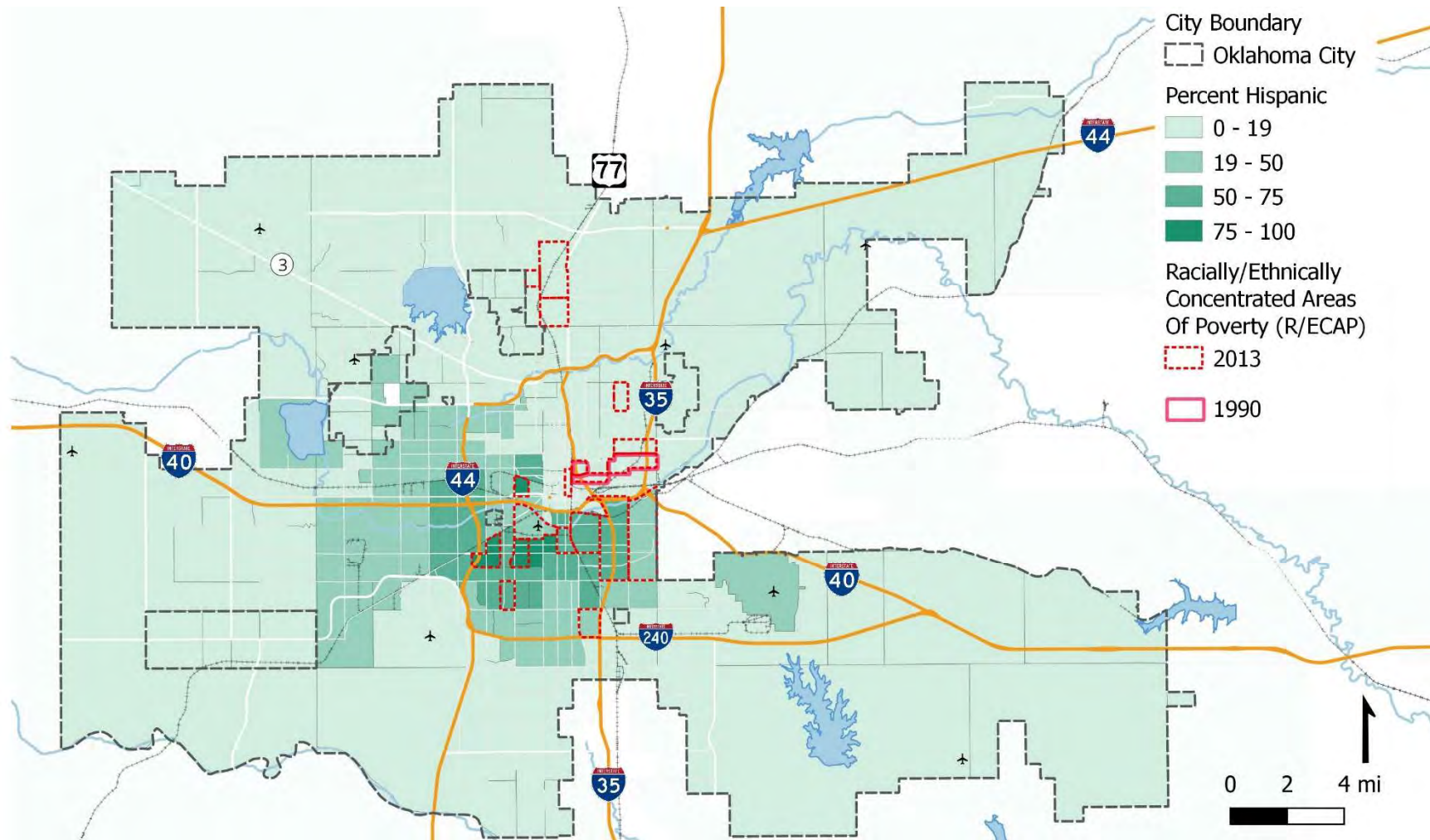
Source: 2018 ACS 5 year estimates

Figure I-7.
Percentage Point Change in Percent African American by Census Tract, 1990-2018



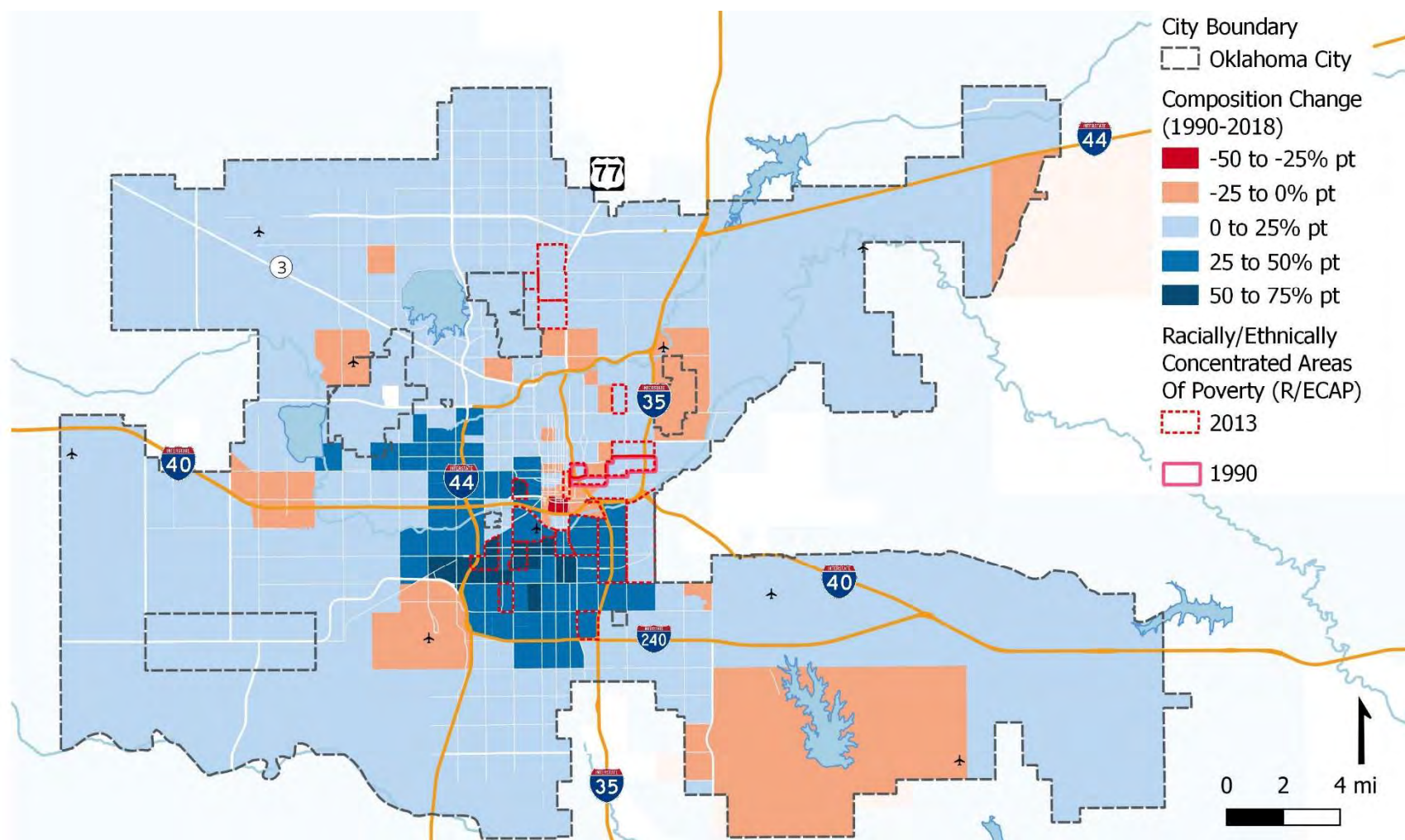
Source: 2018 ACS 5 year estimates, HUD AFFH Raw Data, February 2018.

Figure I-8.
Percent Hispanic by Census Tract, 2018



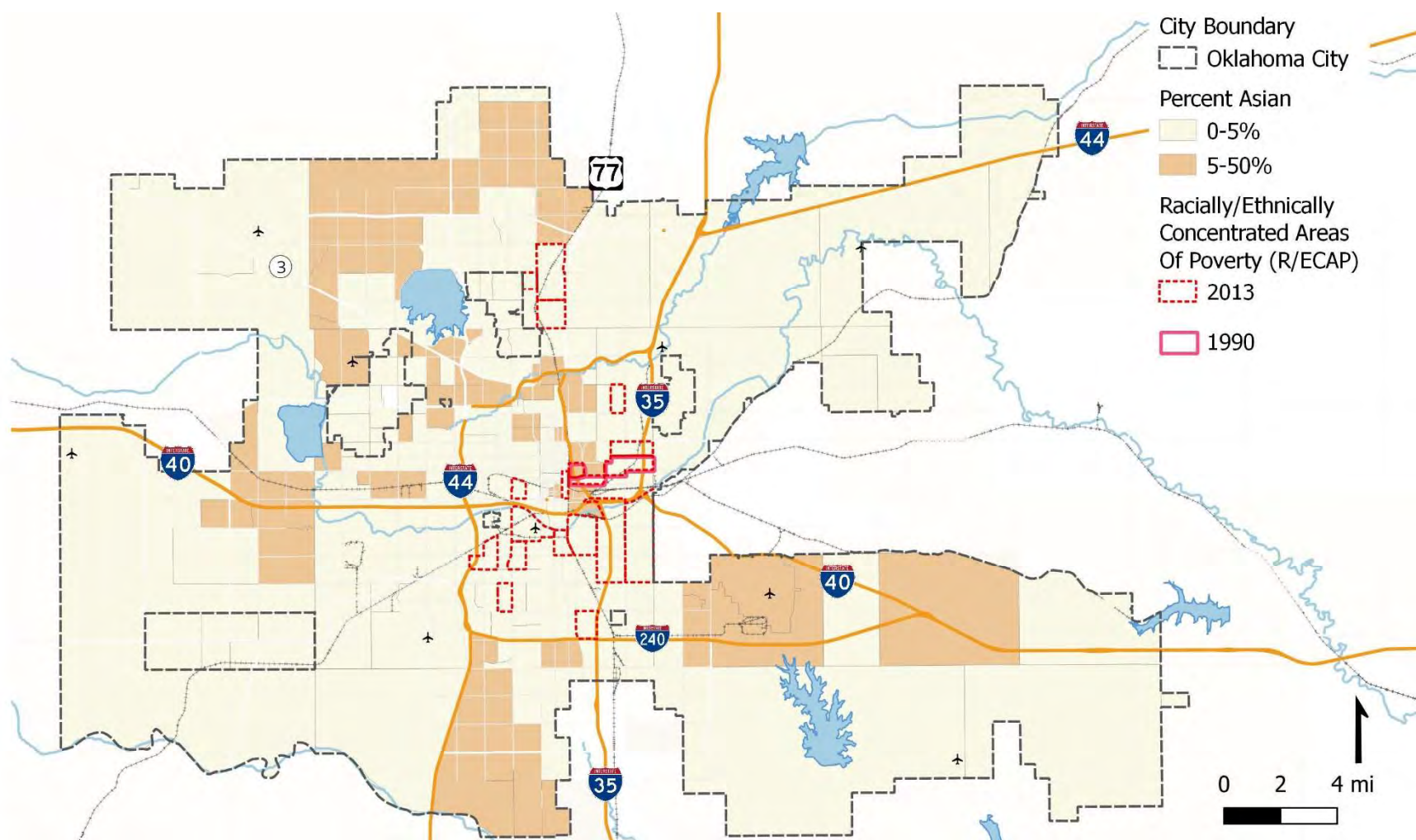
Source: 2018 5 year estimates, HUD AFFH Raw Data, February 2018

Figure I-9.
Percentage Point Change in Percent Hispanic by Census Tract, 1990-2018



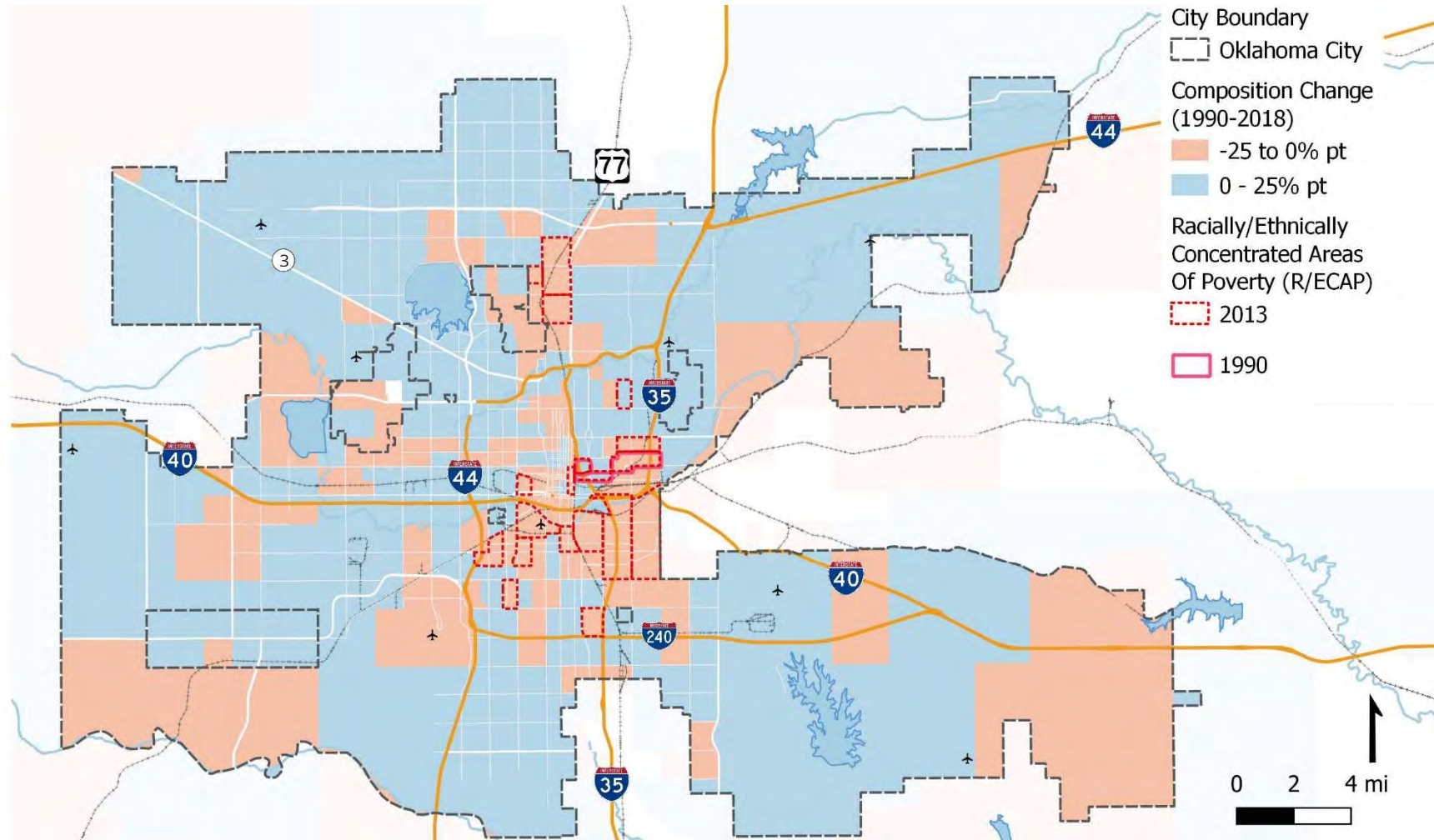
Source: 2018 ACS 5 year estimates, HUD AFFH Raw Data, February 2018.

Figure I-10.
Percent Asian by Census Tract, 2018



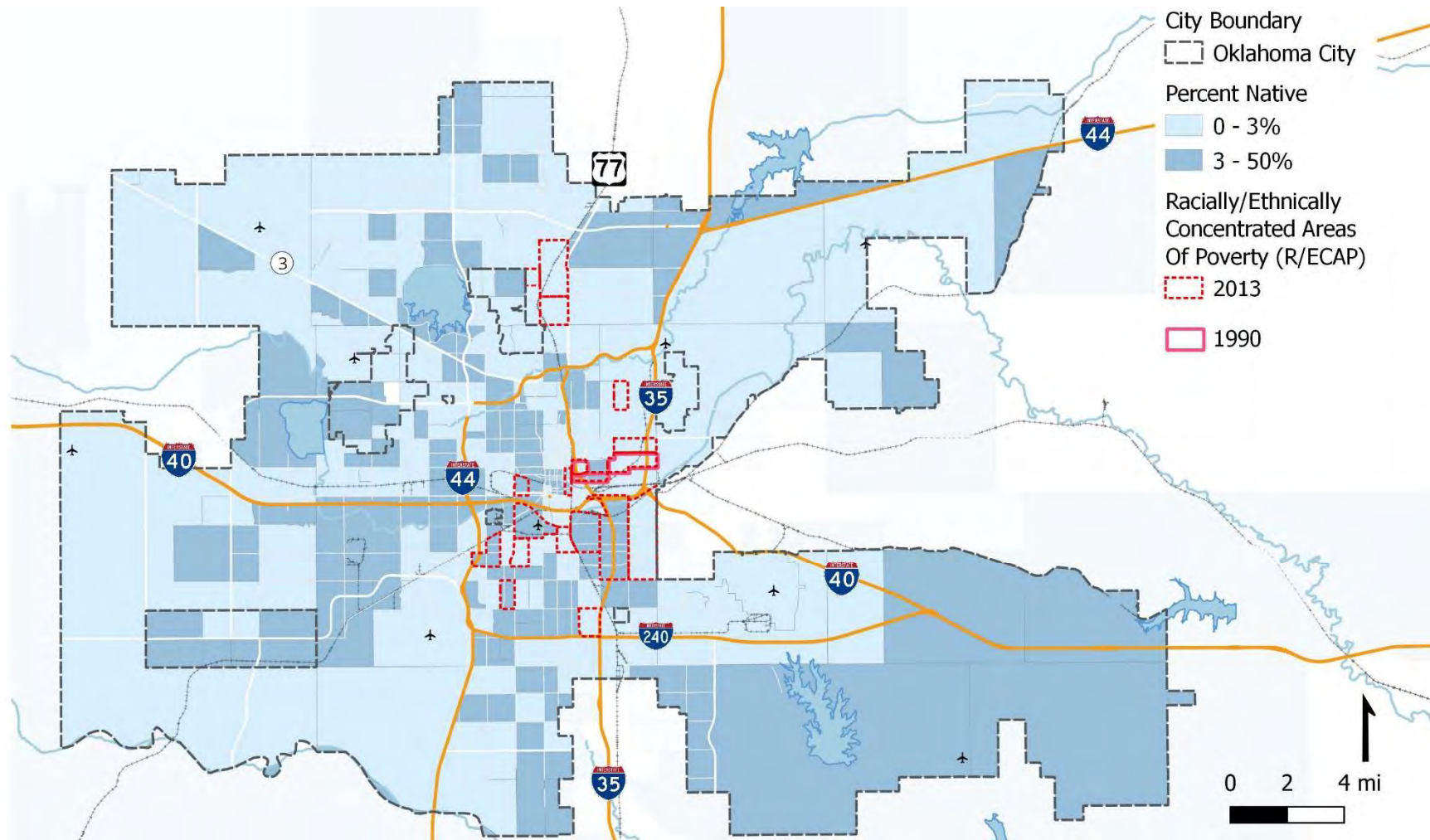
Source: 2018 ACS 5 year estimates, HUD AFFH Raw Data, February 2018.

Figure I-11.
Percentage Point Change in Percent Asian by Census Tract, 1990-2018



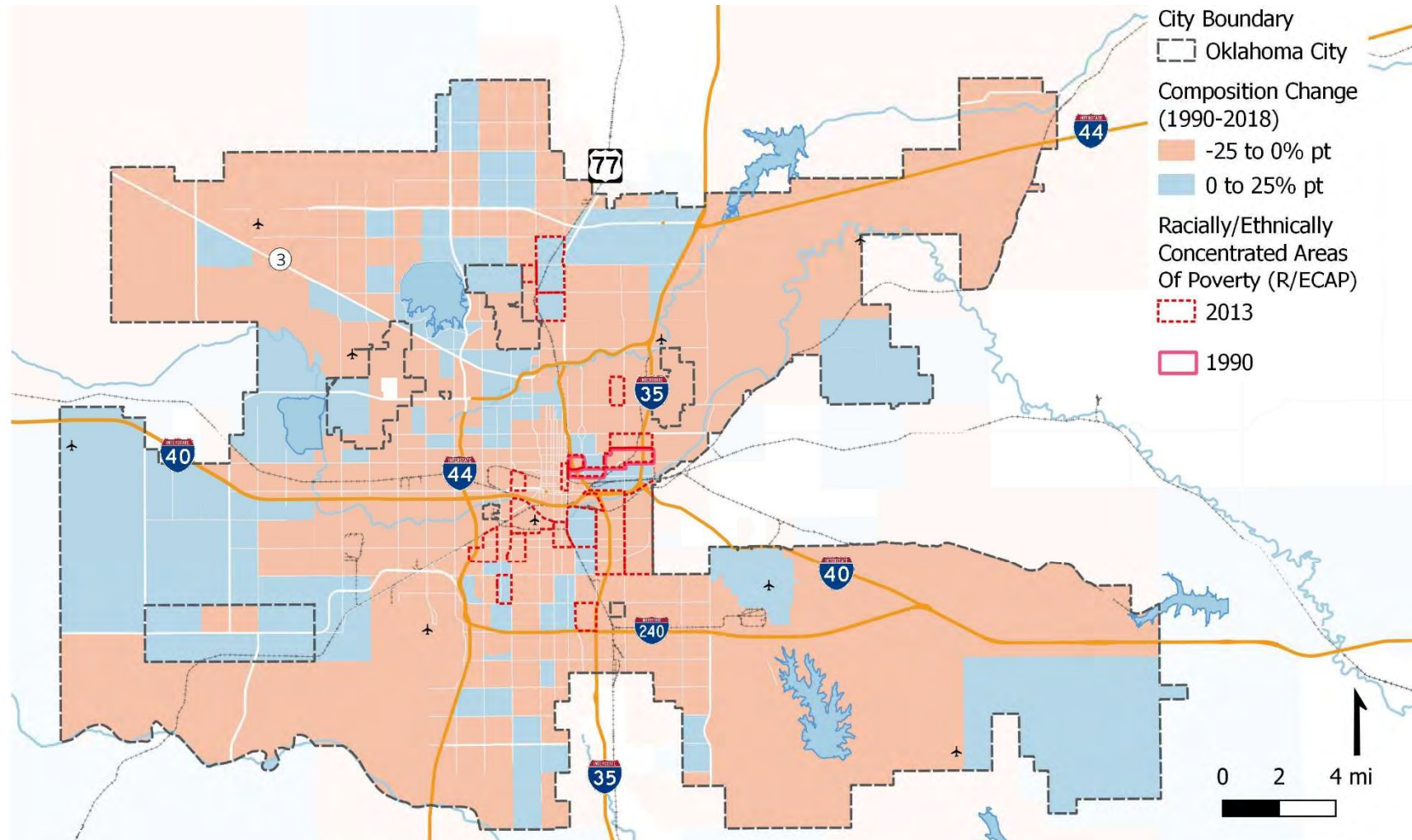
Source: 2018 ACS 5 year estimates, HUD AFFH Raw Data, February 2018.

Figure I-12.
Percent Native American by Census Tract, 2018



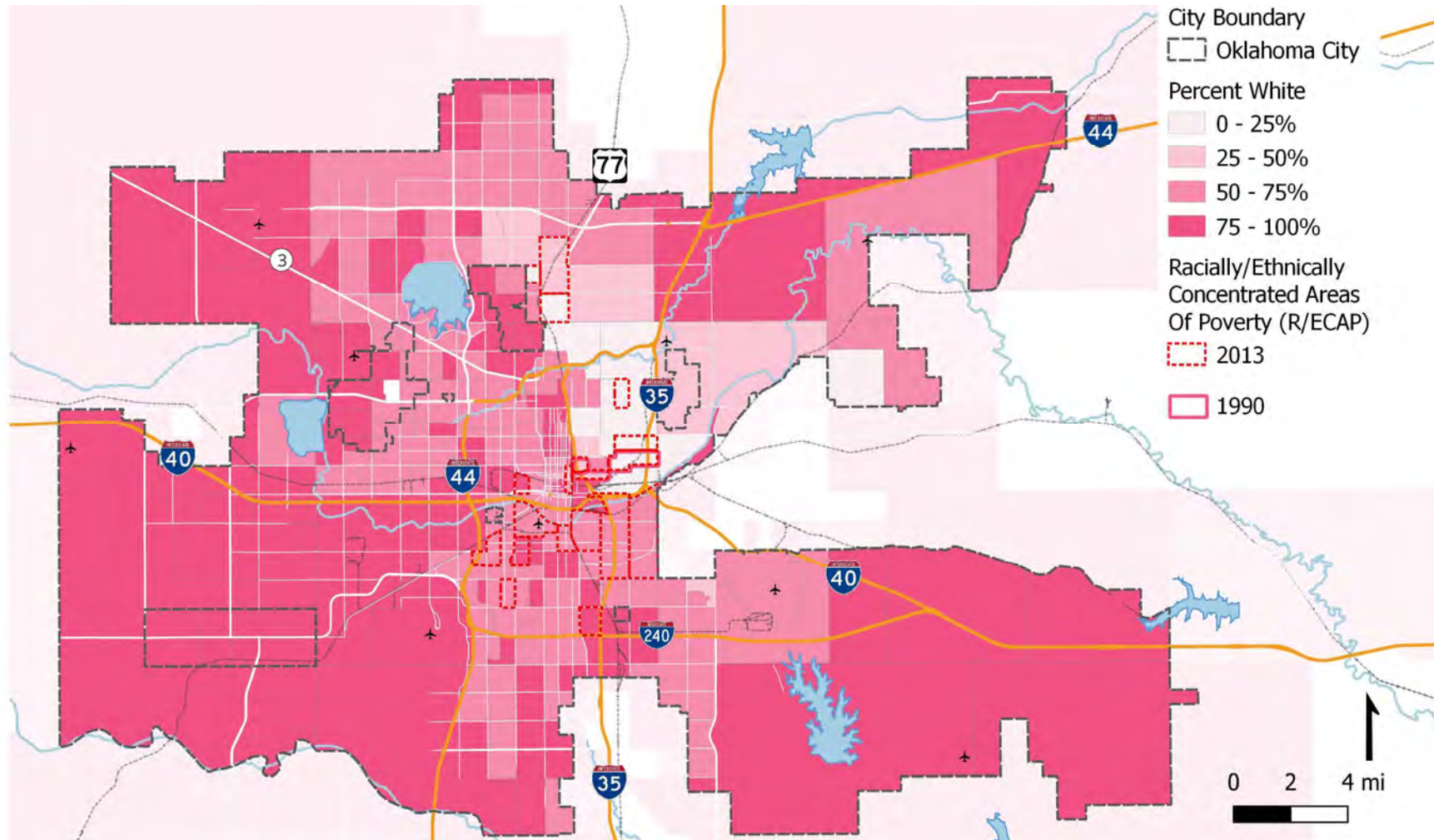
Source: 2018 ACS 5 year estimates, HUD AFFH Raw Data, February 2018.

