

City of Norman
Community Development Block Grant and
HOME Investment Partnerships Program

Consolidated Plan

2020-2024

First Year Action Plan 2020

Department of Planning
and Community Development
Grants Division

CITY OF NORMAN

2020-2024 CONSOLIDATED PLAN

2020-2021 ACTION PLAN

EXECUTIVE SUMMARY

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EXECUTIVE SUMMARY

ES-05 EXECUTIVE SUMMARY - 24 CFR 91.200(C), 91.220(B)

1. Introduction

This Consolidated Plan provides a basis and strategy for the use of federal funds granted to the City of Norman by the U.S. Department of Housing and Urban Development (HUD) under the Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs. The Consolidated Plan serves as a planning document meeting the federal government statutory requirements in 24CFR 91.200-91.230, with revisions for preparing a Consolidated Plan and guiding the use of funding. This Consolidated Plan covers the period beginning July 1, 2020 through June 30, 2024, including five program years. The U.S. Department of Housing and Urban Development (HUD) defines the City of Norman as an entitlement community due to its population and demographics. As an entitlement community, the City of Norman receives an annual allocation of Community Development Block Grant (CDBG) and HOME program funding. Programs and activities described in this plan are intended to primarily benefit low and moderate-income residents of the City of Norman, neighborhoods with high concentrations of low-income and moderate-income residents, and the city as a whole.

The major sections of the Consolidated Plan include a Housing Market Analysis, Housing and Homeless Needs Assessment, 5-year Strategic Plan, a 1-year Action Plan, and Consultation and Citizen Participation, with accompanying documentation relating to public comment. The Strategic Plan addresses specific needs that were identified in the data analysis, with specific goals and program targets for each category designated for funding. The Action Plan is a subset of the Strategic Plan, addressing funding options for the next fiscal year. The Consolidated Plan can be used by organizations in the community as a guide for identifying activities through which they can help the jurisdiction reach their housing and community development goals. The Consolidated Plan also serves as the baseline for measuring program effectiveness, as reported in the Consolidated Annual Performance and Evaluation Report (CAPER) required by HUD for each fiscal year's funding allocation.

Incorporated into the Consolidated Plan are an analysis of the local housing market and a review of housing and homeless needs in Norman as a means of defining the current environment in which federal funding is being used. The Consolidated Plan provides a strategic plan for meeting priority needs that were identified through the community participation process. The analytical parts of the document draw from the 2011-2015 American Community Surveys and 2015 CHAS data provided by HUD. Other data sources include the 2010 U.S. Census and other information gathered locally, including the Norman/Cleveland County Continuum of Care. Public housing information was provided by the Norman Housing Authority.

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

The City of Norman undertook a significant public input and planning process during the year leading up to the submission of the plan. Public input was obtained through focus groups, formal and informal meetings, and public hearings. This Consolidated Plan contains a range of goals, objectives, and outcomes formulated to address needs identified for homelessness, affordable housing, non-housing community development, barriers to affordable housing, lead based paint hazards, institutional structure, and coordination. The overall goals include:

- Continue to collaborate with homeless providers to supply a continuum of services.
- Support services aimed at the prevention and elimination of homelessness and Rapid Rehousing.
- Improve the condition of housing for low-income homeowners.
- Increase the viability of potential homeownership opportunities.
- Improve the condition of housing for low-income renters and homeowners through regulatory programs.
- Support improvement of infrastructure and public facilities in CDBG targeted areas in Norman.
- Expand business opportunity by supporting economic development projects.
- Address community needs through community-based public service programs.

These goals are supported by a collection of associated objectives and performance goals. The objectives seek to work toward meeting the goals stated, addressing the need for more affordable housing, housing rehabilitation, public facilities and infrastructure improvements, and social services. Specifics can be found in the Strategic Plan and Annual Action Plan. All objectives and outcomes identified in the plan will meet a national objective identified by HUD through providing decent affordable housing, creating suitable living environments and improving economic opportunity.

Relative to activities and allocated funds, following is a summary of stated objectives and outcomes.

GENERALLY, THERE ARE THREE OBJECTIVES RELATIVE TO PROGRAM FUNDING:

1. **Providing decent housing.** Activities that fall within this goal include assisting homeless persons in obtaining appropriate housing and assisting those at risk of homelessness; retaining affordable housing stock; increasing availability of permanent housing that is affordable to low-income Americans without discrimination on the basis of race, color, religion, sex, national origin, familial status or handicap; and increasing the supply of supportive housing, which includes structural features and services to enable persons with special needs to live with dignity. Specific items that may be eligible under this objective include but is not limited to:
 - a. Assisting homeless persons to obtain affordable housing;
 - b. Assisting persons at risk of becoming homeless;
 - c. Retention of affordable housing stock;
 - d. Increasing the availability of affordable permanent housing in standard condition to low-income and moderate-income households, in particular to members of disadvantaged minorities without discrimination;
 - e. Increasing the supply of supportive housing which includes structural features and services to enable persons with special needs to live in dignity and independence; and
 - f. Providing affordable housing that is accessible to job opportunities.
2. **Establishing and maintaining a suitable living environment.** The concept of a suitable living environment includes improving safety and livability of neighborhoods; increasing access to quality facilities and services; reducing isolation of income groups within an area through availability of housing opportunities and revitalization of deteriorating neighborhoods; restoring and preserving properties of special value for historic, architectural or aesthetic reason(s), and conserving energy resources. Specific items that may be eligible under this objective include but is not limited to:
 - a. Improving the safety and livability of neighborhoods;
 - b. Increasing the access to quality public and private facilities and services;
 - c. Reducing the isolation of income groups within areas through spatial deconcentration of housing opportunities for lower income persons and the revitalization of deteriorating neighborhoods;
 - d. Restoring and preserving properties of special historic, architectural, or aesthetic value; and
 - e. Conservation of energy resources.
3. **Providing expanded economic opportunities.** Activities funded under this goal can include creating jobs accessible to low-income persons; making mortgage financing available at reasonable rates for low-income persons; providing access to credit for development activities that promote long-term economic and social viability of the community; and empowering low-income persons to achieve self-sufficiency to reduce generational poverty in federally assisted and public housing. Specific items that may be eligible under this objective include but is not limited to:
 - a. Job creation and retention;

- b. Establishment, stabilization and expansion of small businesses (including microbusinesses);
- c. The provision of public services concerned with employment;
- d. The provision of jobs to low-income persons living in the areas affected by those programs and activities, or jobs resulting from carrying out activities under programs covered by the plan;
- e. Availability of mortgage financing for low-income persons at reasonable rates using non-discriminatory lending practices and
- f. Empowerment and self-sufficiency for low income persons to reduce generational poverty in federally assisted housing and public housing.

RELATIVE TO ACTIVITIES AND ALLOCATED FUNDS, FOLLOWING IS A SUMMARY OF STATED OBJECTIVES AND OUTCOMES.

Planning and Administration. Norman will continue to plan comprehensively for community change with accommodation given to the importance of maintaining and enhancing the quality and stability of existing neighborhoods. Norman will provide administrative capacity for effective and efficient implementation of plans and programs including, as appropriate, supportive service and capacity-building assistance for non-profit entities - such as Community Housing Development Organizations (CHDO's).

Housing. In the area of affordable housing, the City will make intensive use of the existing stock of housing through rehabilitation and rental assistance. The retention of the existing housing stock provides the best opportunity for affordable housing, while fostering neighborhood stability and the efficient use of existing infrastructure. As needed, the City will support expansion of housing stock also to address targeted income/affordable interests.

Public Facilities. The City will assist with the renovation and expansion of public facilities and community centers that are accessible to low and moderate residents, as needed to serve health and safety needs with enhancement of amenities for social and recreational interaction. Priority needs include sidewalk replacement and construction, park improvements and drainage improvements.

Public Services. The City will continue to support a variety of public services, ranging from meeting basic needs to achieving self-sufficiency. Priority needs include transportation; youth programs; senior programs; homeless services; medical and mental health care; and employment.

GENERALLY, THREE OUTCOMES ARE RELATIVE TO PROGRAM FUNDING OBJECTIVES:

Availability/Accessibility. As defined by HUD, this category is applicable to activities that make up services, infrastructure, housing or shelter that is available or accessible to low- and moderate-income people, including persons with disabilities. Accessibility does not refer only to physical barriers, but also to making the affordable basics of daily living available to low- and moderate-income people. As further locally defined, this includes public service activities that originally satisfied the eligibility threshold requirement of either being a new activity or a substantial increase to an already existing activity that would provide availability/accessibility to individuals. In a sense this could possibly be considered “sustainability”, except the activity is not directed toward a particular targeted/geographical area but, rather, individuals or households. This also includes something newly developed or made available that previously did not exist, or is substantially improved.

Affordability. As defined by HUD, this category is applicable to activities that provide affordability in a variety of ways in the lives of low- and moderate-income people, including: the creation or maintenance of affordable housing; basic infrastructure hookups; or services such as transportation or day care. As further locally defined, because this includes “maintenance” as a consideration, this includes any low/moderate income housing where an income payment is typically needed for the occupant’s mortgage or rent that is rehabilitated. It also includes activities that provide a service otherwise readily available but un-affordable to low/moderate income persons (such as medical health care).

Sustainability. As defined by HUD, this category is applicable to activities or services that are directed toward improving communities or neighborhoods (to make them livable or viable) by providing benefit to low- and moderate-income people or by removing or eliminating slums or blighted areas. As further locally defined, this also includes rehabilitation/ renovation activities for public facilities (including shelters).

3. Evaluation of past performance

The City of Norman has a long history of successful programs funded through the Community Development Block Grant and HOME Investment Partnerships Program. Of particular importance to the health of the city have been programs that address the condition of the housing stock. The City of Norman has successfully funded housing rehabilitation activities targeting lower income and elderly households unable to properly maintain their homes. By working actively with local homeless service providers, the City of Norman has been able to facilitate the expansion of both the stock of units/beds available to homeless persons and services aimed at helping those persons find employment, housing, health care services, and educational opportunities. Details of past performance can be found in the City's Consolidated Annual Performance and Evaluation Report (CAPER).

4. Summary of citizen participation process and consultation process

The City of Norman abides by the Citizen Participation Plan most recently amended in April of 2020. This plan is approved by the CDBG Policy Committee. Citizen participation is the heart of the consolidated planning process, involving citizens in decisions that directly affect their lives. The purpose of the Citizen Participation Plan is to encourage and insure full and proper citizen participation at all stages of the Consolidated Plan process. The Citizen Participation Plan formally designates structures, procedures, roles and policies to be followed by program participants. A secondary purpose of this Plan is to implement federal regulations regarding citizen participation for the consolidated planning process described by Title 24 CFR 91.105 of the Housing and Community Development Act of 1974, as amended. Nothing in this Plan shall restrict the responsibility and authority of the City of Norman from developing and executing its Consolidated Plan.

In addition to public hearings as a means of receiving comment from the public in front of the Mayor and City Council, City staff held meetings to provide citizens with information concerning the availability of Community Development Block Grant, HOME and Emergency Solutions Grant funds and to incorporate their comments into the planning process. These included both formal and informal meetings with neighborhoods and focus groups held both during the day and evening hours. Additional interviews were conducted with representatives of the housing and banking industry, non-profit organizations, and the community to further explore community needs and concerns.

5. Summary of public comments

Public comments will be added after the close of the public comment period, after May 13, 2020.

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

Public comments will be added after the close of the public comment period, after May 13, 2020.

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	Lisa D. Krieg	CDBG/Grants Division, Planning and CD
HOME Administrator	Lisa D. Krieg	CDBG/Grants Division, Planning and CD

Table 1 – Responsible Agencies

Narrative

The lead agency for the Consolidated Plan is the Grants Division of the Planning and Community Development Department, City of Norman, OK. This division and department oversaw the development of the plan. The City of Norman contracted with RKG and Associates who lead the City through the research and writing of the Analysis of Impediments to Fair Housing Choice. Two citizen advisory boards performed key roles: The CDBG Policy Committee and the Continuum of Care Steering Committee.

The Community Development Policy Committee Purpose: To develop and propose community development strategy and policy in conjunction with the allocation of CDBG and HOME funds. The 15 committee members are drawn from low and moderate income areas and neighborhoods at-large.

The Continuum of Care Steering Committee Purpose: To implement the community's plan for homeless services include allocation and performance review of Continuum of Care funds and Emergency Solutions Grant funding; make policy recommendations regarding addressing homelessness; make regular reports to the community on the progress of the plan.

Consolidated Plan Public Contact Information

Lisa D. Krieg
CDBG Grants Manager
405-366-5464

lisa.krieg@normanok.gov

PR-10 CONSULTATION – 91.100, 91.110, 91.200(B), 91.300(B), 91.215(I) AND 91.315(I)**1. Introduction**

The following information is compromised of the agencies that have served on committees, provided direct input or provided input via other means, CDBG, HOME, and CoC-funded sub-recipients, and delivered the CDBG and HOME services directly. The Consolidated Plan and Action Plan process is a year-round accumulation of reports, discussions, analysis, and observations. All the agencies/groups listed below have had a part in the final product as well as decisions and discussions that happen year-round.

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 of Norman has a very strong commitment to agency coordination, and because of this commitment and the effort to bring community agencies and providers together this has been very successful. Because of the effort to bring all stakeholders to the table no matter what the issue or discussion, there is a strong knowledge of community resources among the agencies, resulting in a very strong referral network, very effective discussions regarding needs analysis and service delivery resulting in minimal duplication of services.

The Norman Housing Authority works closely with the City of Norman and service providers to organize resources from the federal government to address the housing needs of the City’s lowest income households. Through the Continuum of Care process, the City of Norman maintains relationships with mental health providers, homeless shelter and homeless service providers, and other governmental agencies with specific responsibilities for homeless individuals and families. This system provides a forum for assisting these agencies grow and meet their own targeted clientele. The City of Norman also participates in a variety of other coalitions that seek to address other issues that relate to housing and service needs.

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

The City of Norman, the City of Moore, and the surrounding Cleveland County area comprise the Norman/Cleveland County Continuum of Care (CoC) designated as OK-504. The City of Norman is designated as the Collaborative Applicant. The CoC Steering Committee encompasses 88 members with an elected Executive Committee having 14 members. The Executive Committee meets on a monthly schedule with the entire Steering Committee meeting quarterly. The City of Norman staff works actively with the Executive Committee and other designated committees in the identification of needs and coordination of resources. In the past, the City of Norman has often brought CDBG and HOME resources to the table to supplement CoC initiatives and to serve as a local government pass through when required by funders.

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

Designated as the Collaborative Applicant, the City of Norman is directly involved with all CoC activities including the allocation of ESG resources. The City of Norman is a non-voting member of the Executive Committee but has a dedicated staff member that is responsible for coordination of meetings and is the official repository of documents for Continuum activities. The Norman/Cleveland County CoC has developed and adopted governance documents including conflict of interest policies. The documents which were developed in consultation with the City of Norman, establish guidelines for the evaluation of outcomes and performance standards that are performed by the COC.

The Oklahoma City Continuum of Care is located adjacent to the Norman/Cleveland County CoC and because both represent a common metropolitan area and thus share a commonality in the homeless population. Regular collaboration between the two entities occurs and the common HMIS system is utilized which facilitates identification of the mobile segment of this population.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Norman Housing Authority
	Agency/Group/Organization Type	Housing PHA Services - Housing Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Norman Housing Authority was included on the staff technical team that collected and analyzed data as well as assisted in community outreach. The outcomes will be accurate data on participants served through the housing authority, and coordinated efforts on future affordable housing projects. NHA staff also assisted in significant outreach activities to low income households served through the NHA.

2	Agency/Group/Organization	City of Norman
	Agency/Group/Organization Type	Other government - Local Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Lead Agency
3	Agency/Group/Organization	Norman/Cleveland County Continuum of Care
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Agency was consulted through in person conversations and public forum participation to assist in identifying future service and facility needs. The anticipated outcome includes assistance in the City identifying service and facility needs and goals for the 2020-2021 Plan. Members of the CoC include Sanctuary Women's Development Center, Catholic Charities, COCMHC, Food and Shelter, HOPE Community Services, Norman Housing Authority, Progressive Independence, Salvation Army, Thunderbird Clubhouse, United Way of Norman, Variety Care, Women's Resource Center, Mission Norman, Veteran's Administration.

4	Agency/Group/Organization	NORMAN AFFORDABLE HOUSING CORPORATION, INC.
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Agency was consulted through an in person conversation to assist in identifying future service and facility needs. The anticipated outcome includes assistance in the City identifying service and facility needs and goals for the 2020-2025 Plan.

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

All service providers and agencies that provide services directly pertaining to the Consolidated Planning process have been involved in some type of consultation. Some have been consulted during other meetings and other forums. There have been no agencies left off of communication efforts or meeting invitations. The City of Norman works very hard to ensure strong and positive community collaboration.

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	City of Norman	Coordination in terms of homeless program delivery and strategic planning. Technical assistance to grantees, support to applicants.
2015-2019 State of Oklahoma Consolidated Plan	Oklahoma Department of Commerce	The City of Norman is not an entitlement recipient of ESG funding. Coordination and oversight of agencies receiving funding for the Emergency Solutions Grant Program is the responsibility of the Continuum of Care Steering Committee but funds are awarded by the State of Oklahoma. In addition the City of Norman has previously been awarded CDBG Disaster Recovery funding, Homeless Prevention and Rapid Recovery funding as well as Neighborhood Stabilization Program funding from the State of Oklahoma.
Norman Housing Authority PHA 5-Year Plan	Norman Housing Authority	The 5-Year Plan addresses specific maintenance and planning needs of the Norman Housing Authority, which has a major role in addressing the housing needs of Norman.

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))

The City of Norman regularly consults with the State of Oklahoma as well as Cleveland County government. While the CDBG and HOME funding affect the city itself, importance is placed on effective collaboration with all agencies with the same cause and goals. The goals of the Consolidated Plan and corresponding Annual Action Plans should be, and are, efforts that have the support of the three levels of government in our community. Several CDBG and HOME-funded agencies work with both the City and the County to reach their goals and deliver their services. As Norman is the city in Cleveland County where many of the service agencies are located, County partnerships are crucial to provide the level of service necessary to accomplish goals and serve the greater community. The City has a history of strong partnerships with both the State and County and look to continue those relationships and collaborations moving forward.

Narrative:

The lead agency for the Consolidated Plan is the Grants Division of the Planning and Community Development Department of the City of Norman. The division and department oversaw the development of the plan. Two advisory boards performed key roles:

The Community Development Policy Committee: Purpose: To develop and propose community development strategy and policy; To recommend allocation of CDBG and HOME funds. The 15 committee members are drawn from the low and moderate income neighborhoods in the CDBG Target Area and the community at large.

The Continuum of Care Executive Committee: Purpose: To implement the community's plan for homeless services; to make policy recommendations regarding addressing homelessness; to make regular reports to the community on the progress towards elimination of homelessness. The 17 committee members are drawn from the following community resources: housing and other service providers; current or formerly homeless individuals; faith leaders; and researchers.

