



Amendment Number One

Fifth Program Year Action Plan

Narrative Responses

GENERAL

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

Program Year 5 Action Plan Executive Summary:

The City of Norman continues to work toward addressing the needs of the community while at the same time there continues to be demands for funding to address other national priorities. Like other HUD grant entitlements, the City of Norman is faced with providing more services to a growing population amid continued reductions in local and state resources.

Allocations are typically used to address high priority needs, as identified in this plan, on a citywide basis for projects primarily benefiting low and moderate income households. The basis for assigning priority given to each category of priority needs was focusing on meeting the statutory requirements of the CDBG and HOME programs, input from members of housing and community services, public meetings and public hearings.

Program Year 5 Action Plan Proposed Use of Funds:

Estimated HUD funding sources for the 2014 Plan Year includes:

1. \$721,987 of CDBG and \$318,067 of HOME funding as indicated on page 3 in Tables 1 and 2;
2. The CDBG and HOME budgets do not reflect any program income due to the sporadic nature of these funds.
3. The 2013 awards of Continuum of Care funding for renewal applications is still pending. Renewal funding in the following amounts is proposed: \$43,895 is proposed to be reallocated to Food and Shelter for permanent housing for the chronic homeless from East Main Place Transition Housing Program (closed 3/2014), \$51,337 to Food and Shelter Chronic Outreach Program, \$47,157 for the Shelter + Care Program operated by Progressive Independence, \$91,342 for the Shelter + Care Program operated by HOPE Community Services, four separate SHP projects are proposed for renewal for Food and Shelter that total \$67,571. Each of these renewals was for a one year period. There is one renewal that is in Tier Two status as well in the amount of \$32,769. The Cleveland County Continuum of Care is still implementing the changes required with the revision of the Continuum of Care Programs.

4. The allocation of 2013 Emergency Solutions Grant Program awards are currently under contract with the Oklahoma State Department of Commerce. This is the first year that the Continuum of Care was allocated a specific amount and selected and ranked the applicants for awards. Food and Shelter was awarded \$100,000 and Thunderbird Clubhouse was awarded \$79,848 after Salvation Army withdrew their application for \$50,000. The \$29,848 application that Thunderbird Clubhouse had submitted was amended to include this amount. The RFA for the 2015 Allocation of ESG funds has been released and will be submitted June 2015 for contract period beginning October 2015.
5. HUD Funding for the Norman Housing Authority is projected to receive approximately \$5.5 million to assist in continuation of support to the management and maintenance of 173 public housing units and 1,185 Housing Choice Vouchers, including the following:
 - a. \$359,350 for its public housing capital fund;
 - b. \$5 million dollars were provided to Section 8 participating landlords on behalf of Housing Choice Voucher participants.

TABLE ONE FY2014-2015 CDBG PROGRAM

2014-2015 CDBG Budget \$721,987

\$144,392 Administration, Planning and Fair Housing Activities

~~\$ 50,000 Acquisition of Property~~

\$ 75,000 *Acquisition of Property*

\$ 70,000 *ADA Trip Hazard Sidewalk Program*

\$407,595 Housing Rehabilitation

\$ 25,000 Public Service Funding

Metro Transit - public transportation assistance for low-income persons \$25,000

TABLE TWO FY2014-2015 HOME PROGRAM

HOME 2014-2015 Budget \$318,067

\$ 31,806 Administration and Fair Housing Activities

\$ 47,711 CHDO Activities

\$ 40,000 Tenant Based Rental Assistance

\$198,550 Affordable Housing Development

Below are statements, by national objective and national outcome measures of the projected accomplishments for CDBG, HOME and other HUD funded activities within the next year. Where the objective is similar to one carried over from a previous year, the accomplishments on that objective are stated for the 2014-2015 program year.

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 are 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, particularly 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 are 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 are 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.

Generally, three outcomes are relative to program funding objectives:

1. **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.
2. **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).
3. **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).

National Objective of Providing Decent Housing

Through the use of CDBG and HOME funding during 2014-2015, the Plan provides for the ability of the City to facilitate the provision of 40 rehabilitation, emergency repair, and accessibility projects. In the Action Plan for 2012-2014 these same general goals were stated. As of this date there have been 24 rehabilitation projects undertaken, 16 below the projection. In actuality due to the requirement for the separation of activities in addressing of environmental issues in each rehabilitation project, these projects have been undertaken in separate phases, therefore practically doubling the number of actual projects. With impact of the Interim HOME Rules that were in effect for the 2012 funds, the decision was made to only utilize 2011 HOME funds for these projects and amend the 2012 Action Plan to not address the Homebuyer Program. Projection activity for the 2014-2015 program year, there again are 40 rehabilitation projects anticipated.