Figure I-13.
Percentage Point Change in Percent Native American by Census Tract, 1990-2018



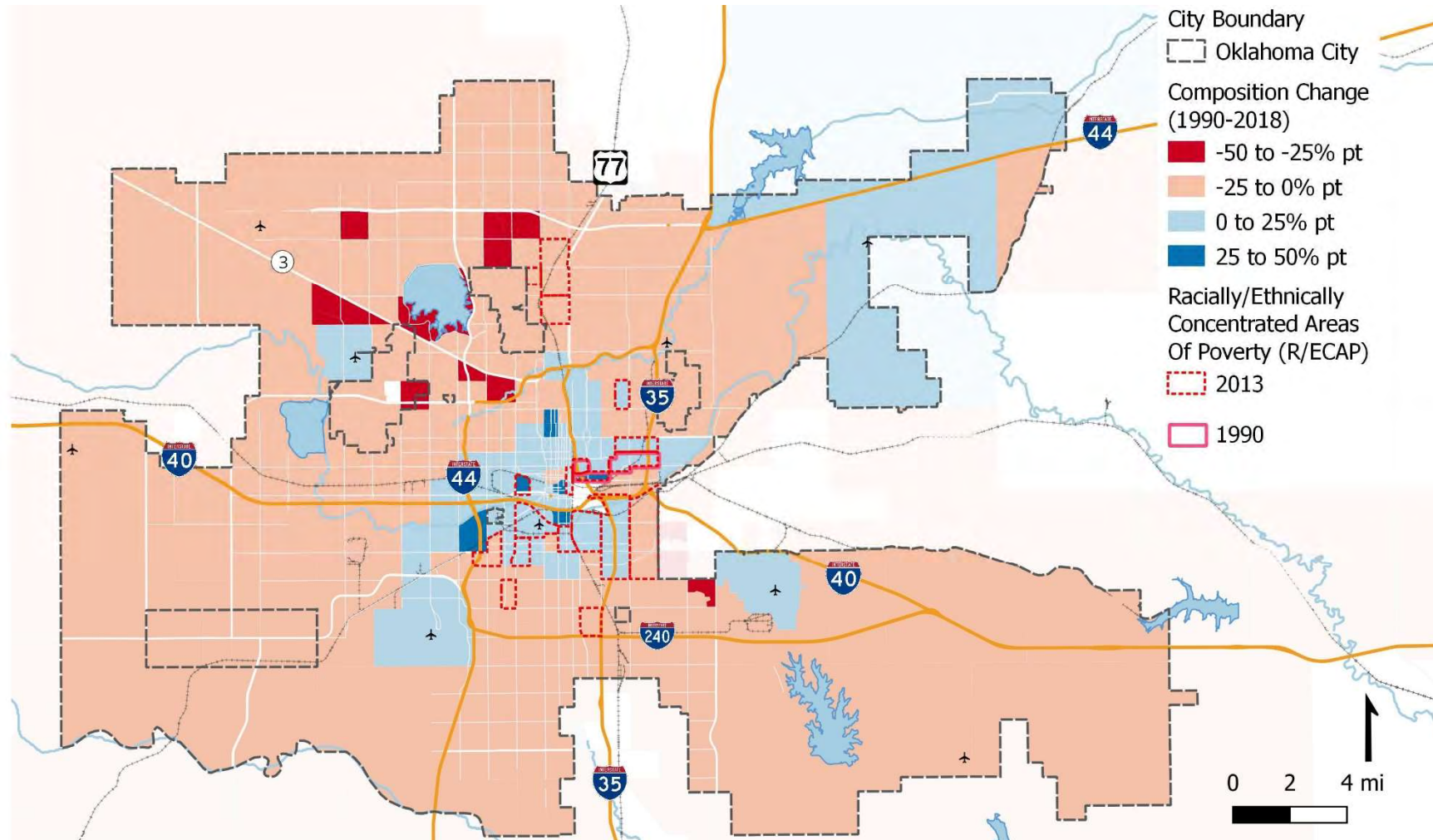
Source: 2018 ACS 5 year estimates, HUD AFFH Raw Data, February 2018

Figure I-14.
Percent White by Census Tract, 2018



Source: 2018 ACS 5 year estimates, HUD AFFH Raw Data, February 2018.

Figure I-15.
Percentage Point Change in Percent White by Census Tract, 1990-2018



Source: 2018 ACS 5 year estimates, HUD AFFH Raw Data, February 2018.

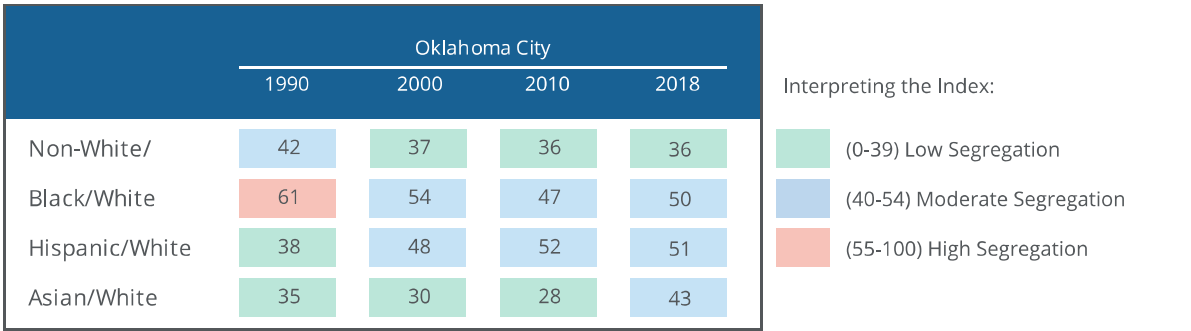
Severity of segregation. A common measure of segregation used in fair housing studies is the dissimilarity index (DI). The DI measures the degree to which two distinct groups are evenly distributed across a geographic area, usually a metropolitan area or county. DI values range from 0 to 100—where 0 is perfect integration and 100 is complete segregation. The DI represents a “score” where values between 0 and 39 indicate low segregation, values between 40 and 54 indicate moderate segregation, and values between 55 and 100 indicate high levels of segregation.

Like all indices, the DI has some weaknesses: First, the DI provided by HUD uses Non-Hispanic White residents as the primary comparison group. That is, all DI values compare racial and ethnic groups against the distribution of Non-Hispanic White residents.

Another limitation of the DI is that it can conceal practices that lead to racial and ethnic exclusion. Communities without much diversity typically have very low dissimilarity indices, while counties with the most diversity will show high levels of dissimilarity. Thus, a “low” dissimilarity index for a jurisdiction is not always a positive if it indicates that racial and ethnic minorities face barriers to entry in a community. These limitations are not significant for this study but are noted in the event that the city’s DI is used to evaluate segregation against peer cities.

Figure I-16 shows trends in DI for Oklahoma City. For Non-White residents overall, the DI has declined since 1990 and is now “low.” This is largely a factor of decline in the DI for Black/African American residents, which was “high” in 1990 and is now moderate, yet increasing. Hispanic/White segregation has been increasing, and is approaching a high segregation level. Asian segregation has also increased since 2010 after being stable.

Figure I-16.
Regional Dissimilarity Index Trends, 1990 - 2018



Note: 2018 Dissimilarity Index calculated by Root Policy research using methods that vary slightly from previous HUD calculations. Partial Census tracts are not weighted.

Source: HUD AFFH Raw Data, February 2018.

Figure I-17 graphically represents these trends.

Figure I-17.
Oklahoma City
Dissimilarity Index
Trends, 1990 - 2018

Note: 2018 Dissimilarity Index calculated by Root Policy research using methods that vary slightly from previous HUD calculations.

Source:

HUD AFFH Raw Data, February 2018, 2018 ACS 5 year estimates

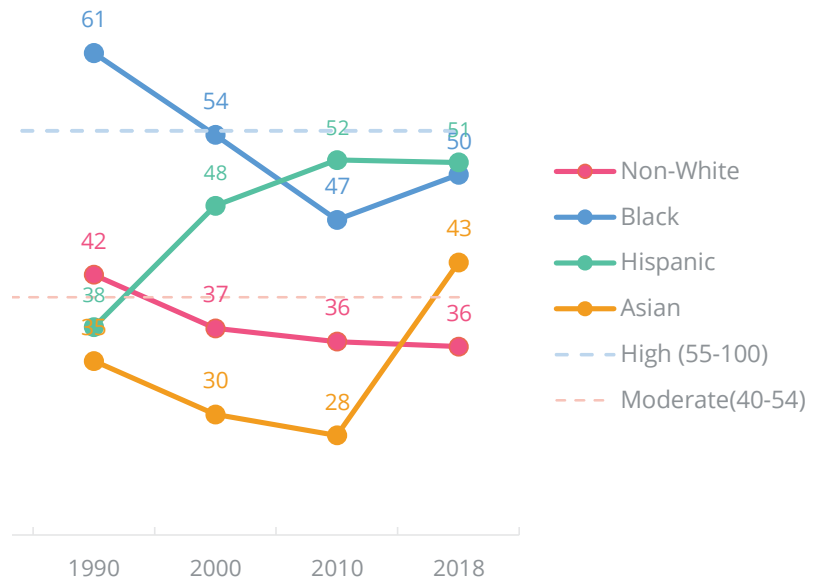
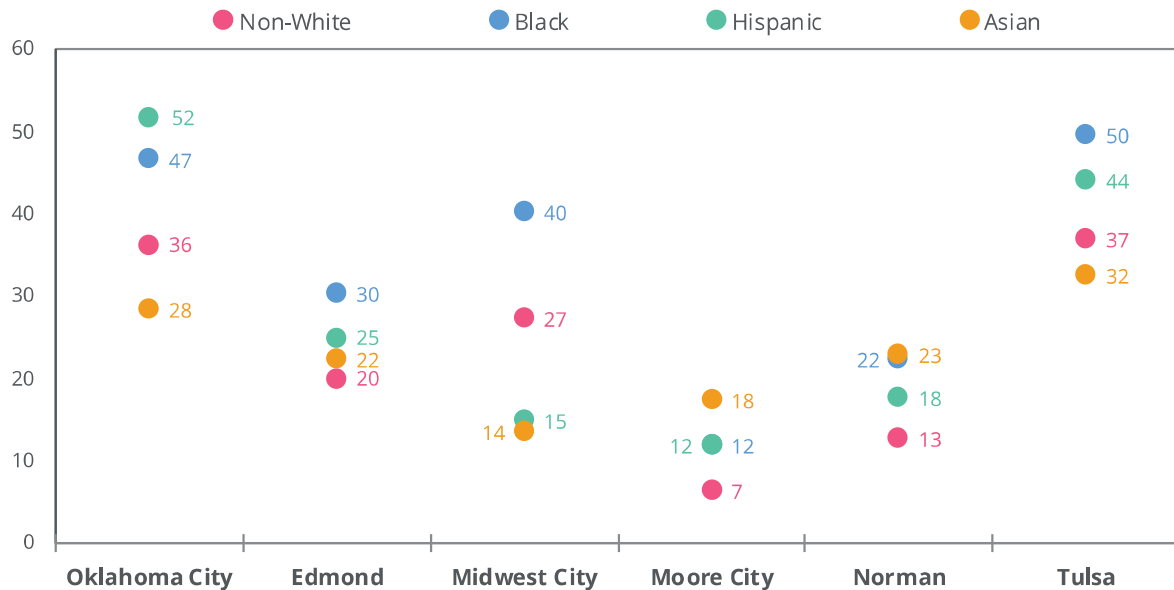


Figure I-18 compares the DI to other cities in the region, and to Tulsa. Compared to Tulsa, Oklahoma City's Hispanic residents are more segregated, and Black/African Americans are similarly segregated, as measured by the DI. Segregation is lowest in Moore City and Norman and moderately low in Edmond.

Figure I-18.
Dissimilarity Index by Jurisdiction, 2010



Source: HUD AFFH Raw Data, 2010.

Economic Segregation

A critical aspect of expanding economic opportunity is addressing economic segregation. A growing body of research has consistently found that reducing economic segregation, especially for young children, has long-term, positive outcomes for families, and decreases the public sector costs of addressing the consequences of poverty.

Overall, the poverty rate of Oklahoma city is 17 percent. Figure I-19 compares the overall, youth, and older adult poverty rates of Oklahoma City to peer cities and Tulsa. Oklahoma City’s poverty rate for children is relatively high.

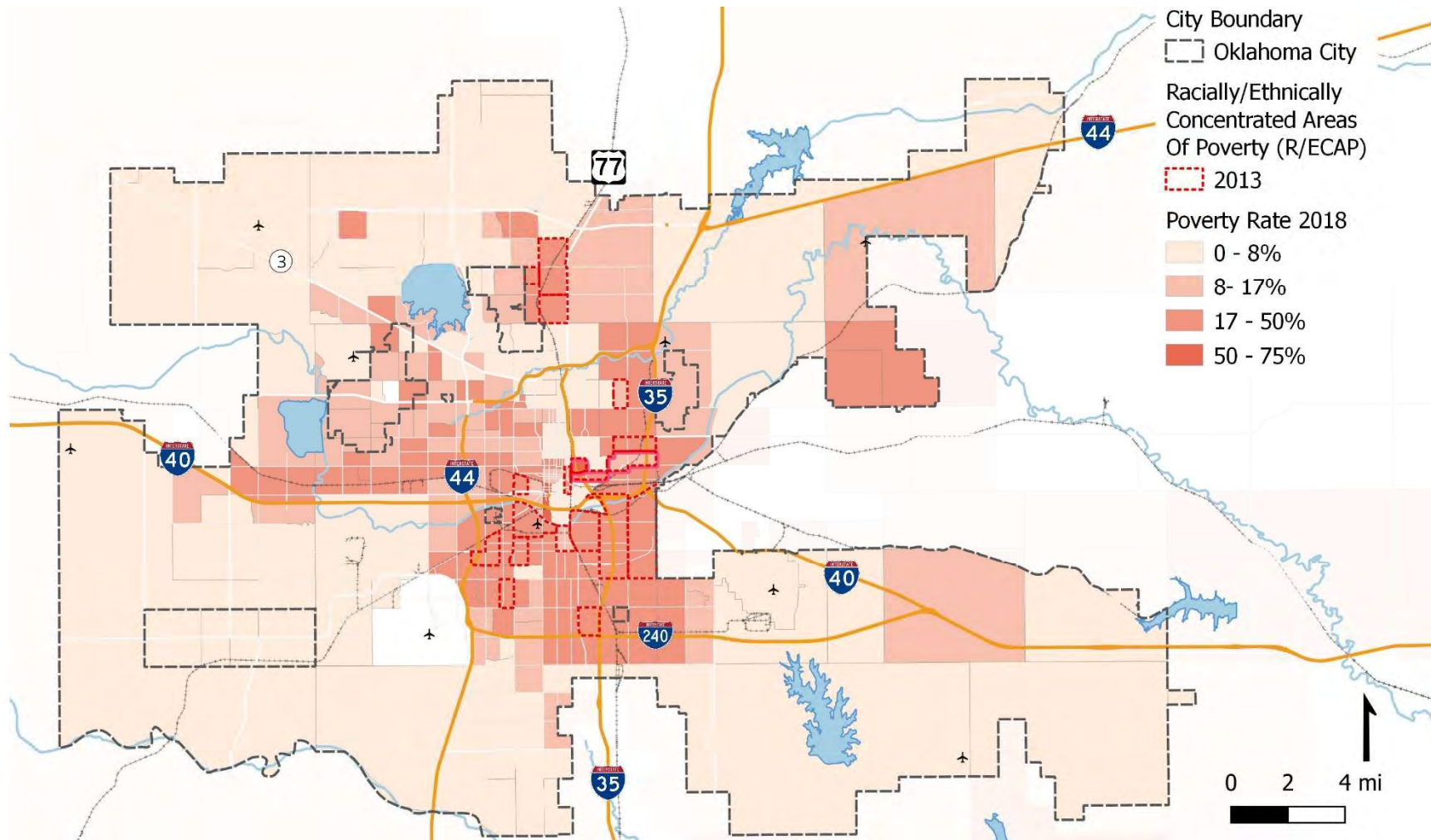
Figure I-19.
Poverty Rates, 2018

Source:
2018 ACS 5 year estimates.

	Total	0 to 18 yrs	65 yrs and Older
Oklahoma City	17%	25%	15%
Edmond	11%	13%	6%
Midwest City	15%	23%	13%
Moore City	9%	11%	16%
Norman	18%	17%	10%
Tulsa	20%	30%	15%

The map in Figure I-20 reveals that poverty is concentrated in census tracts in a crescent around the central business district below Interstate 40 and East of Interstate 235 as well as in the neighborhoods in and surrounding the industrial areas that flank Interstate 35 to Interstate 240 and north of Interstate 40 west of downtown. Other areas of concentrated poverty are more scattered throughout the northwest quadrant of the city. There is also a concentration in the areas to the west of Highway 77 in the north of the city and to the east in more rural areas near Spencer, north of Midwest City.

Figure I-20.
Poverty by Census Tract, 2018



Source: 2018 ACS 5 year estimates

Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

HUD has developed a framework to examine economic opportunity at the neighborhood level, with a focus on racial and ethnic minorities. That focus is related to the history racial and ethnic segregation, which, as discussed in the beginning of this section, often limited economic opportunity.

“Racially or ethnically concentrated areas of poverty,” also known as R/ECAPs, are neighborhoods in which there are both racial concentrations and high poverty rates.

HUD’s definition of an R/ECAP is:

- A census tract that has a non-white population of 50 percent or more (majority-minority) or, for non-urban areas, 20 percent, and a poverty rate of 40 percent or more; of
- A census tract that has a non-white population of 50 percent or more (majority-minority) and the poverty rate is three times the average tract poverty rate for the county, whichever is lower.

Why R/ECAPs matter. The 40 percent poverty threshold used in the R/ECAP definition is based on research identifying this to be the point at which an area becomes socially and economically dysfunctional. Conversely, research has shown that areas with up to 14 percent of poverty have no noticeable effect on community opportunity.²

Households within R/ECAP tracts frequently represent the most disadvantaged households within a community and often face a multitude of housing challenges. By definition, a significant number of R/ECAP households are financially burdened, which severely limits housing choice and mobility. The added possibility of racial or ethnic discrimination creates a situation where R/ECAP households are likely more susceptible to discriminatory practices in the housing market. Additionally, due to financial constraints and/or lack of knowledge (e.g., limited non-English information and materials), R/ECAP households encountering discrimination may believe they have little or no recourse, further exacerbating the situation.

It is very important to note that many R/ECAPs, while not economically wealthy, are rich in culture, diversity, and community. R/ECAPs are not meant to cast broad judgments on an area, but rather to identify areas where residents may have historically faced discrimination and continue to be challenged by limited economic opportunity.

² The Costs of Concentrated Poverty: Neighborhood Property Markets and the Dynamics of Decline.” In Nicolas P. Retsinas and Eric S. Belsky, eds., *Revisiting Rental Housing: Policies, Programs, and Priorities*. Washington, DC: Brookings Institution, 116–9.

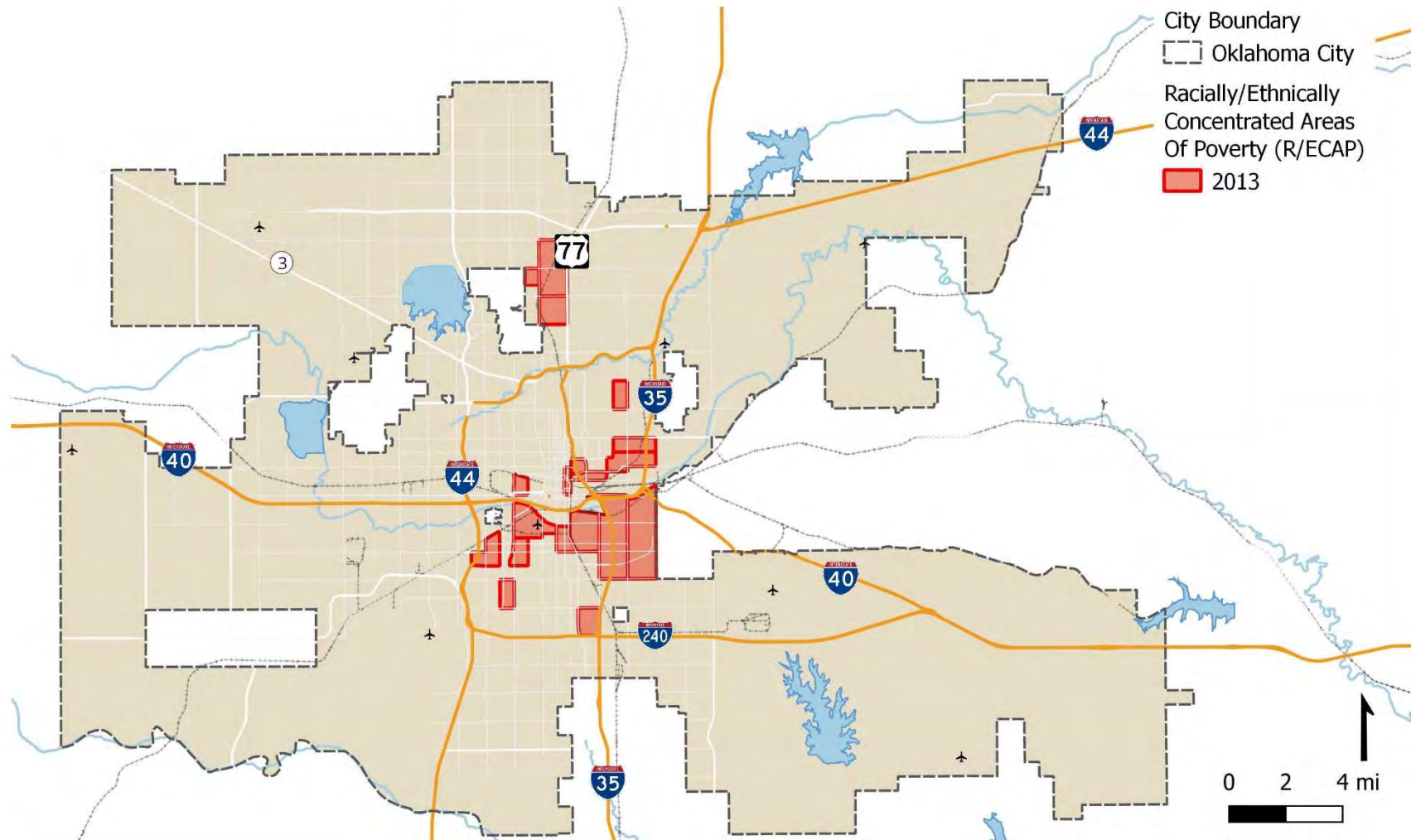
R/ECAP trends. According to HUD's current R/ECAP designations, there are 19 R/ECAP designated census tracts in Oklahoma City. All of the R/ECAP areas in the broader region are within city boundaries.

The map in Figure I-21 reveals that many of the R/ECAP tracts are clustered around the downtown area, directly to the south and northeast. There is also a cluster of tracts to the further from the CBD, north along Highway 77.

The number of R/ECAPs has increased significantly since 1990 when the total number of designated tracts was only three. The number of R/ECAP census tracts grew to five in 2000, 14 in 2010, and currently total 19. Figure I-21 shows the location of the R/ECAP designated tracts over this time period. The maps reveal that while racially and ethnically concentrated poverty was initially confined to a contiguous set of neighborhoods in and around the CBD, R/ECAPs developed in several new clustered and have expanded in those areas since.