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**

As mentioned previously the City of Norman follows an approved Citizen Participation Process. This process begins at the neighborhood level where the City facilitates neighborhood meetings which allow for interaction with city staff, the community police officers assigned to the area as well as staff that is responsible for code compliance for the areas. Over the years this process has improved relations between these entities where a simple phone call is welcomed to ask a question, obtain information, or to inform the city about a potential neighborhood issue.

From the neighborhood level, ten representatives are chosen to further the dialogue. In addition, at a Public Hearing held in late summer, five at-large representatives are also elected. These fifteen people comprise the CDBG Policy Committee. Their purpose is to develop and propose community development strategy and policy in conjunction with the allocation of CDBG and HOME funds.

While the CDBG Policy Committee is the mechanism for policy making, the City staff as well as many CDBG Policy Committee members are involved with numerous efforts throughout the community that address the needs of low and moderate income households. It is through these efforts that data on needs are gathered and brought back to the CDBG Policy Committee for discussion.

During the development of the Consolidated Plan, the Citizen Participation Plan was revised and submitted for 30-day public comment. No comments were received. With the COVID Act, an Amendment was made to address changes in the Citizen Participation Process to address the crisis. This was an amendment to the Citizen Participation Plan. A five-day public comment period was utilized in accordance with the Act. No comments were received. This document is attached in Appendix A.

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
	Public Hearing	<p>Persons with disabilities</p> <p>Non-targeted/ broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>The Community Dialogue Public Hearing was held on November 6, 2019. Initiations were directed to every Social Service Agency in Norman utilizing the United Way of Norman and the Continuum of Care mailing lists. Invitations were also sent to households who have participated in the CDBG process in the past including the target neighborhoods. In addition to advertising on the City of Norman media outlets, a legal notice was placed in the Norman Transcript announcing the meeting. A total attendance of 18 individuals was recorded.</p>	<p>Comments were directed at overall needs of the low income and special needs populations of Norman. Specific emphasis was placed on transportation and affordable housing.</p>	<p>No written comments were received and all verbal comments were duly recorded and considered.</p>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons
2	Public Meeting	CDBG Target Neighborhoods Meeting	On December 4, 2019 a meeting was held jointly for the current five CDBG Target Neighborhoods. Direct mailing to previous participants, City of Norman calendar announcement as well as newspaper announcement of meeting was done. An attendance of fifteen individuals was reported.	Comments were neighborhood specific and pertained to code enforcement issues regarding property maintenance and parking. Locations of sidewalk issues were noted and forwarded to Public Works for repairs. Several attendees commented on the Housing Rehabilitation Programs that the City offers and how they or their neighbors have been benefits of that program and would like to see it continue.	All verbal comments were duly recorded and considered.
3	Internet Outreach	CDBG Target Neighborhoods	A direct mail was sent to each property in the target area. A total of 3,500 households. The letter was to inform them of a project being conducted in conjunction with the Anne and Henry Zarrow School of Social Work pertaining to their neighborhood. An online survey was conducted for each neighborhood. The student are preparing summary papers for each neighborhood.	Eighty Four online responses were received and the summary is attached in Appendix B.	All comments were accepted.

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons
4	United Way Community Needs Assessment	Non-targeted/ broad community	The University of Oklahoma facilitated the undertaking of a Community Needs Assessment in conjunction with over 40 community partners, including the CDBG program. The United Way of Norman was the lead agency.	Over 500 survey responses were received and the summary is located in Appendix C.	All comments were accepted.

NEEDS ASSESSMENT

NA-05 OVERVIEW

Needs Assessment Overview

The Needs Assessment of the Consolidated Plan helps to provide a snapshot of the needs of the City of Norman in terms of Housing Needs, Disproportionate Greater Needs, Public Housing, Homeless Needs, Non-Homeless Special Needs, and Non-Housing Community Development Needs. The data is derived from a combination of HUD Comprehensive Housing Affordability Strategy (CHAS) statistics, City of Norman estimates and assessments, Consolidated Plan discussions, and community goals. The primary obstacle to meeting all of the identified needs, including those identified as high priorities is the general lack of funding resources available to the public and private agencies who serve low and moderate income residents. Norman, due to being an entitlement community, is not eligible for state CDBG or HOME programs. No state dollars are available for community development activities and the city's general fund is based upon sales tax revenues. This leaves little room for expansion of community development funding at the local level. Furthermore, the City of Norman's entitlement grants, specifically HOME funding, have been reduced over the last several years further limiting the funds available to address the needs in the community. Market Conditions have a significant impact on the City of Norman's priority housing needs.

NA-10 HOUSING NEEDS ASSESSMENT - 24 CFR 91.205 (A,B,C)**Summary of Housing Needs**

The following numbers demonstrate the change in households from the 2010 Census and the most recent American Community Survey, as well as the complete Housing Needs Assessment. In addition, staff consults the yearly ACS data for CAPER and Action Plan submissions. Not only are data sets used, but provider input is crucial to the Consolidated Planning process. As noted below in the narrative section, Norman has a unique situation in that there are 31,000 students enrolled at the Norman location of the University of Oklahoma, and about two-thirds of them live off campus in rental housing.

The City of Norman's most significant housing needs include lower income renters and lower income homeowner populations. A significant portion of lower income rental households are experiencing a housing cost burden greater than 30% of income. Many lower income renters are also experiencing overcrowding, as well as living in substandard housing. A portion of lower income homebuyers are experiencing housing cost burden greater than 30% of income and some homebuyers between 50-80% AMI are also living in substandard housing. These needs are based upon the 2011-2015 CHAS data provided through the HUD consolidated plan templates as seen in the following tables.

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	110,925	117,350	6%
Households	42,442	44,910	6%
Median Income	\$43,119.00	\$51,491.00	19%

Table 4 - Housing Needs Assessment Demographics

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	6,735	4,965	7,515	4,635	21,065
Small Family Households	1,815	1,325	2,425	1,870	10,165
Large Family Households	300	135	465	305	1,730
Household contains at least one person 62-74 years of age	580	715	1,030	720	4,700
Household contains at least one person age 75 or older	419	610	945	430	1,435
Households with one or more children 6 years old or younger	925	654	1,094	739	2,525

Table 5 - Total Households Table

Data 2011-2015 CHAS
Source:

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	150	40	25	0	215	35	30	15	0	80
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	60	0	30	15	105	0	4	35	30	69

	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
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	105	105	240	15	465	45	10	4	30	89
Housing cost burden greater than 50% of income (and none of the above problems)	3,745	1,440	115	50	5,350	835	345	165	4	1,349
Housing cost burden greater than 30% of income (and none of the above problems)	330	1,500	1,430	205	3,465	240	294	915	495	1,944
Zero/negative Income (and none of the above problems)	545	0	0	0	545	155	0	0	0	155

Table 6 – Housing Problems Table

Data Source: 2011-2015 CHAS

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	4,055	1,585	410	80	6,130	915	390	220	65	1,590
Having none of four housing problems	670	1,995	3,945	2,130	8,740	395	995	2,940	2,365	6,695
Household has negative income, but none of the other housing problems	545	0	0	0	545	155	0	0	0	155

Table 7 – Housing Problems 2

Data Source: 2011-2015 CHAS

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	1,235	820	365	2,420	285	215	355	855
Large Related	190	85	120	395	54	28	80	162
Elderly	260	320	200	780	485	330	310	1,125
Other	2,625	1,855	940	5,420	290	95	355	740
Total need by income	4,310	3,080	1,625	9,015	1,114	668	1,100	2,882

Table 8 – Cost Burden > 30%

Data Source: 2011-2015 CHAS

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	1,165	420	25	1,610	215	145	40	400
Large Related	160	20	0	180	50	4	0	54
Elderly	225	85	25	335	375	175	50	600
Other	2,420	935	80	3,435	205	40	75	320
Total need by income	3,970	1,460	130	5,560	845	364	165	1,374

Table 9 – Cost Burden > 50%

Data Source: 2011-2015 CHAS

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	115	105	230	19	469	15	14	4	60	93
Multiple, unrelated family households	0	0	40	10	50	30	0	35	0	65
Other, non-family households	65	0	0	0	65	0	0	0	0	0
Total need by income	180	105	270	29	584	45	14	39	60	158

Table 10 – Crowding Information – 1/2

Data Source: 2011-2015 CHAS

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

Table 11 – Crowding Information – 2/2

Data Source Comments:

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

HUD CHAS data breaks households into 4 categories including small related (2-4 persons), large related (5 or more), elderly, and other. CHAS data places single person household into the "other" category. There are a total of 44,910 households in Norman with 19,215 households having an income of 80% or below MFI. Previous version of the CHAS provided data breaks for the total households under the Other category, which included single person households, not the 2011-2015 CHAS. The 2011-2015 CHAS does provide data pertaining to the Cost Burden of this category. The 2016 ACS 5-Year Estimate indicates that 29.7% of the 45,526 households in Norman live alone or 18,888 households. Given that Norman is the home of the University of Oklahoma this large percentage is not surprising. While it does not provide an actual total number of Other households, the 2011-2015 CHAS Data does provide analysis of the numbers of the Other category that are rent burdened. There are 5,420 Other Households that fall into the 30% Rent Burdened category and 3,435 Other Households that fall into the 50% Severely Rent Burdened Category. A total of 8,075 households at or below 100% MFI are 30% Rent Burdened with 5,420 being Other Households. This equates to 60% of the rent burdened households being from the Other category.

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

The Women's Resource Center (WRC) is a non-profit organization serving families experiencing domestic violence. WRC responded to 1,751 Crisis Calls for Information and Referral in 2019 and 279 adults and 133 children received emergency shelter during this same time period. These totals resulted in 5,365 shelter days being provided. These numbers represent the number of families knowledgeable of Women's Resource Center's programs and chose to receive services. It is likely that many additional families experience domestic violence and are in need of housing.

What are the most common housing problems?

By far, the most common housing problem is Cost Burden.

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

The renter households that are at or below 30% MFI are understandably the most affected.

Cost burden and extreme cost burden affect all household types in the lower income categories. In simple numerical terms, it would appear that “Other” households bear much of the brunt of severe cost burden, with over 66 percent of the total number of below 30% AMI rental households experiencing severe cost burden and 32 percent of owner households in the same income category are experiencing extreme cost burden. The data, however, does not provide a perspective in the percentage of households that comprise the “Other” household category. Much of the “Other” category is made up of single person households and census data indicate that about 30 percent of households in Norman are single person households. Generally speaking, it appears that all household types in both the renter and owner categories are hard hit by housing costs in the below 30% AMI income groups.

The Housing Rehabilitation Staff works with homeowners who are at 50% MFI or less with their Comprehensive Housing Rehabilitation Program and at 80% MFI or less with their Emergency Repair Program. The cost burden of both housing and much needed repairs makes it difficult for owners to make the repairs and for renters to get out of rental situation and into home ownership. There is not a particular sector of the population more affected than another, as the affordability issue covers the complete spectrum of housing, from rental to owner-occupied.

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

Cost burden and extreme cost burden affect all household types in the lower income categories. In simple numerical terms, it would appear that “Other” households bear much of the brunt of severe cost burden, with over 66 percent of the total number of below 30% AMI rental households experiencing severe cost burden and 32 percent of owner households in the same income category are experiencing extreme cost burden. The data, however, does not provide a perspective in the percentage of households that comprise the “Other” household category. Much of the “Other” category is made up of single person households and census data indicate that about 30 percent of households in Norman are single person households. Generally speaking, it appears that all household types in both the renter and owner categories are hard hit by housing costs in the below 30% AMI income groups.

The Housing Rehabilitation Staff works with homeowners who are at 80% MFI or less with their programs. The cost burden of both housing and much needed repairs makes it difficult for owners to make the repairs and for renters to get out of rental situation and into home ownership. There is not a particular sector of the population more affected than another, as the affordability issue covers the complete spectrum of housing, from rental to owner-occupied.

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:

Homeless service providers in Norman work together to assess, identify and plan for the needs of homeless individuals and families. They have combined their efforts to avoid unnecessary duplications of efforts and to close gaps in services. In addition, they have undertaken the task of educating the community about the causes and extent of homelessness as well as advocate for the homeless/at risk population to prevent homelessness.

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

Severe cost burden is linked with housing instability and an increased risk of homelessness. When a household is paying too large a portion of their income on housing expenses, sudden and unexpected financial demands can tip the scales, forcing them from their homes. These demands might include illnesses requiring hospital stays or time away from their job, automotive problems requiring repairs or loss of work due to lack of transportation, and legal problems that might require payments to lawyers or time away from their job. Lower income households are particularly susceptible to these financial impacts because they are less likely to have savings that can cover these expenses and buffer the effects of monetary demands in covering unexpected events. Many of these families do not have savings or back-up plans, and Norman, while not being hit as hard with the recent economic issues, still has experienced repercussions from this. Norman does have a population of homeless that have been defined as “housing resistant.” With the implementation of the Housing First philosophy in the completed 100,000 Homes Campaign, the Zero: 2016 program, and now the Built for Zero program, Norman has made strides with this very difficult population. Barriers to providing and maintaining stable housing for this population primarily include the inadequate number of Permanent Supportive Housing (PSH) units, whereas the case management efforts are tied to the provision of housing. The lack of the availability of these units, which creates a problem for those who are chronically homeless with mental illness or other disability that without case management, find it problematic to remain housed on their own.

Discussion

Norman is a community that is fortunate to have housing available in both the homebuyer and the rental market. Where Norman sees challenges is in the realm of affordable housing. With a few exceptions, the housing stock and available units are in good condition. The problem lies in that some affordable units are in substandard condition, and many of the available units are not in an affordable rent range for low-moderate income renters. The community sees this need and efforts are underway through several sources to facilitate the increase of affordable unit supply and address the issue of substandard units through Code Compliance activities.

NA-15 DISPROPORTIONATELY GREATER NEED: HOUSING PROBLEMS – 91.205 (B)(2)

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

Introduction

The 2011-2015 CHAS data, constructed from data collected by the US Census Bureau for HUD, show housing problems by income and race/ethnicity. The housing problems include incomplete kitchen or plumbing facilities, cost burden greater than 30 percent, and overcrowding (more than 1 person per room). The tables below show the distribution of one or more problems by race/ethnicity for each of four lower income groups, 0 to 30 percent of the area median income, 30 to 50 percent of the area median income, 50 to 80 percent of the area median income, and 80 to 100 percent of the area median income. The discussion following the tables will identify disproportionately greater need within each income group for particular racial or ethnic group. The next section will look at severe housing problems (severe overcrowding and extreme cost burden).

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	5,545	485	700
White	4,090	330	540
Black / African American	315	45	4
Asian	240	15	80
American Indian, Alaska Native	220	45	0
Pacific Islander	0	0	0
Hispanic	450	30	10

Table 12 - Disproportionally Greater Need 0 - 30% AMI

Data 2011-2015 CHAS
Source:

*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	3,765	1,195	0
White	2,565	1,070	0
Black / African American	435	45	0
Asian	200	4	0
American Indian, Alaska Native	130	15	0
Pacific Islander	0	0	0
Hispanic	290	25	0

Table 13 - Disproportionally Greater Need 30 - 50% AMI

Data 2011-2015 CHAS
Source:

*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	2,975	4,555	0
White	2,295	3,565	0
Black / African American	55	150	0
Asian	90	190	0
American Indian, Alaska Native	215	130	0
Pacific Islander	0	4	0
Hispanic	100	380	0

Table 14 - Disproportionally Greater Need 50 - 80% AMI

Data 2011-2015 CHAS
Source:

*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	835	3,795	0
White	740	2,965	0
Black / African American	0	95	0
Asian	0	105	0
American Indian, Alaska Native	55	130	0
Pacific Islander	0	0	0
Hispanic	15	245	0

Table 15 - Disproportionally Greater Need 80 - 100% AMI

Data 2011-2015 CHAS
Source:

*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

The 2011-2015 CHAS data, constructed from data collected by the US Census Bureau for HUD, show housing problems by income and race/ethnicity. The housing problems include incomplete kitchen or plumbing facilities, cost burden greater than 30 percent, and overcrowding (more than 1 person per room). The tables above show the distribution of one or more problems by race/ethnicity for each of four lower income groups, 0 to 30 percent of the area median income, 30 to 50 percent of the area median income, 50 to 80 percent of the area median income, and 80 to 100 percent of the area median income. The discussion following the tables will identify disproportionately greater need within each income group for particular racial or ethnic group. The next section will look at severe housing problems (severe overcrowding and extreme cost burden).

According to the charts, there are no instances of any specific racial or ethnic group that is experiencing a disproportionately greater need.

Within the 30% or less category the percentages across all racial categories are consistent with the racial percentages of the population as a whole. Norman does not show a disproportionate need within this income level.

Within the 50% to 80% category the percentages across all racial categories are consistent with the racial percentages of the population as a whole. Norman does not show a disproportionate need within this income level.

Within the 80% to 100% category the percentages across all racial categories are consistent with the racial percentages of the population as a whole. Norman does not show a disproportionate need within this income level.

Within this data set the only racial category that is exhibiting anything close to a disproportionate need is the white category within the 80% to 100% household income category where the white alone households equal 88% of the 835 households indicating one of four housing problems in comparison to the overall population of Norman reporting 79% white alone.

NA-20 DISPROPORTIONATELY GREATER NEED: SEVERE HOUSING PROBLEMS – 91.205 (B)(2)

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

Introduction

The 2011-2015 CHAS data, constructed from data collected by the US Census Bureau for HUD, show housing problems by income and race/ethnicity. The severe housing problems include incomplete kitchen or plumbing facilities, cost burden greater than 50 percent, and severe overcrowding (more than 1.5 persons per room). The tables show the distribution of one or more problems by race/ethnicity for each of four lower income groups, 0 to 30 percent of the area median income, 30 to 50 percent of the area median income, 50 to 80 percent of the area median income, and 80 to 100 percent of the area median income. The discussion following the tables will identify disproportionately greater need within each income group for particular racial or ethnic group. The next section will look at severe housing problems (severe overcrowding and extreme cost burden).

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	4,970	1,065	700
White	3,585	845	540
Black / African American	300	60	4
Asian	240	15	80
American Indian, Alaska Native	210	55	0
Pacific Islander	0	0	0
Hispanic	415	65	10

Table 16 – Severe Housing Problems 0 - 30% AMI

Data 2011-2015 CHAS
Source:

*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	1,975	2,990	0
White	1,390	2,250	0
Black / African American	245	235	0
Asian	120	85	0
American Indian, Alaska Native	105	45	0
Pacific Islander	0	0	0
Hispanic	55	260	0

Table 17 – Severe Housing Problems 30 - 50% AMI

Data 2011-2015 CHAS
Source:

*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	630	6,885	0
White	415	5,445	0
Black / African American	0	205	0
Asian	70	205	0
American Indian, Alaska Native	69	270	0
Pacific Islander	0	4	0
Hispanic	40	440	0

Table 18 – Severe Housing Problems 50 - 80% AMI

Data 2011-2015 CHAS
Source:

*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	145	4,495	0
White	130	3,575	0
Black / African American	0	95	0
Asian	0	105	0
American Indian, Alaska Native	0	190	0
Pacific Islander	0	0	0
Hispanic	15	245	0

Table 19 – Severe Housing Problems 80 - 100% AMI

Data Source: 2011-2015 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

According to the above charts, there are no instances of any specific racial or ethnic group across all income categories that are experiencing a disproportionately greater need.