Goal 1: Maintain an adequate supply of permanent, quality affordable housing for low- and moderate-income households.

- Objective 1.1: Continue to assist households with repair, emergency assistance and accessibility improvement needs through the City's housing rehabilitation program.

Outputs:

- 1.1.1. Provide rehabilitation services to a minimum of 40 units each year by a combination of neighborhood based activities, emergency repairs, accessibility modifications, and whole house rehabilitation programs.
- 1.1.2. Target the City's rehabilitation program to areas in the City with units that have lead-based paint risk (older housing), elderly, and persons with disabilities by marketing the program through social service organizations and other direct means.
- 1.1.3. Continue to provide opportunities for contractors to be trained on lead-based paint remediation conducted through the rehabilitation program. The City may also consider partnering with the university and other organizations to develop programs that train and certify students as contractors.
- Objective 1.2: Explore the feasibility of a licensing program for property management companies doing business in Norman. As part of the licensing, require training on acceptable housing quality standards and fair housing.

Outputs:

- 1.2.1. Interview other communities that have such a program to understand the program strengths and weaknesses and administrative costs. If the City decides to move forward with a program based on this evaluation, develop draft licensing guidelines and administrative procedures.
- Objective 1.3: Continue to create affordable homeownership opportunities for low- and moderate income households.

Outputs:

- 1.3.1. Continue affiliation with the Norman Community Reinvestment Council to provide opportunities for downpayment and closing cost assistance from non-HOME funds.
- 1.3.4 Monitor the demand for accessible structures that are created and develop units that are consistent with demand.
- Objective 1.4: Maintain and improve the marketing plan for the City's housing rehabilitation program and affordable single-family program.

Outputs:

- 1.4.1. Target marketing efforts so that populations with the greatest needs—lowest income owners, persons with disabilities, families living in units with lead based paint risk—have access to the program.
- Objective 1.5: Explore additional resources to supplement housing and community development in Norman.

Outputs:

- 1.5.1. Continue efforts, with a variety of funding sources, toward land acquisition/land-banking for future affordable housing development.
- 1.5.2. Evaluate and consider City policy changes to promote affordable infill housing development, such as waiving proposed impact fees, reducing lot sizes, providing more flexible setback requirements, and encouraging elements conducive with existing neighborhood standards.
- 1.5.3. Explore the interest and potential of a capacity building program that is privately funded and would assist nonprofits with operating needs and technical assistance to weather market fluctuations, staff changes, etc.
- 1.5.4. Develop strong partnerships with local or regional profit and non-profit organizations capable of developing low and moderate income housing. Seek organizations capable of successfully partnering with the City from planning through construction of new housing units during this consolidated plan. Encourage and partner with private developers to include affordable units in their projects via providing support and access to HOME and other federal and state incentives.

Goal No 2: Assist special-needs populations with social service and housing needs.

- Objective 2.1: Strengthen the supportive service system for low-income persons with special needs.

Outputs:

- 2.1.1. In conjunction with the Cleveland County Continuum of Care and the United Way of Norman, maintain communications with all organizations that serve persons with disabilities in Norman (involving case managers) to identify supportive service needs and to explore options to create or better link housing with supportive services in the City.
- 2.1.2. Based on the framework established, partner with the appropriate agencies to improve capacity by providing supportive services linked with housing.
- 2.1.3. Should the PHA continue to provide much of the housing assistance to serve this population, work with the PHA to consider designating a qualified person on staff that can serve as a liaison between residents and service providers and ensure they are receiving the help they need. This person could also assist with resident disputes through conflict management training and community building activities.
- 2.1.4. Continue to support and participate in emergency food and fuel assistance programs.

Goal No 3: Reduce homelessness.

- Objective 3.1: Partner with the Cleveland County Continuum of Care and the Governor's Interagency Council to End Homelessness to support statewide efforts to reduce homelessness.

- Objective 3.2: Continue to work with homeless/housing providers to respond to requests for assistance as appropriate. Work in conjunction with efforts to ensure an adequate supply of emergency shelter, transitional housing, and permanent supportive housing is maintained.