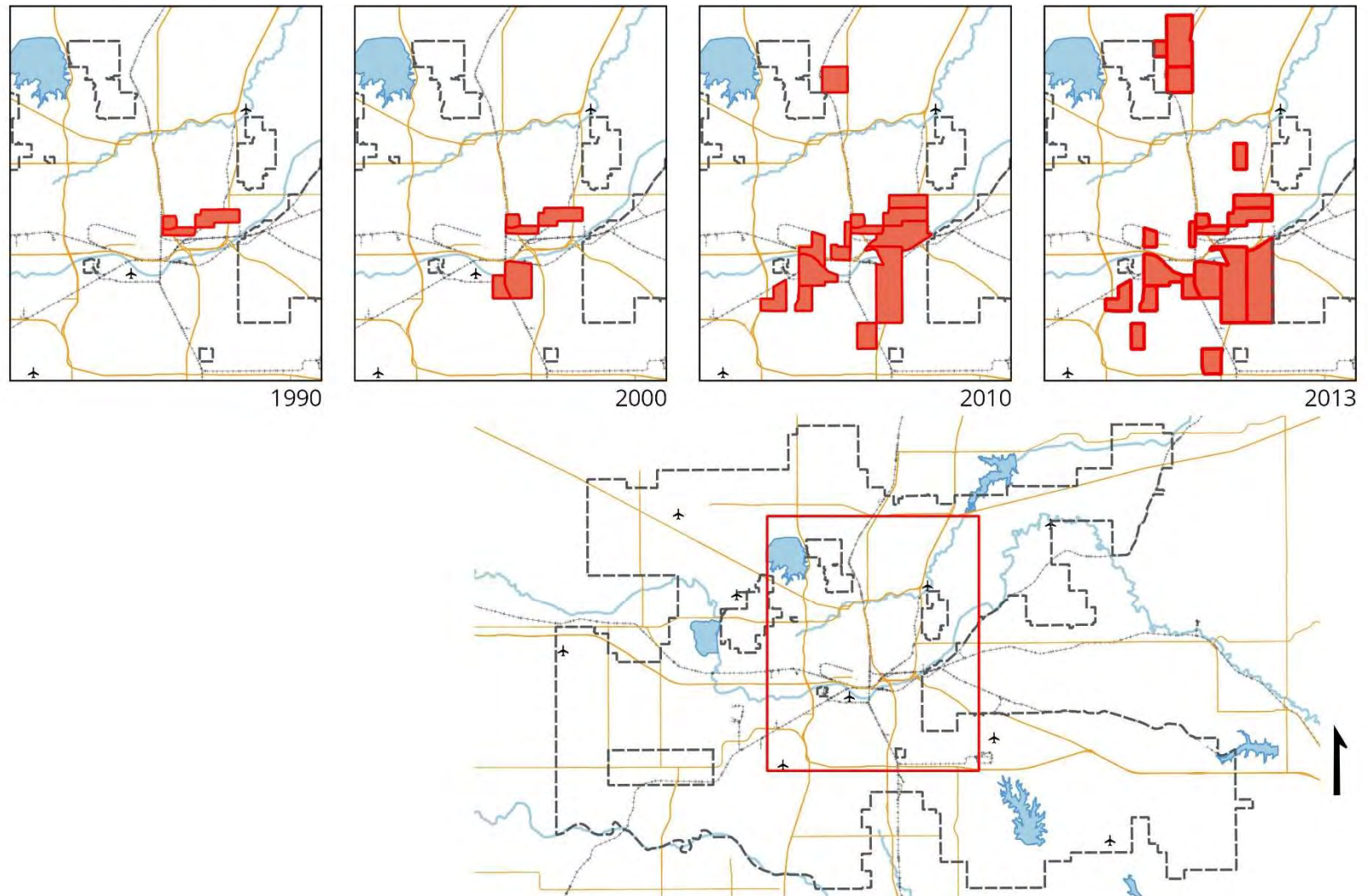
Comparing these geographic trends to the racial concentration trends, the 1990s R/ECAP tracts near downtown had higher concentrations of African American residents at the time but, since then, African American resident concentrations have declined as they have migrated into more suburban areas in the city. In several cases, these declines have exceeded 50 percent. Tracts that became R/ECAP designated tracts after 1990 have had relatively consistent racial and ethnic concentrations. The rise of R/ECAP designated tracts south of Interstate 40 coincide with the growth in the concentration of Hispanic residents since 1990.

Figure I-21.
Racially and Ethnically Concentrated Areas of Poverty, 2013



Source: HUD AFFH Raw Data, February 2018.

Figure I-22.
Racially and Ethnically Concentrated Areas of Poverty, 1990, 2000, 2010, and 2013



Source: HUD AFFH Raw Data, February 2018.

Characteristics of R/ECAPs. More than 40,000 residents of Oklahoma City live in R/ECAP areas. There are nearly 10,000 families living in R/ECAP designated areas and over half of those families are families with children. Overall, the Hispanic residents represent the highest proportion of residents in R/ECAP designated tracts (36%) while African American residents are similarly high (33%). Compared to their racial and ethnic representation in the city overall (15% and 19%, respectively), both African American and Hispanic residents are disproportionately represented in R/ECAPs.

White residents are less represented in R/ECAP designated tracts only constituting under one quarter of the total residents (23%).

Figure I-23 compares the overall R/ECAP demographics of Oklahoma City with the two other cities with R/ECAP designated tracts, Lawton and Tulsa. Compared to these cities, Oklahoma City has both a significantly larger population living in R/ECAPs but also a significantly higher proportion of Hispanic residents living in those areas with (35% compared to 10%). In contrast, Oklahoma City has a much lower representation of African American residents in R/ECAPs than both Lawton and Tulsa.

Figure I-23.

R/ECAP Demographics, Oklahoma City, Lawton, and Tulsa, 2010

	Oklahoma City		Lawton		Tulsa	
	Number	Percent	Number	Percent	Number	Percent
R/ECAP Race/Ethnicity						
Total Population in R/ECAPs	43,281	-	2,050	-	23,110	-
White, Non-Hispanic	10,040	23%	520	25%	5,030	22%
Black, Non-Hispanic	14,369	33%	991	48%	13,404	58%
Hispanic	15,377	36%	213	10%	2,277	10%
Asian or Pacific Islander	280	1%	44	2%	168	1%
Native American	1,424	3%	155	8%	854	4%
Other	33	0%	3	0%	25	0%
R/ECAP Family Type						
Families in R/ECAPs	9,794		472		5,340	
Families with Children	5,379	55%	248	53%	2,742	51%

Note: Lawton is included here because, in addition to Tulsa, it has R/ECAPs. No other entitlement cities in the state have R/ECAPs.

Source: HUD AFFH Raw Data, February 2018

Dissimilarity Index Reference Guide

What is the Dissimilarity Index?

A very common measure of segregation used in fair housing studies is the dissimilarity index (DI). The DI measures the degree to which two distinct groups are evenly distributed across a geographic area, usually a county. The DI uses a mathematical formula that compares the percentage of Non-Hispanic, White residents living in a Census tract to the percentage of minority residents living in that same Census tract to the overall city proportion of each.

What do the DI numbers mean?

DI values range from 0 to 1—where 0 is perfect integration and 1 (or 100, if decimals are not used) is complete segregation. The DI represents a “score” where values between 0 and .39 indicate low segregation, values between .40 and .54 indicate moderate segregation, and values between .55 and 1 indicate high levels of segregation.

Can the DI apply to neighborhoods?

The DI is not usually calculated at the neighborhood level; it is meant to be aggregated at the city or county level. At the neighborhood level the DI would examine racial and ethnic dispersion among city blocks, and a low-segregation score would mean even distribution of households along blocks, which is unusual in the United States.

Are there problems with the DI?

It is important to note that the DI generally uses White, non-Hispanic residents as the primary comparison group. That is, all DI values compare racial and ethnic groups against the distribution of white, non-Hispanic residents. This is a logical approach for the Regional AI because White, non-Hispanic residents are the largest racial and ethnic group in the region.

Another limitation of the DI is that it can conceal practices that lead to racial and ethnic exclusion. Counties without much diversity typically have very low dissimilarity indices, while counties with the most diversity will show high levels of dissimilarity.

SECTION II.

DISPROPORTIONATE HOUSING NEEDS

SECTION II.

Disproportionate Housing Needs

The primary purpose of a disproportionate housing needs analysis is to determine how access to the housing market and housing choice differ for members of protected classes—and to ensure that these disproportionate needs are part of housing plan goal-setting and strategic planning.

To that end, this section:

- 1) Identifies gaps in housing cost burden, for rental and for sale housing;
- 2) Examines differences in the ability to attain homeownership through mortgage loans;
- 3) Assesses how these differences affect housing choice. This includes geographic choice as well as differences in public and private housing options;
- 4) Examines differences in the races and ethnicities of beneficiaries of publicly supported housing and neighborhoods where publicly subsidized housing is concentrated; and
- 5) Identifies where gaps in housing choice are related to actions by the public or private sector, as reported by stakeholders and residents participating in focus groups and a review of fair housing complaint data.

Primary Findings

- Rising rents and tightening of the rental market has disproportionately hurt very low income single-person households and families, many of whom are racial and ethnic minorities, persons with disabilities, and elderly residents.
- Similarly, rising home prices has introduced predatory lending and home purchase activity—e.g., “we’ll buy your house as is” offers, rent to own scams, and predatory lending.
- Weak state laws to protect tenants from evictions without just cause exacerbates their vulnerability and increases homelessness, an undesirable outcome which is costly for the public sector.
- Residents and landlords would benefit from increased education and training, including fair housing laws and requirements and “good tenant” classes. Fair housing information should be more intentionally marketed through social service agencies and in grassroots newspapers and social media networks.

- There is growing concern about the effect of city-facilitated redevelopment efforts on displacement of low income and minority residents and skepticism that leadership is working in the best interest of these residents.
- Multifamily developments are not being built to comply with the accessibility requirements under the Fair Housing Act due to lack of inspection/testing and enforcement.

Cost Burden

A starting point for housing needs is the measure of “cost burden.” Cost burden exists when households pay more than 30 percent of their gross household income in housing costs. Housing costs include the rent or mortgage payment, utilities, renter or homeowner insurance, and property taxes.

Severe cost burden—paying more than 50 percent of monthly gross income on a household rent or mortgage—is an indicator of critical housing needs. Severe cost burden is also linked to a high risk of eviction or foreclosure, and homelessness.



Why policymakers should care about cost burden. From an economic perspective, Oklahoma City should aim to mitigate cost burden to allow households to invest in the local economy—through direct spending on goods and services, as well as investments in education, health, and well-being of their families. These investments bolster local revenues, increase job readiness, help renters become homeowners, lower the public costs of eviction and foreclosure, and, most importantly, increase the economic opportunity for children.

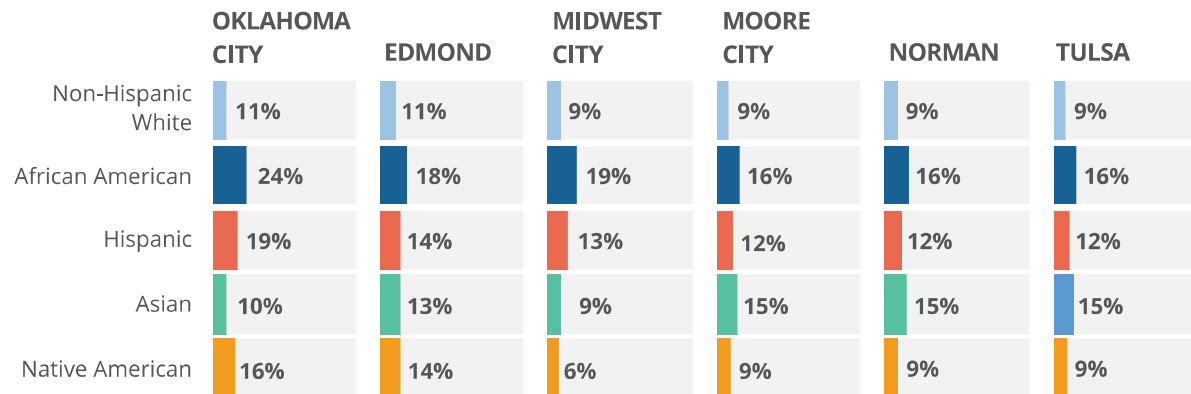
Differences in severe cost burden by race and ethnicity. As shown in Figure II-1, African Americans face the highest rate of severe cost burden of any resident group in Oklahoma City. Severe cost burden for African Americans living in Oklahoma City is much higher than in any other city in the region; this is also true for Hispanic and Native American residents.

Overall, in Oklahoma City:

- One in four African American households experience severe cost burden;
- One in five Hispanic households experience severe cost burden;

- One in six Native American households experience
- One in ten Asian and Non-Hispanic White households experience severe cost burden.

Figure II-1.
Households Experiencing Severe Cost Burden by Race and Ethnicity, by Jurisdiction, 2015



Note: Severe housing cost burden is defined as housing costs that are greater than 50 percent of income.

Source: HUD CHAS dataset using ACS 2011-2015. Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

Disparities in Homelessness

The most severe consequence of severe cost burden is homelessness, and, in Oklahoma City, the risk of homelessness is unequal among racial and ethnic groups, even after adjusting for poverty.

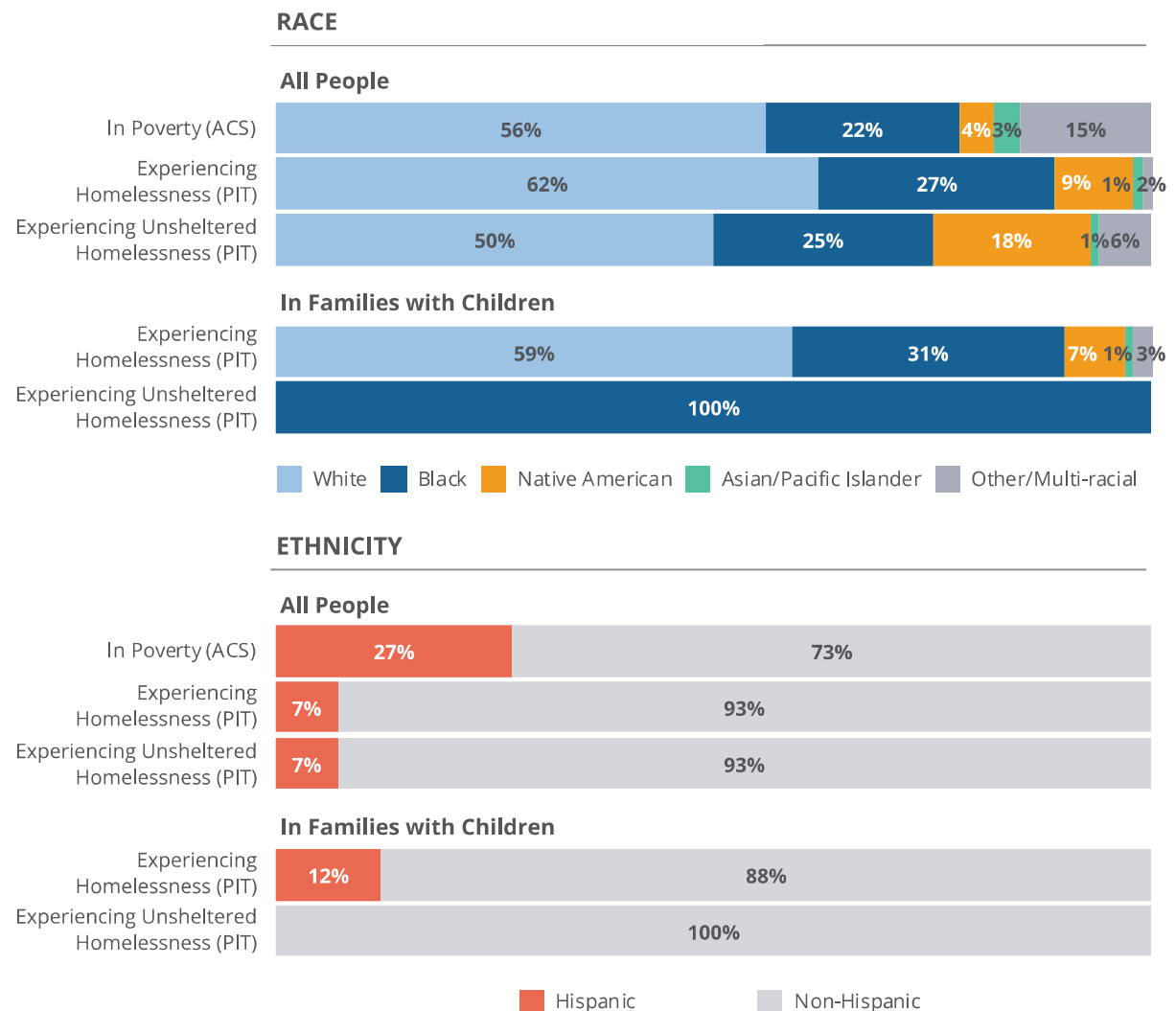
As demonstrated in Figure II-2, African Americans and Native Americans are disproportionately likely to experience homelessness:

- African Americans make up 22 percent of residents living in poverty in the Oklahoma City region. This compares to 27 percent of residents experiencing homelessness, 25 percent of residents who are homeless and unsheltered, and 31 percent of families experiencing homelessness.
- Native Americans make up 4 percent of residents living in poverty yet comprise 18 percent of residents who are homeless and unsheltered.
- White residents are also more likely to experience homelessness than their representation among residents living in poverty would suggest.

In contrast, residents of Hispanic descent represent 27 percent of residents in poverty and only 7 percent of residents experiencing homelessness.

Figure II-2.

Race and Ethnicity of Individuals in Poverty v. in Homelessness, 2015



Source: HUD Continuum of Care Equity data reflecting the Oklahoma City Continuum of Care region.

Evictions

According to the Eviction Lab project, Oklahoma City ranks 20th in the nation for evictions. This ranking is based on the city's eviction rate of 6.19 percent per 100 renters. In Oklahoma City, nearly 18 households are evicted every day ; 6,400 households are evicted each year. Tulsa is 11th in the nation with a rate of 7.77 percent.

Many stakeholders interviewed for this AI expressed concerns about the high rate of evictions in the city and the impact on families and the city:

- The costs of eviction are many, ranging from children moving schools to job losses to homelessness. A recent study in Philadelphia—which has an eviction rate half of that of Oklahoma City's—found that eviction costs the city \$45 million annually, which

could be avoided with a \$3.5 million investment in legal representation for renters to help avoid eviction.

- The University of Oklahoma’s Housing Eviction Legal Assistance Program (HELP) estimates that 9 out of 10 people are *not* represented in their eviction proceedings.
- Evictions disproportionately impact women/single mothers, people of color, and persons with mental health challenges.
- The city needs a three-pronged approach to eviction prevention:
 - 1) Invest in tenant education on rights and responsibilities;
 - 2) Provide renters at risk of eviction with legal representation to negotiate solutions other than eviction; and
 - 3) As part of code enforcement efforts, address “slumlords,” often out-of-state owners who do not keep their properties in good condition and use eviction as a threat against tenant complaints about condition. Some stakeholders feel that such landlords exploit poor families who have very limited choices in the housing market due to poor credit and/or lack of documentation. When code enforcement encounters such properties, officers could provide tenants with information about their rights (e.g., pamphlet with information in English and Spanish).

Gaps in Attaining Homeownership

For the majority of households in the U.S., owning a home is the single most important factor in wealth-building. Homeownership is also thought to have broader public benefits, which has justified decades of public subsidies to support ownership. The federal government has subsidized homeownership in various forms for nearly 100 years—yet the subsidies and wealth-building benefits of ownership have been realized by a narrow segment of households, largely due to the denial of ownership opportunity through restrictive covenants, lending bias, and direct discrimination.

Overall in Oklahoma City, 58 percent of households own their homes. This compares to 50 percent in Tulsa. Oklahoma City’s homeownership rate is also higher than similarly sized- and positioned-cities: Austin’s is 45 percent; Denver, 49 percent; and Sacramento, also 49 percent.

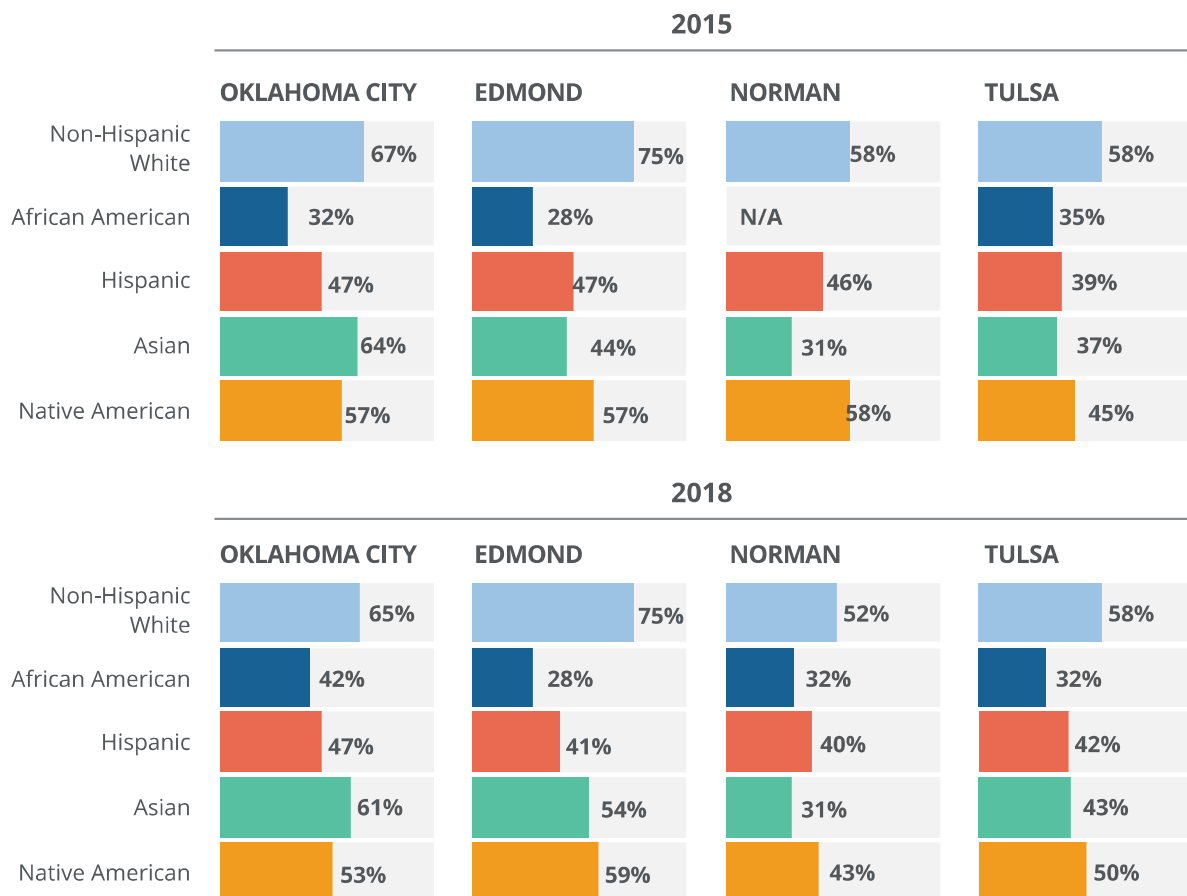
Yet homeownership rates vary considerably by race and ethnicity in Oklahoma City. Figure II-3 compares homeownership rates by race and ethnicity, in 2015 and 2018, and among jurisdictions for which 2018 data were available.

Oklahoma City shows a significant increase in homeownership for African Americans from 2015, although the rate of 42 percent in 2018 is still much lower than that of Non-Hispanic

White households. Oklahoma City's African American ownership rate is also much higher than peer cities, which did not show an increase from 2015.

Hispanic ownership did not change from 2015 and is lower than Non-Hispanic White ownership, yet remains higher in Oklahoma City than in other cities. For Asian and Native American households, the ownership rate declined slightly from 2015. Asian ownership in Oklahoma City is higher than in peer cities; Native American ownership is in the middle.

Figure II-3.
Homeownership by Race and Ethnicity, 2015 and 2018



Source: American Community Survey, 2013-2017.

A recent examination of the commonalities of cities with high rates of African American ownership found two important factors: 1) High levels of advocacy, organizing, and testing that guards against discriminatory practices and treatment; and 2) Inner-ring suburban areas that provide attractive alternatives to city living due to good schools, welcoming leadership, and affordability.¹ Ensuring that these factors are in place in Oklahoma City will

¹ <http://www.governing.com/topics/transportation-infrastructure/sl-black-homeownership-norm-in-these-cities.html>

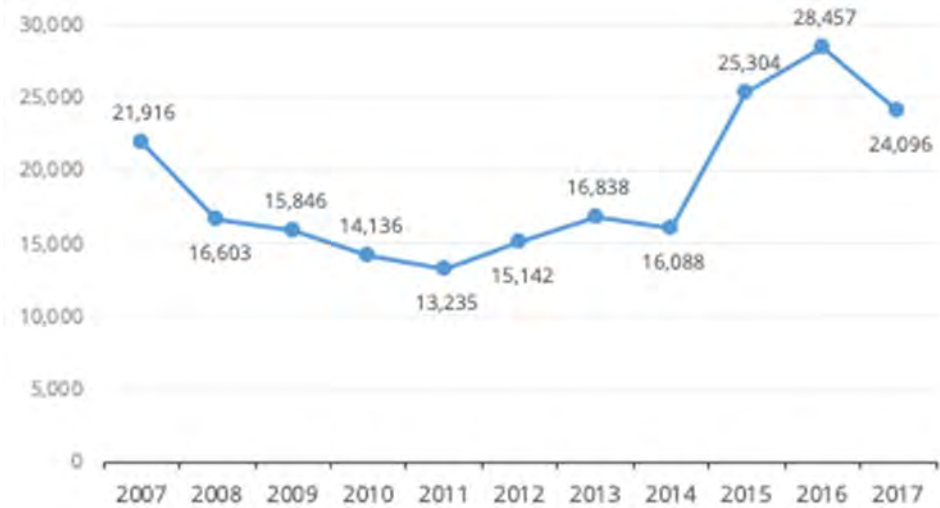
be important for the city to continue to boost ownership rates among under-represented households.

Differences in access to credit. The federal Home Mortgage Disclosure Act (HMDA) data are used to detect differences in mortgage loan originations by the protected classes reported in the data. The HMDA data analyzed in this section reflect loans applied for by residents in 2015, 2016 and 2017, with 2017 being the latest year for which HMDA were publicly available at the time this document was prepared. During this time period, nearly 78,000 households applied for a loan to buy a home, improve a loan, or refinance an existing loan, all in Oklahoma City.

In the past 10 years, applications were highest in 2016 and lowest in 2011. Loan applications declined significantly during the period of the Great Recession and bounced back beginning in 2015—yet declined by nearly 20 percent between 2016 and 2017.

Figure II-4.
Number of
Loan
Applications,
2007-2017

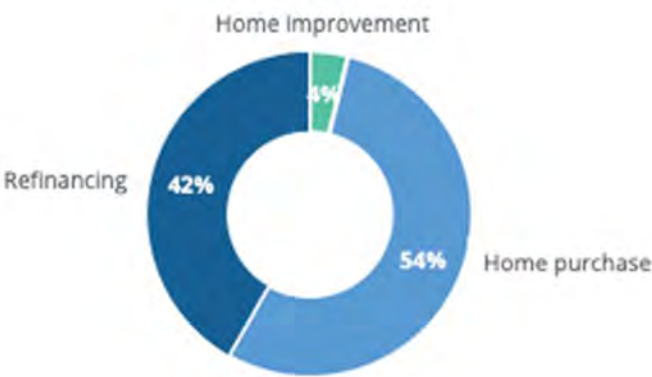
Source:
2015-2017 HMDA and
2014 AI.



Of the 78,000 loans applied for between 2015 and 2017, 54 percent were for home purchases, 42 percent were for refinancing existing loans, and just 4 percent were home improvement loans.