NA-25 DISPROPORTIONATELY GREATER NEED: HOUSING COST BURDENS – 91.205 (B)(2)

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

Introduction:

The 2011-2015 CHAS data were used to compare housing cost burden across racial/ethnic groups. Cost burden (30 to 50% of household income going to housing expenses), extreme cost burden (more than 50% of household income going to housing expenses), and no cost burden (less than 30% of household income going to housing expenses) were compared by racial/ethnic group to the city as a whole.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	30,560	6,550	7,070	750
White	25,235	5,140	5,130	545
Black / African American	800	285	535	15
Asian	915	175	345	110
American Indian, Alaska Native	780	245	310	0
Pacific Islander	8	0	0	0
Hispanic	1,535	340	450	10

Table 20 – Greater Need: Housing Cost Burdens AMI

Data 2011-2015 CHAS
Source:

Discussion:

There are no instances of a racial or ethnic group having a disproportionate greater need in terms of housing cost burdens.

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?**

In looking at housing problems, severe housing problems, and housing cost burdens, there are no instances of a racial or ethnic group having a disproportionate greater need. Norman has found consistently in their Analysis of Impediments that this is the case, and further CHAS data backs up this finding.

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

In the City of Norman, there does not appear to be a disproportionately greater need in either housing problem categories nor in housing cost burdens. The majority of renters or owners fall into the category of no housing cost burden, and the rest of the characteristics of the grouping fall into essentially the same breakdown of the overall population. Norman does not have any areas that are highly concentrated with minority or ethnic populations, so this helps to not make this an issue of geography. The low-moderate income categories, while for the most part are in the core area do not include defined pockets of low income persons.

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

The City of Norman does not have any areas with a racial or ethnic concentration.

NA-35 PUBLIC HOUSING – 91.205(B)

Introduction

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	0	172	1,238	1	1,236	0	0	0

Table 21 - Public Housing by Program Type

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

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	11,584	9,593	0	9,594	0	0
Average length of stay	0	0	4	3	1	3	0	0
Average Household size	0	0	1	2	1	2	0	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	64	207	0	207	0	0
# of Disabled Families	0	0	49	334	1	332	0	0
# of Families requesting accessibility features	0	0	172	1,238	1	1,236	0	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 22 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	148	911	1	909	0	0	0
Black/African American	0	0	19	233	0	233	0	0	0
Asian	0	0	1	7	0	7	0	0	0
American Indian/Alaska Native	0	0	3	85	0	85	0	0	0
Pacific Islander	0	0	1	2	0	2	0	0	0
Other	0	0	0	0	0	0	0	0	0

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

Table 23 – 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	0	5	58	0	58	0	0	0
Not Hispanic	0	0	167	1,180	1	1,178	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 24 – 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:

The availability of fully accessible units in public housing is extremely limited. As demonstrated with the composition of the waiting lists additional fully accessible units are warranted. At this time no funding mechanism is available to bring all units into Section 504 compliance. To address individual needs, the Norman Housing Authority partners with the City of Norman Accessibility Modification Program. Typical modifications include the conversion of a bathtub to a shower.

The Norman Housing Authority takes reasonable steps to maximize use of the fully accessible units by eligible individuals. When an accessible unit becomes vacant, before offering the unit to an individual without a disability, accessible units are offered to a current participant requiring the unit's accessibility features or to an eligible qualified applicant on the waiting list requiring the accessibility features. The Norman Housing Authority has a Reasonable Accommodation Policy that requires an accessible feature or policy modification to accommodate a disability, when necessary for an applicant or tenant to enjoy the same benefit of their programs as any non-disabled person, unless doing so would result in a fundamental alteration of a program or an undue financial and administrative burden.

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

Public Housing Program

- 17 current applicants on waiting list
- Types of low-income families on waiting list: Households with children (8); Households with disabilities (3); One-person households (5)
- Noticeable increase in mental health consumers

Housing Choice Voucher Program

- 370 current applicants on waiting list
- Types of low-income families on waiting list: Households with children (178); Households with disabilities (87); Elderly households (87)
- Noticeable increase in mental health consumers
- Identified needs:
 - Assistance with Rent and Deposits
 - Personal Care Attendants
 - In-home Services
 - Access to Affordable Transportation

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

With the reduction in funding that the Housing Choice Voucher Program has experienced over the last several years, the Norman Housing Authority has been unable to issue vouchers to their designated baseline. This has resulted in a very long waiting list for housing assistance. The immediate need for Public Housing is to increase the supply of one bedroom units that adhere to the non-elderly/disabled facility. Due to the stability of the Public Housing population, the waiting list has not substantially moved in the last three years.

The Norman Housing Authority applied and was awarded 80 Section 811 Mainstream Vouchers earlier this year. Policies and Procedures are being finalized and eligible households from the Section 8 Waiting List will begin receiving notifications of eligibility this summer.

NA-40 HOMELESS NEEDS ASSESSMENT – 91.205(C)**Introduction:**

A yearly count is conducted for both sheltered and unsheltered population, typically during the last 10 days of January. The data supplied for this report is from 2019, which was the most recent completed Point In Time. 2020 Point In Time data was not completed at the time of this report. The Norman/Cleveland County Continuum of Care (OK-504) (CoC) has been a partner with Community Solutions, since its inception in 2014. Based on our participation in the 100,000 Homes Campaign, the CoC housed 34 chronically homeless persons. Because of the success in housing, our CoC was considered a “Fully Committed Community” and selected to

continue our engagement under the ZERO:2016 Campaign led by Community Solutions. The furtherance of the 100,000 Homes Campaign where high performing communities embraced the challenge from HUD to end Veteran Homelessness by December 31, 2015 and Chronic Homelessness by December 3, 2016. Our CoC achieved functional Zero for the Veteran population on February 27, 2018 formally recognized, and confirmed by U.S. Interagency Council on Homelessness (USICH), the U.S. Department of Housing and Urban Development (HUD), and the U.S. Department of Veterans Affairs (VA). Norman/Cleveland County Continuum of Care (CoC) becomes the 62nd community nationwide (59 cities and three states), and the first in Oklahoma to achieve this certification from USICH indicating that Norman has sufficient resources to provide housing to every homeless veteran in the City of Norman and Cleveland County. In addition, the City of Norman is the seventh community in the nation to have reached all federal criteria benchmarks, and simultaneously, Built for Zero benchmarks.

Since the first ICount in 2014, our CoC has continued to assess the homeless population by conducting a sheltered and unsheltered count each year and dedicating resources affectively to maintain functional zero for the Veteran population, while, addressing and using appropriate resources targeted to the Chronic population. A VI-SPDAT is a tool our CoC has formally adapted and agreed to use to assess the acuity and vulnerability of persons who are unsheltered, or experiencing homelessness in a sheltered environment.

A By-Name list is the formal list the CoC has decided to adapt, it is a list that allows us to know everyone in our community experiencing homelessness in real time. It allows us to understand the scope of homelessness, understand how people move in and out of the system on an ongoing basis, and maintain accurate information to understand if we are making progress in ending homelessness. Since 2014 over 110 Veterans and 230 Chronic Homeless persons have been housed.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	20	10	30	30	20	90
Persons in Households with Only Children	12	10	10	20	10	90
Persons in Households with Only Adults	15	250	400	150	75	180
Chronically Homeless Individuals	15	200	300	100	50	370
Chronically Homeless Families	4	1	20	30	15	100
Veterans	5	10	40	25	30	120
Unaccompanied Child	0	0	0	0	0	0
Persons with HIV	1	4	5	5	4	100

Table 25 - Homeless Needs Assessment

Data Source

Comments:

Norman/Cleveland County Continuum of Care

Indicate if the homeless population is: Has No Rural Homeless

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	124	187
Black or African American	1	17
Asian	0	1
American Indian or Alaska Native	7	8
Pacific Islander	0	2
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	5	2
Not Hispanic	127	213

Data Source

Comments: Norman/Cleveland County Continuum of Care

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

In reviewing the data provided by the Cleveland County Department of Human Services a total of 1124 men, women, and children identified in Norman and an additional 561 cases in Moore (also Cleveland County) with the application for DHS assistance that they were living in a place unfit for human habitation and an additional 861 men, women, and children identified that they were temporarily living with friends or family (doubled-up). While this data is not broken down by household composition, DHS reports that they majority of their applicants are households with children. Homeless Service Providers in Norman prioritize the placement into shelter programs for households with children and yet, there are this many that are unserved. A total of 96 beds making up Veteran families were without a nighttime residence and or living in a place unfit for human habitation as reported by the SSVF (Supported Services for Veteran Families) in January 2020.

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

The composition of persons that have been identified as homeless follows the general distribution of the racial and ethnic groups in Norman.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The historical data regarding homelessness within Cleveland County (the geographic designation for the Continuum of Care OK-504) has relied on the sheltered count during the point-in-time count each year. Each year, the sheltered count remained steady while the unsheltered count continues to fluctuate mainly due to weather, and difficulty in locating street homeless individuals during the 24-hour time frame of the count.

Since 2014, our continuum has conducted a sheltered and unsheltered count each year during the point-in-time, historically, the last 10 days of January. Since 2014, our unsheltered count has continued to increase and we attribute this to the increase availability in volunteers assisting in the count, increased continual outreach throughout the year by CoC partners, and a robust By-Name-List of individuals living unsheltered.

The last complete point-in-time count (2019) we identified 561 individuals who became homeless for the first time, a slight decrease from the year prior. A total of 481 unduplicated individuals coded as sheltered homeless, 407 in emergency shelter and another 79 in transitional housing. A total of 215 unsheltered individuals counted. A total of 3 households counted in emergency shelters, with a total number of family members of 34. Another 11 households were counted in transitional housing, with a total of 34 family members. There were zero unsheltered families counted during this timeframe.

The point-in-time information is a snapshot of a 24-hour time frame each year. It is not a true indicator of the extent of homelessness, rather, a coordinated, planned count of people experiencing homelessness on a given night living in a sheltered and or unsheltered situation. The recent implementation of the philosophy that identification and assessment are a year-around effort including knowing each person by name, which directly flows onto the By-Name-List that is continually monitored on a daily basis and updated in live time allowing the providers to concentrate efforts swiftly and collectively while addressing all levels of homelessness.

Discussion:

Homeless data shows that homeless populations with the greatest need are persons identified as chronically homeless followed by households with adults and children. Chronically homeless populations include a significant amount of persons with mental illness and/or dealing with substance abuse. Households with adults and children potentially include families experiencing domestic violence or being doubled up with friends or family due to economic hardship.

While there were eleven unsheltered veterans identified, and another 3 sheltered with the point-in-time, this is a relatively small percentage of the homeless population in Norman. Since achieving Functional Zero for the Veteran population in February of 2018, we have maintained the status by enrolling each identified Veteran into a housing/intervention plan. This is made possible by the commitment our community continues to endorse of the Housing First Philosophy by providing service-

intensive housing to each individual and ensuring this number is less than the number of Veterans entering homelessness.

Efforts to implement a "Housing First" philosophy with the chronic homeless population have been very successful over the last year. It is with this approach that the elimination of chronic homelessness and veteran homelessness will be successful. The Cleveland County Continuum of Care has embraced the housing first model in not only chronic and veteran homelessness but the provision of Rapid Rehousing assistance in all but the extreme cases where due to financial and life skill constraints warrant placement in Transitional Housing.

Measuring the extent of homelessness is essential to combatting it, and efforts to count the homeless population have evolved significantly since 2014. A combination of Homeless Service Providers and improved accuracy and detail of homeless have influenced all aspects of HUD's policies and the protocol set by the Providers. Ultimately the Homeless Service Providers are adamant that it is the provision of appropriate case management regardless of the housing provided (Emergency, Transitional, Permanent, or Permanent Supportive) that is the ultimate indicator of success.

Introduction:

Norman has a strong partnership between agencies that serve the homeless, housing providers, and those who serve the non-homeless special needs populations. The non-homeless special needs assessment includes persons who are elderly, severely mentally ill, developmentally disabled, physically or mentally disabled, have been diagnosed and/or living with HIV/AIDS, and persons with drug or alcohol addiction. These families and individuals are living either with families, in group facilities, or individually. They have a wide variety of needs, many of which are being met without public assistance. This population group has specific housing needs beyond the affordability problems discussed elsewhere in this document.

Describe the characteristics of special needs populations in your community:

These populations have a broad spectrum of characteristics, similar to the population at large, but a distinguishing factor for them is an increased risk of homelessness due to the fragile nature of their existence, some relying heavily on others for their care, others living on fixed incomes and vulnerable to hardships caused by sudden demands on their resources.

Elderly are those individuals aged 62 or older. The elderly population continues to show a strong growth pattern as a population group. The elderly live a distinctive lifestyle requiring numerous supportive services. The Aging Services of Cleveland County (ASI) operates the Older Americans Grant for Cleveland County funded through the Area Agency on Aging (AAA), which provides an inclusive and coordinated variety of services and opportunities for seniors, including information, congregate and home delivered meals, advocacy, family caregiver support, transportation, and resource assistance. The City of Norman is responsible for the operation of the senior citizen center where the central kitchen for ASI is located and this location also hosts a congregate meal site. The local Meals on Wheels program utilizes over 300 volunteers annually to insure delivery of 300 hot meals daily to qualified participants. According to the American Community Survey, Norman is home to approximately 13,000 people over the age of 65, which is around 11% of the overall population. This population is approximately 51% female and 49% male.

Persons with severe physical or developmental disabilities often require special facilities and care. These persons sometimes lack the capacity to care for themselves and rely on a caretaker to see to their daily needs. More often than not the caretaker is a parent. If the child outlives the parent who has provided their care all their lives, other arrangements must be made to see to their continued care. This group can include all ages, races, and ethnicities.

In contrast, persons in living with and recovering from severe mental illness experience isolation in part due to the stigma associated with their illness. This isolation is a two-way street that is caused by their illness. The person may feel that others are judging them because of their illness and withdraw while

society tends to be unwilling to interact with them. Support systems that promote socialization and community building for persons with a severe mental illness are as integral a part to their recovery as the necessity of housing stabilization. Individuals with psychiatric diagnoses that experience chronic symptomatology often need the support of mental health professionals on either an on-going basis or periodically. They often do not have transportation and must live close a bus line and have access to low cost or free bus passes. Supports provided by community agencies must be comprehensive and flexible. A majority of individuals that have had their illness for some years have often developed other challenges such as obesity (due to medication and poor nutrition), diabetes (due to medication) and poor circulation (due to sedentary lifestyle). Consequently, as they age, they often require accessibility accommodations such as grab bars and bottom floor apartments.

The National Institute of Alcohol and Abuse and Alcoholism estimated the number of adult men with a drinking problem at 15 percent of the total population and that of adult women at 6 percent. These percentages, when applied to Norman, would yield a total population of alcohol abuser at 23,294 persons, using 2010 U.S. Census population figures.

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

Housing

Staff has worked for several years with Progressive Independence, Inc. (PI) regarding a comprehensive inventory of “accessible” housing in Norman. There is a consensus that there is not a reliable database describing the total number of “accessible” housing units. There is data available on the number of low income housing tax credit (LIHTC) developments and housing developments with accessible units, however, the extent of accessibility is not defined as well as the number of accessible housing units is not specified. Affordable housing with Universal Design features was continually identified as a high priority of special needs populations during discussions. The City of Norman is currently working on a Visitability Ordinance to incentivize the construction of dwelling units that meet these criteria.

There are many agencies in Norman that serve those with special needs. For the Elderly and Frail Elderly, the Norman Housing Authority (NHA) provides subsidized housing at Red Rock Villa. Additional housing dedicated for seniors is Northciff Gardens consisting of 44 one bedroom units of Section 202 Program units. For those with developmental or physical disabilities, ABLE, Inc. provides subsidized group homes. The provision of permanent housing for persons recovering from a severe and persistent mental illness is difficult. McKinzie Gardens is an apartment complex funded by the HUD 811 Program which consists of 34 one bedroom units. Clients live independently with no supportive services provided by the complex. McKinzie Gardens is located within the grounds of Griffin Memorial Hospital, but is governed by an independent non-profit entity not associated with the hospital.

Supportive Services

There are also agencies that provide non-housing services to Special Needs population. For the elderly population, as mentioned previously, Aging Services of Cleveland County provides advocacy, education, and meal and programs. For those who are disabled (either physical or developmental) there are several agencies that provide services. ABLE, Inc. provides, in addition to their subsidized housing, a job training program for adults with developmental disabilities. Central Oklahoma Community Mental Health Center provides outpatient treatment and case management to those persons with severe mental illness. Additional opportunities for services and housing for persons with a severe mental illness can be found at Thunderbird Clubhouse and Transition House. Progressive Independence, Inc. an Independent Living Center provides housing assistance, support groups, and accessibility modifications for persons with a physical disability. Among Friends operates a day center for adults with a developmental disability. For those with alcohol or drug dependency issues, the Virtue Center offers support groups and outpatient treatment.

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

Regional AIDS Network of Oklahoma (RAIN Oklahoma) is the primary non-profit organization in central Oklahoma designated as an AIDS Service Organization. RAIN is widely recognized as a trusted, effective agency that provides caring and urgently-needed services related to the HIV/AIDS epidemic. Cleveland County had 304 reported cases of HIV/AIDS per 1,000 population according to the Oklahoma Department of Health reported in the most recent data available is for the year 2010. The City of Norman is not a HOPWA Entitlement Community, Oklahoma City, located 15 miles north, receives HOPWA funding.

Discussion:

Non-homeless special needs populations encompass a wide variety of persons and households and cannot be easily categorized except in very general terms. Because of the nature of this population, a large portion of this population is dependent on outside assistance, both public and private. Some are on the verge of homelessness themselves and struggle from day to day. Some live independently, while others depend on family or caregivers to help on a daily basis. Needs for these populations are as varied as the populations are themselves and depend on individual situations.

The agencies that work with the non-homeless special needs populations are a crucial part to the overall community picture. Each agency works together to bring a continuum of services to the non-homeless special needs population, and these agencies are at the table in community provider discussions. Many of these agencies have been supported through CDBG funding, and there have been both capital improvements as well as public service assistance dollars that have gone to these agencies. The City will continue their partnership with these agencies and continue to utilize their input as part of the Consolidated Planning process.

Describe the jurisdiction’s need for Public Facilities:

The CDBG Division was a stakeholder in a Community Needs Assessment undertaken by the United Way of Norman and facilitated by the Anne and Henry Zarrow School of Social Work. This undertaking consisted of attendees and survey responses from a broad and diverse number of stakeholder groups. While the survey was not a statistically reliable instrument for prioritizing, it was a useful tool to include community concerns and preferences into consideration. Results of the Community Needs Assessment are located in Appendix C. In addition, staff held a series of Neighborhood Meetings and a facilitated a Public Hearing to discuss possible needs.