Outputs:

- 3.2.1. If opportunities become available, assist the Continuum with securing resources to provide temporary housing to more of the City's population who are homeless and/or at-risk of homelessness. Continue to work with service providers to identify populations to be served.
- 3.2.2. Provide assistance where needed to organizations that assist persons who are homeless move from homelessness into temporary and permanent housing.
- 3.2.3. Continue to encourage the creation appropriate housing services for homeless individuals and families through the Continuum of Care process.

Specific Objectives with the Primary Outcome of Making Decent Housing Available/Accessible

Activities receiving funding in the 2014-2015 Program Year with this objective and outcome:

Housing rehabilitation accessibility modification program (\$15,000 CDBG; 3 households assisted)

Specific Objectives with the Primary Outcome of Making Decent Housing Affordable

Activities receiving funding in the 2014-2015 Program Year with this objective and outcome:

Housing Rehabilitation Program, (\$502,595 CDBG; 70 households assisted)

Acquisition of Property, (\$50,000 \$75,000 CDBG); ± 20 households assisted

Affordable Housing Development, HOME Program; (\$198,550 HOME; minimum 4 households assisted)

CHDO Activities (\$47,711 HOME; 1 household assisted)

Specific Objectives with the Primary Outcome of Making Decent Housing Sustainable

Activities receiving funding in the 2014-2015 Program Year with this objective and outcome: no activities planned

National Objective of Establishing and Maintaining a Suitable Living Environment.

Goals and objectives in this section address environmental concern necessary to sustain individuals and households and enhance the non-housing aspects of the quality of life in the community.

Goal No. 4: Continue commercial and residential revitalization efforts in low income neighborhoods.

- Objective 4.1: Continue to conduct vigorous code enforcement programs in CDBG eligible areas and coordinate incentive programs. Such a program could be funded with CDBG dollars or City general funds.

Outputs:

- 4.1.1 Coordinate with the Housing Rehabilitation Office to develop and implement an Exterior Property Maintenance Program to assist low income owners of housing with exterior Code Compliance issues.

Funding for this program is budgeted under the Housing Rehabilitation total.

- 4.1.2 Using neighborhood peer pressure and the power of neighborhood associations, create the expectation that both owner occupants and absentee owners will maintain their properties.
- Objective 4.2: Encourage the maintenance and improvement of infrastructure facilities in the core area of Norman

Outputs:

- 4.2.1. Continue to monitor and assess the condition of existing infrastructure in the core area.
 - 4.2.2. Continue to provide support for inclusion of identified core area projects within the City of Norman Capital Improvement Plan.
 - 4.2.3. Continue support for traffic calming implementation methods where needed to protect residential character and pedestrian circulation.
 - Objective 4.3: Continue to coordinate efforts with the City of Norman Parks Department to further develop and improve eligible neighborhood parks.
- Outputs:*
- 4.3.1. Continue to monitor and assess the condition of existing neighborhood parks in the eligible areas.
 - 4.3.2. Implement improvements as funding is available to neighborhood parks in conjunction with neighborhood needs and the Norman Park Master Plan.
 - 4.3.3 Coordinate with newly eligible areas as well as existing target areas to foster ownership in the neighborhood parks in regards to security and maintenance.
 - Objective 4.4: Continue to improve accessibility in the City through extension and installation of sidewalk systems.

Outputs:

- 4.4.1. Coordinate with Neighborhood Representatives and the Public Works Department on where sidewalk system improvements are needed and what the overall costs may be.
- 4.4.2. Prioritize sidewalk system improvements based upon areas where persons with disabilities and low-income transit users reside.
- 4.4.3. Explore alternate funding methods to construct priority sidewalk infrastructure and utilize CDBG funds for service delivery costs in eligible areas as needed.
- Objective 4.5: Promote greater economic and income diversity within the central neighborhoods.

Outputs:

- 4.5.1. Continue to engage in neighborhood revitalization efforts to improve the core area and low income neighborhoods and encourage more mixed-income communities.
- 4.5.2 Continue to engage the development of live/work units in fringe commercial and residential border areas.
- Objective 4.6: Support business and neighborhood associations.

Outputs:

- 4.6.1. Continue to encourage the formation and maintenance of active business and neighborhood associations in Norman where appropriate. Staff should continue to work with the associations to identify specific problems and opportunities, and prepare plans to implement strategies and programs that enhance the livability of the neighborhoods, particularly through volunteerism.