Figure II-5.
Type of Loan Applications,
2015-2017

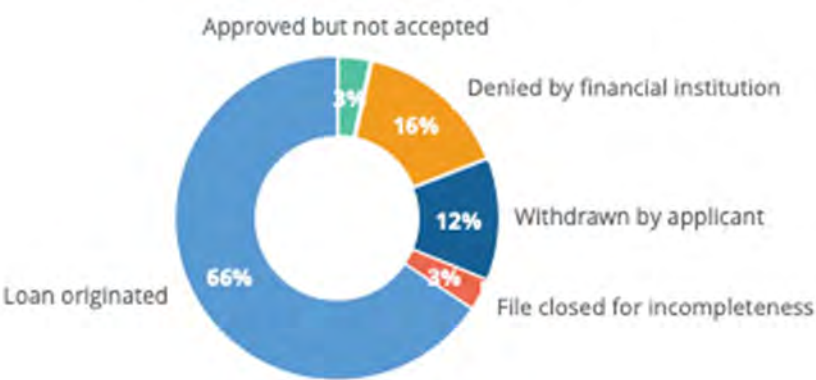
Source:
2015-2017 HMDA.



Overall, 66 percent of the loan applications were approved. Sixteen percent were denied. Another 12 percent with withdrawn by the applicant and the balance were not initiated because they were not accepted by the applicant or were incomplete.

Figure II-6.
Action Taken on
Loans, 2015-2017

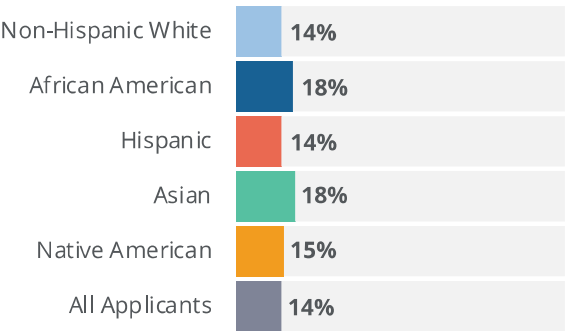
Source:
2015-2017 HMDA.



Overall, there was little variation in the proportion of loans denied by race and ethnicity. African American and Asian loan applications had the highest denial rate of 18 percent—4 percentage points higher than that of Non-Hispanic White applicants.

Figure II-7.
Mortgage Loan Denial Rate by
Race and Ethnicity, 2015-2017

Source:
2015-2017 HMDA.

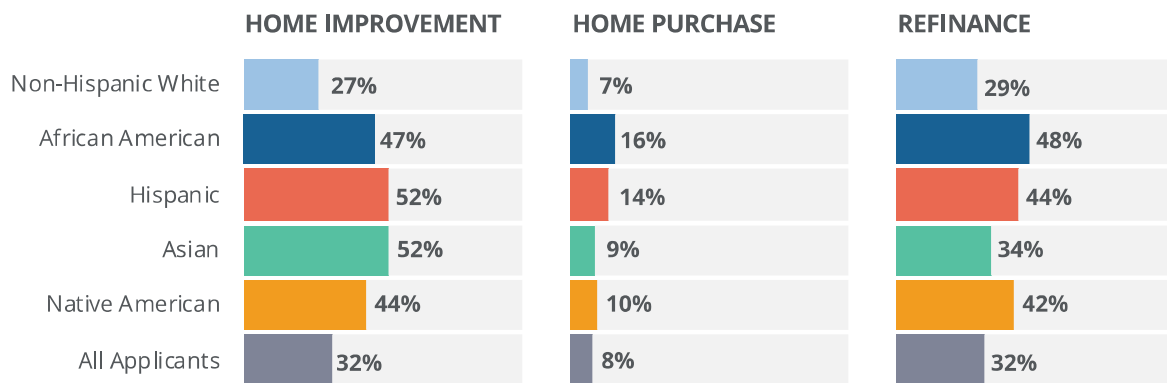


Variation is more pronounced by loan type, however, as shown in the figure below.

- For home improvement loans, around half of the applications submitted by African American, Asian, and Hispanic households were denied. This is much higher than the 27 percent denial rate for Non-Hispanic White applicants and 32 percent for all applicants.
- Refinances rates also differed widely among African American, Hispanic, and Native American applicants relative to Non-Hispanic White and all applicants.
- Home purchase denial rates showed the smallest percentage point differences.

Figure II-8.

Type of Mortgage Loans Denied by Race and Ethnicity, 2015-2017

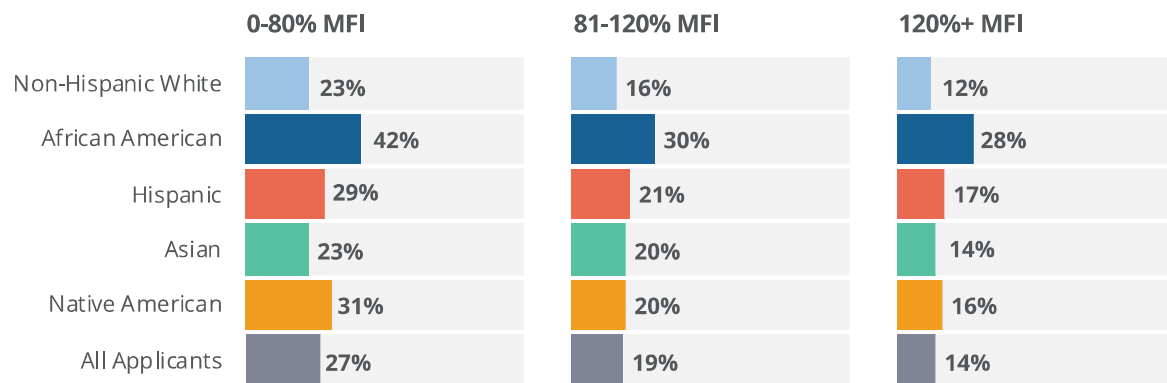


Source: 2015-2017 HMDA.

Figure II-9 shows differences in denial rates by race and ethnicity and applicant income.

- Across all ranges of Median Family Income (MFI) applicants, the denial rate is much higher for African American households than all applicants and all other racial and ethnic groups.
- African American applicants are unique in that their denial rate never approximates the “all applicants” rate. Even for the highest income applicant range, the African American denial rate is twice the all applicant rate.
- In contrast, Non-Hispanic White applicants have denial rates lower than all applicants across all income categories.
- The persistent differences in denial rates across income categories for African American applicants was also evident in the AI from 2014—although the denial rates overall were much lower.

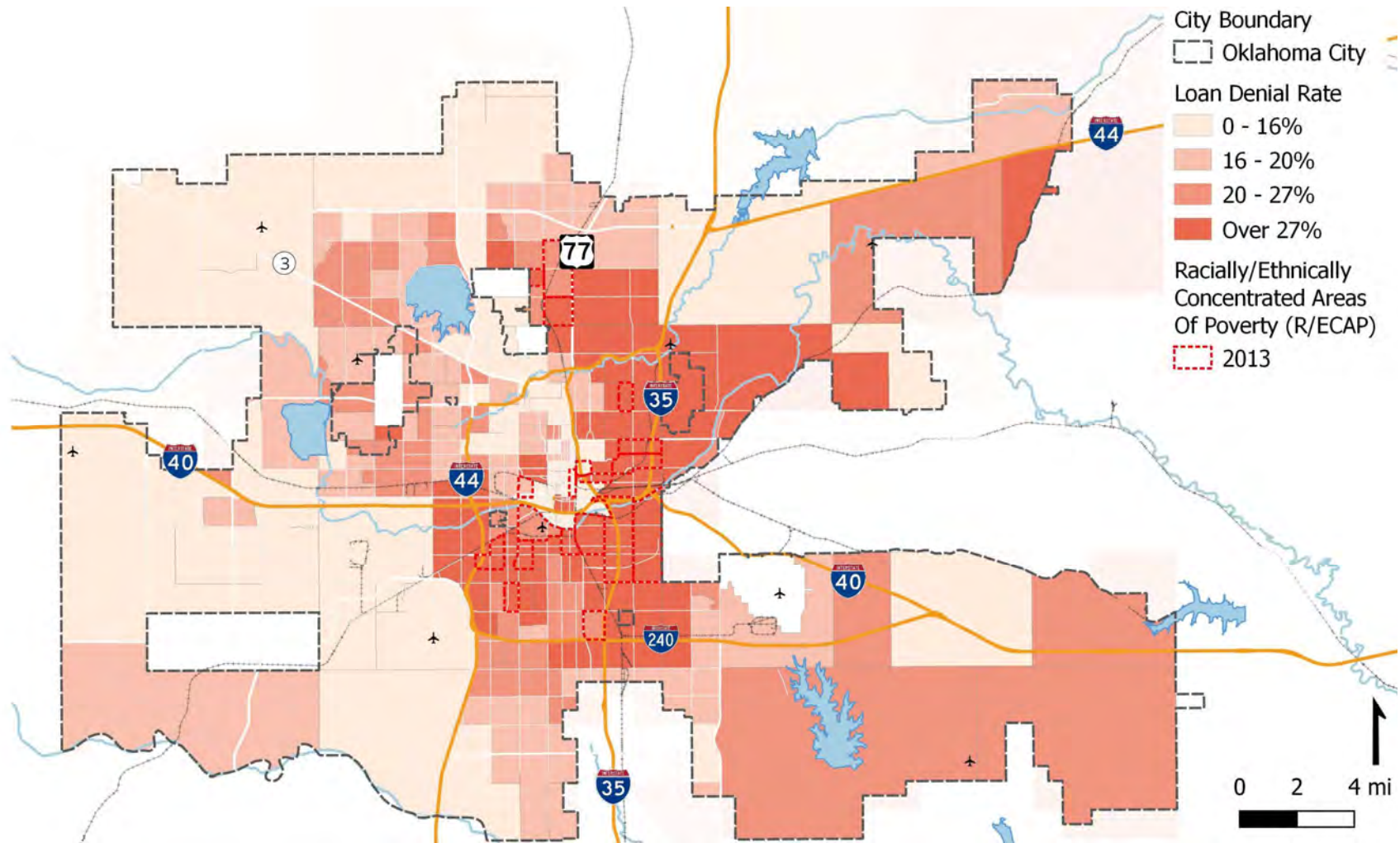
Figure II-9.
Denial Rate by Race/Ethnicity and Applicant Income, 2015-2017



Note: 2015-2017 HMDA.

Figure II-10 shows the geographic patterns in loan denials. The darkest shading shows areas where the denial rate was higher than that of all 0-80 percent MFI applicants. Nearly all R/ECAPs are in high-denial areas. High-denial areas are also those where the city's African American and Hispanic residents are most likely to live.

Figure II-10.
Loan Denial Rates, 2015-2017



Source: 2015-2017 HMDA .

Subprime lending. Nationally, in 2017, about 4 percent of conventional home purchases and 2 percent of refinance loans were subprime²—down from 25 percent in 2006.³

In Oklahoma City in 2017, 7 percent of mortgage loans carried subprime rates—much higher than the national proportion. As shown in the figure below, the proportion of subprime loans varied considerably by race and ethnicity, however, with one-fifth of the loans to Hispanic borrowers carrying subprime rates. The proportion of subprime loans made to African Americans is also relatively high at 13 percent.

Figure II-11.
Percent Loans Subprime by
Race and Ethnicity, 2015-2017

Source:
2015-2017 HMDA.

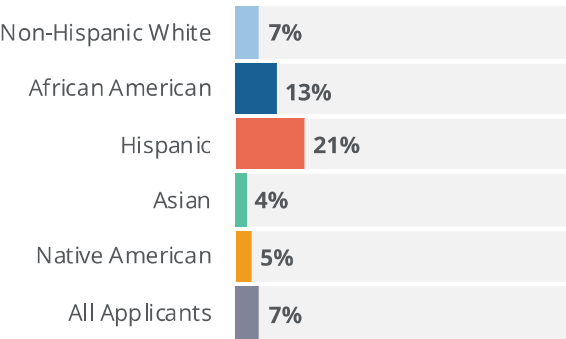
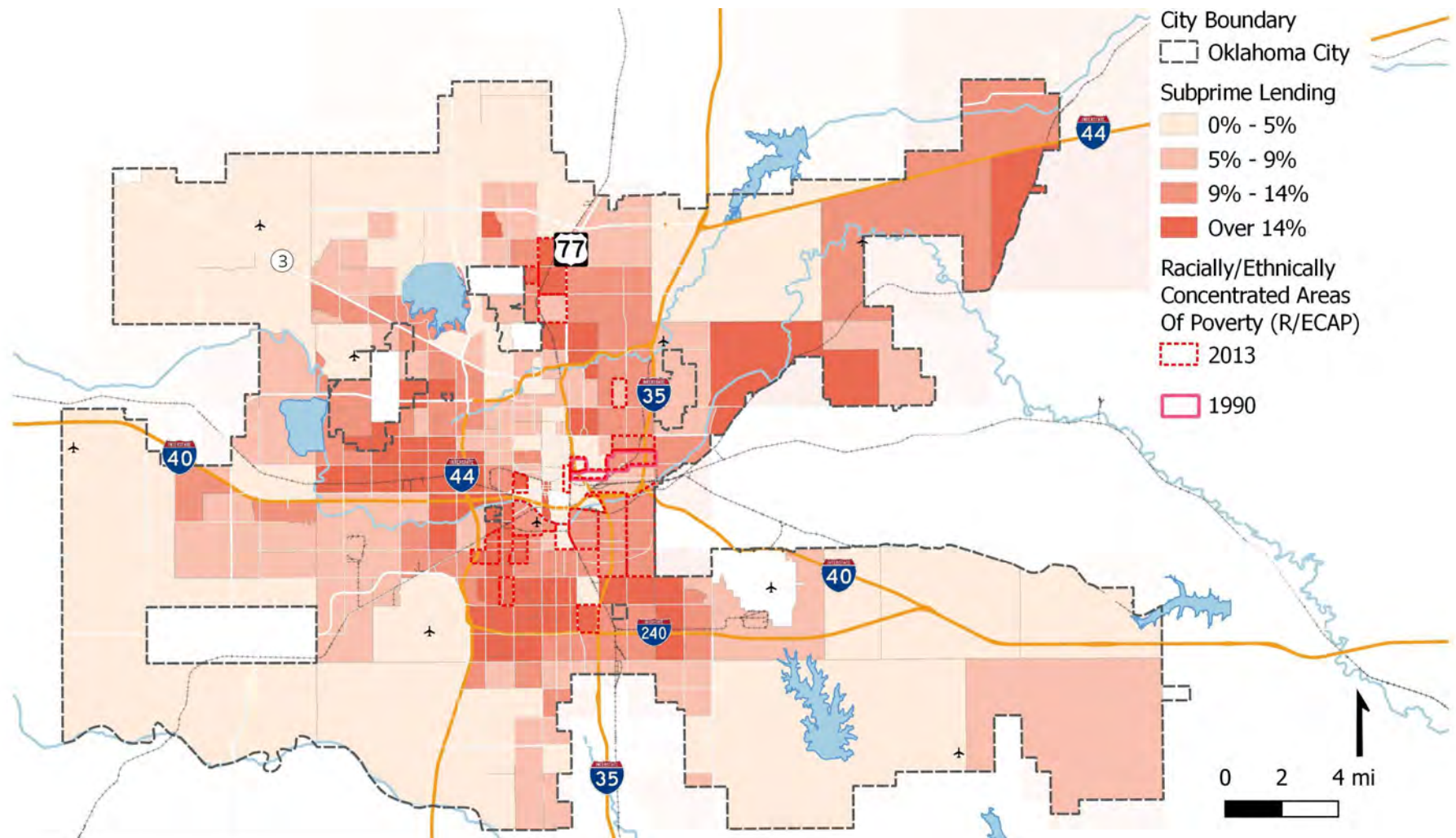


Figure II-12 is a map of subprime lending. Consistent with the data in Figure II-11, the geographic areas where subprime lending is most concentrated are also areas of Hispanic concentration. The exception are the neighborhoods on the western portion of the city which have moderate levels of poverty and Hispanic concentration.

² For the purposes of this section, “subprime” is defined as a loan with an APR of more than three percentage points above comparable Treasuries. This is consistent with the intent of the Federal Reserve in defining “subprime” in the HMDA data.

³ https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/bcfc_hmda_2017-mortgage-market-activity-trends_report.pdf

Figure II-12.
Subprime Lending, 2015-2017



Source: 2015-2017 HMDA..

Reasons for denials. Differences in denial rates are difficult to explain because of the variety of factors that influence the lending decision. HMDA data on reasons for denials are broad, and typically show little variation among racial and ethnic groups, with the primary reasons for denial being high debt to income ratios and poor credit history.

A growing body of research has looked more closely at the harder-to-detect reasons for differences in mortgage loan outcomes:

- A 2014 study found that much of the racial and ethnic variance in pre-recession subprime lending was determined by the lenders chosen by borrowers. Some lenders steered racial and ethnic minorities toward high rate loans, even when their risk profiles did not require a subprime rate.
- Many of these loans resulted in foreclosures, which disproportionately affected the communities in which racial minorities purchased homes.
- As discussed below, a more recent study has found that computer algorithms contain geographic biases that perpetuate differences in loan denials and subprime lending.

Effects of redlining on values. A recent study, conducted by researchers at UC Berkeley, suggests that past practices, which depressed home values in neighborhoods with minority residents, continues to have a negative effect in those neighborhoods. The computer algorithms used to determine mortgage pricing could treat some of these areas as higher risk.

The study found that, nationally, Latinx and African American borrowers paid between 5.6 and 8.6 basis points more for mortgage loans made between 2008 and 2015 regardless of the type (computer or human) of lender. This is equivalent to 11 to 17 percent of lender profit on the average loan, meaning that lenders earn significantly more from loans made to Latinx and African American homebuyers.⁴

There was little difference in the rate charged by computer or human, suggesting that the higher rate charged to minority borrowers is a factor of other variables, which are built into risk pricing and could be geographically related. The research also speculated that timing (urgency of getting a loan to buy a home once found) and lower frequency of comparison shopping among persons of color could also explain the interest rate differences.

There was, however, a difference in the denial rate for mortgage loans: humans rejected loans to these borrowers 4 percent more often than a computer did. Computer rejections did not discriminate on the basis of race and ethnicity at all.

⁴ The time period covered in that study includes the period when subprime loans were common; subprime loans are a much smaller part of the market today. Several lawsuits and challenges have demonstrated that minority borrowers received subprime loans that were not risk-justified.

Publicly Supported Housing and Neighborhood Access

A growing body of recent research has bolstered the evidence that where affordable and mixed-income housing is developed has a long-term impact on the households that occupy that housing. For example:

- Dr. Raj Chetty's well known Equality of Opportunity research found positive economic returns for adults who had moved out of high poverty neighborhoods when they were children. The gains were larger the earlier children moved.
- A companion study by Dr. Chetty examining social mobility isolated the neighborhood factors that led to positive economic mobility for children. Children with the largest upward economic mobility were raised in neighborhoods with lower levels of segregation, lower levels of income inequality, higher quality schools, and greater community involvement ("social capital").
- A similar study by researchers at Johns Hopkins University found that when assisted housing is located in higher quality neighborhoods, children have better economic outcomes. The study also concluded that because low income African American children are more likely than low income white children to live in assisted housing, the location of assisted housing in poor quality neighborhoods has a disproportionate impact on African American children's long-term economic growth.

This research is counter to years of housing policies and programs that focused on building large multifamily complexes to house persons living in poverty, often placing these developments in the least desirable areas in a city.

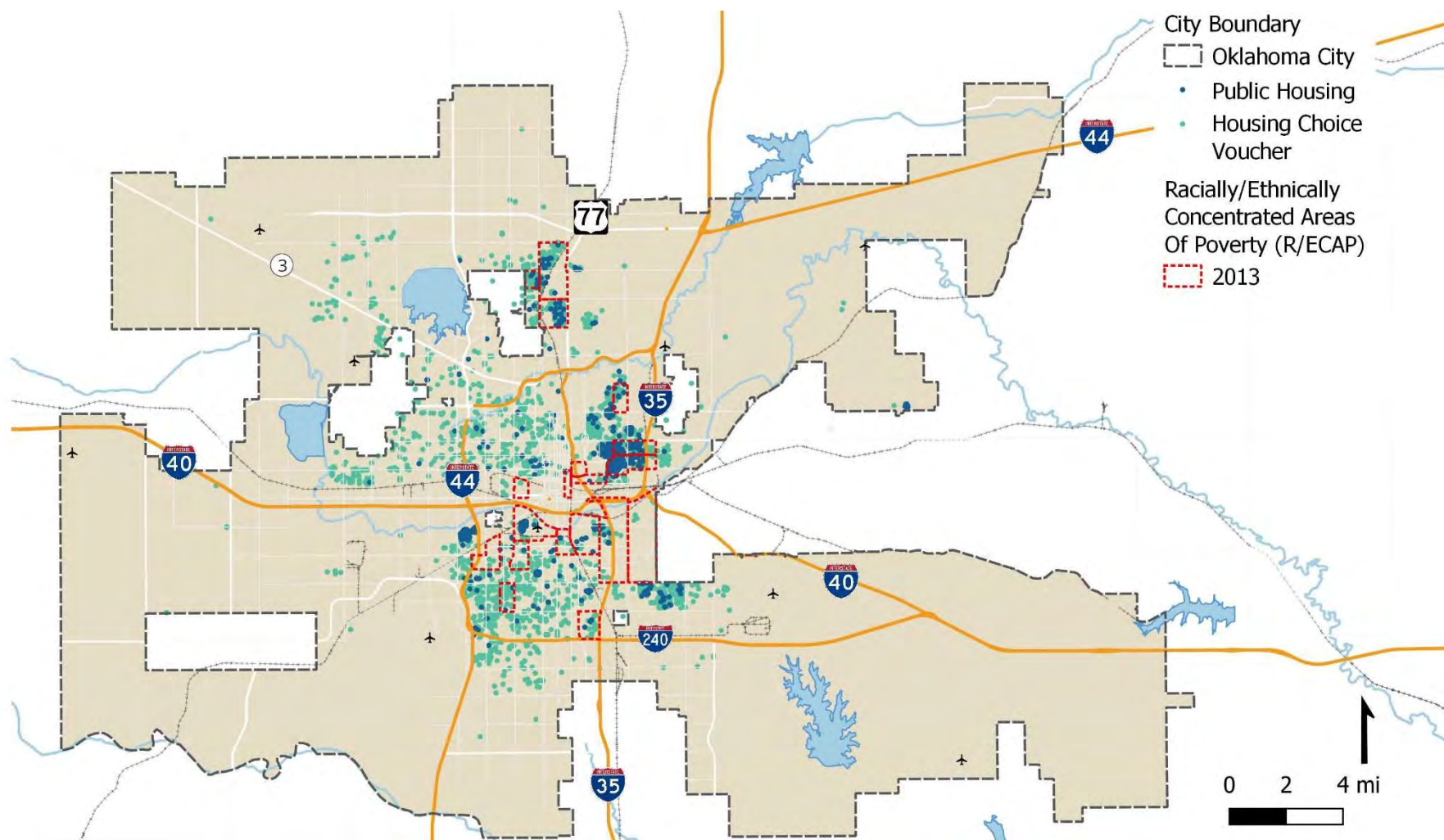
Public housing authority. The Oklahoma City Housing Authority administers more than 4,500 Housing Choice Vouchers and 2,900 traditional public housing units, with more than 400 scattered site units.

According to housing authority staff, demand is highest for 1 bedroom units to serve single, mostly elderly, households. In the past decade, demand has shifted toward smaller units and away from larger units. The housing authority offers preferences to senior and elderly households to help accommodate growing needs in the city.

Voucher holders seek housing that is close to strong schools—mostly in Edmond—yet units in those areas are the most difficult to find. Vouchers are easiest to place in the northwest and southwest portions of the city.

Figure II-13 shows the location of public housing, in addition to Housing Choice Vouchers. Housing Choice Vouchers are well distributed in the city with some modest concentrations in the south, reflective of where housing authority staff find the most available rental units. As with most housing authorities, traditional public housing is concentrated in a handful of neighborhoods, some of which are also R/ECAPs.

Figure II-13.
Public Housing and Housing Choice Vouchers, 2019



Source: Oklahoma City Housing Authority

Figure II-14 shows the racial and ethnic breakdown of households served by the housing authority. Except for “other multifamily” housing, racial and ethnic minorities benefit from publicly subsidized housing proportionate to their representation of households overall. In sum, the data do not reveal any significant concentrations of racial or ethnic groups in any type of publicly subsidized housing.

Figure II-14.
Race and Ethnicity of Publicly-Supported Housing Occupants

	Non-Hispanic White	African American	Hispanic	Asian	Native American	Total Minority
Other Multifamily	55%	12%	5%	2%	4%	22%
Project Based Section 8	17%	28%	3%	2%	7%	41%
Public Housing	13%	24%	17%	0%	2%	44%
Compared to Total Households	54%	15%	19%	5%	1%	46%

Note: HUD AFFH Raw Data, February 2018.

The greatest challenges in meeting the large and growing need for deeply subsidized housing, according to housing authority staff, include:

- Landlords in Oklahoma City are quick to evict tenants. The housing authority has a plan in place and legal staff working to lower evictions by enhancing resident services and “good tenant” programming.
- Past drug use and convictions, including the prevalence of opioid use, of clients are a major challenge in housing the city’s most vulnerable residents. The housing authority has a 5 year look back for drug use and considers convictions only, not just arrests, to avoid disproportionate impacts on persons of color.
- HUD does not typically fund housing authorities to provide the services necessary to support the needs of residents with mental health challenges.
- Tighter rules from HUD regarding immigration status complicate access to housing for those who do not have a social security card, regardless of their citizenship status. It is very time consuming and difficult to get a social security card in Oklahoma City; the office is not convenient for residents without a car.
- Lack of frequent public transportation is a major barrier for clients.
- Keeping up with the cost of rising utilities is a growing challenge for clients.

Resident and Stakeholder Input on Barriers to Housing Choice

Private barriers to housing choice were discussed with stakeholders and residents during the development of this AI. These discussions focused on both disproportionate housing needs, as well as affordable housing gaps in general. This section summarizes the primary findings from those discussions.

Rental Market and Gaps

- Rental housing very hard to find for extremely low income renters (earning less than 30% MFI) as well as middle class renters (those with incomes just above LIHTC income limits).
- The median rent consumes 80 percent of monthly assistance for a senior or resident with disability who cannot work and must live on Social Security/Disability Income.
- To adequately address the needs of extremely low income renters with special needs, Oklahoma City needs 5,000 units of truly supportive housing with onsite case management as part of the housing spectrum.
- Redevelopment of formerly low income areas is producing luxury rental units that are unaffordable for the residents who were displaced. These units are perceived as being for “newcomers,” not for long time OKC residents. Residents worry that plans for the areas around the medical campus will further exacerbate gentrification and displacement.