Responses regarding public facilities needs were similar to previous efforts in that the needs of local non-profit facility renovations were a common theme, as well as improvements to infrastructure in low income neighborhoods including sidewalks, sewer and bus shelters. A 24- hour center for homeless populations and/or a resource center was a common theme identified for public facilities.

Most of the needs for the Norman community in terms of public facilities are repairs on the existing building stock or to improve accessibility. Many social service agencies that are CDBG funded are housed in the Community Services Building, and others are in the practice of occupying buildings that are already constructed. The Community Services Building is an adaptive reuse of a previous nursing facility for veterans and throughout the years, CDBG funds have been utilized for the ongoing rehabilitation of the facility.

How were these needs determined?

The CDBG Division was a stakeholder in a Community Needs Assessment undertaken by the United Way of Norman and facilitated by the Anne and Henry Zarrow School of Social Work. This undertaking consisted of attendees and survey responses from a broad and diverse number of stakeholder groups. While the survey was not a statistically reliable instrument for prioritizing, it was a useful tool to include community concerns and preferences into consideration. Results of the Community Needs Assessment are located in Appendix C. In addition, staff held a series of Neighborhood Meetings and a facilitated a Public Hearing to discuss possible needs.

Describe the jurisdiction’s need for Public Improvements:

Responses for the need for Public Improvements were also similar to the previous responses. Stormwater, sidewalk improvements and general neighborhood improvement issues were prevalent within the CDBG Target Areas.

The City of Norman Public Works department conducts sidewalk inventories around the community in order to assess the condition of existing sidewalks. This can be further broken down into areas that

provide a low-moderate area benefit, and in recent years, CDBG money has been utilized to work on sidewalks in these neighborhoods. In addition, the City of Norman participates in the Safe Routes to School Program to insure that not only capital improvements are made to the neighborhood schools but social improvements are addressed also. As with any municipality, streets, sidewalks, and other pedestrian-related repairs are needed. CDBG is used in partnership with low-moderate area neighborhoods to both repair existing sidewalks, but also to provide safety improvements such as crosswalks, signals, and other items. Parks are an important part of the quality of life for the residents of Norman, and there are five neighborhood parks located within the CDBG Target Area. These parks are maintained by the City of Norman and have received substantial improvements in the recent years utilizing the funding from the CDBG program.

Located within the CDBG Target Area is the Center City Form Based Code area. This thirty block location is undergoing intensive redevelopment driven by private market student housing. In addition to the CCFBC, a Tax Increment Finance District was established to provide resources for the replacement and expansion of public infrastructure within this area. As a result, no CDBG funds will be utilized for Public Improvements within this designated area.

How were these needs determined?

The CDBG Division was a stakeholder in a Community Needs Assessment undertaken by the United Way of Norman and facilitated by the Anne and Henry Zarrow School of Social Work. This undertaking consisted of attendees and survey responses from a broad and diverse number of stakeholder groups. While the survey was not a statistically reliable instrument for prioritizing, it was a useful tool to include community concerns and preferences into consideration. Results of the Community Needs Assessment are located in Appendix C. In addition, staff held a series of Neighborhood Meetings and a facilitated a Public Hearing to discuss possible needs.

Describe the jurisdiction's need for Public Services:

Norman is the service hub for Cleveland County; additional services are available in Oklahoma City, approximately 15 miles north. As mentioned previously, Norman does not have a dedicated inpatient drug and alcohol treatment program, and those requiring these services must go to surrounding areas for treatment. Norman is the location of Griffin Memorial Hospital, a 120 bed inpatient facility for the treatment of persons with a mental illness, operated by the State of Oklahoma. There are also numerous ancillary services for the treatment of persons with a mental illness that are associated with the hospital.

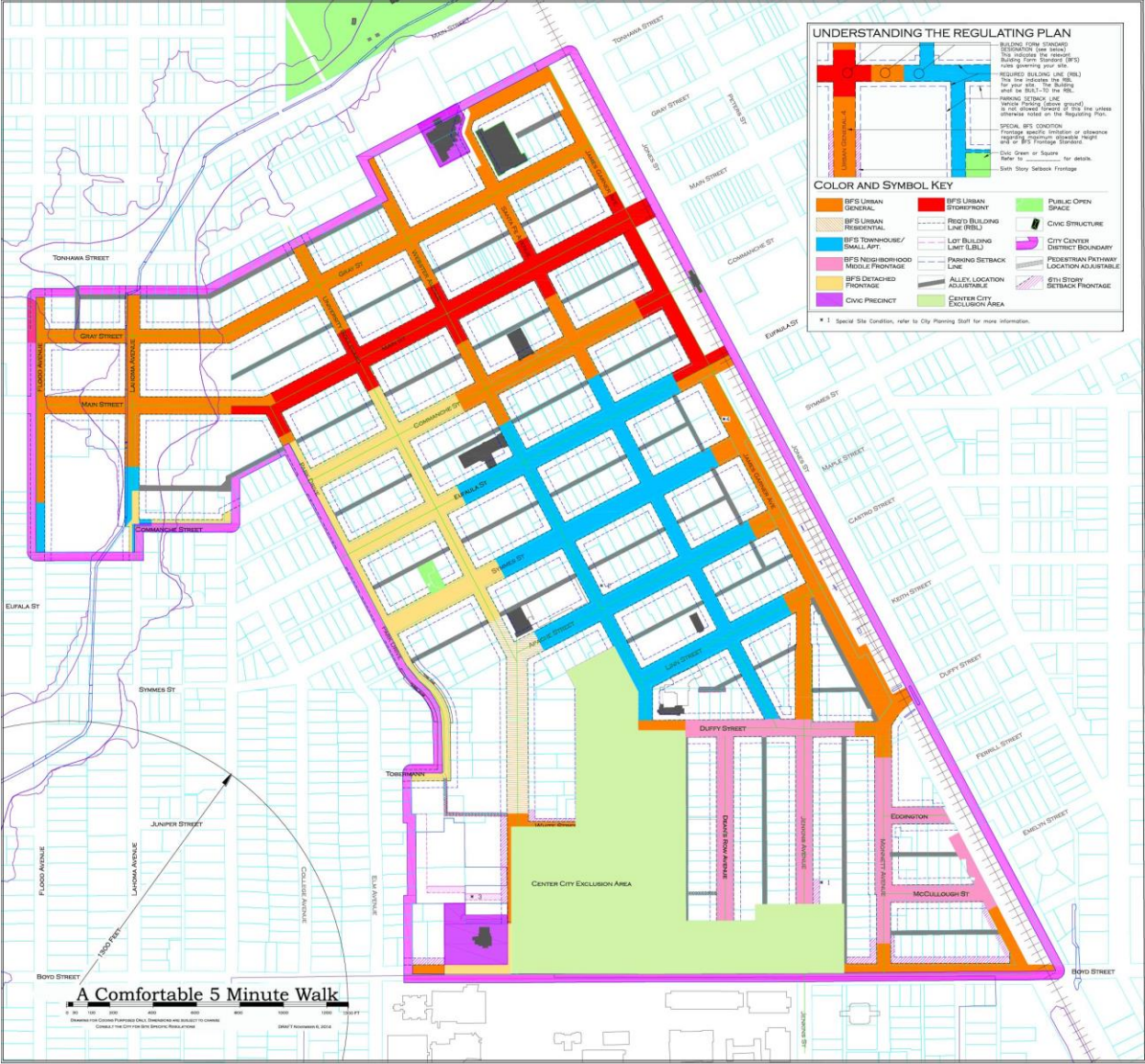
The City of Norman maintains funding for public services with the annual allocation to the Social and Voluntary Services Program which allows agencies to make applications for funding. The main need with public services is the need for varied and reliable funding streams. Considering the trend in funding reductions with the CDBG program, the decision was made two years ago by the CDBG Policy Committee to eliminate Public Service funding to individual agencies, except for transportation. Funding

will be considered on an individual basis each year. In the past, the City of Norman CDBG program has funded these activities and historically has been close to the 15% cap on public services funding.

Given the prominence by HUD on the efforts towards the elimination of homelessness, the City of Norman will be emphasizing this effort with available public service funding.

How were these needs determined?

The CDBG Division was a stakeholder in a Community Needs Assessment undertaken by the United Way of Norman and facilitated by the Anne and Henry Zarrow School of Social Work. This undertaking consisted of attendees and survey responses from a broad and diverse number of stakeholder groups. While the survey was not a statistically reliable instrument for prioritizing, it was a useful tool to include community concerns and preferences into consideration. Results of the Community Needs Assessment are located in Appendix C. In addition, staff held a series of Neighborhood Meetings and a facilitated a Public Hearing to discuss possible needs.



HOUSING MARKET ANALYSIS

MA-05 OVERVIEW

Housing Market Analysis Overview:

The local housing market affects the availability and affordability of housing. In Norman, the housing was not as affected as other locations in the United States with the foreclosure crisis of the last decade and has since rebounded. With that recovery, housing prices have increased, but are still generally affordable with the historically low interest rates found in the current market. The following analysis looks at a variety of data from the American Community Survey, the census, the Norman Housing Authority, and the homeless service providers to provide a picture of the local market. Market data and public input indicates a need for the development of affordable owner occupied and rental units, as well as the preservation of existing housing.

Introduction

Norman is a unique community in that the University of Oklahoma brings approximately 31,678 students (2017 graduate and undergraduate enrollment at the Norman Campus) to the community, and more importantly to the rental market. When one looks at the numbers of available units alone and the breakdown of the unit sizes, it appears that Norman has a good cross-section of availability. The reality is most of the units that are available for rental and ownership are not affordable to the renter/buyer at or below 80% of the area median income (AMI).

According to ACS data, in Norman there are 50,940 housing units, with around 24,300 of these units constructed prior to 1980. The following section will look at the number of housing units and what the subsequent needs are for those units.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	32,145	63%
1-unit, attached structure	1,915	4%
2-4 units	4,435	9%
5-19 units	7,670	15%
20 or more units	2,915	6%
Mobile Home, boat, RV, van, etc	1,860	4%
Total	50,940	100%

Table 26 – Residential Properties by Unit Number

Data 2011-2015 ACS
Source:

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	85	0%	730	4%
1 bedroom	295	1%	4,335	22%
2 bedrooms	2,950	12%	8,115	41%
3 or more bedrooms	21,730	87%	6,660	34%
Total	25,060	100%	19,840	101%

Table 27 – Unit Size by Tenure

Data 2011-2015 ACS
Source:

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

The City of Norman HUD funded housing programs serve populations at 80% or below AMI. The Comprehensive Rehabilitation Program serves owner occupied households at or below 50% AMI while the Emergency Repair Program serves owner occupied households at or below 80% AMI. The Accessibility Modification Program serves both renter and owner occupied households at or below 80% AMI. A new Exterior Maintenance Program will be utilized in the CDBG Target Area and will be available to owner occupied households at or below 80% AMI and will be administered in the form of a grant. To allow for maximum flexibility, budgeting for these activities will be combined within one cost center and will utilize funds remaining from prior years in addition to funds in the First Year Action Plan. There are also a variety of other units throughout the City assisted with federal, state, and local funds. A summary of organizations providing housing assistance, including annual funding amount and source, to low income populations is as follows:

- City of Norman Housing Rehabilitation Programs, CDBG federal funding \$280,621
- Cleveland County Continuum of Care, CoC federal funding (FY19), \$426,422
- Cleveland County Continuum of Care, ESG federal funding, passed thru the State of Oklahoma \$200,000
- United Way of Norman, EFSP federal funds \$115,000
- Section 8 Housing Choice Voucher Program, HUD federal funding \$5,400,000
- Public Housing Program, HUD federal funding \$456,000

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

No units are to be lost in the near future. Most past funded affordable housing units still have significant time left in affordability periods.

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

There currently is not sufficient housing, owner or renter, for households at 0 to 30% AMI. There is also a shortage for remaining income levels when considering quality, energy efficiency, universal design, location to amenities and cost burden. Census data indicates there are 19,215 households in Norman at 80% or below AMI, and there are 11,897 households at or below MFI that are cost burdened. CHAS data reviewed earlier in this section also indicates the need for additional affordable housing units due to age and quality of housing stock.

Describe the need for specific types of housing:

Data referenced previously indicates a need for additional affordable rental housing for incomes 80% and below AMI, particularly for incomes below 30% AMI. In addition, it has been demonstrated that there is a need for additional accessible units (units that exceed Universal Design Guidelines) integrated within the community.

The data available for the affordability of owner occupied housing indicates that the 50 to 80% AMI group is demonstrating the largest shortage of affordable housing.

Housing service providers in Norman are reporting greater need for the three+ bedroom units as we are seeing an increasing number of larger families that are finding themselves without a place to live. Along with the reduction in Section 8 funding, the number of families in need greatly affects the number of families or individuals being able to be assisted due to the larger cost of the vouchers for the larger families. While the charts above show that there is a comparable amount of housing available in this category, it is important to note that in a University town such as Norman, many of those three bedroom and larger units are encompassed in student-driven apartment complexes and housing communities. These are also the units that show the highest increase above market-rate rent. For the permanent resident in Norman, the selection is limited. On the homeowner side of the equation, Norman appears to be in need of affordable workforce housing. As education jobs far outweigh other industries in the community, there is a sector of individuals and families that cannot afford the average home prices in Norman.

Discussion

The University of Oklahoma has a large impact on the rental housing picture in Norman, Oklahoma. Many of the larger units are taken by students in roommate living situations, and some of these would fall under the "affordable" tag. In a community with much diversity in Norman, many apartment complexes are a mixture of college students, single people, and families. Within the last five years there have been eight apartment complexes constructed that include over 1,700 units that equate to over 5,400 beds. In addition, the University of Oklahoma has completed construction on four new dormitories with approximately 1,500 beds. All four of these facilities are limited to upperclassmen, with the required freshman residency being confined to the three existing towers.

Recent discussions with the University of Oklahoma have indicated that there is not an effort to increase the enrollment at OU but instead to improve the quality of the university experience they offer. Given this fact, it appears that the substantial increase of private market student housing and the planned expansion of university facilities will result in an oversupply of student oriented housing within Norman in the near future.

Introduction

The City of Norman lacks sufficient quality affordable housing for its low and moderate income citizens. The information presented below demonstrates the rapid increase in housing costs both owner and renter since 2009.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	138,200	160,100	16%
Median Contract Rent	545	647	19%

Table 28 – Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	4,650	23.4%
\$500-999	12,305	62.0%
\$1,000-1,499	2,175	11.0%
\$1,500-1,999	480	2.4%
\$2,000 or more	240	1.2%
Total	19,850	100.0%

Table 29 - Rent Paid

Data Source: 2011-2015 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	735	No Data
50% HAMFI	5,415	1,685
80% HAMFI	13,535	5,155
100% HAMFI	No Data	7,775
Total	19,685	14,615

Table 30 – Housing Affordability

Data Source: 2011-2015 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	612	669	851	1,163	1,437
High HOME Rent	612	669	851	1,163	1,319
Low HOME Rent	607	651	781	902	1,007

Table 31 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

There currently is not sufficient housing for households at 0 to 30% AMI. There is also a shortage for remaining income levels when considering quality, energy efficiency, universal design, location to amenities and cost burden. Census data indicates there are 19,215 households in Norman at 80% or below AMI, and there are 18,690 units that are affordable for households below 80% AMI. CHAS data reviewed earlier in this section also indicates the need for additional affordable housing units due to age and quality of housing stock.

In Norman, the question is not necessarily the availability of housing; it is the affordability of the housing that is available. Larger families who have one or income or two incomes that fall at or below 80% AMI would be looking at approximately \$1,163 for three or more bedrooms. For a family with a need for larger units, this is a substantial cost burden.

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

According to the data presented, median home values have substantially increased since 2009. These increases are expected to continue in the near future given the availability of historically low mortgage interest rates.

Recently the City of Norman has experienced a substantial increase of private student housing being developed whereas the rent is based upon a bedroom unit versus a multiple bedroom unit. The calculation of rent in this manner is not resulting in an increase of affordability. Asking prices per bedroom range from \$600 and up, resulting in rents of a three-bedroom unit being \$1800. Likewise, in addition to the trend in private student housing the trend in the development of general occupancy apartments is concentrated towards the upscale client.

With enrollment figures remaining steady, and multiple public and private projects under construction being occupied in the near future, there is a possibility of an increased rate of vacancy in the student housing market. With the configuration of these units being bed based not unit based and the proximity to the university, there is difficulty in reprogramming these developments into general occupancy housing.

The affordability gap in owner occupied housing will remain present and with continued lowering of entitlement HOME funding that was previously utilized to fund first-time homebuyer programs that gap will only get larger.

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 HOME Rents/Fair Market Rents are consistent with the Area Median Rent for the efficiency, one bedroom and two bedroom units. With three bedrooms and above a large discrepancy appears between the Low HOME Rents and the Fair Market and High Home Rents. The ability to develop housing that is affordable to those at or below 50% AMI will require substantial investment in the project from outside sources such as the HOME program or the LIHTC Program to maintain rents that are affordable to this income level.

With the above comparison of Fair Market/HOME Rents it must be stated that rents in Norman vary widely based upon location, condition, housing type and amenities. There are economy units and there are luxury units. There are multi-apartment buildings, townhomes, duplexes, and single family homes for rent. Norman has several LIHTC projects that offer affordable must for the most part they are restricted to elderly. For the most part, rents in Norman drift to the high end of the fair market rent and above. As stated above the largest disparity is seen between three and four bedroom rents.

Discussion

Norman is not an inexpensive place to live. The proximity to Oklahoma City makes it especially attractive to people who are looking for a community to settle into. It is a challenge in Norman to house the people who live here and the demand it has to house those who are passing through. A balance must be achieved to provide affordable and workforce housing as well as upscale housing. The rental market in Norman is similar to many other college communities and it will continue to be influenced by student demand. The community needs to work on retaining the existing housing stock and with keeping it affordable and safe for occupancy.

Introduction

The condition of housing units is highly correlated to the income of the household residing within those housing units. In Norman, 81 percent of owner-occupied housing units and 60 percent of renter occupied housing units have no housing problems reported. Four conditions are represented as housing problems, including lack of complete kitchen facilities, lack of complete plumbing facilities, more than one person per room, and cost burden (paying more than 30% of household income on housing expenses). The data show that 19 percent of owner households and 40 percent of renter households have one housing problem or condition. Presumably, this one housing problem is most likely either cost burden or substandard housing, with the latter more likely for renter housing than for owner housing. Forty-four percent of owner-occupied housing and 49 percent of renter-occupied housing was built prior to 1980, making those units' potential sources of lead-based paint contamination. While not all will have lead-based paint, the age of the units suggests that at one time lead-based paint may have been used on the unit and provides a potential hazard, particularly for households with children present. Over 6,113 units in Norman were built before 1980 and have children present in the household. It is reasonable to assume that a large number of these households are lower income households due to the fact that older housing stock is often filtered down through the income categories to the lowest income households.