- 4.6.2. Establish formal neighborhood associations in each of the target areas, new and existing.
- Objective 4.7: Continue to support commercial revitalization in designated redevelopment areas.

Outputs:

- 4.7.1. Continue to work with property owners and area residents to identify problems and solutions to blighting conditions.
- 4.7.2. Coordinate CDBG funding with long-term City goals, such as urban renewal planning efforts.

Goal 6: Continue to support enhancement of the availability of public services by mainstream and other providers to low- and moderate-income persons and special needs populations.

- Objective 6.1: The City will continue to support a variety of public services, ranging from meeting basic needs to achieving self-sufficiency. Priority needs include transportation, substance abuse, and mental health services. Enhanced accessibility targeting transit dependent populations is essential to ensure all residents may travel to work and other facilities, as are other mobility concerns specific to the elderly and handicapped. The provision of substance abuse and mental health services is needed to assist individuals and families with emotional stability and good health. Continued support will be given to entities that enhance employment, and other community agencies to address health needs.

Outputs

- 6.1.1. Support services which provide reliable and safe mobility for the disabled; and transportation for transit-dependent special needs and low income populations.
 - 6.1.2. Support services which improve the community's health and welfare with relief targeted to the medical, dental, mental, substance abuse, and HIV/AIDS needs of lower-income households.
 - 6.1.3. Support services that address the provision of needs targeted to the low income population of Norman; food, shelter, job training, etc.
- Objective 6.2: The City will assist community efforts to expand and enhance facilities and services that address the needs of senior citizens including health care, nutrition, recreation, transportation, and other activities that sustain assisted/independent living with dignity, including elder "protective services" to prevent abuse and fraud, assist bill paying with counseling for other financial matters, and provide substitute decision-makers. These services reinforce independent living by meeting the physical and social needs of seniors and reduce expenses for costly long-term care.
- *Outputs:*
 - 6.2.1. Support programs which assist community efforts to expand and enhance facilities and services that address the needs of senior citizens including health care, nutrition, recreation, transportation, and other "protective services" to prevent abuse and fraud, assist bill paying with counseling for other financial matters, and provide substitute decision-makers.
- Objective 6.3: The City will help address the problems of child care, nutrition, education, job training, crime/abuse prevention, recreation, transportation, gang induction and drug addiction among its youth through expansion and enhancement of developmental facilities and services. Special attention will be given young persons who are victims or otherwise "at risk" due to inadequate supervision and guidance. A preventive approach is preferred in

order to avoid problems from occurring for susceptible youth during their developmental growth. That is especially true when otherwise exposed within at-risk environments which, if untreated, will surely compound into a larger and more costly dilemma.

Outputs:

- 6.3.1. Support programs which assist community efforts to expand and enhance facilities and services that address the needs/problems of youth including child care, nutrition, education, job training, crime/abuse prevention, recreation, transportation, gang induction and drug addiction.
- Objective 6.4: The City will help improve the capacity of the community's non-profit organizations to provide targeted services identified in this plan through distribution of funds and administrative support.

Outputs

- 6.4.1. Support programs which assist with the development of new entities and maintenance of existing entities pending ability to become self-sustaining ("start-up" and operational costs).

Specific Objectives with the Primary Outcome of Establishing and Making Suitable Living Environments Available/Accessible

Activities receiving funding in the 2014-2015 Program Year with this objective and outcome:

ADA Trip Hazard Sidewalk Repair Program (\$70,000; 540 Assisted)

Specific Objectives with the Primary Outcome of Establishing and Making Suitable Living Environments Affordable

Activities receiving funding in the 2014-2015 Program Year with this objective and outcome:

CART (\$25,000 CDBG; 2,500 persons assisted)

Specific Objectives with the Primary Outcome of Establishing and Making Suitable Living Environments Sustainable

Activities receiving funding in the 2014-2015 Program Year with this objective and outcome: no activities planned

National Objective of Providing Expanded Economic Opportunities

Objectives in this section include economic development activities as well as activities that build the self-sufficiency of persons to create wealth, outside of housing investment opportunities.

Goal No. 5: Continue to support and implement economic development activities that eliminate blight, promote private investment, and expand economic opportunities for low- and moderate-income persons.