Homeownership Market and Gaps

- Residents are very concerned about gentrification in the city’s remaining and most affordable neighborhoods in the South and East/Northeast neighborhoods. They witness \$30K homes being scraped, replaced with \$250K+ homes. This raises concerns about rising property taxes that residents on a fixed income cannot afford.
- Affordable ownership products are lacking for middle class households, earning \$50,000 to \$75,000 per year.
- The city should prioritize preservation of traditionally “blue collar” neighborhoods with high homeownership rates for future families and workers.
- “Rent to Own” and predatory lending scams target Hispanic households and seniors with homes in need of repairs.

Services

Oklahoma City has been hit by the opioid crises and providers are under-resourced. The faith community fills the gap by providing substance abuse counseling and assistance, yet their resources are limited. There is only one medical detox provider with 25 beds; they are

oversubscribed and there is a two month wait to get in. Similarly, the city's mental health crisis centers can only accommodate worst case needs—immediate danger of harm, which a very narrow definition of crisis.

Leadership on Housing

- Many residents are skeptical of the city's plans for housing development and feel that affordability is not part of the plan. They perceive development as driven by people with long-time connections and old money—*"They're not for us or like us."* Lack of representation of residents who are not "connected" or economically powerful on city boards and commissions fuels this skepticism.
- Residents expressed a desire for better representation of the Black community living in East/Northeast CHDO Boards. Some residents feel that the homes being built by CHDOs are too small for a traditional Black or Hispanic family.
- Some residents believe that community engagement occurs *after* decisions have been made and is only conducted to check a box. *"We want more than a seat at the table; we want an invitation to the kitchen to help cook."*

Fair Housing Complaints and Enforcement

The 2014 AI reported that Oklahoma City residents had filed 325 complaints between 2004 and 2014, for an average of 30 complaints annually. The top reasons for the fair housing complaints were disability and race, followed by familial status. The two most common discriminatory acts that led to the complaints included: 1) Different terms or conditions in privileges, services or facilities; and 2) Coercion and related discriminatory acts.

Between 2015 and 2018, 79 complaints were filed, for an average of 20 complaints per year. Recent trends show the number of complaints on a declining trend: 26 were filed in 2015, 29 in 2016, 15 in 2017, and 9 in 2018.

The Metropolitan Fair Housing Council, discussed below, managed 356 fair housing cases in 2018, with approximately one-quarter related to disability and another one-quarter related to familial status. The balance were race and ethnicity related cases.

These trends are consistent with observations by fair housing advocates who noted that filings, as well as general advocacy, has been hampered by fear that landlords will evict tenants who complain about their treatment or conditions of their rental units. Both federal and state legislation has contributed to this fear, including bills that restrict public programs to U.S. citizens, as well as White nationalist movements.

According to the complaints filed between 2015 and 2018, the most common bases for complaints include:⁵

- Discrimination on the basis of disability at 62 percent of all complaints;
- Discrimination based on race at 25 percent of all complaints;
- Discrimination based on gender/sex at 15 percent of all complaints.

Refusal to rent, different conditions for rentals, and refusal to make reasonable accommodations were the most common violations alleged.

Interviews with stakeholders for this AI provided additional detail on the experiences of vulnerable residents:

- Hispanic residents, in particular, are reluctant to file complaints, report discrimination, or call code enforcement about rental units in poor condition. They worry that their landlords will report them to immigration officials or evict them.
- Discrimination against families is increasingly more subtle—e.g., regulations that prohibit where children can play within an apartment complex.
- Multifamily developments are not being built to comply with the accessibility requirements under the Fair Housing Act due to lack of inspection/testing and enforcement.
- Rising rents and tightening of the rental market has disproportionately hurt very low income single-person households and families, many of whom are racial and ethnic minorities, persons with disabilities, and elderly residents. Weak state laws to protect tenants from evictions without just cause exacerbates their vulnerability and increases homelessness.
- Similarly, rising home prices has introduced predatory lending and home purchase activity—e.g., “we’ll buy your house as is” offers, rent to own scams, and predatory lending.
- Fair housing knowledge and awareness among residents is still lacking, especially among vulnerable populations.

Fair housing organizations. Oklahoma City is very fortunate to have a well-established fair housing agency, the Metropolitan Fair Housing Council of Oklahoma (MFHC). The city funds the activities of MFHC annually as part of its commitment to fair housing. MFHC serves residents statewide with fair housing counseling, investigation and testing, mediation services, and legal and complaint referral.

⁵ Percentages total more than 100 due to multiple bases in some complaints.

In Oklahoma, fair housing complaints must now be filed with HUD because of the lack of a state fair housing investigative agency. MFHC facilitates the filing of HUD complaints and advocates for residents during the investigation process. This is a change from when the Oklahoma Human Rights Commission was active and investigations occurred at the state level; this expedited the resolution of complaints.

Residents of Oklahoma City can also be served by Legal Aid OK, a nonprofit law firm that provides legal assistance to low income residents and seniors. Legal Aid offers a range of services that include assistance to individuals who believe that they have been subject to discrimination and eviction assistance.

Since the 2014 AI, MFHC has settled two very high profile cases:

- In 2018, a \$50,000 settlement was achieved by a homeowner with a disability living in the Shady Acres Mobile Home Park in Oklahoma City. The plaintiff, who owned her mobile home and rented the lot space in the park, was denied a reasonable accommodation for an assistance animal.
- In 2017, MFHC settled a complaint for \$800,000 brought against Walter Ray Pelfrey by several defendants who alleged discrimination on the basis of sex, as well as sexual harassment and unwelcome sexual advances, in exchange for rent forgiveness, promises not to evict, and payment of utilities.

SECTION III.

ZONING AND LAND USE

SECTION III.

Zoning and Land Use

This review discusses areas where Oklahoma City's zoning ordinances and land use regulations could be improved to ensure compliance with federal laws related to fair housing choice.

Summary of Recommendations

The regulatory review of Oklahoma City's zoning and land use policies found many areas where the code could be clarified or strengthened to avoid fair housing challenges. The areas we recommend for priority action include:

- The code should add flexibility to the definition of family to avoid potential fair housing challenges and better reflect changing living arrangements.
- The code would benefit from a legal review on potential fair housing challenges associated with treatment of persons with disabilities living in group homes. Several areas of the code are unclear and may result in treating persons with disabilities differently from non-disabled persons and among people with different types of disabilities.
- The city's code update should consider revising densities and development standards to ensure they accommodate a wide range of housing types and products that are typically more affordable and avoid indirect effects of segregating protected classes into certain neighborhoods. This should include an assessment of where different housing types are allowed, how rezoning decisions affect housing type placement, and the impact of required approval processes for variances on the distribution of housing by type and level of affordability. Some cities are achieving this by building an equity framework into their updated comprehensive plans and codes.

Best practices that are not as critical in nature but would be beneficial during the update of the code or in text amendments include:

- Include a definition of disability that is consistent with the Federal Fair Housing Act.
- Establish standard processes for reasonable accommodation requests.
- Allow ADUs and other types of gentle density in some single family districts, potentially in exchange for affordability commitments.

Background on Federal Laws

The Federal Fair Housing Act (referred to as the Fair Housing Amendments Act, or FHAA, to acknowledge the full protections the act affords) requires that recipients of housing and community development funds affirmatively further fair housing choice. This includes avoiding policies and/or practices that limit the fair housing choice of the individuals and households protected by the FHAA.

Land development codes cannot contain standards, definitions, or procedures that result in differential treatment in housing on the basis of race, sex, religion, national origin, color, disability, or familial status (households with children under the age of 18). In addition, land development regulations that increase development costs, e.g., through density or design requirements that make residential development overly expensive, can limit the supply of affordable housing. In most communities, this has a direct impact on racial and ethnic minorities, larger households and families with children, and persons with disabilities because these groups are disproportionately represented among those residing in lower cost housing. Limits or prohibitions on multifamily housing or restrictions on household occupancy are other examples of how land development codes can negatively affect the groups protected under FHAA.

The Americans with Disabilities Act (ADA) prohibits discrimination based on disability, defined by ADA as a physical or mental impairment. The ADA requires accessibility in public places (i.e., open to and used by the public) and also requires that “reasonable accommodations” be allowed when necessary to permit persons with disabilities equal opportunity to enjoy such places. The accessibility provision in the FHAA governs residential accessibility, and requires that multifamily buildings built after March 13, 1991 have specific accessible design features and be adaptable. In addition, the FHAA ensures that persons with disabilities have the right to request and be granted modifications to residential units—as well as local regulations and standards—to make a residence or building accessible to them.

Common Regulatory Barriers

Some of the key factors in land development codes that most commonly result in barriers to fair housing choice and reasonable accommodation include:

- **Site standards.** Large lots or excessive setbacks between structures or from streets that can increase development costs, e.g., special infrastructure;
- **Limits on density.** Restriction on or prohibition of multifamily housing; low floor area ratios (FAR) for multifamily or mixed-use development; or low density requirements;
- **Use-specific standards.** Special site or operational requirements for group homes for persons with disabilities that are not required for other residences or groups;

- **Differences in quality and access to public services.** Additional requirements for infrastructure or essential municipal services not required for other residences or dwelling units;
- **Definition of family and occupancy restrictions.** Definitions of family or occupancy limits that prohibit or limit the number of unrelated persons in a household;
- **Procedures for development or rezone reviews.** Extensive review procedures, public hearings, or notice requirements for different housing types, housing for protected classes, or low-income housing;
- **Housing types.** Limits or prohibitions on alternative affordable housing options such as accessory dwelling units (ADUs), modular or manufactured homes, and mixed-use developments;
- **Spacing.** Minimum distance between group homes that are not required for other residences or groups and make development of group homes difficult;
- **Reasonable accommodations.** Regulations inhibiting modifications to housing for persons with disabilities or their ability to locate in certain neighborhoods; and
- **Code language.** Local land development codes and standards that are not aligned with federal and state regulations governing fair housing and reasonable accommodation.

Oklahoma City Regulatory Review

The Oklahoma City Zoning and Planning Code was reviewed based on a checklist developed by the Region IX HUD office (“Review of Public Policies and Practices—Zoning and Planning Code). The checklist poses a series of questions aimed at common zoning regulations that impact fair housing. The questions in that checklist are consolidated below and used to evaluate the zoning and planning code.

1. Is there a definition of “family” and does it discriminate against group living for persons with disabilities?

Family is defined in section 59.2150 of the Zoning and Planning Code as “one or more persons related by blood or marriage, including adopted children, or a group of, not to exceed five unrelated persons (not related by blood or marriage), occupying the premises and living as a single non-profit housekeeping unit, as distinguished from a group occupying a boardinghouse, lodging house, or hotel.”

This definition does not single out persons with disabilities and would include both related and unrelated persons as long as the group meets the other parameters of the definition: related by blood, marriage or adoption or an unrelated group not exceeding five persons, regardless of an individual’s disability.

Although not unusual in residential codes, the definition could come into conflict with FHAA since it limits the number of unrelated persons but does not limit the number of “related” persons. While all unrelated persons are treated the same, this definition could create disparate treatment if a related family of eight persons is permitted to reside in a residence similar to one inhabited by unrelated persons with disabilities or other protected classes who may be more likely to live in unrelated group settings (e.g., farmworkers, refugees), who are limited to five persons in the same residence.

The city’s definition may also create barriers to forming cooperative housing arrangements, which are becoming a more common solution to housing affordability constraints and growing in popularity among single, unrelated residents, including older adults seeking communal living arrangements.

To that end, some cities have moved away from defining “family” to avoid potential FHAA conflicts and instead rely on occupancy standards to regulate residential overcrowding. The recent “Scarborough 11” case in Hartford, Connecticut provides a strong case for removing narrow definitions of family from local codes.

The Planning and Zoning Code also defines different types of residential units in section 59-8200, Residential Use Unit Classifications. One type of residential unit listed is “group residential.” This is defined as “the residential occupancy of living units by a number of occupants, not constituting a family or otherwise related, but occupying the structure on a non-transient basis. Typical uses include occupancy of fraternity or sorority houses, dormitories, boardinghouses, lodging houses and monasteries...” It is unclear how this definition may relate to groups of persons with disabilities living in a single-family dwelling unit. Because of this there may be confusion about how to review a residential facility serving a group of persons with disabilities and to determine which zone district permits such facilities.

2. Are there any occupancy standards or maximum occupancy limits?

Except as noted in the definition of “family,” there are no occupancy standards or maximum occupancy limits established for residential dwelling units in the Zoning and Planning Code.

3. Is the number of unrelated disabled individuals residing together restricted but there is no restriction for other persons?

There does not appear to be any restriction for the number of unrelated disabled individuals residing together. As discussed above, the definition of family restricts groups of unrelated persons living together to a maximum of five.

4. Is “disability” defined and is the definition the same as FHAA?

“Disability is not defined. A best practice is to define disability in alignment with FHAA or to reference FHAA (note that the term “handicapped” is used in FHAA and is interpreted to have the same meaning as “disability”). This is helpful in determining

requests for reasonable accommodation and ensures that all disabilities encompassed by FHAA are acknowledged in the local zoning code—including persons with substance abuse challenges who are in recovery. This group has been found by the courts to meet the definition of “disability.”

5. Are housing opportunities for persons with disabilities restricted or mischaracterized as a “boarding or rooming house”?

No. The code allows a use called “low impact institutional: residential-oriented.” This use specifically states that a typical use is “group home for the mentally or physically handicapped,” and also states that persons adjudicated as “criminal, delinquent, or mentally ill” may not be residents. It is a permitted use in 17 zone districts, including all the lower density residential zones. The definition does not stipulate a maximum or minimum number of residents. It clearly states that such group living facilities may be public, quasi-public, or private. The code also includes a definition for “group residential,” broadly defined to include “boarding houses” and “lodging houses.” This use is permitted in five zone districts and only one of those is a residential zone.

These aspects of the code could benefit from clarification and revision in several ways:

- There may be some confusion in assigning a land use category to a group living facility, particularly if that facility provides housing for more than the number of individuals permitted in the definition of “family” for a group of unrelated persons. To that end, clarification is needed on whether either of these residential unit uses must also comply with the unrelated persons occupancy restrictions established in the definition of “family.” There also needs to be clarification regarding how larger residential facilities, not meeting the definition of “family,” are treated and where they are allowed.
- The definitions exclude some categories of disability, such as persons with developmental disabilities and persons in recovery, which are covered under the FHAA, and, as such, may have the effect of excluding these protected classes from a range of residential settings. The U.S. Department of Justice states that the FHAA term mental or physical impairment “may include conditions such as blindness, hearing impairment, mobility impairment, HIV infection, mental retardation, alcoholism, drug addiction, chronic fatigue, learning disability, head injury, and mental illness.”¹ The DOJ also provides an example of a violation of the FHAA that resembles the city’s code: “An example would be an ordinance prohibiting housing for persons with disabilities or a specific type of disability, such as mental illness, from locating in a particular area, while allowing other groups of unrelated individuals to live together in that area.”

¹ <https://www.justice.gov/crt/fair-housing-act-1#disability>

6. Does the zoning code allow housing with on-site support services for persons with disabilities?

The definition for “low impact institutional: residential-oriented” includes language that recognizes residents of such facilities may need “special care, supervision, or treatment.” It does not state if such care-givers may be live-in, and if so, if they are calculated in the determining the occupancy for the purposes of satisfying the limitations established for groups of unrelated persons living together found in the definition of “family.” The definition for “group residential” is silent regarding on-site support services, making it unclear as to whether a necessary support service would be considered an allowed accessory use or a primary use that also would need to be a permitted use in the zone district.

Clarification is needed on how live-in staff is counted for the purposes of determining compliance with the definition of “family” and whether on-site support services are an accessory use in “group residential.”

7. Are there definitions for “special group residential housing” and if so, do the definitions align with FHAA?

Yes, there are several definitions for different types of group residential housing. The definitions do not limit the number of persons residing in the group housing, which minimizes potential conflict with FHAA. In addition to “low impact institutional: residential-oriented” and “group residential” (see items 5 and 6), the following types of “special group residential housing” are included in the residential use unit classification:

- Congregate Care Housing and Convalescent Homes: A residential facility with support services and 24-hour nursing home care.
- Senior Independent Living: Rental housing for independent elderly adults not needing 24-hour oversight. Services such as meals, laundry, transportation, housekeeping, and organized social activities may be provided.

Included under the civic use unit classification are also:

- Domestic Violence Shelters: A residential institution providing shelter and meals for domestic violence victims and their families and where counseling and other support services may be provided.
- Emergency Shelters and Feeding Sites: Transient sleeping and/or meals on a nightly basis provided by charitable organizations.
- Residential Facilities for Dependent and Neglected Children: A supervised residential institution caring for children who cannot reside in their natural home.
- Transitional Mental Health Residential Facilities: A supervised residence with treatment and counseling for stabilized mental health clients who are the responsibility of, and under the control of, the State mental health system or a similar authority.

- Forced Detention or Correction Facilities: Facilities for the confinement of persons accused or convicted of offenses, and may include prisons, jails, work release facilities, pre-release centers and halfway houses.

Although these are listed as “civic uses” the persons residing in these facilities may be a protected class. See the discussion in Item #9.

8. Is there a process to allow waivers of zoning and building code regulations for reasonable accommodation for persons with disabilities?

No process is set forth in the zoning code to allow waivers of zoning requirements for reasonable accommodation. The variance process allows the Board of Adjustment to grant relief from the requirements of the zoning code. However the variance must be necessary because of “conditions that are peculiar to the particular property involved.” This strictly limits the scope of the variance process to physical characteristics of the land and makes it unavailable to persons who are requesting a modification to zoning requirements based on reasonable accommodation. Such requests may include a wheelchair ramp that does not meet setback regulations, a modification to an exterior wall to accommodate certain equipment necessary to address a particular disability, or special exterior treatments.

A best practice is to establish a standard process for reasonable accommodation requests. Some codes identify typical requests, such as a setback waiver for wheelchair ramps, as administrative in nature when it does not exceed a certain amount. Such requests are processed the same as any other building permit. Other reasonable accommodation requests are processed with a more detailed administrative review using criteria that comply with FHAA and ADA. This clarifies how a reasonable accommodation is reviewed and removes such requests from consideration under procedures and criteria that do not fit the circumstances of the request. When the reasonable accommodation request does not qualify for administrative review, a review before an appointed body can be used. However, the same criteria for deciding the request must be used:

- Whether the person to be accommodated has a disability;
- Whether the modification requested is reasonably necessary to accommodate that disability; and
- Whether the modification would fundamentally and unreasonably alter the nature or purposes of the zoning ordinance. The burden is on the municipality to prove this would occur.

The International Building Code (IBC) allows appeal of decisions of the building official and decisions can be made based on “alternate equivalency” to meeting the IBC requirement. The building code does not tie the determination of an alternative to the physical characteristics of the property or building, making the standard appeal process

available to process requests for reasonable accommodation. Examples may include lower sink heights to accommodate a person in a wheelchair, or special positioning of grab bars to accommodate different types of disabilities.

9. Are public hearings required for exceptions to land use codes for disabled applicants but no hearing is required for all other applicants?

“Low impact institutional: residential-oriented” is a permitted use in all residential zone districts except the two mobile home zone districts, in all the downtown design districts, and in Tracts 1, 2, and 3, of the neighborhood conservation district. It is not allowed in any other districts except the historic preservation district where it requires a review through the special exception process. Multiple family also is processed as a special exception in this zone district, but single-family residential is a permitted use, with no special review beyond the requirements of the historic preservation zone district (HP). While the “low impact institutional: residential-oriented” is broadly defined to include a variety of group living situations which may or may not be for persons with disabilities, the special exception process in the HP District may conflict with FHAA when it is a residence for persons with disabilities. Since this use is permitted the same as single-family residential in all other residential zone districts (excepting the two zone districts for mobile homes) it is unclear why it would be treated differently in the historic preservation district. It should be noted that for the purposes of determining disparate treatment of persons with disabilities the comparison is to other single-family residential, not to how other groups in similar residential facilities are treated.

Urban Conservation Districts (UCD) are specific areas established by ordinance that set development regulations in addition to the underlying zone district. The regulations are specific to each UCD and may govern the use of land. Section 13650.4 states that “UCD regulations can supersede any provisions of the zoning code regulating “low impact institutional: residential-oriented” use.” The underlying zone district governs whether this use is permitted, how it is reviewed, and any special standards, not the UCD overlay. Note that in no case do the underlying zone districts subject to a UCD overlay establish special standards for “low impact institutional: residential-oriented” uses.

Also of note is that separate land use categories (use unit classification) are established for several specific types of residences. Contained in the “civic use classification,” these include domestic violence shelters, emergency shelters and feeding sites, and residential facilities for dependent and neglected children, among others (see Item #7). How these are considered under FHAA are nuanced based on length of stay and how the facility is operated. All three uses are allowed in all zoning districts with residential uses except Bricktown, two of the downtown design districts, and the historic preservation district. In all cases a special permit review is required. This necessitates a public notification and hearing process before two public bodies, the planning commission and the city council. Disparate treatment may occur if the comments of

decision-makers are discriminatory in nature or the final decision is made based on opinion rather than the criteria in the zoning code. In addition, special requirements that are substantially different than those for other similar residential structures (i.e., single-family) may trigger a claim of disparate treatment. Finally, it is unclear why such uses would be prohibited in the downtown and historic districts, which have strong access to neighborhood amenities.

10. Are mixed-uses allowed and is housing for persons with disabilities and other protected classes permitted where mixed-use is allowed?

Yes, a mix of commercial of residential and uses are allowed in all office and commercial zone districts and dwelling units above the ground floor are allowed in all industrial zone districts. However the land use categories that encompass housing for persons with disabilities are not allowed in all these zone districts. In those zone districts that allow mixed-use:

- “Congregate care housing and convalescent home” is a permitted use only in the C-CBD and all Downtown Design Districts and a conditional use in Tracts 2 and 3 of the Neighborhood Conservation District.
- “Low impact institutional: residential-oriented” is permitted only in the Downtown Design Districts and a conditional use in Tracts 1, 2 and 3 of the Neighborhood Conservation District. It is a special exception use in the Historic Preservation District.
- “Group Residential” is permitted only in C-CBD and three of the Downtown Design Districts.
- “Domestic Violence Shelters,” “Emergency Shelters,” and “Residential Facilities for Dependent and Neglected Children” are a special permit use in all zone districts except Bricktown, two of the Downtown Design Districts, and the Historic Preservation District.

It is unclear how a group of persons with disabilities who do not meet the definition of “family” would be classified, if such a group would be allowed in any zone district, and if so, how that determination is made.

The higher- and medium-density residential zone districts are described as allowing for conditional approval of limited non-residential uses with the intent to reduce dependence on the automobile and supporting population densities that support mass transportation. However none of the residential districts permit commercial uses such as retail sales (i.e., grocery stores) or offices (i.e., medical offices).

11. What types of residential land uses are allowed and what standards apply?

a. *Is there variety in allowed single-family and multi-family residential land uses?*

Yes, a range of housing types are allowed in all residential zone districts and a mix of uses are allowed in the office and commercial zone districts as well as the industrial zone districts. The residential unit classifications specify:

- Single-family residential, described as a single detached dwelling.
- Two-family residential, described as a duplex residence.
- Three- and four-family residential, described as a triplex or fourplex residence.
- Multiple-family residential, described as apartments, condominiums, and townhouses, and excludes “dwelling units and mixed uses” and “senior independent living.”
- Dwelling units and mixed use, described as a building with commercial or office uses and residential uses.
- Manufactured home residential, described as fabricated on or after July 13, 1994, assembled at the building site, and certified that complies with the Federal Manufactured Housing Construction and Safety Standards.
- Manufactured (mobile) home residential, described as a manufactured, detached, transportable single-family dwelling unit not meeting the single- and two-family structure requirements of the Building code.

The PUD process may allow for alternative housing types that are an option to address affordable housing. These include tiny homes, cottage housing, courtyard development, micro-homes, and cooperative housing.

A best practice is to incorporate residential unit classifications, zone districts, and site design requirements for the alternative housing types listed above. This minimizes delay in the approval process, reduces costs, and educates zoning and building officials and the entire community about these housing types and who it will serve.

b. *Do densities and development standards (lot size, height, etc.) support low- and middle-income housing options?*

Yes, densities and development standards support low- and middle-income housing—although improvements could be made.

Only single-family detached dwelling units are allowed in the five lowest density residential zone districts (AA, RA2, RA, R-1, and R-1ZI). Single-family dwelling units are permitted in all residential zone districts and buildings for two – four dwelling units are allowed in the medium- and higher-density residential zones. The two- and four-unit dwelling types are allowed at densities that could serve the “missing-middle” housing gap for low-middle-income households. A best practice is to allow flexibility for “gentle density” such as duplexes to triplexes, to accommodate demand for missing middle housing, promote economic integrate, and meet current preferences in housing. Some communities allow these densities if the units carry a level of affordability (e.g., 80-120% AMI to facilitate middle income ownership).

Infill development in some of these zones are allowed through a “manufactured home overlay district (MH).” The intent of this overlay district is to provide affordable infill housing in areas with little or no new construction. Manufactured homes meeting specific standards may be placed in all residential zone districts except AA, RA, Historic Preservation and Urban Conservation Districts. An area must request this overlay district and there may be opposition to it based on misperceptions about manufactured housing. A best practice is to allow manufactured housing in appropriate residential zone districts.

The R-3 zone district allows up to 17 dwelling units per gross acre and is the only zone that allows a three or four unit residential building and does not allow a “multi-family building.” Residential zone districts with both these unit types (R-3M, R-4M, and R-4) allow density between 19 and 34 dwelling units per gross acre. The R-3 zone may be the only zone district actively addressing the “missing-middle” housing market, but because the density in this zone goes as high as 17 dwelling units per acre, yet this level of density could have the effect of limiting true missing middle housing. Housing densities for these households are better targeted if a zone district with small lots and attached housing types is established with a density range of 8 – 12 dwelling units per acre and/or allows the gentle infill options recommended above. This is not to say that the existing zone districts and allowed housing types do not provide appropriate densities; instead, this statement reflects the tendency of developers to seek the greatest density or largest dwelling unit (i.e., the most units or the unit with the greatest return on investment) in order to maximize profit. When zone districts allow a broad range of densities, the middle-range, serving the lower- and middle-income household, may be squeezed out.