Definitions

The City of Norman utilizes HUD's definition of "substandard condition" as described in the Housing Quality Standards, which states, "Units are in substandard condition when, while they may be structurally sound, they do not provide safe and adequate shelter, and in their present condition endanger the health, safety, or well-being of the occupants." The City of Norman bases their program on the 2003 International Property Maintenance Code. This document is generally more stringent than the requirements in the Housing Quality Standards. These standards are implemented in the rehabilitation programs we administer. The purpose of the International Property Maintenance Code is to provide a minimum requirement for the protection of life, limb, safety, health, property, and welfare of the general public and the owner and/or occupants of a residential property. The City of Norman has structured their programs to provide up to \$25,000.00 of program funding to a qualified residence. The City of Norman defines a "substandard condition but suitable for rehabilitation" if the residence does not meet the criteria of the International Property Maintenance Code, as described above, and the rehabilitation cost is within the parameters of the \$25,000.00 program limits.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	4,445	18%	9,285	47%
With two selected Conditions	115	0%	475	2%
With three selected Conditions	15	0%	10	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	20,485	82%	10,075	51%
Total	25,060	100%	19,845	100%

Table 32 - Condition of Units

Data 2011-2015 ACS
Source:

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	5,635	22%	4,555	23%
1980-1999	8,415	34%	5,640	28%
1950-1979	9,565	38%	7,895	40%
Before 1950	1,455	6%	1,770	9%
Total	25,070	100%	19,860	100%

Table 33 – Year Unit Built

Data 2011-2015 CHAS
Source:

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	11,020	44%	9,665	49%
Housing Units build before 1980 with children present	3,704	15%	2,409	12%

Table 34 – Risk of Lead-Based Paint

Data 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)
Source:

Vacant Units

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

Table 35 - Vacant Units

Data 2005-2009 CHAS
Source:

Need for Owner and Rental Rehabilitation

The major obstacle the City of Norman faces is the lack of quality and affordable housing in both the rental market and homeownership market. The homeowner rehabilitation programs, offered by the City of Norman, are designed to maintain the quality of what little affordable housing that is available to low to moderate income households. To help maintain affordable homeownership, the Comprehensive Housing Rehabilitation Program and the Emergency Loan Program provides assistance to low and moderate income homeowners to maintain the quality, safety and efficiency of their homes. The city also administers the Accessibility Modification Program to owner and rental households below 80% AMI. This program assists disabled, income eligible renters with accessibility modifications to their housing, which too assists in maintaining/gaining accessibility and livability of the residence.

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

Forty-four percent of owner-occupied housing and 49 percent of renter-occupied housing was built prior to 1980, making those units' potential sources of lead-based paint contamination. While not all will have lead-based paint, the age of the units suggests that at one time lead-based paint may have been used on the unit and provides a potential hazard, particularly for households with children present. Over 6,113 units in Norman were built before 1980 and have children present in the household. It is reasonable to assume that a large number of these households are lower income households due to the fact that older housing stock is often filtered down through the income categories to the lowest income households.

Discussion

The City of Norman will continue to administer their Housing Programs, including homeowner Exterior Property Maintenance Program, Comprehensive Rehabilitation, Emergency Repair Program, and Accessibility Modification Program to answer the challenges of the housing rehabilitation needs of the community. These programs have been very successful in keeping people housed and maintaining their homes in a safe and efficient manner.

Introduction

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			173	1,185			0	0	0
# of accessible units									

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

Table 36 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

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

The Norman Housing Authority has 173 units of Public Housing. Although the units are clustered, the developments are disbursed through the city, with the largest development being Rose Rock Villa, which is for seniors. The Norman Housing Authority is committed to maintaining their property in excellent condition. It accomplishes this with an expert maintenance staff that provides excellent service to tenants, including a 24-hour emergency service.

Public Housing Condition

Public Housing Development	Average Inspection Score

Table 37 - Public Housing Condition

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

Because of the strict yearly inspection programs that the Norman Housing Authority follows, the units are in very good condition. There is no development planned of new units in the near future, nor are there any plans for redevelopment of current units. All units were constructed after 1978 and are free of Lead Based Paint Hazards.

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

On April 13, 2013, the Norman Housing Authority Board of Commissioners adopted a policy which bans indoor smoking in all NHA owned property. The policy took effect on August 15, 2013. This was a Board initiative directed to the protection of the health and safety of all residents and to reduce the costs of maintenance operations. NHA tenants have benefited from the policy that creates a healthier, safer smoke free environment.

Discussion:

The Norman Housing Authority is committed to providing affordable housing, economic opportunity and a suitable living environment free from discrimination. The agency is concerned with the safety and security of their tenants first and foremost. The units within NHA programs are expected to pass a yearly inspection, with a plan in place if a unit does not pass. The Norman Housing Authority will continue their commitment to the public housing units and will continue to explore new and innovative measures to improve an already successful program. This spring, the Norman Housing Authority submitted and was awarded 80 vouchers for Section 811 Mainstream Housing.

Introduction

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)	64	60	34	38	0
Households with Only Adults	36	60	23	53	0
Chronically Homeless Households	75	60	23	53	0
Veterans	0	0	2	0	0
Unaccompanied Youth	19	0	0	19	0

Table 38 - Facilities and Housing Targeted to Homeless Households

Data Source Norman/Cleveland County Continuum of Care
Comments:

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

Norman is a community, rich in social services, and many work with homeless providers to coordinate service delivery in the community. The main way these agencies complement those working with homeless persons is by participation in the Cleveland County Continuum of Care. There are multiple services offered through local agencies to assist those experiencing homelessness and coordination of these services is essential. Many of these agencies are represented on the CoC and the vast majority report on a regular basis to the body. The City of Norman Police Department works closely with the staff of both Food and Shelter, Inc. and Salvation Army. In addition, they enforce non-camping ordinances as well as other ordinances that are closely associated with unsheltered situations while being respectful of the homeless populations by making every effort to refer to permanent housing options. A representative from the Norman Police Department serves on the CoC Committee as well as Norman Regional Hospital. The Norman Workforce Center operates as a single point of entry to a network of employment, training, and educational programs in Cleveland County. The Norman Workforce Center helps employers to find skilled workers and helps career seekers access the tools needed to manage their careers through high quality information services.

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 Central Oklahoma Community Mental Health Center provides case management and referral services to those unsheltered homeless and actively participates in the Coordinated Case Management efforts as well as the social work staff at Griffin Memorial Hospital. It is this collaboration that has recently been expanded with the implementation of the Coordinated Case Management process in our efforts towards the elimination of chronic and veteran homelessness. In February 2018, the Cleveland County Continuum of Care reached Functional Zero for Veterans and have maintained this status since.

The Salvation Army is the only year-around general occupancy emergency shelter located in Norman. A recent rehabilitation allowed for an increase of capacity but as a whole the community is underserved with emergency shelter beds. As stated previously, the Women’s Resource Center operates a domestic violence shelter and a seasonal emergency shelter is operated by Food and Shelter. The scarce resource of dedicated beds for family emergency shelter is supplemented with motel vouchers from multiple funding sources and primarily administered by Food and Shelter. Catholic Charities operates a day shelter for women at their facility as well as providing support for permanent housing.

The City of Norman HOME Program provides TBRA to chronically homeless individuals that are participating in the Built for Zero Program and Coordinated Case Management. In addition, the Norman Housing Authority have pledged 12 vouchers a year towards the Built for Zero efforts. The Coordinated

Case Management Committee works directly with the client to provide a wrap-around approach to both housing and the barriers that may keep them from maintaining a permanent residence. In addition, 86 beds of Permanent Supportive Housing are funded by the Continuum of Care Program.

Introduction

Several agencies in the Norman community have a hand in providing special needs services and facilities. The questions below take a look at what is available in the community, how the Consolidated Plan and the Consolidated Planning process fit into that sector, and what the community sees as challenges in providing effective and efficient services to the special needs population in times of reduced funding.

The City of Norman will continue to support a range of services and programs that meet the needs of Norman individuals and families with special needs. Given the great need for services and limited resources, Norman is focusing its resources on maintaining successful programs that meet the special needs of low and moderate income Norman households. Norman plans to complete specific physical investments in neighborhoods with a high concentration of low and moderate income residents as well as investments in parks and community facilities that will improve the quality of life for all Norman residents, including individuals and families with special needs.

The City of Norman Planning Department staff works closely with organizations through the City's Social Voluntary and Social Services Committee of the City Council, State Departments that provide services to the non-homeless, and various service providers as the lead agency for fund applications for supportive services, Continuum of Care, Emergency Solutions Grants, and others in efforts to capture funds for the service activities conducted in Norman. The City of Norman and its partners will continue to obtain funds to provide the services that presently exist over the term of this Plan period.

Participant organizations rely on the City as the steward of the Federal funds awarded to the City in response to competitive and non-competitive applications for grant funds. The funds captured in grants awarded are expended in accordance with regulations governing each grant through the review of supporting documents submitted for payment or reimbursement, through accounting procedures and by tracking funds on a project basis. The departments and divisions within the City of Norman who are responsible for the administration of for federal grant funds, monitors grant activities to insure funds are being spent appropriately.

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

Other population groups, who are not homeless, have specific housing needs beyond the affordability problems discussed in the previous sections. This section discusses the housing and support services needs of the elderly, frail elderly, persons with severe mental illness, persons with physical disabilities, substance abusers, and persons with HIV and AIDS.

Central Oklahoma Community Mental Health Center is a licensed, comprehensive mental health facility that provides community support services for those who are diagnosed with Severe and Persistent Mental Illness (SPMI). The staff includes the homeless outreach team, who helps to provide housing services to the homeless population, as well as offering staff, which include social workers, nurses, case managers, psychiatrists, and therapists.

In addition, within the community Thunderbird Clubhouse, Inc. operates a facility based upon the Clubhouse model for persons with SPMI. This facility provides opportunities for socialization, support, job training, employment and housing assistance. Transition House, Inc. provides a Transitional Housing Program and drop-in center for persons diagnosed and recovering from mental illness and/or substance abuse.

ABLE, Inc. offers group homes for adults with severe developmental disabilities. The group home offers a structured peer support environment that allows for the individual to remain in mainstream housing.

Progressive Independence, Inc. is an Independent Living Center works with those with physical disabilities through case management, housing assistance, accessibility improvements, and other items.

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

While recent efforts have increased the supply, Norman is still lacking in Permanent Supportive Housing beds, and this is something the community recognizes and has taken steps to add more beds to the inventory. Each year the Continuum of Care Grant Inventory is evaluated and Supportive Service and Transitional Housing Projects have been reprogrammed into PSH as warranted. Two programs in Norman voluntarily reprogrammed into PSH from TH once they evaluated the program effectiveness of PSH. Norman Housing Authority and the City of Norman HOME Program provides additional PSH beds through the Ready for ZERO Program and the Coordinated Case Management Team.

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)

In July of 2019, the City of Norman began operation of the Public Transportation System transferred from the University of Oklahoma. Currently and projected thru July of 2021 the system is operating with no fares being collected. After the free fare timeframe is ceased, CDBG funding will be utilized for the provision of bus passes to households at or below 80% AMI to increase the availability of affordable transportation. The City of Norman partners with the agencies that serve special needs populations to allow the clients to submit bus pass applications and receive the bus passes offsite.

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 City of Norman will continue efforts with the Norman Housing Authority and Legal Aid of Oklahoma to provide educational opportunities to special needs populations relating to the Oklahoma Landlord Tenant Law. The City of Norman general fund offers assistance to outside agencies as well to fund programs that help those with special needs.

The City of Norman serves on the Local Allocation Board for the Emergency Food and Shelter Funding (EFSP) that is received by United Way from FEMA. These funds received will be disbursed to qualified agencies for provision of rental and utility financial assistance. In addition, the City of Norman is actively involved with the allocation process from United Way, again funding agencies to meet the housing and supportive service needs of low and moderate income citizens of Norman. As with most everything related to these services, reduced funding has had a negative impact on the budgets of many of these providers.

Negative Effects of Public Policies on Affordable Housing and Residential Investment

A review of the City of Norman housing policy indicates there are no institutional barriers to obtain affordable housing. The city has adopted the 2015 International Codes (Building, Residential, Fire, Energy, Mechanical, Plumbing and Fuel Gas) and the 2011 National Electrical Code. The 2015 International Property Maintenance Code that has been adopted as the minimum housing code is similar to the requirements of HUD’s Housing Quality Standards. The minimum housing code is enforced through pro-active code compliance for the exterior of the properties while the interior is enforced on a complaint basis. The city does not impose rent controls. Regulations that are designed to protect the health, safety, and welfare of citizens may affect the cost of housing. However, these regulations are not designed to discourage the availability of affordable housing. Therefore, the City of Norman does not propose actions or reform steps to remove or restructure such policies in the coming five-year period.

Introduction

Norman has a well-developed economic base that provides a significant level of employment opportunities. The University, local health care providers, finance, manufacturing, and real estate sectors provide a significant number of jobs to the area. In the middle of the City of Norman is the University of Oklahoma (OU), a nationally recognized research university with a student population of around 31,000 on the Norman campus. Because of OU, as well as Norman Public Schools, jobs and careers in the field of education dominate the workforce in Norman. The University of Oklahoma alone employs 12,941 people. These jobs, of course, are not all in the teaching field. There are countless other positions that are filled at OU that keep the university running on a day to day basis. Norman is also a very educated community, with over 42% of the population over the age of 25 having attained a bachelor's degree, and almost 20% having obtained a Graduate degree. Only 7% of the population aged 25 and over have educational experience that did not result in at least a high school diploma. (Information contained in this section from the Norman Chamber of Commerce, Oklahoma Department of Labor, and the US Department of Labor.)

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	1,132	310	4	1	-3
Arts, Entertainment, Accommodations	5,816	7,061	18	22	4
Construction	1,947	1,507	6	5	-1
Education and Health Care Services	5,405	5,112	17	16	-1
Finance, Insurance, and Real Estate	2,447	2,287	8	7	-1
Information	674	504	2	2	0
Manufacturing	2,524	2,575	8	8	0
Other Services	1,117	1,149	3	4	1
Professional, Scientific, Management Services	3,417	3,199	11	10	-1
Public Administration	0	0	0	0	0
Retail Trade	5,275	7,270	16	23	7
Transportation and Warehousing	935	180	3	1	-2
Wholesale Trade	1,575	1,153	5	4	-1
Total	32,264	32,307	--	--	--

Table 39 - Business Activity

Data Source: 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	62,448
Civilian Employed Population 16 years and over	59,255
Unemployment Rate	5.11
Unemployment Rate for Ages 16-24	16.35
Unemployment Rate for Ages 25-65	2.74

Table 40 - Labor Force

Data 2011-2015 ACS
Source:

Occupations by Sector	Number of People
Management, business and financial	17,390
Farming, fisheries and forestry occupations	3,205
Service	5,973
Sales and office	13,655
Construction, extraction, maintenance and repair	3,770
Production, transportation and material moving	2,090

Table 41 – Occupations by Sector

Data 2011-2015 ACS
Source:

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	39,163	70%
30-59 Minutes	14,575	26%
60 or More Minutes	2,260	4%
Total	55,998	100%

Table 42 - Travel Time

Data 2011-2015 ACS
Source:

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	1,900	165	1,310
High school graduate (includes equivalency)	7,955	495	2,700
Some college or Associate's degree	12,820	580	3,785
Bachelor's degree or higher	19,490	265	3,740

Table 43 - Educational Attainment by Employment Status

Data 2011-2015 ACS
Source:

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	135	240	274	430	355
9th to 12th grade, no diploma	1,215	750	575	1,100	1,100
High school graduate, GED, or alternative	4,445	3,080	3,015	5,055	3,330
Some college, no degree	16,570	4,550	2,595	5,875	2,790
Associate's degree	590	1,410	1,000	1,850	600
Bachelor's degree	2,525	5,020	3,195	5,070	2,385
Graduate or professional degree	315	2,765	2,620	4,875	2,835

Table 44 - Educational Attainment by Age

Data 2011-2015 ACS
Source:

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	35,390
High school graduate (includes equivalency)	84,851
Some college or Associate's degree	71,947
Bachelor's degree	91,328
Graduate or professional degree	129,045

Table 45 – Median Earnings in the Past 12 Months

Data 2011-2015 ACS
Source:

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

With the University of Oklahoma main campus located in the city limits of Norman, it is not surprising that it is also the largest employer (12,941) and with the third largest employer being Norman Public Schools with 1,806, these two combined make education the largest employment sector in Norman. The second largest employer is Norman Regional Hospital and they employ 3,040, followed closely in fourth by a local manufacturing facility, Johnson Controls with 1,030 employees.

Describe the workforce and infrastructure needs of the business community:

Norman has many positions within the University of Oklahoma, including careers ranging from facilities and operations to professors and administrators. The University of Oklahoma is a diverse work force with opportunities on many levels of education and knowledge. For those who do not fall in the higher income categories in the realm of jobs in the field of education, there is a large gap in the resources needed to qualify for home ownership. This situation exists within all workforce categories.

While the City of Norman HOME Program is working closely with multiple service providers to address the needs of low and moderate income households (<80% AMI) in the provision of affordable housing, another identified need is to address the affordability of workforce housing. The City of Oklahoma City recently has had success in utilizing a variety of public and private resources in the development of housing targeted to the workforce (<120% AMI) to reduce the overall development cost and thus maintain the affordability desired for this population.

Increased access to affordable transportation options is another identified need. The public transportation system, operated by the City of Norman and while there is adequate access immediately surrounding the university with their student orientated system, access community wide is limited in both hours of service and limits of service. Resources to fund expansions are limited.

In discussions with focus groups additional needs that were identified include the need for vocational training, particularly in the retraining of workforce and the opportunity for support for entrepreneurs through increased opportunities for business incubators and micro-lending.

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.

There are several projects on the horizon for the Norman community that may have a significant impact on the amount of jobs available in the community, including the potential redevelopment of the Griffin Memorial Hospital site in which the City of Norman is taking a lead role. In addition, the University Northpark Development continues to be implemented. Depending on the businesses that locate in UNP, there may be an increased need for workforce housing. Norman Forward, a Quality of Life Community Initiative, is currently proposing public funding on several large projects for Norman. Included are several large recreational and business facilities that will create a regional draw. The proposed improvements could demand additional hospitality component needs. These types of jobs will more than likely be catered more toward college students and other part-time workers.

Within the last three months, Norman regional has announced plans to consolidate their operations to the new Northwest Campus and possible redevelopment of the Porter Campus. The location of the Porter Campus is within the CDBG Target Area. At this time the redevelopment details are not finalized.

As the University of Oklahoma continues their development of the National Weather Center Research Campus in south Norman, an increase in housing and business support will be reflected. While these jobs generally fall in the upper quadrille of income for the community, the demand for housing and business support these new jobs create must not be ignored.

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

Norman is an educated community in that the majority of the residents have completed at least some higher education schooling, and many have obtained college diplomas, master's degrees, and PhDs. The University of Oklahoma is a nationally recognized research university. Norman is also a community where access is easy to the Oklahoma City Area, so there is also a sector of commuters in the population. With education being the highest employment category by a large margin, many of those who have advanced degrees either commute to the other area job markets, work with Norman organizations or companies, or work within the weather research field, which is a significant presence in the Norman community. The City of Norman, in conjunction with the Norman Economic Development

Corporation, constructed a technology business incubator which houses start-up tech companies. In addition, there are opportunities in the hospitality industry for part-time workers, and there are many warehouse or distribution positions as well.