- Objective 5.1: Continue to support commercial revitalization in designated redevelopment areas. The City will work with property owners and area residents to identify problems and solutions to blighting conditions. Responses may include organizational support through a business improvement district, public investments and increased code enforcement (including possible acquisition and demolition activities).
- Objective 5.2: Continue to utilize alternative funding sources. In cooperation with community economic development groups, continue the use of tax increment financing, SBA loans, and other loan funds that promote the long-term economic and social viability of the community. Continue close working

relationships between the City and developers in the preparation of plans and projects that take advantage of opportunities to create tax increment financing districts and leverage possible private dollars for housing, neighborhood revitalization and economic development.

- Objective 5.3: Support enhancement of living wage job opportunities and enhance job training/access to employment. Provide support where needed for the creation, retention, and expansion of living wage jobs in Norman. Where possible, contract with service and construction providers who provide living wages to their employees. Work cooperatively with and support, where appropriate, entities that assist individuals (including youth) who have low household incomes, are homeless, or have special needs by providing job training and improving their access to employment (including transportation and childcare assistance) and related informational resources. In addition, where possible, encourage opportunities for University of Oklahoma graduates to use their talents and education in the City of Norman.
- Objective 5.4: Continue to promote preservation of historic commercial and residential structures. Through mixed use zoning, create a vibrant 24-hour presence with people living, working and recreating in neighborhoods, which provide the community with its valuable sense of place. Support may come from the City's Historic District Commission, from CDBG funds, and other sources.

Specific Objectives with the Primary Outcome of Making the Provision of Expanded Economic Opportunities Available/Accessible

Activities receiving funding in the 2014-2015 Program Year with this objective and outcome: no activities planned

Specific Objectives with the Primary Outcome of Making the Provision of Expanded Economic Opportunities Affordable

Activities receiving funding in the 2014-2015 Program Year with this objective and outcome: no activities planned

Specific Objectives with the Primary Outcome of Making the Provision of Expanded Economic Opportunities Sustainable

Activities receiving funding in the 2014-2015 Program Year with this objective and outcome: no activities planned

General Questions

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.
2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.
3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.

4. Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

Program Year 5 Action Plan General Questions response:

The primary obstacle to meeting underserved needs of low-income and moderate-income populations continues to be the availability of funds. The City and other agencies serving these populations continue to experience significant reductions in funding from both governmental and non-governmental sources. This challenge is beyond the capacity of the local jurisdiction to satisfactorily address many issues.

The CDBG Program requires that most activities benefit low to moderate income persons, which are defined by HUD as persons falling below 80% of the median income. All activities designated for funding in the Fifth Year Action Plan are for the benefit of low to moderate income persons.

The majority of the designated projects will directly serve individuals citywide who qualified based on their income or other criteria (Housing Programs and Public Service funding). The other infrastructure or neighborhood projects are area benefit activities, i.e., projects located in parts of the City where more than half the residents have low or moderate-incomes. Norman's Core Neighborhoods, which overall are low and moderate-income areas (LMA) are designated as target areas for the expenditure of CDBG funds. Projects in other areas of the city are eligible for CDBG funding if they individually benefit LMI individuals or persons who meet other HUD criteria including those of a presumed benefit.

There are currently five targeted CDBG neighborhoods in Norman that have been the concentrated areas for public infrastructure improvements. The five neighborhoods include: Original Townsite, First Courthouse, Old Silk Stocking, University, and Larsh/Miller. The eligibility of these neighborhoods was based on the requirement that the areas have greater than 50% of the residents be at or below 80% of the median income. The City initially selected only these areas that qualified on the basis of income and needed public facility or other public infrastructure improvements.

Managing the Process

1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.

The City of Norman principally administers its housing and community development programs through the Revitalization Division of the Department of Planning and Community Development. The Revitalization Division coordinates all Consolidated Planning initiatives of the City, including plan preparation with citizen participation and community collaboration, and directly manages all housing and non-housing projects and activities funded through the Federal Community Development Block Grant (CDBG) and the HOME Investment Partnerships (HOME) Program.

To assist the Revitalization Division, the following departments of the City of Norman will be consulted in the following manners:

- a. The Planning and Community Development Department will assist with Neighborhood Planning efforts
- b. The Parks and Recreation Department will implement the Neighborhood Parks Improvements projects.
- c. The Public Works Department will assist with the evaluation and implementation of the Neighborhood Improvement Projects
- d. The Finance Department is responsible for processing pay requests and reconciling drawdown requests for the CDBG and HOME programs.