Multiple-family residential includes buildings with five or more dwellings, such as apartments, condominiums, and townhomes. This use is allowed in the higher density residential zone districts (R-3M, R-4M, and R-4), Neighborhood Business (NB), Central Business District (C-CBD), Bricktown, all Downtown Design Districts, and Tracts 2 – 5 of the Neighborhood Conservation District. In all these districts densities between 19 and 34 dwelling units per gross acre are allowed for multiple-family construction. The maximum height in most of these zone districts is 2-1/2 stories of 35 feet, which may constrain achieving the maximum allowed density. It may be difficult to supply the required parking at grade. This may result in parking underground or above ground with the dwelling units over a parking structure. This adds considerable cost to multiple-family construction, impacting the affordability of the dwelling units to both owners and renters. That said, if the city were to consider density bonuses to incentivize affordable housing, a below-market height cap is useful to ensure that developers take advantage of the opportunity.

The land use categories of “senior independent living” and “dwelling units and mixed use” are subject to the same development standards as multiple-family residential.

Manufactured home in a manufactured home subdivision (where the lots are owned by the home-owner), as allowed in the R-MH-1 zone district, requires a 5,000 square foot lot. Consideration for a process to allow smaller lot sizes may be merited to provide additional affordable housing options for this housing type. HUD guidance recommends a minimum lot size of 4,500 square feet and a maximum density of eight dwelling units/acre.

c. *Are accessory dwelling units (ADU) allowed?*

No. Accessory dwelling units are not defined in the zoning code and are not listed as a type of residential use. Section 12.100.1, Lot, area, yards, limits lots for single-, two-, three-, and four-family dwellings to one structure per lot except as allowed by the planned unit development process. It is unclear if ADUs would be permitted in a planned unit development. Typically two or more structures may be permitted in a PUD to allow different types of commercial or multi-family buildings on a single larger lot which is held in one ownership.

A manufactured home may be placed as a temporary second structure in certain zone districts for up to three years. This may be approved by the Board of Adjustment for a “medical hardship” through the special exception process. The occupant of the manufactured home must be the caregiver for the occupant of the primary residence on the lot and must be a relative by blood or marriage. While this provides a housing solution for persons who may be disabled or elderly, by allowing an option to remain in their own home, it is not a permanent housing option available to lower- and middle-income Oklahoma City households. In addition, restricting the caregiver to a person who is related by blood or marriage significantly reduces access to a caregiving option that is best suited to needs.

A best practice is to allow small second units, or accessory dwelling units, in existing single-family zone districts. Such units are smaller than the primary unit and may be internal to an existing single-family home, a detached or connected structure, or a second story on an existing accessory structure (e.g., garage). In some communities, ADUs are also permitted in two-family dwelling units and townhomes. The ADU offers an alternative housing type that may permit a household to age in place, make a home affordable to a family, and increase housing options for lower-income one and two-person households. Neighborhood concerns about the additional gentle density can be addressed by requiring that the owner renting the ADU live onsite and that ADUs not be used as vacation rentals.

d. *Is design review required for multi-family housing or group living?*

Design review is required in certain zone districts. Although design standards are useful in creating a desirable built environment, they can raise costs and may communicate exclusivity. As such, design standards should be reviewed frequently for such barriers and the committees reviewing design compliance must be aware of the potential negative impacts.

- Urban Design Overlay District, including the Asian District, Paseo, Capitol Hill, and property along NW 23rd St. corridor
- Historic Preservation District and Historic Landmark Overlay District
- Neighborhood Conservation District – (Tract 4G and restrictions on materials in all tracts)
- Bricktown Urban Design District
- Downtown Design District
- Scenic River Overlay Design District, with six subdistricts
- Stockyards City Development District
- Northeast Gateway Urban Conservation District requires review to “Multiple-family (four or more units) uses or districts” as well as commercial and institutional (total of 11 Urban Conservation Districts)

e. *Are there special site improvement standards for certain types of housing?*

No, there are no site improvement standards applicable to only certain types of housing. Special use standards apply to the following:

- Congregate care housing and convalescent home: Special setback requirements for off-street parking and loading spaces in certain zone districts when adjacent to specific residential zone districts.
- Domestic violence shelter, Emergency shelters and feeding sites, Residential facilities for dependent and neglected children, Forced detention or correction facilities, Residential facilities for drug or alcohol treatment centers, and Transitional mental health residential facilities: Program and staff details required in application, identification of other such facilities within one mile, consideration of “overconcentration” and decision made, in part, on “the differences or similarities in existing uses among these use units and the compatibility or incompatibility of such uses in the particular area.” (see Item #9)

Spacing requirements imposed on housing occupied by certain protected classes can be found to violate the FHAA. Spacing requirements should also be reviewed carefully to ensure that they do not in effect prohibit housing for certain protected classes. Furthermore, spacing requirements can be challenged on the basis that they lack scientific evidence or demonstrated public health

benefits. Considerations regarding overconcentration is a legitimate concern—yet one that needs to be balanced against the right of persons with disabilities and other protected classes to choose where they live.

12. Does the zoning code describe any areas as exclusive?

No areas are described as exclusive.

13. Are there restrictions for senior housing and if so, do the restrictions comply with Federal law on housing for older persons?

“Senior Independent Living” is a defined residential use unit. Since the definition does not include any age-specific requirements, there may be confusion regarding compliance with FHAA and the Housing for Older Persons Act (HOPA), which could be bolstered in the code.

The familial status protection prohibits exclusive communities of “adults only” that do not allow families with children. HOPA was enacted to allow an exemption to this protection for senior housing communities. To qualify for the exemption, 100 percent of the dwelling units in such communities must be for persons aged 62 or older. In addition communities may be exempt if 80 percent of the dwelling units are limited to at least one of the residents of the unit being aged 55 or older. The 55 or older communities must follow HUD’s age verification requirements and publish policies that shows the intent to operate as a “55 and over” community.

14. Is senior housing a specific land use and if so, is a special or conditional use permit required but is not required for single-family or multi-family residential uses?

“Senior Independent Living” is a residential use allowed by right in four zone districts: R-4M, R-4, C-2, and C-3. These are the only zone districts where this use is permitted. This use receives the same review process as single-family and multi-family uses in the R-4M and R-4 zones.

It should be noted that several other residential zone districts also allow the same single-family and multi-family dwelling units as in the two residential zone districts that support Senior Independent Living, but the other zone districts do not permit Senior Independent Living as a use (R-3, R-3M). The reason is unclear. Multiple-family residential is allowed as a conditional use in the C-3 zone district and not allowed in the C-2 zone, while Senior Independent Living is a permitted use in both these commercial zone districts. However, both these zones permit “dwelling units and mixed-use.”

15. Is a conditional or special use review permit required for housing for persons with disabilities but is not required for single-family or multi-family residential uses?

“Low impact institutional: residential-oriented” is a permitted use in all residential zone districts except the two mobile home zone districts, in all the downtown design districts, and in Tracts 1, 2, and 3, of the neighborhood conservation district. It is not

allowed in any other districts except the historic preservation district where it requires a review through the special exception process. Multiple family also is processed as a special exception in this zone district, but single-family residential is a permitted use, with no special review beyond the requirements of the historic preservation zone district. While “low impact institutional: residential-oriented” is broadly defined to include a variety of group living situations which may or may not be for persons with disabilities, there may be a conflict with FHAA when it is a residence for persons with disabilities. This use is permitted the same as single-family residential in all other residential zone districts (excepting the two zone districts for mobile homes) and it is unclear why it would be treated differently in the historic preservation district.

Since the code is silent on the number of persons that can reside in a “low-impact institutional: residential-oriented” facility, it is likely that a facility that does not meet the occupancy limit of five or fewer unrelated persons, set in the definition of “family,” is enforced. A single-family dwelling is defined as “a building designed for occupancy by one family.” This means that a “low-impact institutional: residential-oriented” for six or more persons, with or without a disability, is not allowed in any of the residential zone districts. There is no definition for a facility for six or more persons, making it unclear where such facilities could be located. The “group residential” category may where the six or more facility is placed, but this type of facility is only allowed in five zone districts, only one of which is residential in nature (R-4). While the definition does not limit “group residential” to persons with disabilities, and all groups fitting this use classification are subject to the same zone districts, the comparison is to how a facility for persons with disabilities is treated with regard to other residential uses, not how it is treated compared to other groups in the same land use classification.

Also of note is that separate land use categories (use unit classification) are established for domestic violence shelters, emergency shelters and feeding sites, and residential facilities for dependent and neglected children. How these are considered under FHAA are nuanced based on length of stay and how the facility is operated. All three uses are allowed in all zoning districts with residential uses except Bricktown, two of the downtown design districts, and the historic preservation district. In all cases a special permit is required. This necessitates a public notification and hearing process before two public bodies, the planning commission and the city council. Discriminatory treatment may occur if the comments of decision-makers are discriminatory in nature or the final decision is made based on opinion rather than the criteria in the zoning code. In addition, special requirements that are substantially different than those for other similar residential structures (i.e., single-family) may trigger a claim of disparate treatment.

16. Are there any references to fair housing or a statement about fair housing in the zoning code?

There are no references to FHAA. Section 25-39, Discrimination in housing, prohibits discrimination based on age, familial status, disability, race, color, sex, sexual orientation, gender identity, religion, creed, ancestry, or national origin in lending and real estate transactions.

17. Are there specific references to the accessibility requirements of FHAA or ADA in the development codes?

a. *Are there minimum standards for handicap parking for multi-family housing?*

Section 59-10650, Accessible Parking Space Requirements, establishes accessible parking space requirements based on the total number of required parking spaces. The accessible spaces must be provided for any commercial, industrial, and residential use that has a parking requirement established by the zoning code. The same accessible parking requirements are in the Building Code, and these reflect the ADA standards for minimum number of accessible parking stalls.

b. *Are there standards for accessible routes (e.g., sidewalks and access through parking lots)?*

Section 12100.2, Use and Structure Regulations, requires sidewalks along major and minor arterial streets in the case of new construction and when residential is converted to a more intense use. Sidewalks are to be constructed "in accordance with the Subchapter II of the American With Disabilities Act, 42 U.S.C. § 12131, et seq., as amended, and the regulations promulgated there under ("ADA")." Single-family residential lots fronting arterial public streets, used for residential purposes, are exempt from this requirement. Single-family and two-family lots platted prior to 2007, with frontage on an arterial, are also exempt.

Section 10600.4 Parking Lot Design, also requires internal pedestrian access ways, a minimum of five feet in width, be incorporated in parking lot design. Specific references to ADA requirements for surfacing materials and demarcating the pedestrian routes are included.

Other considerations. Somewhat unique to Oklahoma City is a state-enacted zone district known as the "Capitol-Medical Center Improvement and Zoning District" (CMC). Title 73 of the state statutes sets the boundary of this zone district and authorizes the Capitol-Medical Center Improvement and Zoning Commission to establish and enforce zoning and improvement regulations for the district. These regulations are based on a master plan for the area and are contained in administrative rules adopted by the CMC Commission. Although not responsible for the enactment nor the processing of land use and development permits in this zone district, the zoning regulations for this district are adopted by the City Council of the City of Oklahoma City for the purposes of enforcement (Oklahoma City Municipal Code, 2010 Section 59.7400-2). Code violations of this zone district are prosecuted in municipal court upon action by the CMC Commission.

Some zoning regulations are the same between the two codes, such as the definition of “family.” Where the regulations are similar, the concerns identified in the assessment of the Oklahoma City Zoning and Planning Code hold true for the CMC zone district. There are also some differences in the two sets of regulations regarding the range of land uses allowed and certain procedures. This means that group living facilities may be treated differently in the CMC zone district than the zone districts established by the Oklahoma City Zoning and Planning Code.

Examples of different land use categories for “special group residential housing” found in the CMC zone district that are not found in the Oklahoma City Zoning and Planning Code are:

- Drug treatment center or halfway house—defined as a temporary residence for persons recovering from treatment for chemical dependence, alcoholism, or psychological illness and no counseling or treatment is provided, excluding "halfway house or sober houses" as defined by the Americans with Disabilities Act;
- Group home, for temporary residency in independent sleeping and living quarters;
- Geriatric care center;
- Rehabilitation center;
- Intermediate care facility; and
- Juvenile treatment center, residential.

Group residential housing options not specifically listed as an allowed use in the CMC zone district would require a determination as to whether it meets the definition of one of the listed uses or needs a hearing to determine if it should be added as a land use category.

The most notable difference in procedures between the two sets of regulations is that the CMC zone district has a reasonable accommodation process while the Oklahoma City Municipal Code does not. Section 120:10-5-25, Reasonable accommodation permit, allows the owners or operators of a halfway house to seek a conditional use approval of this use “when such accommodation may be necessary to afford persons with disabilities an equal opportunity to use and enjoy a dwelling.” All halfway houses for persons with disabilities in a zone district with residential uses must be approved through the reasonable accommodation process, and this is different from the review processes and procedures that may be required in the zoning districts regulated by the Oklahoma City Zoning and Planning Code. Because the definition of “drug treatment center or halfway house” includes persons recovering from “psychological illness,” it is unclear how facilities for persons with mental disabilities may be treated. It should be noted that HUD guidance on the application of FHAA in land use laws states that:

“Although a group home for persons in recovery may commonly be called a “sober home,” the term does not have a specific legal meaning, and the Act treats persons with disabilities who reside in such homes no differently than persons with disabilities who reside in other types of group homes.”²

The reasonable accommodation process in the CMC district allows for equal treatment, although the use of the term “halfway house” in the reasonable accommodation process implies the process may be limited only to a group living situation meeting the definition for “drug treatment center or halfway house” in the CMC district regulations.

Also of note is that accessory dwelling units (ADUs) are allowed in the CMC zone district but are not allowed under the Oklahoma City Zoning and Planning Code. ADUs may be approved in the RD-1 and RD-2 residential districts through a conditional use permit. Such units may be occupied by no more than one person, constructed on the rear property line, and have a floor area of 50 percent or less of the main building on the parcel. ADUs are allowed only on property with owner-occupied homes. As noted previously, ADUs allow for infill development and help to increase affordable housing options in the community.

² Joint Statement of the Department of Housing and Urban Development and the Department of Justice, State and Local Land Use Laws and Practices and the Application of the Fair Housing Act, November 10, 2016

SECTION IV.

ACCESS TO OPPORTUNITY

SECTION IV.

Access to Opportunity

This section examines the extent to which members of protected classes experience disparities in access to opportunity measured by access to education, employment, and transportation. It also discusses challenges faced by persons with disabilities. The analysis is based on HUD opportunity indicators, interviews of stakeholders, findings from the resident and stakeholder focus groups.

Primary Findings

- Compared to other cities in the Oklahoma City region and Tulsa, African American and Hispanic residents in Oklahoma City are more likely to live in high poverty neighborhoods. In fact, Non-Hispanic White and Asian residents living below poverty in Oklahoma City have better access to low poverty neighborhoods than do African American and Hispanic residents overall. This is a factor of the concentration of many African American and Hispanic residents in a handful of high-poverty neighborhoods within the city.
- African American, Hispanic, and Native American children have lower access to high performing elementary schools relative to Non-Hispanic and Asian children. This is true for many cities in the region and for Tulsa. Only Edmond demonstrates high levels of proficiency for students across races and ethnicities and income levels.
- Oklahoma City offers equal access to jobs among races and ethnicities and income levels. Yet there is significant disparity in unemployment and educational attainment among residents, meaning that not all residents can benefit from city's labor market. Expanding employment access and opportunities for Hispanic, African American, and Native American residents would benefit these residents and the city overall.
- Residents and stakeholders who participated in focus groups about barriers in access to economic opportunity focused on inadequate transportation—especially public transit to serve persons with disabilities; needed accessibility improvements and more equitable distribution of quality parks; and equity in education.

HUD Opportunity Indicators

HUD provides several “opportunity indices” to assess and measure access to opportunity in a variety of areas, including education, poverty, transportation, and employment. The opportunity indices allow comparison of data indicators by race and ethnicity, for households below the poverty line, and among jurisdictions. They are also a good starting point for the opportunity analysis, identifying areas that should be examined in more detail.

The HUD opportunity tables—specifically the following six indices in the tables—were the starting point for this Access to Opportunity analysis.

To interpret these indices, use the following rule: a higher number is always a better outcome. The indices should be thought of as an “opportunity score”, rather than a percentage.

The indices include the:

- **Low Poverty Index.** This index measures neighborhood exposure to poverty, with proximity to low poverty areas considered to be an advantage. Higher index scores suggest better access to economically strong (i.e. low poverty) neighborhoods.
- **School Proficiency Index.** This index measures neighborhood access to elementary schools with high levels of academic proficiency within 1.5 miles. Proficiency is measured by 4th grade scores on state-administered math and science tests. HUD uses elementary school scores only for this index because they are typically more reflective of school quality and access at the neighborhood level. Middle and high schools draw from larger boundaries and, especially in high school, have more transportation options.
- **Labor Market Engagement Index.** This index measures the employability of neighborhood residents based on unemployment, labor force participation, and educational attainment. Higher index scores suggest residents are more engaged in the labor market.
- **Jobs Proximity Index.** The jobs proximity index indicates how close residents live to major employment centers. The higher the index, the greater the access to nearby employment centers for residents in the area.
- **Transit Index.** The transit index measures use of public transit by low income families that rent. The higher the index, the more likely that residents in the area are frequent users of public transportation.
- **Low Cost Transportation Index.** This index measures the cost of transportation, based on estimates of the transportation costs for low income families that rent. Higher index values suggest more affordable transportation.

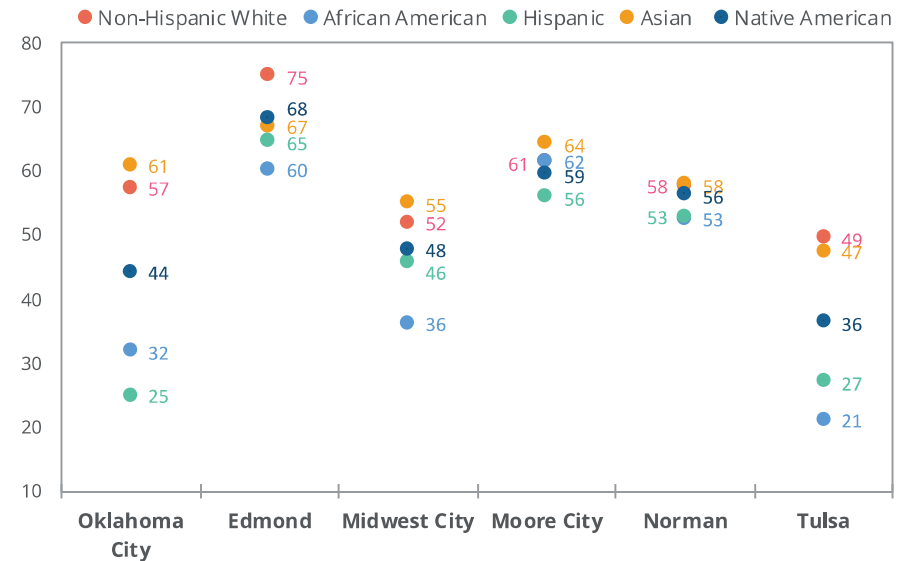
Low poverty index. Figures IV-1a and IV-1b present the values of the low poverty index for Oklahoma City and comparative jurisdictions by race and ethnicity. The top figure shows the index for all residents, while the bottom figure is restricted to residents with incomes below the poverty level. Higher values mean better access to low poverty environments and, conversely, lower numbers mean residents are more likely to live in neighborhoods of concentrated poverty.

For residents overall, Oklahoma City shows the largest variance between Non-Hispanic White and Asian residents and African American and Hispanic residents. This is true even for residents living in poverty. The indices suggest that African American and Hispanic residents in Oklahoma City are more likely than comparable residents in other cities to live in high poverty neighborhoods.

**Figure IV-1a.
Low Poverty
Index, Total
Population**

Note:
Higher numbers indicate greater access to low poverty neighborhoods.

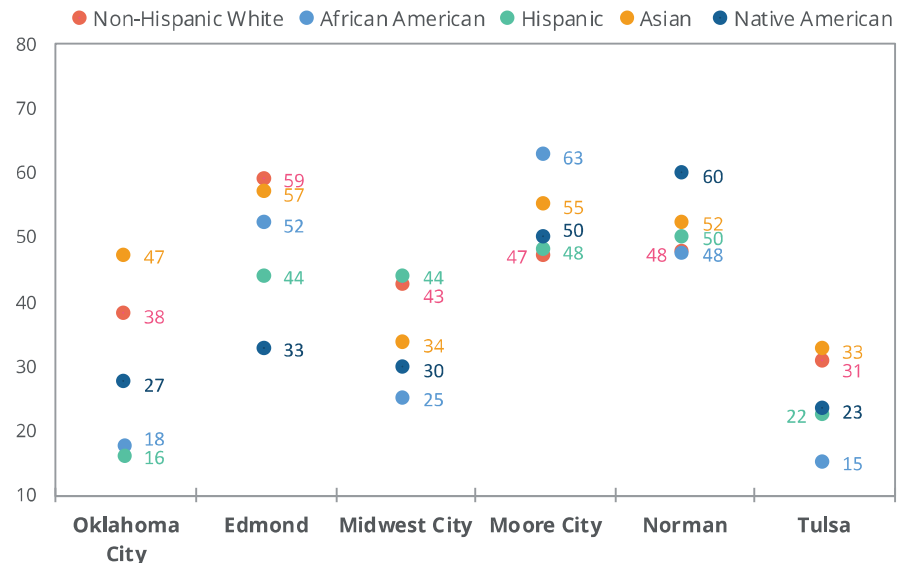
Source:
Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Low Poverty Index.



**Figure IV-1b.
Low Poverty
Index,
Population
Below the
Poverty Line**

Note:
Higher numbers indicate greater access to low poverty neighborhoods.

Source:
Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Low Poverty Index.



School proficiency index.

Figures IV-2a and IV-2b present the values of the school proficiency index by race and ethnicity. Higher values mean better access to high-performing schools and lower numbers mean worse access.

Edmond stands out for having equal access to high-performing schools regardless of a child's race or poverty level. Oklahoma City shows a moderate variance to access by race and ethnicity, similar to Tulsa. Oklahoma City shows better access for African American children than Tulsa, particularly for children living in poverty. Access for Native American children is moderate in most communities, with Edmond being the exception.

**Figure IV-2a.
School
Proficiency
Index, Total
Population**

Note:

Higher scores indicate greater likelihood of access to proficient schools.

Source:

Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, School Proficiency Index.

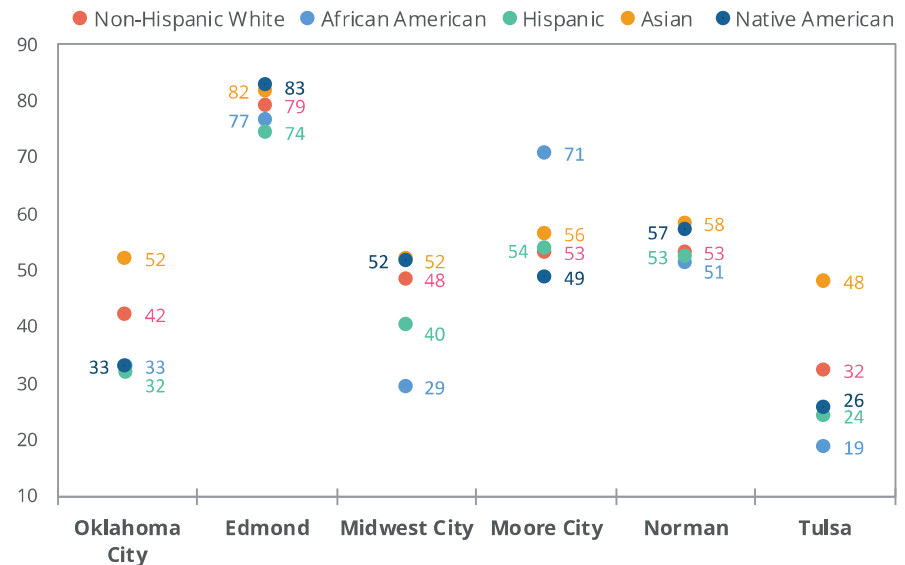
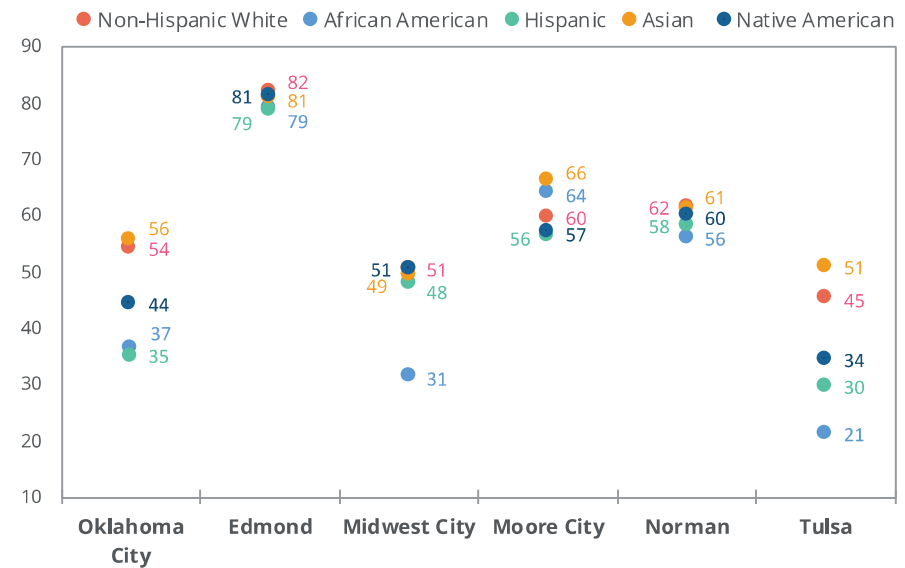
**Figure IV-2b.
School
Proficiency Index,
Population Below
the Poverty Line**

Note:

Higher scores indicate greater likelihood of access to proficient schools.

Source:

Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, School Proficiency Index.



Labor market engagement index. Figures IV-3a and IV-3b present the values of the labor market engagement index for each by race and ethnicity. Higher values indicate higher employability of residents.