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.

There are several programs available in the area offering workforce development and skills training. These include but are not limited to: Moore-Norman Technology Center: Offers more than 2500 training and development courses per year, and Norman Workforce Center: Provides workforce training, resume services, employer and employee data base.

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

No

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.

Discussion

The City of Norman Economic Development Advisory Board regularly collaborates with the Norman Economic Development Coalition on numerous economic development opportunities. The City of Norman has an adopted Economic Development Incentives Policy and the Norman Economic Development Coalition has a Strategic Development Plan. Each of these documents is available for public review.

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

While the low-moderate income neighborhood census tracts and block groups are primarily located in the core area of Norman, there are not any significant concentrations of populations that are more affected by housing problems than the next. The housing stock in the core is older than the surrounding areas, however the housing that experiences housing problems is not clustered together necessarily, it is scattered. There are homes in every part of the city that participate in our housing programs such as comprehensive rehabilitation, emergency repairs, and accessibility modifications of units all over town. Norman Housing Authority offers both onsite properties as well as scattered site voucher programs and all units are governed by a thorough inspection process.

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

There are no defined areas where concentrations of ethnic or racial minorities exist in the City of Norman. As with any community, there are sections of the community that are of a lower income than others, but there is no defined area that includes a concentration of poverty.

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

There are no defined areas where a concentration of homes with multiple housing problems exists. As with any community, there are sections of the community that are older than others, however staff has seen within their housing programs that the need for comprehensive rehabilitation on homes or emergency repairs extends city-wide.

Most of the work that is done within City housing programs is located in neighborhoods that have a larger concentration of homeowner units than rental units. With a city that is over 50% rental units, there are several neighborhoods that have an abundance of rental properties. This really is not a defining factor in overall housing condition, though. Many of the homes that the housing programs work with are pre-1978 homes and some of the newer ones are dwellings where furnaces, siding, or roofing materials have reached their life expectancy.

Are there any community assets in these areas/neighborhoods?

Norman has neighborhood schools throughout town, and these schools, along with community buildings, parks, and other facilities bring about a strong sense of neighborhood throughout the City. Many neighborhoods in Norman have active neighborhood associations. There are five CDBG-funded neighborhoods, located in low-moderate income census tracts, who receive funding for specific infrastructure improvements as well as organization support from the City.

Are there other strategic opportunities in any of these areas?

Within the CDBG Target Area are two locations. One is the location of Griffin Memorial Hospital which is proposed for redevelopment. The other is the redevelopment of the Porter Campus of Norman regional Hospital. Strategic opportunities may present itself as the redevelopment planning continues in the areas of economic development and housing.

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

Currently access to multiple broadband services are readily available for the urban area of Norman. Access is limited in the eastern, less developed areas of Norman but access is increasing at an amazing rate with the Oklahoma Electric Cooperative taking the lead. While access is available city-wide, the cost can be prohibitive for low and moderate income households, particularly special needs populations. The City of Norman recently completed the construction of two public libraries and a substantial remodeling of a third. They are strategically located for access to all citizens. Included within the facilities is free public access.

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

As stated above there are multiple providers that serve the Norman area depending on the specific geographic location.

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

Norman is located in central Oklahoma and sits in a frequent crossroads between three different air masses: warm, humid air from the Gulf of Mexico; warm to hot dry air from Mexico and the Southwestern US; and cold, dry air from Canada.

Especially from fall to spring, Oklahoma, including Norman, sees frequent air mass changes, which can produce drastic swings in both temperature and humidity. Much of the state is often subjected to extremes in temperature, wind, drought, and rainfall. Most of the state lies in an area known as Tornado Alley, characterized by frequent interaction between cold and warm air masses, producing severe weather, with the highest-risk months from April to June. An average of 62 tornadoes strike the state per year, making that one of the highest rates in the world. Due to its position between zones of differing prevailing temperature and winds, weather patterns within the state can vary widely between relatively short distances. Precipitation occurs year-round, but average monthly precipitation is generally lowest in the winter months, rises dramatically to a peak in May (the year's wettest month virtually statewide, owing to frequent, and not uncommonly severe, thunderstorm activity), and decreases again by mid-summer, when long stretches of hot, dry weather are common in July and August many years. Early to mid-fall (September and October) often sees a secondary precipitation maximum. From late October to December, precipitation generally decreases again.

The National Weather Center and Severe Storm Laboratory is located in Norman and data that demonstrates the effects of climate change is readily available for our location. Increasing temperature swings as well as the severity of the storms are widely documented and attributed to climate change.

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

As with all housing located within Norman, low and moderate income households will be affected by climate change. The difference is that these households will not have adequate financial resources to be able to respond to the effects without assistance.

STRATEGIC PLAN

SP-05 OVERVIEW

Strategic Plan Overview

Norman is a diverse and multifaceted city that provides many of the amenities of a large metropolitan area, while still maintaining a strong sense of community. Located in central Oklahoma, Norman is just 15 minutes south of Oklahoma City, the state capital. The total area within the main body of Norman is 189 square miles. Norman offers a rich and fascinating history, a wide range of cultural experiences and nationally recognized educational institutions. Norman is also home to the University of Oklahoma which has an enrollment of 31,000 students. As of the 2016 American Community Survey Five-Year Estimates, Norman was home to approximately 117,350 people, of whom twenty-one percent were members of minority groups. According to the same survey, the median income of households in Norman was \$51,491 and 18.2% of individuals were in poverty. According to 2011-2015 CHAS data, there were 44,910 households in Norman, and the percentage of households who earn less than 80% of the area median income and are therefore classified as low-or moderate-income by HUD was 42.8% of the city-wide population for whom household income could be determined. Consolidated Plan funds will be targeted toward these low and moderate income neighborhoods or toward activities that benefit all residents of the city who are low or moderate income.

The Strategic Plan lays out the direction the City intends to take in the distribution of the Community Development Block Grant and HOME funding for the 2020-2024 planning period. The priorities listed were determined through consultation with citizens, service providers and other City of Norman departments. Some of the programs will be targeted to individual households who qualify for the programs according to their income status (individual or direct benefit). Other programs are directed towards particular area within Norman where the median income of the census blocks groups involved meets the HUD standards for area benefit. This standard states that the median household income of 51% of households in the area is at or below 80% of MFI. The City's goals and objectives were identified and developed through the context of eligible uses of HUD funding and are listed below and summarized in Section SP-45.

Geographic Area

Table 46 - Geographic Priority Areas

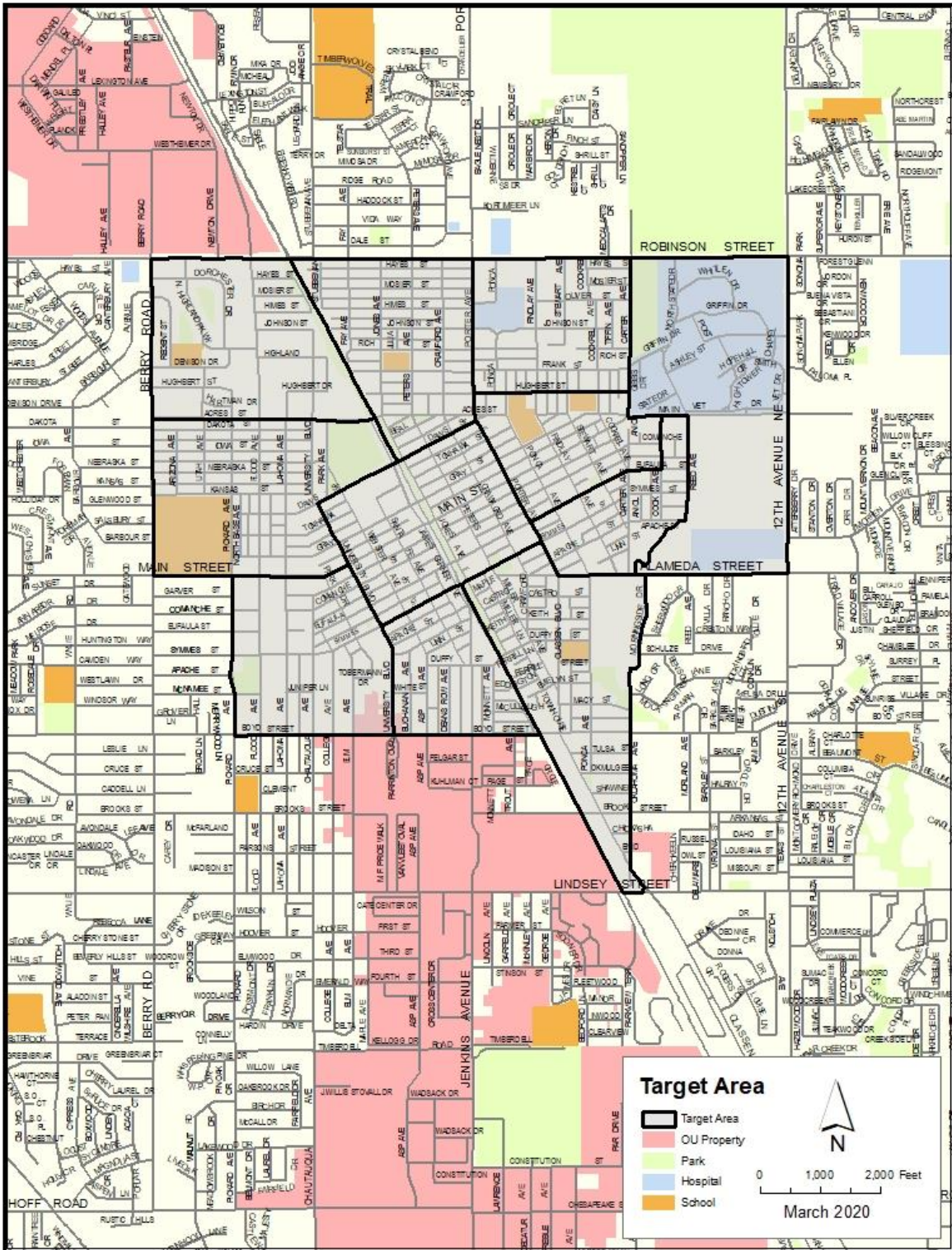
1	Area Name:	2020-2024 Target Area
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revitalization Type:	Comprehensive
	Other Revitalization Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	

2	Area Name:	Community Wide
	Area Type:	Eligible Area
	Other Target Area Description:	Eligible Area
	HUD Approval Date:	
	% of Low/ Mod:	
	Revitalization Type:	
	Other Revitalization Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
Are there barriers to improvement in this target area?		

General Allocation Priorities

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

The 2020-2024 Target Area is primarily the same target area that the program has concentrated area benefits in the past. Compared to other potential target areas within the city, the infrastructure within this area is substandard. That being said, the City of Norman will invest a majority of CDBG and HOME funds city-wide due to low to moderate income population needs city-wide. Investing in affordable housing projects city-wide will also assist the city in affirmatively furthering fair housing and avoiding concentration of low income populations. The City of Norman will target a specific geographic area for infrastructure improvement which constitutes an overall low to moderate percentage of 73% as calculated by HUD.



2020-2024 Target Area

Priority Needs

Table 47 – Priority Needs Summary

1	Priority Need Name	Need for Housing Rehabilitation
	Priority Level	High
	Population	Low Moderate Large Families Families with Children Elderly Persons with Physical Disabilities
	Geographic Areas Affected	Eligible Area 2020-2024 Target Area
	Associated Goals	Housing Rehabilitation
	Description	According to the 2011-2015 CHAS, Norman had 2,550 low-moderate income homeowner households who paid more than 30 percent of their incomes in housing expenses and, as such, were cost-burdened. Homeowners who have difficulty making their mortgage payments may be unable to afford to keep up the maintenance on their homes. These households need assistance with repair needs. Very low-income renters who are looking for affordable housing might only be able to find housing that is in poor condition. Anecdotal evidence suggests that substandard rentals are all that the City’s lowest income renters can afford. Property management companies should understand basic housing quality standards and have incentives to bring the units they manage up to standard.
	Basis for Relative Priority	Community input from forums and surveys

2	Priority Need Name	Availability of Affordable Rental Units
	Priority Level	High

Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents
Geographic Areas Affected	Eligible Area
Associated Goals	Affordable Rental/Owner Housing
Description	Consistent with nationwide trends, housing costs in Norman have been increasing. Although Norman does not face the affordability crises of many communities, there are many low and moderate income renters in the City who cannot afford to rent an appropriate sized unit for their household. The rental units available in the market that are affordable to renters in this income category are very limited. If these renters do not receive housing assistance from the City’s housing authority, they would have difficulty finding rental units they can afford.
Basis for Relative Priority	

3	Priority Need Name	Housing and Services for Persons with Special Need
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	Eligible Area
	Associated Goals	Housing Rehabilitation Affordable Rental/Owner Housing
	Description	Providing adequate, affordable housing with supportive services to special-needs populations is very difficult in every community. In Norman, most of the subsidies for affordable housing for persons with developmental disabilities and mental illnesses are provided by the Norman Housing Authority, which does not have the ability to provide the full menu of supportive services these populations may need. There is a need for the expansion of the Shelter Plus Care or Supportive Housing Programs available through HUD’s Continuum of Care to allow for a more formal and coordinated system of supportive services for the City’s lowest income residents with developmental disabilities and mental illnesses.
	Basis for Relative Priority	

4	Priority Need Name	Housing and Services for the Homeless
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	Eligible Area
	Associated Goals	Housing Rehabilitation Homelessness Affordable Rental/Owner Housing
	Description	
	Basis for Relative Priority	

5	Priority Need Name	Public Improvements
	Priority Level	High
	Population	Extremely Low Low Moderate Non-housing Community Development
	Geographic Areas Affected	2020-2024 Target Area
	Associated Goals	Community Development
	Description	Within the Target Area there is an identified need related to public infrastructure and public facilities.
	Basis for Relative Priority	

Narrative (Optional)

Priority needs were identified and prioritized through the City of Norman's community forums and focus groups including individual consultations. All needs in the plan were taken directly from public input.

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)	The City of Norman partners with the Norman Housing Authority for a TBRA program that is targeted toward the Built for Zero Program for ending chronic and veteran homelessness. The market characteristic that affects this is the reluctance of landlords to rent to these clients due to the reputation they have. Other market conditions that could influence the use of TBRA have to do with rents being asked for rental property. If the rents are too high, the rental assistance might not be enough to allow clients to lease the units, even if the landlord is willing.
TBRA for Non-Homeless Special Needs	Not applicable. The City of Norman TBRA program only provides services for homeless individuals. There are several other programs in the community that provide vouchers to veterans, however these are state and CoC funded programs.
New Unit Production	<p>The City's CHDO's, Norman Affordable Housing Corporation and now CDBG 2015, has a rich history of providing affordable housing opportunities to low to moderate income renters.</p> <p>The cuts in funding have made it challenging to provide new unit production, however NAHC operates many other projects in the community, so the agency can self-sustain on its own based on their revolving operating funds. CHAS data provided in the HUD template demonstrates the need for new affordable rental units for very low income, due to the high level of cost burdened households at 0 to 30% AMI and also the high number of households with 1 or more of the 4 housing problems. The production of new housing units for this population is influenced by several market conditions, including the cost of land, the cost of construction, and prevailing interest rates. While rates are currently at historic lows, the mortgage markets will be recovering from the COVID-19 Crisis for the foreseeable future.</p>
Rehabilitation	Rehabilitation of properties has become increasingly difficult due to the increased costs of materials and labor.
Acquisition, including preservation	Acquisition of property is funded through the CDBG and HOME programs.

Table 48 – Influence of Market Conditions

Introduction

The priorities and accomplishment goals outlined in this document are based on assumptions about future funding levels for the Consolidated Plan programs. In all cases, the City of Norman has used the presumption of level-funding of each program at Federal Fiscal Year 2020 levels as outlined below. Because these programs are subject to annual Congressional appropriations as well as potential changes in funding distribution formulas or the number of communities eligible to receive entitlement grants, the accomplishment projections and planned activities are subject to change with availability of funding. Supplemental funding that was received as a result of the COVID-19 (CARES Act) was appropriated with the 2019 Program Year and not reflected here.

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	910,621	0	403,000	1,313,621	3,640,000	The City of Norman will continue to derive strategies and priorities for housing and community development cooperatively with public and private entities as well as community groups.

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: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	412,569	0	955,000	1,367,569	160,000	The City of Norman will continue to derive strategies and priorities for housing and community development cooperatively with public and private entities as well as community groups.

Table 49 - 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

CDBG and HOME funding will leverage a significant amount of additional resources including federal, state, and local funding. The City of Norman Social and Voluntary Services Commission annually funds \$175,000 in social services through local general revenue. CDBG funds and social service funding are often provided to similar agencies and implemented to maximize funds available and build agency capacity for services. HOME funding often leverages significant investment from private entities

The U.S. Department of Housing and Urban Development (HUD) requires that the Participating Jurisdictions (PJs) that receive HOME funding match \$.25 of every dollar. The matching requirement mobilizes community resources in support of affordable housing. The City of Norman expects to receive approximately \$400,000 in HOME funding for FY2020 and beyond, requiring an annual match requirement of \$100,000. HUD allows cities to rollover excess match from previous years and to date the City of Norman has banked over 2.5 million dollars of excess match.

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

The Oklahoma Department of Mental Health and Substance Abuse Services is collaborating with the City of Norman on the possible redevelopment of Griffin Memorial Hospital (GMH). GMH is located within the CDBG Target Area and as part of the redevelopment; land and or structures could be utilized to meet these identified needs. In addition, Norman Regional Hospital has recently announced the concentration of their activities at the Tecumseh Campus and a potential redevelopment of the Porter Avenue Campus which is located within the CDBG Target Area.

Discussion

The City of Norman has programmed approximately \$1.4 million dollars from the CDBG and HOME programs for the FYE2021 program year. These funds will be used to operate a range of private and public services as described later in the Annual Action Plan.

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 Norman	Municipal Government	Grantee	City Limits of Norman

Table 50 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

Norman is a rich community in terms of services available for those in need. Norman lacks an adequate amount of permanent supportive housing options, and does not have a detox center. Any person needing to detox must go out of town to do so. The City of Norman is committed to the goal of partnership with various agencies in the community regardless of their funding source in order to have the most effective impact that we can in the community. The Grants Division, who administers the grants is a small division, however the impact is large when the partnerships with other agencies help to get the word out in the community. With these partnerships, the City is able to overcome gaps in institutional structures and enhance coordination.

The institutional delivery system in Norman is well coordinated and spans a range of community needs. The City has many years of experience managing and implementing the programs addressed in the Consolidated Plan, as well as working with outside agencies that fill some of the needs as outlined in the Consolidated Plan. The delivery of listed services meets the needs of the homeless persons and additional populations mentioned above through the network of agencies in Norman. There are several organizations that serve homeless persons specified above and there is close coordination between agencies. Services provided by the Emergency Solutions Grant Program are managed by the Executive Committee of the Norman/Cleveland County Continuum of Care in response to HUD grant requirements. Though this organization, the group collects facilities and client information and prepares grant proposals in an effort to bring additional resources to Norman. The Housing Authority of Norman operates public housing units and works well with City staff and the City political leadership.