The Norman Housing Authority is responsible for the administration of Public Housing and Section 8 Housing Choice Voucher Program and federal rent subsidy certificates and vouchers awarded by the U.S. Department of Housing and Urban Development from the Section 8 Housing Choice Voucher Program.

Another lead entity with significant involvement in the City's consolidated planning effort is the Cleveland County Continuum of Care Steering Committee (CoC). It is principally through this committee, that homeless issues are addressed through a "Continuum of Care" for the community. The City of Norman acts as the lead entity providing administrative support, assists with arrangements to compile necessary demographic data (such as "point-in-time" counts of the homeless), and tracks trends to identify needs and priorities. As the organization's name implies, it is through this structure that the provision of homeless facilities and services are locally coordinated.

As a voluntary consortium of facility/service providers and other community interests concerned about homelessness, the CoC lacks a direct organizational charter from any governmental authority and, instead, relies on mutually agreed upon consensus of need, purpose, etc. to form such a collaboration to carry-out its stated mission. Aside from the coordination role it provides, the CoC was also created, in part, to satisfy requirements for competitive funding. The Cleveland County CoC also satisfies federal provisions administered by the U.S. Department of Housing and Urban Development (HUD) as part of a Consolidated Planning process required to access funds from the Community Development Block Grant (CDBG) Program, HOME Investment Partnership Program, and other programs.

With broad-based cross-representative membership from the public and private sectors throughout Cleveland County, the principal role of the CoC is to serve as the primary local entity responsible for managing a systematic process designed to provide transition from homelessness to permanent independent living.

2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.

This Action Plan outlines the means through which the public was consulted for development of the plan. This plan incorporated the thoughts and concerns of citizens and organizations into the planning process at multiple stages. The plan was prepared using the input of citizens and interested organizations early in the process through focus group meetings and through direct surveying of citizens. As with the first Action Plan of the 2010-2014 Consolidated Plan, many of the meetings and agencies that participated in the Action Plan are the same as those listed in the Consolidated Plan document. Upon completion of the draft version of the plan, citizen input was again sought. At each stage, the plan was modified and edited to incorporate comments and suggestions.

The process for development of the Consolidated Plan and each subsequent Action Plan is initiated by a citizen input meeting held to discuss past program accomplishments, eligible grant activities and community development needs within the community. Comments and recommendations from the citizen input meetings are forwarded to the CDBG Policy Committee. The Policy Committee is an advisory committee established in the 1970's to review and make recommendations on entitlement grant programs and activities. The Policy Committee, after review and deliberation, forwards the proposed Plan and funding recommendations to the Norman City Council. All meetings are open to the public and are posted so interested persons and organizations can be alerted to meeting items and dates. In addition the meeting Agendas are posted on the City of Norman website and at the meeting location.

The process concludes by the publication of a public notice on the proposed Consolidated and/or Action Plan in The Norman Transcript, the general circulation newspaper in Norman. The notice sets forth the proposed sources and uses of funds that have been recommended by the Policy Committee. The Notice sets a 30-day period for citizens to submit written comments to the Planning and Community Development Department prior to the submittal of the Plan to HUD. All written comments receive a written response. Comments on the Consolidated Plan and Action Year Strategy and the written responses are submitted with the Action Year application.

Finally, a notice of a public hearing before the City Council is published to provide adequate notice to the public of the subjects and proposals that will be considered and/or changes and amendments that will be considered by the Council. The public hearings afford citizens with another opportunity to give their advice and comments to the City Council before the Council takes action to amend or adopt the proposed activities and funding allocations

The City of Norman, Oklahoma, has compiled information from a variety of sources to formulate a five-year consolidated plan that would reflect the needs and priorities of its citizens. This plan is the result of collaboration with citizens, the private sector, private non-profit agencies, and other governmental agencies. The goals of the plan are to provide decent housing, a suitable living environment, and expanded economic opportunities for primarily low-to-moderate income people in our community. Information was obtained from the 2000 Decennial Census, the 2006-2010 American Community Survey, as well as the City of Norman 2025 Plan (long-range comprehensive plan) and annual updates, reports from the Norman Housing Authority, the Norman Housing Authority 5-Year Plan, service reports from agencies providing a wide range of services to homeless and other low-to-moderate income persons, local ordinances, a recently completed analysis of impediments to fair housing, and information gathered from local meetings and public hearings which were attended by City staff.