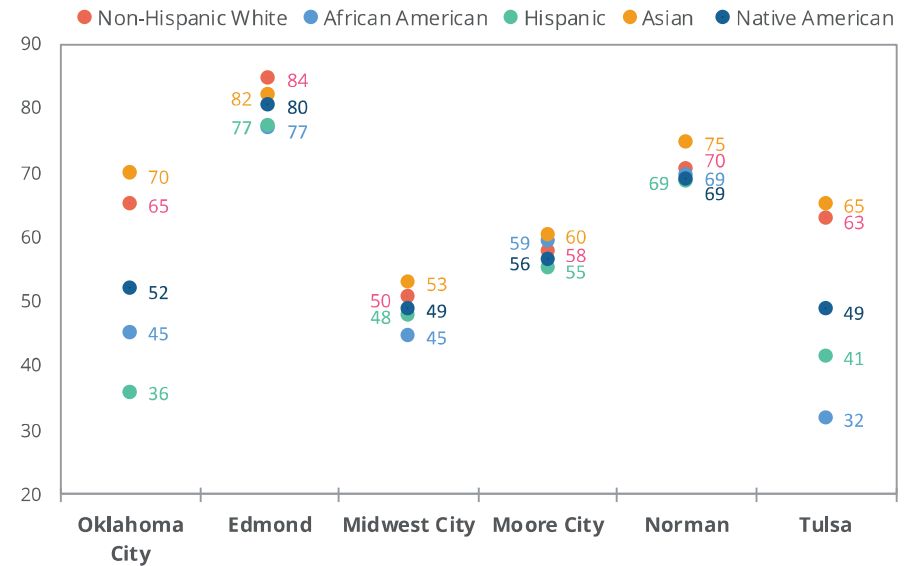
Oklahoma City and Tulsa both stand out for their relatively low levels of labor market engagement for Hispanic residents. Oklahoma City has stronger labor market engagement for African American residents than Tulsa and is about the same as Midwest City.

For residents living in poverty, engagement is low in Oklahoma City and Tulsa. Midwest City, Moore City, and Norman show little variation by income. Edmond shows the largest shift in labor market engagement for residents in poverty. To the extent that residents occupy jobs in the communities in which they live, this indicator reflects opportunities within local job markets.

**Figure IV-3a.
Labor Market
Engagement
Index, Total
Population**

Note:
Higher numbers indicate greater levels of employability of residents.

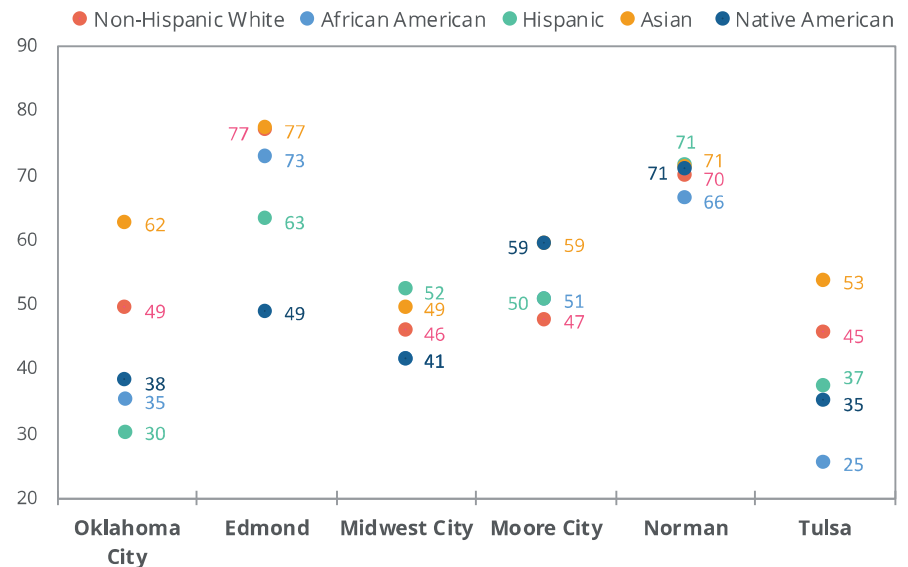
Source:
Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Labor Market Engagement Index



**Figure IV-3b.
Labor Market
Engagement
Index,
Population
Below the
Poverty Line**

Note:
Higher numbers indicate greater levels of employability of residents.

Source:
Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Labor Market Engagement Index



Job proximity index.

Figures IV-4a and IV-4b present the values of the job proximity index for each jurisdiction by race and ethnicity.

This is the only indicator where the results differ dramatically between all residents and residents living in poverty. For all residents, proximity to jobs is moderate and differs little by race and ethnicity (with two exceptions).

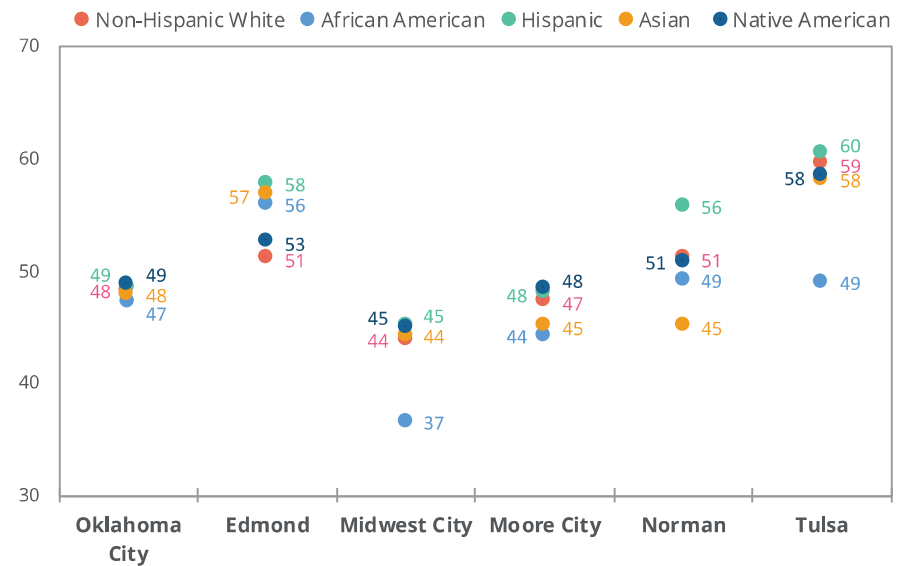
Oklahoma City offers equal access to jobs, both among races and ethnicities and between all residents and residents living in poverty.

Edmond scores highest on access to jobs for Hispanic and African American residents living in poverty. Midwest City, Moore City, and Normal show more variation for residents in poverty, while Tulsa shows little change.

**Figure IV-4a.
Job Proximity
Index, Total
Population**

Note:
The higher the index, the greater the access to nearby employment centers for residents in the area.

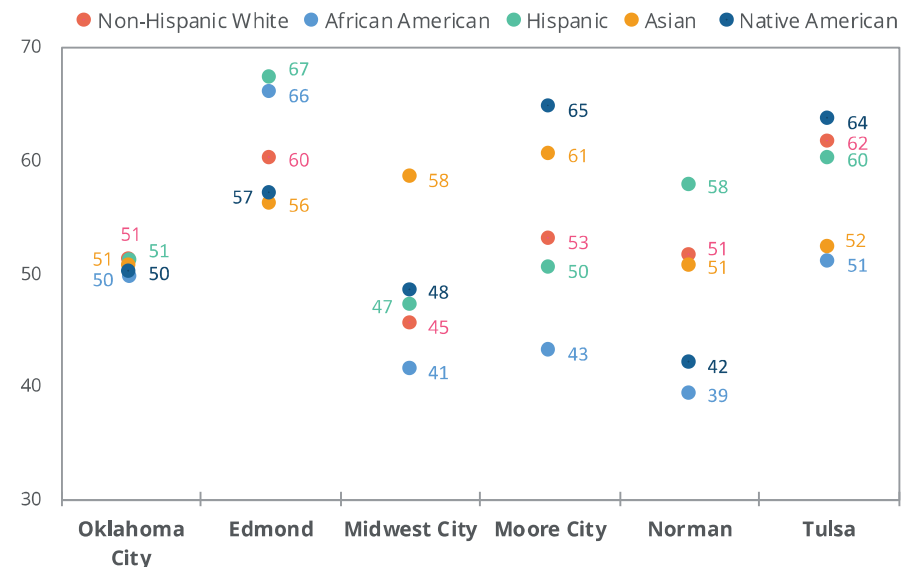
Source:
Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Job Proximity Index.



**Figure IV-4b.
Job Proximity
Index, Population
Below the Poverty
Line**

Note:
The higher the index, the greater the access to nearby employment centers for residents in the area.

Source:
Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Job Proximity Index.



Transit index. Figures IV-5a and IV-5b present the values of the transit index for each jurisdiction by race and ethnicity.

The indicators suggests no meaningful differences by race or ethnicity within the jurisdictions. Tulsa has the best access to transit of any of the jurisdictions yet the overall score is still low—less than 40 on a scale of 0 to 100.

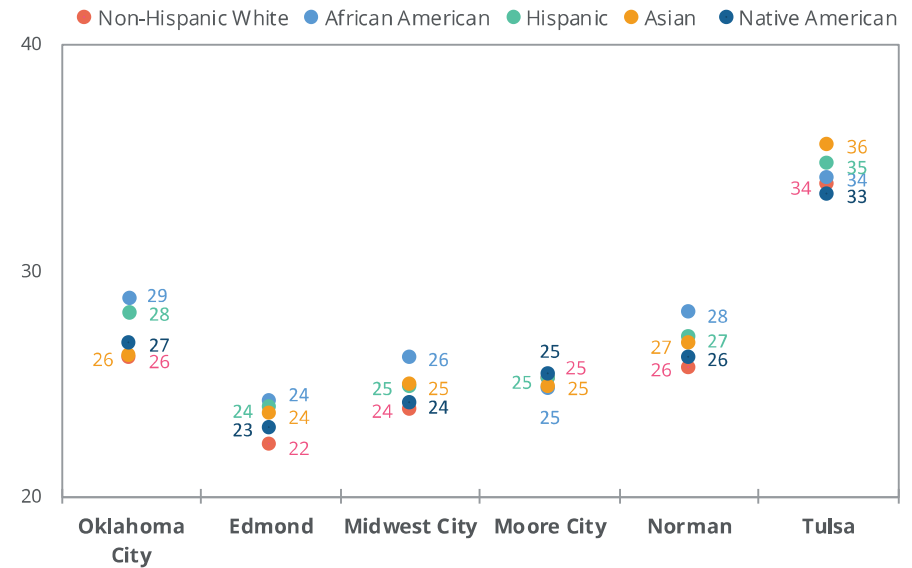
**Figure IV-5a.
Transit Index,
Total Population**

Note:

The higher the index, the more likely that residents in the area are frequent users of public transportation.

Source:

Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Transit Index.



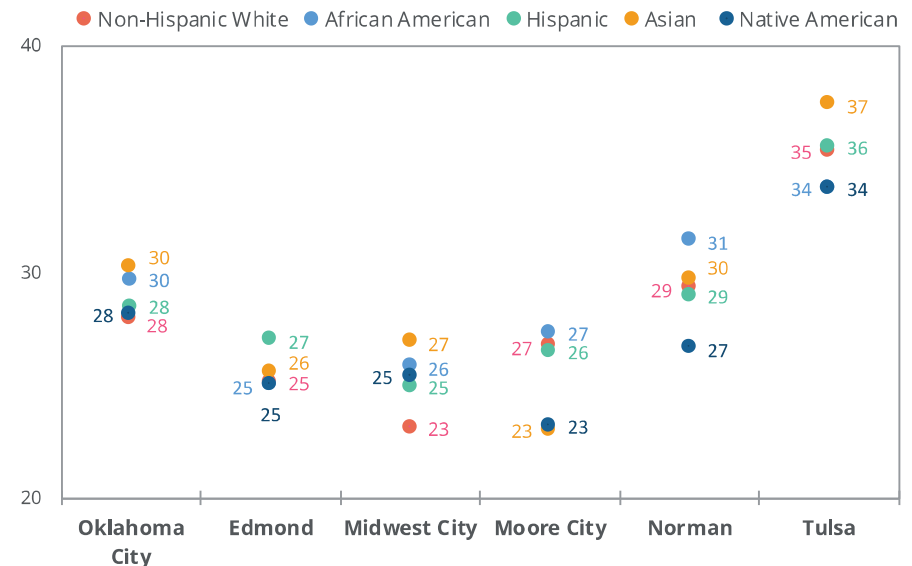
**Figure IV-5b.
Transit Index,
Population Below
the Poverty Line**

Note:

The higher the index, the more likely that residents in the area are frequent users of public transportation.

Source:

Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Transit Index.



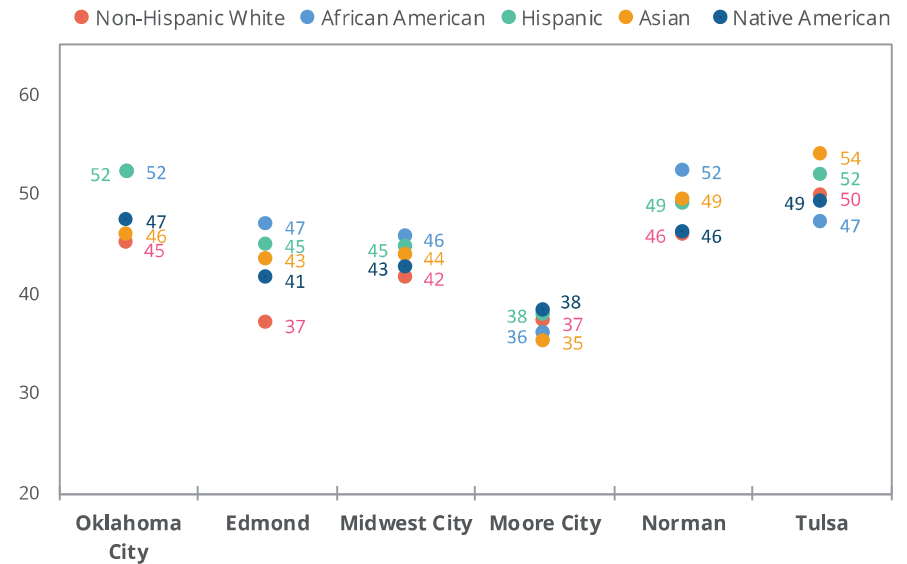
Low cost transportation index. Figures IV-6a and 6b present the values of the low cost transportation index.

There is little variation among communities, among racial and ethnic groups, and among all residents and those living below the poverty level. In general, transportation is moderately affordable for residents in the region regardless of where they live or their income level.

**Figure IV-6a.
Low Cost
Transportation
Index, Total
Population**

Note:
Higher index values suggest
more affordable transportation.

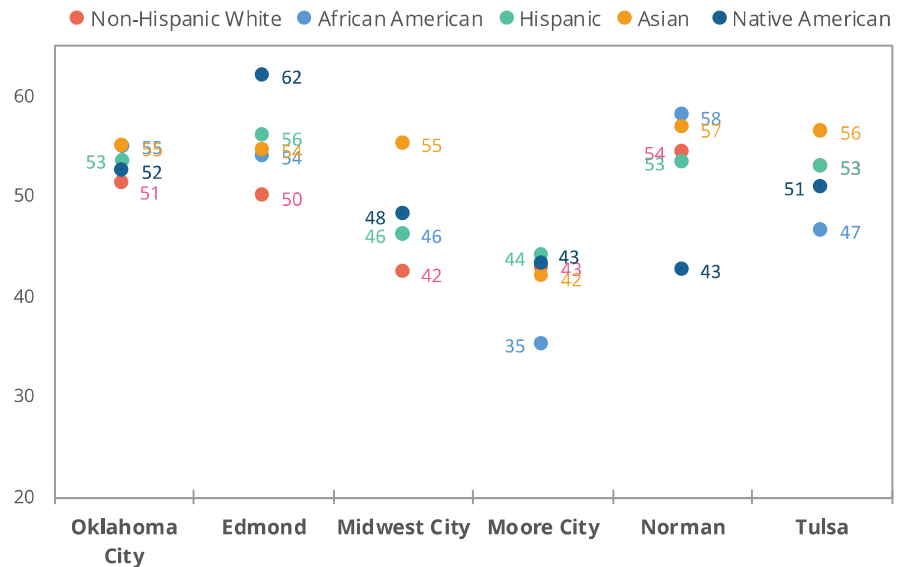
Source:
Root Policy Research from the
HUD AFFH-T Table 12,
Opportunity Indicators by Race
and Ethnicity, Low Cost
Transportation Index.



**Figure IV-6b.
Low Cost
Transportation
Index, Population
Below the Poverty
Line**

Note:
Higher index values suggest
more affordable transportation.

Source:
Root Policy Research from the
HUD AFFH-T Table 12,
Opportunity Indicators by Race
and Ethnicity, Low Cost
Transportation Index.



Resident and Stakeholder Perspectives

The balance of this section discusses access to opportunity from the perspective of the residents and stakeholders who participated in focus groups for the AI. The focus groups reveal barriers that cannot be found in the data indicators. They are also useful to understand how typically under-represented groups view equity within the city. These perspectives are organized by access to opportunity topic.

Education. At the time this AI was prepared, Oklahoma City schools was in the process of implementing its “Pathway to Greatness” or P2G. Since enrollment peaked at nearly 80,000 students in the mid-1960s, Oklahoma City school enrollment has fluctuated around 40,000 students and has been trending downward since 2014. Racially and ethnically, a little more than half of children in the district are Hispanic, 22 percent are African American, 14 percent are Non-Hispanic White, and 5 percent are multi-racial. Students in the district move frequently, with less than 60 percent enrolled during the entire school year. Three quarters of students qualify for free and reduced lunch programs.

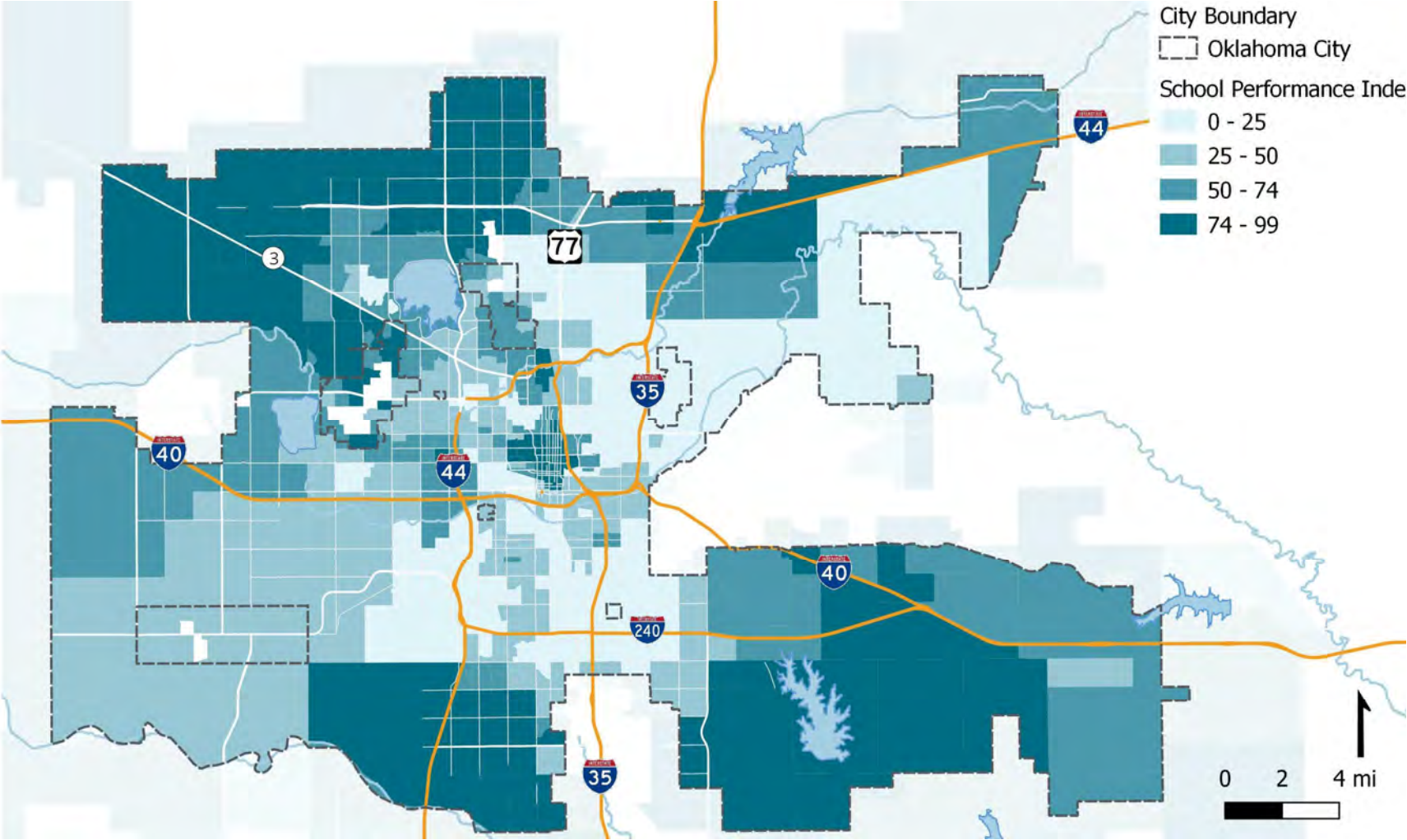
P2G is an ambitious plan that required closing schools, relocating schools, and reconfiguring existing schools. As reported in the Black Wall Street Times, before P2G, the Oklahoma City school district served more than 40,000 students among 79 schools. That means that there is an average of 506 students attending each school. In contrast, the high-performing Edmond Public Schools services 23,966 students in a total of 25 schools, with an average of 958 students per school.¹ Consolidating schools should improve academic and enrichment offerings and align the district’s budget with the core components of academic success—instruction rather than building maintenance.

These changes are being implemented throughout the city according to a map in P2G, with many school closures and relocations in the central portion of the city, and new middle schools in the south. Although some of these areas align with Hispanic and African American concentrations and R/ECAPs, the impact is broader than those areas and more closely correlated with school performance.

Figure IV-7 shows differences in access to high performing schools at the elementary school level, according to the HUD school proficiency index.

¹ “Why school closings in OKCPS may be a step toward equity,” Autumn Brown, December 27, 2019.

Figure IV-7.
Access to High Performing Schools by Census Block Group



Source: HUD AFFH Raw Data, February 2018.

It is too early to tell how P2G will address the inequities in access to high proficiency schools discussed earlier in this section. A mid-January 2020 update from the district reports positive progress in utilization, better student-teacher ratios, lower class sizes, and expanded sports, arts, and STEM programming.

Some residents expressed concern about the plan, mostly about schools being closed in the northeast and the lack of grassroots engagement for the plan. Residents would have liked more transparency about the decision to close schools. Residents also felt that the district events about P2G should have been more intentional in places where neighbors gather—e.g., after church services.

Residents perceive inequities in resources among the city's schools, with lower income schools the most under-resourced. Some questioned the process for deciding how voter-approved funding (MAPS) is allocated and perceive that schools in the northeast never seem to benefit from increased funding.

General community amenities. When asked about equal distribution of community amenities in the city, residents identified several areas where they feel neighborhoods in the northeast and the south are underserved:

- Lack of safe and quality recreation opportunities (pool, gym, parks) and grocery stores in the northeast.
- Lack of grocery stores and gas stations in Capitol Hill.
- Neighborhoods in the south never had the same quality of parks or other amenities as found in other parts of the city.
- There is a general perception that residents living south of the river are not part of OKC; the city has historically ignored the neighborhood and now the neighborhood is cut off from new amenities (the example provided is the sidewalk path of Scissor Tail Park which ends before a neighborhood that is largely Hispanic).

Some residents attribute these differences in amenities to lack of representation by leadership and access to leadership. One resident mentioned frustration that City Council meetings are on Tuesdays at 8:30 a.m., making it difficult for working residents to attend. Important planning meetings held on Wednesday evenings when most of the Black community is at church. There is also a perception that board members of Community Housing and Development Organizations (CHDOs) are not true representatives of neighborhoods and are instead “friends of power brokers.”

Transportation. Lack of reliable and accessible transportation, particularly for persons with disabilities, was frequently raised as an access to opportunity barrier.

- Many residents said they do not use the bus because it is unreliable: *“It can take an hour to reach a destination that’s a 10 minute drive.”*
- Many stops are not accessible to people with mobility disabilities.

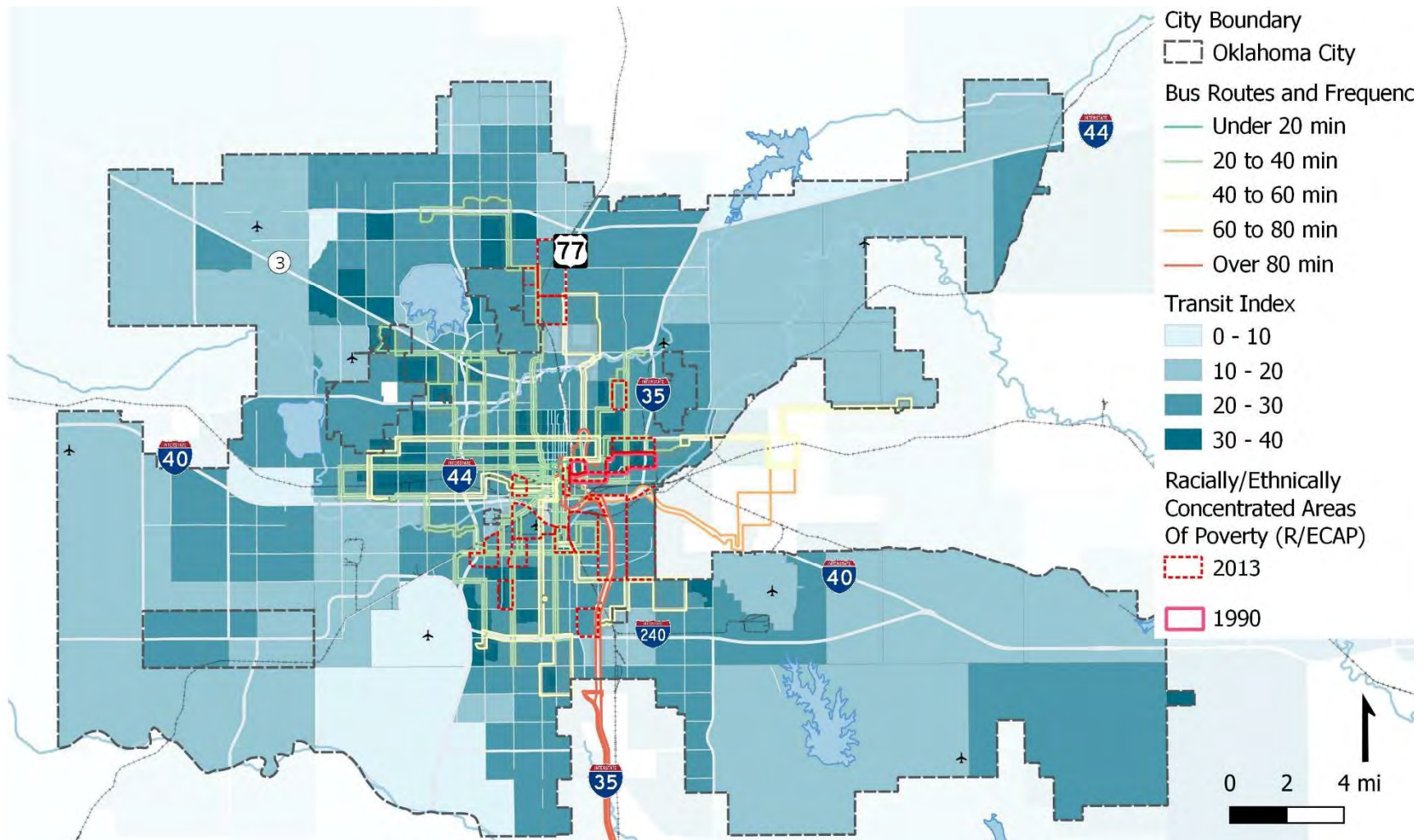
- There are no shelters for shade or protection from the elements.