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		
Rental Assistance	X	X	
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics			
Other Street Outreach Services			
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	
Employment and Employment Training	X	X	
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	
Mental Health Counseling	X	X	X
Transportation	X		
Other			

Table 51 - Homeless Prevention Services Summary

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

The services targeted to homeless persons and persons with HIV/AIDS and mainstream services are made available through the coordination of services provided by the array of non-profit service providers that constitute the Norman/Cleveland County Continuum of Care. These organization partner with each other, the City, and mainstream service providers to provide a wide ranging response to the service needs of homeless persons and persons with HIV/AIDS, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth.

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

Norman prides itself on a decades-long track record of successful partnerships among public and private sector entities. The Consolidated Plan delivery system is an example of this. Communication and cooperation between the City of Norman's Revitalization Division and the partner agencies and organizations that administer activities is strong. City of Norman staff has worked closely with the organizations involved in Consolidated Plan programs to improve regulatory compliance, monitoring, cooperation and partnerships among agencies, and technical capacity of organizations involved in project delivery. The greatest weakness in the delivery system remains the lack of available funding to support community development, affordable housing and public service activities. It is becoming increasingly difficult to maintain existing levels of activity and nearly impossible to expand services or undertake new activities.

In 2014 sixteen agencies joined together to form One Vision One Voice, collaboration devoted to educating the citizens of Norman on all issues related to homelessness. It was this group that was instrumental in the successful participation of the 100,000 Homes campaign and the Continuum's acceptance in to the Zero:2016 campaign and now the Built for Zero Campaign. Through this effort the collaboration between agencies including the City of Norman has never been better. Functional Zero for Veterans was reached in February 2017. Each entity is striving to eliminate gaps where they surface as well as constant monitoring to avoid duplications of service.

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 City of Norman will continue to look at goals and priorities for utilization of the CDBG and HOME resources that are available. Three general strategies have been identified.

- Work with non-profit organizations to address community needs and provide support to federal and non-federal funding initiatives.
- Work with private industry to address important issues that hamper housing and community development efforts.

Identify opportunities to create private/public partnerships for project finance and development to leverage federal funds.

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing Rehabilitation	2020	2024	Affordable Housing	Community Wide 2020-2024 Target Area	Need for Housing Rehabilitation Housing and Services for Persons with Special Need Housing and Services for the Homeless	CDBG: \$2,000,000 HOME: \$0	Homeowner Housing Rehabilitated: 150 Household Housing Unit
2	Homelessness	2020	2024	Homeless	Community Wide	Housing and Services for the Homeless	CDBG: \$625,000 HOME: \$150,000	Tenant-based rental assistance / Rapid Rehousing: 30 Households Assisted Housing for Homeless added: 10 Household Housing Unit
3	Community Development	2020	2024	Non-Housing Community Development	2020-2024 Target Area	Public Improvements	CDBG: \$1,000,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Affordable Rental/Owner Housing	2020	2024	Affordable Housing	Community Wide	Availability of Affordable Rental Units Housing and Services for Persons with Special Need Housing and Services for the Homeless	HOME: \$2,000,000	Rental units constructed: 20 Household Housing Unit Rental units rehabilitated: 5 Household Housing Unit Homeowner Housing Added: 5 Household Housing Unit

Table 52 – Goals Summary

Goal Descriptions

1	Goal Name	Housing Rehabilitation
	Goal Description	
2	Goal Name	Homelessness
	Goal Description	Decrease the number of homeless people living on the streets, in shelters, and in precarious housing situations by monitoring and coordinating the system wide resources necessary to facilitate a cohesive homeless service system.
3	Goal Name	Community Development
	Goal Description	<p>Community development priorities were based on the City’s ongoing evaluation of public infrastructure and programmatic needs among low and moderate income households, slums and blight in targeted areas and key initiatives designed to improve quality of life and economic opportunities.</p> <p>Norman have outdated and aging infrastructure in need of repairs. Norman continues to support expanded recreational opportunities and necessary public facilities that meet the diverse needs of Norman’s population, especially children, elders and households with low and moderate incomes. Norman places a high priority on continued support to public service agencies and organizations that provide essential services.</p>
4	Goal Name	Affordable Rental/Owner Housing
	Goal Description	Development of affordable rental or owner occupied housing

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)

The City of Norman estimates that six individuals per year or 40 during the effective timeframe of this plan will be provided affordable housing by utilizing the HOME TBRA funding for Chronically Homeless persons. Utilizing CHDO funds and HOME funds designated for the development of affordable housing, the City of Norman estimates that the inventory of affordable rental units will increase by a minimum of 30 units. This equates to a total of 70 extremely low-income, low-income, and moderate-income households that will be provided affordable housing as defined by HOME.

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

Not applicable to the Norman Housing Authority. The Norman Housing Authority has a total of 22 accessible units in their inventory. In certain circumstances, a Public Housing Resident needs additional modification to address a specific situation. In this case the CDBG Accessibility Modification Program is utilized for the modifications.

Activities to Increase Resident Involvements

There are several resident activities regularly at Rose Rock Villa- Karaoke night, BINGO, Game, Color Therapy, Country Dances, Game Day Watch Parties, Holiday Parties, Blood Pressure and Blood Sugar checks every month, pot luck once a month, provide gardens spots for the residents that want to have a garden, dog run for the resident to let their dogs and themselves socialize, guest speaker coming in monthly, Food Bank every month, Pet food pantry every month.

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

No

Plan to remove the ‘troubled’ designation

No, the Norman Housing Authority is designated as a “High-Performing” Housing Authority by HUD.

Barriers to Affordable Housing

A review of the City of Norman housing policy indicates there are no institutional barriers to obtain affordable housing. The city has adopted the 2015 International Codes (Building, Residential, Fire, Energy, Mechanical, Plumbing and Fuel Gas) and the 2014 National Electrical Code. The 2015 International Property Maintenance Code that has been adopted as the minimum housing code is similar to the requirements of HUD’s Housing Quality Standards. The minimum housing code is enforced through pro-active code compliance for the exterior of the properties while the interior is enforced on a complaint basis. The city does not impose rent controls. Regulations that are designed to protect the health, safety, and welfare of citizens may affect the cost of housing. However, these regulations are not designed to discourage the availability of affordable housing. Therefore, the City of Norman does not propose actions or reform steps to remove or restructure such policies in the coming five-year period.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

A review of the City of Norman housing policy indicates there are no institutional barriers to obtain affordable housing. The city has adopted the 2015 International Codes (Building, Residential, Fire, Energy, Mechanical, Plumbing and Fuel Gas) and the 2014 National Electrical Code. The 2015 International Property Maintenance Code that has been adopted as the minimum housing code and is enforced on a complaint basis. The city does not impose rent controls. Regulations that are designed to protect the health, safety, and welfare of citizens may affect the cost of housing. However, these regulations are not designed to discourage the availability of affordable housing. Therefore, the City of Norman does not propose actions or reform steps to remove or restructure such policies in the coming five-year period.

The City of Norman will continue to provide the Analysis of Impediments (AI). The AI does indicate that Norman has done well in avoiding systematic impediments to fair housing choice, although affordability remains an important challenge. City ordinances, regulations, administrative policies, procedures and practices do not impede housing choice. The rental and homebuyer market, however, continue to remain at higher cost levels than most of the state of Oklahoma for those families of three or more. Most affordable housing in Norman is not accessible housing. The City of Norman Revitalization Division allocates CDBG funds to the Accessibility Modification Program, which allows for accessibility modifications in both owner occupied and rental units. While it can be concluded that while housing units are available in the community, they are not necessarily affordable.

A Strategic Housing Plan is proposed for funding in FYE21 to address the overall housing policies including homelessness and affordable housing. Staff will be involved with this study as it progresses to insure that Barriers to Affordable Housing are inadvertently constructed as a result.

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

The Cleveland County Continuum of Care has adopted the use of the VI-SPDAT assessment tool. This tool is instrumental in assessing an unsheltered individual needs and assigning a vulnerability index to them. The Coordinated Case Management Team reviews each assessment and other criteria such as length of time homeless, and the number of episodes of homelessness in determining the placement into permanent housing.

Outreach is conducted by Homeless Service Providers on a weekly basis to help identify individuals living in an unsheltered environment. The most recent count of unsheltered individuals was from the 2019 point-in-time which was 215 individuals. All individuals identified were given a survey or a full VI-SPDAT.

This tool is uniformly adapted and used by all the homeless service providers' year around; it is only once a year that a substantial effort is made to update the assessments, unless a significant life changing event occurs and then the assessment is updated accordingly. This is a continual effort by all Homeless Service Providers outside of the January point-in-time count.

Addressing the emergency and transitional housing needs of homeless persons

The City of Norman plans to continue supporting the efforts of all Homeless Service Providers efforts directed toward providing immediate assistance to those who are experiencing homelessness. Identification is the first step, assessing the needs of the individual and level of assistance needed by means of permanent supportive housing, emergency and or transitional housing for households. This plan is aligned with the Written Standards of the Continuum of Care.

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 Continuum of Care partners is a strong network of housing and mental health providers to ensure that homelessness is rare, brief, and one-time. The community is also working to address the causes of homelessness and to shift the conversations to help fill the gaps of funding and to adhere to the community's best practices. The CoC strongly believes the case management is the most effective strategy of assisting all homelessness, (chronic, individuals, families with children, veterans, and unaccompanied youth) to obtain long-term stable housing and to maintain housing.

The City of Norman's Annual Action Plan contributes to helping homeless persons make the transition to permanent supportive housing and independent living by providing funds for case management and a staff position to coordinate the efforts of the Built-For-Zero campaign. In addition, dedicated TBRA funding provided by the HOME program will be used in conjunction with the Built-For-Zero campaign to increase the funding that is available for permanent housing.

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 CoC's efforts have focused on building collaborative partnerships. A hospital representative sits on the CoC Board to assist in ongoing collaboration and communication. Hospital staff has given presentations about hospital discharge processes to the CoC's Governance Committee. CoC staff and subcommittee members offer trainings for hospital staff on helping clients to obtain SSI benefits and are working to increase coordination between hospitals and outside case managers who assist homeless persons with disabilities to obtain disability benefits. The CoC will continue to work this year to increase resources and connections, as homeless persons are still sometimes discharged back into homelessness. The CoC monitors the discharge planning policies of the systems of care and attempts to intervene when these policies result in the potential for homelessness. The CoC also coordinates the Emergency Solutions Grant Program in that it evaluates the funding priorities related to prevention activities and sets the levels of assistance given to individuals who qualify.

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

The City of Norman will ensure that all federally funded improvement programs for the existing housing stock use lead hazard reduction activities including evaluating lead hazard risk and using only lead free paint. Housing Rehabilitation Staff as well as the City of Norman Development Services Division distribute "Renovate Right" pamphlets, published by the Environmental Protection Agency. In homes tested for lead-based paint, if it is determined that lead is present, lead and structural remediation is conducted and Lead Safe Work Practices are utilized and clearance testing performance is attained.

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

Approximately one half of Norman's housing stock was constructed prior to 1979, and because of the age of the housing there is a high prevalence of substandard units and units containing lead-based paint. In the Comprehensive Housing Rehabilitation program, all owner occupied homes constructed prior to 1978 participating in the program are tested for lead-based paint. The city will insure that all federally funded improvement programs for the existing housing stock use lead hazard reduction activities including evaluating lead hazard risk.

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

The Housing Rehabilitation Handbook for the housing programs specifically states that compliance with HUD regulations regarding lead-based paint will be adhered to. To insure this, the financial limits for each project exclude all costs that are required to bring a structure into compliance with these stringent regulations. Lead-based paint inspections determine whether lead-based paint is present in a house, dwelling unit, residential building, or child-occupied facility, including common areas and exterior surfaces, and if present, which building components contain lead-based paint. A surface-by-surface inspection investigation to determine the presence of lead-based paint is conducted. All inspections are done by a licensed lead-based paint risk assessor or paint inspector. HUD lead-based paint standards are used for a determination of the presence of lead-based paint as defined by Title X of the Housing and Community Development Act of 1992. Inspection reports and clearance findings are retained in the client file.

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

One purpose of the Consolidated Plan Programs and other initiatives in Norman is to reduce the number of persons in poverty. The emphasis in Norman is to help people rise out of poverty, rather than temporarily easing their situation. Although within the community there is the availability of essential short-term direct aid such as emergency food and shelter, the strongest community support is for programs to address the root causes of poverty and assisting people in becoming self-sufficient in the long-term. Two key components of helping people attain self-sufficiency are employment and housing. Examples of programs that directly influence people's ability to escape poverty include job education and placement services as well as housing advocacy, homeless prevention and rental assistance. Projects that indirectly affect poverty include those that improve the community at-large and provide transportation and services that help people access employment and services. CDBG, HOME, CoC, and State ESG funds are often used as matching funds for other grants that also contribute to reducing the number of families living in poverty. Thus, the power of these federal dollars is leveraged to a greater extent. Recognizing that limited Consolidated Plan dollars should be focused where the need is greatest; Norman gives preference to projects that directly benefit low and moderate income residents or serve low and moderate income neighborhoods over those that will have indirect benefits. This strategy will ensure that scarce resources are directed to best serve those who have the greatest need, including those areas with the greatest concentration of poverty. In addition to Consolidated Plan programs, a number of other public, private, and partnership initiatives have been designed to assist in the reduction of poverty rates.

The City of Norman in collaboration with local economic development entities and public service providers, identified and reviewed economic factors including, labor force participation, economic development opportunities, self-sufficiency /determination, transportation, and housing. These factors are potentially within the power of the City to address and formulate into an economic development and anti-poverty strategy.

The City has ongoing strategies to address economic development and anti-poverty. Those strategies are:

- Identify and assess the economic and employment needs of low-to-moderate income residents in Norman.
- Identify opportunities for public/private cooperation in developing employment and expanding economic opportunities
- Fund and/or support new and existing and programs that address the economic and employment needs of low-to-moderate income residents
- Educate and inform low-to-moderate income residents of opportunities for improving their economic status.

With the tools available to the CDBG Program from HUD, it is highly recommended that the Norman CDBG Program continue its assistance of existing programs that assist low-to-moderate income persons in the improvement of their economic status and opportunities.

Further the City of Norman should initiate new partnerships with new and existing economic development entities to strengthen and diversify the local economy and create sustainable economic growth.

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

This Consolidated Plan for the City of Norman will utilize the following strategies to reduce poverty and increase the availability of affordable housing:

- Consider supportive service needs for low-income elderly, persons with disabilities, and other at-risk populations when investing available funds.
- Encourage landlords to accept tenants who receive rental assistance.
- Encourage landlords to accept tenants with poor or criminal history.
- Support agencies that provide housing stabilization services.
- Promote collaboration with community based providers.

As mentioned above, job education and job placement services are very important, and are a key component in any anti-poverty strategy. In addition, case management as a whole for those who are in need of assistance is extremely important, as in many circumstances short-term financial assistance really does not solve the problem, and often times it is not even a temporary fix. In addition to Consolidated Plan programs, a number of other public, private, and partnership initiatives have been designed to assist in the reduction of poverty rates.

The overall goals of the reduction of poverty will be addressed by the collaboration between agencies to ensure gaps in services and funding are addressed, while maintaining the utilization of each funding source.

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

The overriding goal of monitoring is to identify deficiencies and promote corrections in order to improve and reinforce performance. Deficiencies will be corrected through discussion, negotiation, or technical assistance. The City of Norman will review all organizations receiving CDBG or HOME funding on a regular basis, at minimum annually. This approach is also utilized with agency funding for the City of Norman Social and Voluntary Services funding and the United Way funding. The City of Norman staff actively participates in each of these entities and participates in the reviews and has found this process very informative in making future funding decisions. Topics that are covered in each review include the following:

- Staff capacity.
- Consistency in activities with contractual agreements.
- Project progress.
- File organization and storage.
- Record retention policies.
- Financial management including purchasing guidelines.
- Compliance with Federal Requirements.
- Internal controls.
- Annual Audit.

The City of Norman will also continue to monitor HOME funded rental units for property maintenance requirements, leases, rents, household eligibility and development financials.

The City provides opportunities to the maximum extent possible, to women and minority owned business enterprises for contract bids and services. The City of Norman encourages inclusion in the list of approved bidders for minority and women-owned businesses, and actively works to recruit new contractors into the programs administered by the Housing Rehabilitation Program. Rehabilitation program staff ensures that MBE and WBE entities are included in contractor recruitment activities. HOME sub-grantee agreements specifically contain the language: 3. Affirmative marketing and MBE/WBE records: (a) Records demonstrating compliance with the affirmative marketing procedures and requirements of 92.351. (b) Documentation and data on the steps taken to implement the jurisdiction's outreach programs to minority owned and female owned businesses including data indicating the racial/ethnic or gender character of each business entity receiving a contract or sub-contract of \$25,000 or more paid, or to be paid, with HOME funds; the amount of the contract or subcontract, and documentation of affirmative steps to assure that minority business and women's

business enterprises have an equal opportunity to obtain or compete for contracts and subcontracts as sources of supplies, equipment, construction, and services. In addition, Staff also monitors the Consolidated Plan through the Annual Performance Report.

EXPECTED RESOURCES

AP-15 EXPECTED RESOURCES – 91.220(C)(1,2)

Introduction

The priorities and accomplishment goals outlined in this document are based on assumptions about future funding levels for the Consolidated Plan programs. In all cases, the City of Norman has used the presumption of level-funding of each program at Federal Fiscal Year 2020 levels as outlined below. Because these programs are subject to annual Congressional appropriations as well as potential changes in funding distribution formulas or the number of communities eligible to receive entitlement grants, the accomplishment projections and planned activities are subject to change with availability of funding. Supplemental funding that was received as a result of the COVID-19 (CARES Act) was appropriated with the 2019 Program Year and not reflected here.

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	910,621	0	403,000	1,313,621	3,640,000	The City of Norman will continue to derive strategies and priorities for housing and community development cooperatively with public and private entities as well as community groups.

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: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	412,569	0	955,000	1,367,569	160,000	The City of Norman will continue to derive strategies and priorities for housing and community development cooperatively with public and private entities as well as community groups.

Table 53 - 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

CDBG and HOME funding will leverage a significant amount of additional resources including federal, state, and local funding. The City of Norman Social and Voluntary Services Commission annually funds \$175,000 in social services through local general revenue. CDBG funds and social service funding are often provided to similar agencies and implemented to maximize funds available and build agency capacity for services. HOME funding often leverages significant investment from private entities

The U.S. Department of Housing and Urban Development (HUD) requires that the Participating Jurisdictions (PJs) that receive HOME funding match \$.25 of every dollar. The matching requirement mobilizes community resources in support of affordable housing. The City of Norman expects to receive approximately \$400,000 in HOME funding for FY2020 and beyond, requiring an annual match requirement of \$100,000. HUD allows cities to rollover excess match from previous years and to date the City of Norman has banked over 2.5 million dollars of excess match.