City staff has also participated in a variety of groups that work to benefit low-to-moderate income persons in our community. Included are the Social Services Coordinating Council, the Norman Community Reinvestment Council, NOAH (Norman Oklahoma Affordable Housing), and the Continuum of Care Steering Committee, and the Public Transit Committee. In addition, City staff has had continued interaction with many local service agencies for a number of years through the CDBG, HOME, and Emergency Shelter Grant Programs. CDBG, HOME, the Continuum of Care, and

Emergency Shelter Grants have provided funding resources for many of the agencies, and staff has had personal contact with service providers, including attending their board meetings and observing provision of services.

The City shall strive to keep all interested parties informed about the opportunities for involvement in each phase of the Plan process, including opportunities to comment on all proposed Action Plan submissions to HUD, any substantial amendments and the Consolidated Annual Performance and Evaluation Report (CAPER).

The process of developing the Plan occurs over a period of approximately six to nine months. This process is started before HUD notifies the City of the anticipated grant allocations. As an entitlement community, development of the plan will begin whether or not the grant amounts are known.

3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies. Coordination of action will primarily be the result of the Cleveland County Continuum of Care which has representatives from all the mainstream service providers, supportive service providers as well as representatives from city, county and state governments. Representatives of this group are currently discussing the needs of offenders and ex-offenders, needs of homeless youth, outreach to homeless persons, and the provision of information needed to apply for Continuum of Care funding. The City of Norman currently provides staff support to assist with this organization. The Continuum of Care is also the primary point of contact with the homeless service providers and will coordinate the City's efforts at identifying and reporting homeless needs for possible future funding.

As stated in Goal 2, Objective 2.1, the Norman Housing Authority is concentrating on improving the housing application process and communication between supportive service providers for special needs populations. This improvement will hopefully reduce the administrative efforts on both parts in working with this hard to serve population.

In addition, the Continuum of Care utilizes a website that enhances the communication between service providers in regards to ongoing goals and objectives in the implementation of the Ten Year Plan.

Citizen Participation

1. Provide a summary of the citizen participation process.
2. Provide a summary of citizen comments or views on the plan.
3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.
4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

Program Year 5 Action Plan Citizen Participation response:

Below is a summary of the City of Norman Citizen Participation Process, the entire document is contained in Appendix D, 2010-2014 Consolidated Plan. A revision of the Citizen Participation Plan is included as part of this Action Plan proposal and is attached.

In 1995 the City developed a citizen participation process for the Consolidated Plan that expanded upon the process which had been in place since 1975. The process included neighborhood meetings at least twice per year for all target neighborhoods; a City-wide meeting (Community Dialogue) held in September of every year; a 36-member Policy Committee representing a wide-range of people in Norman, with emphasis on target neighborhood residents and service agencies providing services to low-to-moderate income persons; outreach to service providers; subcommittees and ad hoc committees on housing, homelessness, public facilities and improvements, economic development/anti-poverty, and citizen participation; technical assistance; access to information; public hearings; performance reporting; and a procedure for complaints. The Policy Committee voted to retain the majority of the exiting citizen participation process, but several amendments were recommended. The Consolidated Plan will continue to be accessible on the City of Norman web site. The address is www.normanok.gov

Sixty-six people served as representatives or alternates on the Community Development Policy Committee for the development of this Action Plan. Through the ad hoc committees that included non-members of the Committee, almost 100 additional people were actively involved in the development as well. Neighborhood meetings, the Community Dialogue, and Policy Committee meetings brought in another 100+ citizens. The formal public hearing before the City Council is scheduled for May 13, 2014, at which additional citizen input will be solicited, with the City Council to vote on the recommendations of the Policy Committee prior to submittal of the plan to the U.S. Department of Housing and Urban Development.