The Center for Neighborhood Technology (CNT) measures gaps in transit connectivity, access, and frequency. CNT analyzes data on station, stop, and frequency data for bus, rail and ferry service for areas with populations greater than 100,000, as well as some subareas.

According to CNT data, 42 percent of households in Oklahoma City are underserved by transit. Geographically, the CNT-identified underserved areas are clustered in the east and northeast, north of downtown, and in suburban neighborhoods to the west. Much of the southern part of the city is adequately served by transit.

Figure IV-8 shows the frequency of buses in 20 minute increments, overlaid with R/ECAPs. The map is generally consistent with the CNT findings in that it shows that frequent transit is more limited in the northeast, east, southeast, and southwest—particularly in the more suburban areas of the city.

Figure IV-8.
Transit Frequency and R/ECAPs



Source: EMBARK General Transit Feed Specification data and posted frequencies.

Access for persons with disabilities. Many residents complimented the city for its persistent work on repairing sidewalks and streets and public facilities. Stakeholders reported that many areas of the city that draw visitors are accessible, making residents with disabilities feel very welcome. The exception is some parks and older neighborhoods, whose infrastructure can be challenging.

Where improvements need to be made to address barriers for persons with disabilities, they are mostly in housing and transportation. These include:

- A significant lack of accessible housing for very low income people with disabilities (0-30% AMI, equivalent to SSI income).
- Lack of proper building inspection by the city to ensure compliance with Fair Housing Act requirements for new construction and design—both for market rate multifamily units and units with federal funds. Some stakeholders noted that units may meet Fair Housing Act requirements on paper (plans), but not as constructed. City compliance audits should occur throughout the building process.
- Group homes have a lot of staff turnover, which is very hard on consumers.
- Many residents said there is a lack of access to parks for persons with disabilities, due to location and design.
 - *“I really wish there were a park closer to my house I could go to.”*
 - *“The zoo is accessible, but it is very hilly!”*
 - *“My wheelchair is very heavy and sometimes gets stuck in the mud. I really wish there were a park with swings I could use with a flat surface underneath”*
- Inadequate transportation for persons with disabilities was a common theme for residents. Most agreed that there is essentially no functional paratransit in the city for people with heavy powerchairs. Paratransit is also expensive at \$3.50 for a one way trip.
- The Oklahoma Foundation for the Disabled supplements transportation to fill gaps in provision—but they are significantly under-reimbursed. They serve 60 people *per day* and receive reimbursement of \$35 *per person per month*.
- Discrimination by the public at large still exists and is a problem in the city and statewide.
 - *“People with disabilities are ‘the forgotten ones.’ People at the Capitol don’t think about this world.”*

SECTION V.

IMPEDIMENTS AND FAIR HOUSING ACTION PLAN

SECTION V.

Impediments and Fair Housing Action Plan

The city of Oklahoma City, as a recipient of federal housing and community development funds, is required to take actions to reduce barriers to fair housing choice. This document—the city’s updated Analysis of Impediments to Fair Housing Choice, or AI—identifies the primary impediments to fair housing choice and recommends a five-year action plan to reduce barriers. It addresses both barriers to housing choice and access to opportunity, as economic factors play a significant role in attaining housing.

Community Engagement

The community engagement activities that supported the development of the AI and identification of impediments included:

- Three focus groups with private and public affordable housing developers and social service providers and case managers;
- Interviews with housing providers, including those serving extremely low income residents and persons experiencing homelessness, as well as civil rights and housing advocates;
- Focus groups with residents most vulnerable to housing discrimination and impediments to housing choice. These included residents of Hispanic descent living in the southern part of the city (8 participants), African Americans living in the northeast (4 participants), and residents with developmental disabilities and staff (9 total).

Past Impediments to Fair Housing Choice

The city’s last Analysis of Impediments to Fair Housing Choice (AI) was completed in 2014. That AI found the following barriers to housing choice. Those barriers that were also identified in this AI update are noted:

Impediment: More frequent denial of home purchase loans to Black, Hispanic, and female applicants, based on a review of home purchase loan data collected under the Home Mortgage Disclosure Act (HMDA). The analysis also found higher loan denials in areas with high concentrations of Black and Hispanic residents.

This impediment remains, particularly for African Americans even after adjusting for income.

Recommended actions to address: Enhance outreach and education to first time homebuyers and track the number of homebuyer education and training sessions offered. This should include financial literacy training.

Impediment: Predatory style lending —as defined by high interest loans—falls more heavily on Black and Hispanic borrowers and neighborhoods in which they are concentrated.

This impediment remains: Hispanic borrowers received subprime rates on mortgage loans 21 percent of the time; African Americans, 13 percent of the time v. 7 percent of the time for all applicants. Stakeholders report that predatory rental and loan practices are on the rise with the tightening of the ownership market.

Recommended actions to address: Improve resident understanding of the attributes of predatory lending, and discourage borrowers from utilizing predatory lending. Publish information regarding predatory style lending on the city website, including how to identify such loans, inclusion of this information in homebuyer education and credit counseling sessions, number of such sessions held and record of participation. Reach out to local bankers and solicit their input on methods to make consumers better aware of the attributes of such loans.

Impediment: Discriminatory terms, conditions, privileges, or facilities relating to rental; refusal to rent as evidenced in housing complaints submitted to HUD and the Metropolitan Fair Housing Council by Oklahoma City residents.

This impediment remains, although complaints have declined as residents have become more fearful of the consequences of filing (e.g., eviction by landlords).

Recommended actions to address: Enhance outreach and education to renters and housing providers.

Impediment: Failure to make reasonable accommodations and neighborhood opposition to group homes, as evidenced in fair housing complaints and reported by stakeholders.

Failure to make reasonable accommodations remain, as evidenced by fair housing complaints and cases. Although NIMBYism against group homes was not found in this AI, the city's zoning code could be modified to better clarify allowance of group homes by zoning district.

Recommended actions to address:

- Conduct audit tests of new market rate construction, and publish the results of such testing
- Conduct outreach and education for providers of multifamily housing
- Encourage developers and builders of housing to attend fair housing training sessions that include reasonable accommodations

Impediment: Lack of understanding of fair housing laws by residents, based on the survey conducted for the AI.

This impediment remains.

Recommended actions to address:

- Engage parties for co-sponsoring events in April during Fair Housing Month
- Conduct educational training sessions for consumers, providers of housing, and program management staff
- Add selection criteria to assisted housing location proposals that give credit to developers and others who have attended fair housing trainings
- Conduct educational training sessions for consumers, providers of housing, and program management staff
- Promote and distribute fair housing flyers

Impediment: Concentration of subsidized and assisted housing in areas with high concentrations of minority residents and households in poverty.

Although public housing is concentrated in some neighborhoods, overall, publicly subsidized housing and particularly Housing Choice Vouchers, are relatively well dispersed citywide.

Recommended actions to address:

- Add selection criteria to assisted housing location proposals that give credit to considering the racial, ethnic, and income characteristics of the neighborhood in which the housing facility is to be placed
- Review planning and zoning ordinances to allow for the greater geographic distribution of such multi-family units or affordable housing units

Impediment: NIMBYism prevents developments of group homes and apartment complexes.

Although NIMBYism against group homes was not found in this AI, the city's zoning code could be modified to better clarify allowance of group homes by zoning district.

Recommended actions to address:

- Consider methods to overcome NIMBYism
- Enhance understanding for affordable housing in alternative locations through outreach and education
- Prepare case studies that highlight the benefits of affordable housing development intermixed with other land uses
- Convene a work group to address which zoning codes represent barriers in some areas, determine which zoning codes those represent, and where, and assess policies or practices to eliminate or modify the codes so that such impacts are lessened or eliminated

Impediment: Lack of adequate public transit in the city, based on stakeholder input.

This impediment remains.

Recommended actions to address:

- Determine which transit routes need to be modified or created
- Solicit input from the affected public on ways to improve the overall transit system
- Solicit input from the transit agency to better understand the institutional reasoning of why some of the suggested options may not be feasible

Impediment. Insufficient fair housing protections in city anti-discrimination law. The statute does not provide for protections from discrimination in the housing market based on disability or familial status. As well, it has not kept pace with State Law, since State Law has protections for age.

No longer an impediment.

Recommended actions to address: City Council pass legislation recognizing disability, familial status, and age as protected classes under Oklahoma City law.

City Progress in Addressing Impediments

Oklahoma City describes its efforts to address barriers annually in its HUD-required Consolidated Annual Performance and Evaluation Report, or CAPER. The city's CAPER is an excellent source of information on efforts to mitigate barriers.

The city partners with the Metropolitan Fair Housing Council (MFHC) to carry out much of its fair housing action plan. The Council has been instrumental in fulfilling many of the 2014 AI fair housing action items, most of which focus on education and outreach. The city has funded the Council to:

- Conduct educational seminars and trainings for first-time homebuyers, public and private housing providers, and faith-based housing providers;
- Monitor and investigate fair housing discrimination complaints; and
- Proceed with legal action when needed, settle complaints, and/or seek damages.

City staff also conduct outreach and education activities, including:

- Hosting housing and legal workshops;
- Using social media to broaden awareness and understanding of fair housing;
- Working with neighborhood groups to provide fair housing education and outreach.

The city has updated its fair housing ordinance to include the protected classes of age, disability, and familial status, in addition to sexual orientation and gender identity.

To address zoning concerns, the city hired a consulting firm to review the city's code. The overhaul of the entire code will continue through 2021 and will include movement to a form-based approach that will allow multifamily housing in more areas of the city, as well as modifications to requirements that raise housing costs.

In September 2017, the city passed a municipal bond that will, in part, add more sidewalks and advance the public transit system. The city's General Obligation Limited Tax Bonds (GOLT) included a \$10 million set aside for affordable housing that will facilitate development of housing near employment, transit, quality schools, and grocery stores for households earning less than 80 percent of the Area Median Income. The joint resolution adopting the allocation limits annual allocations to \$1 million.

Despite these efforts, impediments to housing choice and economic opportunity continue to exist. Decades of exclusionary policies at the federal, state, and local level limited the ability of many racial and ethnic minorities, people with disabilities, women, and non-traditional households from exercising housing choices and building wealth. The effects of these policies are challenging to reverse—yet, as demonstrated by many of the indicators in this AI, and the above discussion, progress is being made within Oklahoma City.

Six priority areas for 2020-2024. The areas where the city should continue to work to break down barriers to housing choice and economic opportunity include:

- **Expand affordable rental housing options** for extremely low income residents who are most vulnerable to discrimination, evictions, displacement, severe cost burden, and homelessness. These residents are disproportionately likely to be racial and ethnic minorities, women/single mothers, persons with disabilities, and persons with mental illness challenges;
- **Improve resident and landlord understanding of fair housing rights** and responsibilities, as well as good tenant and good landlord practices;
- **Narrow the gap in mortgage loan denials and subprime loans** among minority residents, improving low homeownership rates, and combatting predatory lending activity. Work with partners to narrow the gap in mortgage loan denials and subprime loans among minority residents through education and outreach activities that combat predatory lending and expand alternative ownership products (e.g., attached and land trust products).
- **Mitigate displacement** as part of urban renewal and revitalization efforts. Some residents and stakeholders view urban renewal activity as a threat to affordable housing and neighborhoods that have historically housed people of color. The city should be proactive with future urban renewal activities to ensure urban renewal does not result in displacement of low income residents, residents of color, and cultural enclaves;
- **Address gaps in economic opportunity** by lowering concentrated poverty and improving access of African American and Hispanic children to high quality schools; and
- **Improve access to public transit and parks** for underserved areas and residents, including persons with disabilities.

MAPS 4 and fair housing. The recently approved MAPS 4 initiative will be instrumental in addressing barriers. Many MAPS 4 priorities—e.g., developing 500 new ADA-accessible bus shelters—will address some of the barriers identified in this report.

Implementation of MAPS 4 should be viewed through an equity lens and consider the barriers identified in this study. For example, the \$87 million in funds to transform the public transit system should prioritize expanding access to low income households and families and improve the effectiveness of para- and accessible transit. Similarly, investments in sidewalks and placemaking should improve equitable distribution of parks and trails, including accessibility improvements, and yet be mindful of the risk of stimulating market investment that leads to gentrification.

Current Impediments and Fair Housing Action Items

This section details the current impediments to fair housing choice and outlines a recommended set of action items to address the impediments.

Impediment No. 1—Homeownership barriers.

African American, Hispanic, and Native American households find it more difficult to access credit to purchase homes, refinance existing mortgage loans, and/or improve their homes. African American borrowers face high denials even after adjusting for income levels, and Hispanic borrowers are more likely to get high-rate loans. These practices not only have the effect of limiting homeownership opportunities, they also negatively affect housing conditions in certain neighborhoods and perpetuate inequities caused by historic discrimination.

As the city's market has improved, speculative purchases have raised the cost of entry-level ownership housing and property taxes.

Action steps:

- Monitor HMDA data on mortgage loan denials and subprime lending activity including the disproportionate impact on minority borrowers. Fund education and outreach to teach vulnerable residents how to avoid predatory lending, rent to own scams, and high-risk loans.
- Eliminate rezoning requirements for homeownership developments and land trust communities that add affordable products through gentle infill.
- Integrate land trusts into redevelopment activities to mitigate resident displacement and expand affordable homeownership options. While several land trust models exist nationally, the common element is that the land trust retains ownership of the land, thus buying down the cost of homeownership by taking expensive land values out of the equation. The Lowry neighborhood in Denver, a major urban redevelopment/urban infill project, integrated land trust homes into the new neighborhood to expand homeownership across the income spectrum.¹
- Fast track approval of affordable housing developments. Waive, discount, or defer fees for affordable housing, with greater discounts for deeper levels of affordability. Consider exempting affordable units from property taxes.

¹ <https://coloradoclt.org>

- Ensure that city-funded rental and ownership developments built in high opportunity areas exercise affirmative marketing to encourage applications from racial and ethnic minorities living in areas of concentrated poverty.

Impediment No. 2—Discrimination in rental transactions and lack of affordable rental and accessible housing.

The city's shortage of affordable rental options disproportionately affects residents with low incomes who include racial and ethnic minorities, single mothers, residents with disabilities, residents with mental health challenges, and residents with substance abuse challenges. These residents are very vulnerable to being denied housing, being evicted, facing challenges finding housing near quality schools, facing challenges finding accessible and affordable housing, and falling into homelessness—all of which are outcomes that negatively affect the public sector.

Action steps:

- Prioritize city funding to greatly expand the number of affordable housing units with supportive services to serve households who are most vulnerable to discrimination, evictions, and homelessness.
- Fund nonprofit legal representation for renters in the process of eviction to negotiate solutions other than eviction and avoid homelessness. Connect city code enforcement officers with nonprofit legal representation to help negotiate improvements to rental properties without eviction threats.
- Improve the city inspection process for accessibility requirements of the Fair Housing Act to ensure that developers are creating accessible units.
- Consider funding a local program similar to that in Reno, Nevada (administered by Silver State Fair Housing) in which developers are notified of their accessibility requirements at the permitting stage and are regularly inspected during construction.
- Fast track approval of affordable housing developments. Waive, discount, or defer fees for affordable housing, with greater discounts for deeper levels of affordability. Consider exempting affordable units from property taxes.
- Ensure that city-funded rental and ownership developments built in high opportunity areas exercise affirmative marketing to encourage applications from racial and ethnic minorities living in areas of concentrated poverty.

Impediment No. 3—Lack of understanding of fair housing laws and good tenant practices by residents and fair housing compliance by landlords.

Residents are increasingly reluctant to report fair housing violations for fear of losing their housing and facing retaliation. Fair housing complaints and cases processed by the

Metropolitan Fair Housing Council demonstrate a continued need to enhance tenant and landlord fair housing awareness and enforce fair housing laws.

Action steps:

- Continue the commitment to fund the Metropolitan Fair Housing Council to assist residents with fair housing complaints and to conduct fair housing education and training.
- Include fair housing and general housing services on the city's website, including links to the Metropolitan Fair Housing Council's webpage and Legal AidOK. A current search for "fair housing" on the city's homepage returned no fair housing information.
- Ensure that outreach and educational announcements are positioned in newspapers and social media sites that are visited and viewed by vulnerable residents. Continue working with neighborhood groups to raise awareness and transmit fair housing rights information.
- Build public understanding, awareness and support for housing affordability, integration, diversity and inclusion. Recruit a public relations firm to donate or discount time to test messaging to residents and landlords and develop a campaign for execution by the Council and city staff. The city already has an excellent webpage with messaging for some areas ("Snow routes & winter weather tips") and could easily rotate a fair housing campaign through its resident messaging efforts.

Impediment No 4—Zoning code and land use regulations discourage housing type diversity.

As detailed in Section III of this report, there are many areas in the city's zoning code that could be improved to facilitate affordability and more housing type diversity.

Action steps:

- Adopt the recommendations from the zoning review in this AI. Briefly, 1) add flexibility to the definition of family; 2) conduct a legal review on potential fair housing challenges associated with treatment of persons with disabilities living in group homes; and, 3) as part of the code update, consider revising densities and development standards to ensure they accommodate a wide range of housing types and products that are typically more affordable and avoid indirect effects of segregating protected classes into certain neighborhoods.
- As part of continued efforts to update the city's code and add flexibility in residential development consider incorporating the best practices referenced in the zoning review: 1) include a definition of disability consistent with the Federal Fair Housing Act; 2) establish standard processes for reasonable accommodation requests; and 3) allow ADUs and other types of gentle density in some single family districts, potentially in exchange for affordability commitments.

Impediment No. 5—Challenges with affordable and reliable transit access for low income residents and residents with disabilities.

Action steps:

- Assess the results of investments in transit to ensure that they have expanded access in underserved neighborhoods. MAPS 4 should expand transit access to low income households and families and improve the effectiveness of para- and accessible transit.

Impediment No. 6—Limited access to high performing schools for African American and Hispanic students.

Action steps:

- Work with Oklahoma City Public Schools to monitor the results of the P2G transformation on improving access to high performing schools for African American and Hispanic children.
- Continue to invest CDBG public service dollars in afterschool and summer programming and academic activities in low income neighborhoods; increase as resources allow.

APPENDIX 10

SF-424 AND CERTIFICATIONS (COPIES)

CERTIFICATIONS

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

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

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


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

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

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

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

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.


Signature of Authorized Official

5-20-2025
Date

David Holt
Mayor

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

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

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

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

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

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

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2024, 2025, and 2026 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

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

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

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

Excessive Force -- It has adopted and is enforcing:

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

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

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

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

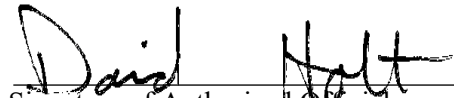
	<u>5-20-2025</u>
Signature of Authorized Official	Date

David Holt
Mayor

OPTIONAL Community Development Block Grant Certification

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

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


Signature of Authorized Official

5-20-2025
Date

David Holt
Mayor

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

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

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

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



Signature of Authorized Official

5-20-2025
Date

David Holt
Mayor

Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

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

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

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

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

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

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


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

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

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

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

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



Signature of Authorized Official

5-20-2025
Date

David Holt
Mayor

Housing Opportunities for Persons With AIDS Certifications

The HOPWA grantee certifies that:

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

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

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


Signature of Authorized Official

5-20-2025
Date

David Holt
Mayor

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

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

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: The City of Oklahoma City

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

736005359

* c. UEI:

D3MUME8J5T25

d. Address:

* Street1: 420 W. Main Street, Suite 920

Street2:

* City: Oklahoma City

County/Parish:

* State: OK: Oklahoma

Province:

* Country: USA: UNITED STATES

* Zip / Postal Code: 73102-4437

e. Organizational Unit:

Department Name:

Planning Department

Division Name:

Community Development Divison

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

Prefix:

Mr.

* First Name:

Benjamin

Middle Name:

* Last Name: Davis

Suffix:

Title: Community Development Division Manager

Organizational Affiliation:

The City of Oklahoma City

* Telephone Number: (405) 297-1602

Fax Number:

* Email: benjamin.davis@okc.gov

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

PY25 Oklahoma City Community Development Block Grant

* 12. Funding Opportunity Number:

* Title:

13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Community Development Block Grant Program Activities

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant 03-05

* b. Program/Project

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

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date: 07/01/2025

* b. End Date: 06/30/2026

18. Estimated Funding (\$):

* a. Federal 5,130,024.00

* b. Applicant

* c. State

* d. Local

* e. Other

* f. Program Income

* g. TOTAL 5,130,024.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

☒ ** I AGREE

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

Authorized Representative:

Prefix: Mr.

* First Name: David

Middle Name:

* Last Name: Holt

Suffix:

* Title: Mayor

* Telephone Number: (405) 297-2424

Fax Number:

* Email: Mayor@okc.gov

* Signature of Authorized Representative:



* Date Signed: 05/27/2025

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

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

*** Other (Specify):**

*** 3. Date Received:**

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:** The City of Oklahoma City

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

736005359

*** c. UEI:**

D3MUME8J5T25

d. Address:

* Street1: 420 W. Main Street, Suite 920

Street2:

* City: Oklahoma City

County/Parish:

* State: OK: Oklahoma

Province:

* Country: USA: UNITED STATES

* Zip / Postal Code: 73102-4437

e. Organizational Unit:

Department Name:

Planning Department

Division Name:

Community Development Divison

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

Prefix:

Mr.

* First Name:

Benjamin

Middle Name:

* Last Name: Davis

Suffix:

Title: Community Development Division Manager

Organizational Affiliation:

The City of Oklahoma City

* Telephone Number: (405) 297-1602

Fax Number:

* Email: benjamin.davis@okc.gov

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

PY25 Oklahoma City HOME Investment Partnerships Program

* 12. Funding Opportunity Number:

* Title:

13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

HOME Investment Partnerships Program Activities

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant 03-05

* b. Program/Project

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

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date: 07/01/2025

* b. End Date: 06/30/2026

18. Estimated Funding (\$):

* a. Federal 2,319,980.93

* b. Applicant

* c. State

* d. Local

* e. Other

* f. Program Income

* g. TOTAL 2,319,980.93

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on.☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

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☒ ** I AGREE

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

Authorized Representative:

Prefix: Mr.

* First Name: David

Middle Name:

* Last Name: Holt

Suffix:

* Title: Mayor

* Telephone Number: (405) 297-2424

Fax Number:

* Email: Mayor@okc.gov

* Signature of Authorized Representative:

David Holt

* Date Signed: 05/27/2025

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

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

*** Other (Specify):**

*** 3. Date Received:**

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:** The City of Oklahoma City

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

736005359

*** c. UEI:**

D3MUME8J5T25

d. Address:

* Street1: 420 W. Main Street, Suite 920

Street2:

* City: Oklahoma City

County/Parish:

* State: OK: Oklahoma

Province:

* Country: USA: UNITED STATES

* Zip / Postal Code: 73102-4437

e. Organizational Unit:

Department Name:

Planning Department

Division Name:

Community Development Divison

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

Prefix:

Mr.

* First Name:

Benjamin

Middle Name:

* Last Name: Davis

Suffix:

Title: Community Development Division Manager

Organizational Affiliation:

The City of Oklahoma City

* Telephone Number: (405) 297-1602

Fax Number:

* Email: benjamin.davis@okc.gov

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.231

CFDA Title:

PY25 Oklahoma City Emergency Solutions Grant

* 12. Funding Opportunity Number:

* Title:

13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Emergency Solutions Grant Program Activities

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant 03-05

* b. Program/Project

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

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date: 07/01/2025

* b. End Date: 06/30/2026

18. Estimated Funding (\$):

* a. Federal 444,290.00

* b. Applicant

* c. State

* d. Local

* e. Other

* f. Program Income

* g. TOTAL 444,290.00

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If "Yes", provide explanation and attach

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☒ ** I AGREE

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

Authorized Representative:

Prefix: Mr. * First Name: David

Middle Name:

* Last Name: Holt

Suffix:

* Title: Mayor

* Telephone Number: (405) 297-2424 Fax Number:

* Email: Mayor@okc.gov

* Signature of Authorized Representative:

David Holt

* Date Signed: 05/27/2025

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: The City of Oklahoma City

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

736005359

* c. UEI:

D3MUME8J5T25

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* Zip / Postal Code: 73102-4437

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Prefix:

Mr.

* First Name:

Benjamin

Middle Name:

* Last Name: Davis

Suffix:

Title: Community Development Division Manager

Organizational Affiliation:

The City of Oklahoma City

* Telephone Number: (405) 297-1602

Fax Number:

* Email: benjamin.davis@okc.gov

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.241

CFDA Title:

PY25 Oklahoma City Housing Opportunities for Persons With AIDS

* 12. Funding Opportunity Number:

* Title:

13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Housing Opportunities for Persons With AIDS (HOPWA)Program Activities

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant 03-05

* b. Program/Project

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

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date: 07/01/2025

* b. End Date: 06/30/2026

18. Estimated Funding (\$):

* a. Federal	1,419,527.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	1,419,527.00

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

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

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

☒ ** I AGREE

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

Authorized Representative:

Prefix: Mr. * First Name: David

Middle Name:

* Last Name: Holt

Suffix:

* Title: Mayor

* Telephone Number: (405) 297-2424 Fax Number:

* Email: Mayor@okc.gov

* Signature of Authorized Representative:



* Date Signed: 05/27/2025

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

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


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

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

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

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal interest in the title of real property in accordance with awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure nondiscrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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