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

The Oklahoma Department of Mental Health and Substance Abuse Services is collaborating with the City of Norman on the possible redevelopment of Griffin Memorial Hospital (GMH). GMH is located within the CDBG Target Area and as part of the redevelopment; land and or structures could be utilized to meet these identified needs. In addition, Norman Regional Hospital has recently announced the concentration of their activities at the Tecumseh Campus and a potential redevelopment of the Porter Avenue Campus which is located within the CDBG Target Area.

Discussion

The City of Norman has programmed approximately \$1.4 million dollars from the CDBG and HOME programs for the FYE2021 program year. These funds will be used to operate a range of private and public services as described later in the Annual Action Plan.

ANNUAL GOALS AND OBJECTIVES

AP-20 ANNUAL GOALS AND OBJECTIVES

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing Rehabilitation	2020	2024	Affordable Housing	Community Wide 2020-2024 Target Area	Need for Housing Rehabilitation Housing and Services for Persons with Special Need	CDBG: \$290,621	Homeowner Housing Rehabilitated: 30 Household Housing Unit
2	Affordable Rental/Owner Housing	2020	2024	Affordable Housing	Community Wide	Availability of Affordable Rental Units Housing and Services for Persons with Special Need Housing and Services for the Homeless	CDBG: \$100,000 HOME: \$352,569	Rental units constructed: 4 Household Housing Unit
3	Homelessness	2020	2024	Homeless	Community Wide	Housing and Services for the Homeless	CDBG: \$129,000 HOME: \$20,000	Tenant-based rental assistance / Rapid Rehousing: 6 Households Assisted Housing for Homeless added: 20 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Community Development	2020	2024	Non-Housing Community Development	2020-2024 Target Area	Public Improvements	CDBG: \$235,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10000 Persons Assisted

Table 54 – Goals Summary

Goal Descriptions

1	Goal Name	Housing Rehabilitation
	Goal Description	
2	Goal Name	Affordable Rental/Owner Housing
	Goal Description	
3	Goal Name	Homelessness
	Goal Description	
4	Goal Name	Community Development
	Goal Description	

PROJECTS

AP-35 PROJECTS – 91.220(D)

Introduction

The CDBG Policy Committee is responsible for the consideration and evaluation and eventual funding of the projects. The process begins in early September with a public hearing to consider overall needs of the low and moderate income populations.

Projects

#	Project Name
1	Administration
2	Housing Rehabilitation
3	Public Services
4	Development of Affordable Housing

Table 55 – Project Information

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

These funding priorities were evaluated and set by the CDBG Policy Committee.

Project Summary Information

1	Project Name	Administration
	Target Area	Community Wide
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$910,621 HOME: \$412,569
	Description	General administration of the CDBG and HOME Projects
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
2	Project Name	Housing Rehabilitation
	Target Area	Community Wide 2020-2024 Target Area
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Need for Housing Rehabilitation Housing and Services for Persons with Special Need
	Funding	CDBG: \$910,621 HOME: \$412,569
	Description	
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	30 Households will receive assistance
	Location Description	Accessibility Modifications and Emergency Repair Projects are available city wide. Exterior Property Maintenance Projects are available only with the CDBG Target Area.
	Planned Activities	

3	Project Name	Public Services
	Target Area	Community Wide
	Goals Supported	Homelessness
	Needs Addressed	Housing and Services for the Homeless
	Funding	CDBG: \$129,000
	Description	
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately six households that were formerly homeless will receive Tenant Based Rental Assistance. Coordination of homeless programs will result with 20 homeless individuals receiving housing.
	Location Description	
	Planned Activities	
4	Project Name	Development of Affordable Housing
	Target Area	Community Wide
	Goals Supported	Affordable Rental/Owner Housing
	Needs Addressed	Availability of Affordable Rental Units Housing and Services for Persons with Special Need Housing and Services for the Homeless
	Funding	CDBG: \$910,621 HOME: \$412,569
	Description	
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Development of three affordable units and acquisition of one unit.
	Location Description	
	Planned Activities	

2020 (FYE21) COMMUNITY DEVELOPMENT BLOCK GRANT

CDBG 20 Budget		\$910,621	
\$156,000	Admin, Planning & MFHC (\$10,000)	\$ 182,122	<i>cap</i>
\$129,000	Public Services	\$136,592	<i>cap</i>
	\$14,000 <i>Intern</i>		
	\$70,000 <i>Homeless Program Coordination</i>		
	\$40,000 <i>Prevention Funds</i>		
	\$5,000 <i>Housing Start-Up Kits</i>		
	<i>Housing Rehabilitation</i>		
	<i>Housing</i>		
\$290,621	\$185,000 <i>Rehabilitation</i>		
	<i>Rehab Delivery Costs</i>		
	\$105,621 <i>Rehab Projects</i>		
	<i>Capital Projects</i>		
\$335,000	\$50,000 <i>Tree Planting Project</i>		
	\$110,000 <i>Senior Citizen Kitchen Rehab</i>		
	\$100,000 <i>Norman Affordable Housing</i>		
	<i>Acquisition of Property</i>		
	\$75,000 <i>Non-Profit Rehab/Acquisition</i>		
<hr/>			
	\$910,621		

2019 (FYE20) HOME INVESTMENT PARTNERSHIPS

HOME 20 Budget		\$412,569	
\$40,000	Administration (\$15,000 MFHC)	\$ 41,257	<i>cap</i>
\$61,886.00	Community Housing Development Corporation		
\$290,683	Affordable Housing Development		
\$20,000	Tenant Based Rental Assistance		
<hr/>			
	\$412,569		

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

The City of Norman will operate the Housing Rehabilitation Activities City-Wide with the exception of the Exterior Property Maintenance Program which is available in the Target Area.

Geographic Distribution

Target Area	Percentage of Funds
Community Wide	75
2020-2024 Target Area	25

Table 56 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Rationale behind allocating investments geographically include ensuring the City of Norman is affirmatively furthering fair housing with housing programs offered city wide with qualification based upon the applicant’s income for a direct benefit. The designated CDBG Target Area consists of contiguous block groups in the core of Norman with 51% or more of the population at 80% or below AMI, in order to ensure the achievement of a CDBG National Objective. While there are other areas in the City of Norman that meet this low-mod income criterion the infrastructure needs are minimal compared to the Target Area.

AFFORDABLE HOUSING

AP-55 AFFORDABLE HOUSING – 91.220(G)

Introduction

The City of Norman will support a variety of affordable projects including rehabilitation (owner and rental), acquisition, and the production of new units. The City will be serving homeless households through providing funds through a dedicated position that will execute the Built for Zero program.

One Year Goals for the Number of Households to be Supported	
Homeless	36
Non-Homeless	30
Special-Needs	0
Total	66

Table 57 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	6
The Production of New Units	6
Rehab of Existing Units	30
Acquisition of Existing Units	1
Total	43

Table 58 - One Year Goals for Affordable Housing by Support Type

Introduction

The City of Norman and the Norman Housing Authority have a very viable working relationship, and the partnership between agencies spans beyond Consolidated Plan items. The Norman Housing Authority sees the community as a big picture and not just in relation to the services they provide. Successful partnerships between the Norman Housing Authority and the community will only continue to become stronger.

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

HOME funds will be utilized for Tenant Based Rental Assistance for the ready for Zero Program. These TBRA funds will be administered in conjunction with the vouchers the Norman Housing Authority has provided for this effort.

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

Efforts to increase participation by public housing residents are ongoing with planned activities at each site to encourage participation. The Residents Council is very active and participates fully in all decision making.

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

Discussion

The provision of HOME funds for TBRA is a program that has expanded each year since the inception and is tied with the Coordinated Case Management Process. It is anticipated that this partnership will continue but will be re-evaluated annually for performance and consideration of potential reduction of HOME funds allocated.

Introduction

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

The Cleveland County Continuum of Care has adopted the use of the VI-SPDAT assessment tool. This tool is instrumental in assessing unsheltered individuals needs and assigning a vulnerability index to them. It is this information that the Coordinated Case Management Team reviews in determining the placement into permanent housing. This tool is utilized by all the homeless service provider's year around; and this effort is also concentrated during the operation of a winter warming shelter and the January point-in-time count.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Norman plans to support the efforts of the Continuum of Care homeless service provider's efforts to provide emergency and transitional housing needs for households who are experiencing homelessness.

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

As mentioned previously, case management is the most effective method of assisting all homeless (chronic, individuals, families with children, veterans, and unaccompanied youth) both obtain housing and remain housed. The City of Norman's Annual Action Plan contributes to helping homeless persons make the transition to permanent supportive housing and independent living by providing funds for a staff position to coordinate the efforts of the Built for Zero campaign. In addition, funding for Housing Start-up Kits is included and dedicated TBRA funding provided by the HOME program will be used in conjunction with the Built for Zero campaign to increase the funding that is available for permanent housing.

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

The City of Norman assists in the coordination of many of these efforts with the Continuum of Care. The CoC monitors the discharge planning policies of the systems of care and attempts to intervene when these policies result in the potential for homelessness. The CoC also coordinates the Emergency Solutions Grant Program in that it evaluates the funding priorities related to prevention activities and sets the levels of assistance.

Discussion

Norman prides itself in a decades-long track record of successful partnerships among public and private sector entities in regard to homelessness and other special needs activities. The Consolidated Plan delivery system is an example of this. Communication and cooperation between the City of Norman's Grants Division and the partner agencies and organizations that administer activities is strong. Staff has worked closely with the organizations involved with the Consolidated Plan programs to improve regulatory compliance, monitoring, cooperation and partnership among agencies, and technical capacity of organizations involved with project delivery.

The City of Norman's Strategic Plan Goals contribute to helping persons make the transition to permanent housing and independent living by supporting and in certain instances providing funding to facilities operated by agencies that serve these populations and by expanding housing options available to these populations. The City of Norman Social and Voluntary Services Commission administers over \$175,000 annually in local government revenue to assist social service providers serving these populations.

Introduction:

The City of Norman will continue to provide the Analysis of Impediments to Fair Housing (AI). Past and present AI's have indicated that Norman has done well in avoiding systematic impediments to fair housing choice, although affordability remains an important challenge. City ordinances, regulations, administrative policies, procedures and practices do not impede housing choice.

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

A review of the City of Norman housing policy indicates there are no institutional barriers to obtain affordable housing. The city has adopted the 2015 International Codes (Building, Residential, Fire, Energy, Mechanical, Plumbing and Fuel Gas) and the 2015 National Electrical Code. The 2015 International Property Maintenance Code that has been adopted as the minimum housing code is similar to the requirements of HUD's Housing Quality Standards. The minimum housing code is enforced through pro-active code compliance for the exterior of the properties while the interior is enforced on a complaint basis. The city does not impose rent controls. Regulations that are designed to protect the health, safety, and welfare of citizens may affect the cost of housing. However, these regulations are not designed to discourage the availability of affordable housing. Therefore, the City of Norman does not propose actions or reform steps to remove or restructure such policies in the coming five-year period.

Discussion:

The primary obstacle to meeting all of the identified needs, including those identified as affordable housing activities is the general lack of funding resources available to the public and private agencies who serve low and moderate income residents.

Introduction:

This Annual Action Plan provides a basis and strategy for the use of federal funds granted to the City of Norman by the U.S. Department of Housing and Urban Development (HUD) under the Community Development Block Grant (CDBG) and Home Investment Partnerships Program (HOME). This Action Plan covers the period beginning July 1, 2020 through June 30, 2021. Programs and activities described in this plan are intended to primarily benefit low and moderate-income residents of the City of Norman, neighborhoods with a high concentration of low-income and moderate-income residents, and the city as a whole.

Actions planned to address obstacles to meeting underserved needs

The primary obstacle to meeting all of the identified needs, including those identified as high priorities is the general lack of funding resources available to the public and private agencies who serve low and moderate income residents. Norman, due to being an entitlement community, is not eligible for state CDBG or HOME funding. Since no state dollars are available for community development activities, the city's general fund is based upon sales tax revenues and has been stretched. This leaves little room for expansion of community development funding at the local level. Furthermore, the City of Norman's entitlement grants have been reduced over the last several years further limiting the funds available to address the needs in the community. Staff continues to look for other funding opportunities to leverage projects and priorities in the Consolidated Plan.

Actions planned to foster and maintain affordable housing

The City of Norman will continue to work with Norman Affordable Housing Corporation (NAHC) in efforts to provide affordable housing. NAHC is a 501(c)(3) that is sponsored by the Norman Housing Authority. NAHC works very closely with the designated Community Development Housing Organization for the City of Norman, CHDO 2015. The City of Norman will be releasing an RFP for a consultant to develop a Strategic Housing Plan for the City. Within this plan, a focus will be on furthering the ability to encourage the development of Affordable Housing.

Actions planned to reduce lead-based paint hazards

The City of Norman will continue to reduce the number of units containing lead-based paint hazards, primarily through its housing rehabilitation programs. Each rehabilitation project is required to be lead-safe upon completion of rehabilitation activities. The City of Norman will continue to utilize a licensed risk assessor to provide lead hazard evaluation for projects requiring an assessment.

Actions planned to reduce the number of poverty-level families

One purpose of the Consolidated Plan Programs and other initiatives in Norman is to reduce the number of persons in poverty. The emphasis in Norman is to help people rise out of poverty, rather than temporarily easing their situation. Although essential short-term direct aid such as emergency food and shelter is provided, the strongest community support is for programs to address the root causes of poverty and assisting people in becoming self-sufficient in the long-term. Two key components of helping people attain self-sufficiency are employment and housing. Examples of programs that directly influence people's ability to escape poverty include job education and placement services as well as housing advocacy, homeless prevention and rental assistance. Projects that indirectly affect poverty include those that improve the community at-large and provide transportation and child care services that help people access employment and services. CDBG, HOME, CoC and State ESG funds are often used as matching funds for other grants that also contribute to reducing the number of families living in poverty. Thus, the power of these federal dollars is leveraged to a greater extent. Recognizing that limited Consolidated Plan dollars should be focused where the need is greatest; Norman gives preference to projects that directly benefit low and moderate income residents or serve low and moderate income neighborhoods over those that will benefit the city as a whole. This strategy will ensure that scarce resources are directed to best serve those who have the greatest need, including those areas with the greatest concentration of poverty. In addition to Consolidated Plan programs, a number of other public, private, and partnership initiatives have been designed to assist in the reduction of poverty rates including the Cleveland County Workforce Development Program.

Actions planned to develop institutional structure

The Planning and Community Development Department, Grants Division is the lead agency of the City in the development of the Consolidated Plan and Annual Action Plans. The Staff provides fiscal and regulatory oversight of all CDBG and HOME funding. The Norman City Council acts as the final authority for the appropriation of funds for Annual Action Plan activities under the Consolidated Plan grant programs, following recommendations of the CDBG Policy Committee. In addition, the City provides opportunities to the maximum extent possible, to women and minority owned business enterprises for contract bids and services. The City of Norman encourages inclusion in the list of approved bidders for minority and women-owned businesses, and actively works to recruit new contractors into the programs administered.

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

To accomplish these goals, the City of Norman will work closely with the Norman Housing Authority on administration of their Tenant Based Rental Assistance (TBRA) to cover the activity of Rental Housing Subsidies through the HOME program. CHDO 2015, Inc., the City of Norman CHDO, will be the agency primarily working towards the goal of Construction of Housing objectives. The City of Norman Housing Rehabilitation staff will administer the Exterior Property Maintenance Program, Emergency Repair Program, and the Accessibility Modification Program through the City of Norman using local licensed contractors. Social service agencies will offer tenant and rental assistance as well as consultation, and will provide programing to move people from the shelter situation into housing of a more permanent nature.

Discussion:

Norman prides itself on a decades-long track record of successful partnerships among public and private sector entities. The Consolidated Plan delivery system is an example of this. Communication and cooperation between the City of Norman's Revitalization Division and the partner agencies and organizations that administer activities is strong. City of Norman staff has worked closely with the organizations involved in Consolidated Plan programs to improve regulatory compliance, monitoring, cooperation and partnerships among agencies, and technical capacity of organizations involved in project delivery.

PROGRAM SPECIFIC REQUIREMENTS

AP-90 PROGRAM SPECIFIC REQUIREMENTS – 91.220(L)(1,2,4)

Introduction:

The CDBG Policy Committee has made allocation recommendations for CDBG and HOME funding for the 2020-2021 Program Year based upon evaluation of the identified needs of the low and moderate income populations of Norman. This Action Plan is a piece of an overall Consolidated Plan and the goals are all based upon the Strategy. Program Income is minimal and when received is returned if possible to the particular activity which generated the income, and therefore not considered as part of the allocation process.

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:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(l)(2)

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

The City of Norman does not plan any additional investment beyond eligible uses of HOME funds 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:

No homebuyer programs are planned and the period of affordability on previous homebuyer program has expired.

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:

All units that are acquired or developed with HOME funds for the purpose of the provision of affordable housing are secured by a deed restriction filed at the Cleveland County Courthouse that is in effect for the required period of affordability. Monitoring of these units is ongoing with no identification of troubled units identified.

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:

There are no plans to utilize HOME funds to refinance existing debt secured by multi-family housing rehabilitated with HOME funds. The City of Norman will subordinate CDBG and HOME funds as requested by property owners refinancing debt that meet the program requirements. The City of Norman has adopted subordination requirements that provide flexibility for property owners while insuring the affordability of the property is maintained.

The City of Norman will continue to utilize their HOME allocation to provide TBRA funds as well as the provision of funds for the development of affordable housing, both rental and owner occupied when feasible.

- Encourage landlords to accept tenants with poor or criminal history.
- Support agencies that provide housing stabilization services.
- Promote collaboration with community based providers.

As mentioned above, job education and job placement services are very important, and are a key component in any anti-poverty strategy. In addition, case management as a whole for those who are in need of assistance is extremely important, as in many circumstances short-term financial assistance really does not solve the problem, and often times it is not even a temporary fix. In addition to Consolidated Plan programs, a number of other public, private, and partnership initiatives have been designed to assist in the reduction of poverty rates.

The overall goals of the reduction of poverty will be addressed by the collaboration between agencies to ensure gaps in services and funding are addressed, while maintaining the utilization of each funding source.

Appendix - Alternate/Local Data Sources

1	<p>Data Source Name</p> <p>2020-2024 CDBG Target Area</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>Staff utilized the data provided by special tabulations of data from the 2011-2015 ACS 5-Year Estimates. Only complete block groups were utilized.</p>
	<p>Provide a brief summary of the data set.</p> <p>The data provided by the special tabulations of data from the 2011-2015 ACS 5-Year Estimates for the designated area calculates an overall low-mod percentage of 74%.</p>
	<p>What was the purpose for developing this data set?</p> <p>This data set was developed to designate a definite area where comprehensive revitalization would have the opportunity to occur. In reviewing the other potentially areas, the for comprehensive revitalization was not as high and with declining CDBG and HOME funds, designating a smaller area was determined to be in the best interest of the City of Norman by the CDBG Policy Committee.</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 data is concentrated in one contiguous geographic area.</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>This data set was developed by HUD based upon the ACS data.</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>This data set is complete.</p>