The neighborhood planning process began in the Fall of 2008 when targeted CDBG neighborhoods began working with City staff to develop long range plans for their neighborhoods. Sessions were held with each neighborhood utilizing a facilitator to assist the residents to identify their neighborhoods Assets, Liabilities, as well as Opportunities. Additional neighborhood meetings were held in the Summer of 2012 to finalize recommendations to the Policy Committee for specific projects as well as review the Plan Statements for each of the Neighborhood Plans. The Old Silk Stocking and First Courthouse Neighborhood Plans were approved by the Norman Planning Commission and the Norman City Council in 2011. The Neighborhood Plan for Original Townsite was approved by the Norman Planning Commission and the Norman City Council in 2012. The two remaining CDBG Neighborhoods (Larsh-Miller Neighborhood and University Neighborhood) will require substantial research and because of the similarities, should be a part of a comprehensive Neighborhood Planning process along with immediately surrounding properties. Currently there is a Mayor appointed Center City Visioning Committee that is undergoing a study with a facilitator to study trends for an area which encompasses the two neighborhoods. Once this process is completed, there will be an opportunity to further study these CDBG neighborhoods. Whereas each of the CDBG neighborhoods have outside influences that affect the neighborhood stability, the Larsh-Miller and University Neighborhoods because of the housing types, the underlying zoning and the proximity to both the University and downtown Norman are much more complex.

A Community Dialogue Public Hearing was held in September 2013 to solicit information about problems and needs in Norman. Throughout the program year, staff has monitored priorities in the CDBG and HOME programs as well as the programs designated for homeless assistance to implement changes. Numerous public meetings both convened by the CDBG program and by other groups have been held throughout the year to discuss issues impacting the low and moderate citizens of Norman.

As a part of the Consolidated Planning process, the Policy Committee held discussions centered on Citizen Participation, Public Services, Infrastructure, Economic Development/Anti-Poverty, and Housing from the members and alternates of that body and other interested groups. In addition the Continuum of Care Steering Committee was asked to assist and make recommendations on homelessness. Staff contracted and assisted in the analysis of fair housing and issues related to lead-based paint. These groups met throughout the process with final recommendations made to the Policy Committee on April 2, 2014. This recommendation was based the funding allocation that had been received.

Throughout the process, members of the Policy Committee continued to relay information to the community groups that they represented, and were therefore able to provide information back to the committee on the comments of additional numbers of citizens. As a result of the extensive and thorough work accomplished by all involved, the Policy Committee voted unanimously to approve their recommendations on the Fifth Program Year Action Plan.

At the April 2, 2014 Policy Committee meeting an Amended Revision to the Adopted Citizen Participation Plan was presented. Given the increasing complexity of the programs that the Policy Committee is charged with oversight, it has become increasingly difficult for staff and the Co-chairs to provide information of appropriate detail and depth to a committee this large and diverse.

In the last several years the committee has transitioned from a working committee which met regularly to plan and discuss issues to an oversight committee, simply relying on staff to dig into the details and present viable options. The proposal recommended was to reduce the size of the committee to fifteen participants. One representative from each CDBG Neighborhood to represent low/mod population; five representatives from human resource or business community; and five at-large representatives. The co-chair structure is retained and will be elected at the annual Community Dialogue Meeting in September.

The Community Dialogue Meeting (Public Hearing) will be held in September to give the public an opportunity to discuss issues and elect representatives that have been nominated. The members of the Policy Committee will be formalized by the Norman City Council. Regular meetings will be held throughout the program year to discuss program opportunities.

The Policy Committee unanimously recommended approval of the restructuring of the Citizen Participation Plan at the April 2, 2014 meeting. This amended plan is forwarded along with this Action Plan for consideration by the Norman City Council on May 13, 2014.

The Policy Committee unanimously recommended approval of Amendment No. One to the Fifth Year Action Plan on January 14, 2015.

Institutional Structure

1. Describe actions that will take place during the next year to develop institutional structure.

Program Year 5 Action Plan Institutional Structure response:

The City's Revitalization Division works in conjunction with other city departments and nonprofit agencies to carry out the activities covered by the Consolidated Plan. The efforts of this division along with others within the Community Development Department will assist in the accomplishment of the goals in the City's Five Year Consolidated Plan and Strategy. The Revitalization Division will develop, implement, and perform oversight and administration of the Action Plan. Implementation and coordination is a collaborative effort between the various departments that provide public services and housing production, and other housing and community development functions. Consultation, outreach and coordination with and between the Norman Housing Authority, for-profit and non-profit providers in the community will be undertaken.

This Consolidated Plan is intended to address three primary goals:

- ☐ Provide Affordable Safe Housing
- ☐ Provide Suitable Living Environments
- ☐ Expand Economic Opportunities

The City of Norman has an established housing delivery system which has been in place for many years. Resources from the federal, state and local levels are used to create housing that is affordable, decent, safe and sanitary for the low to moderate income families of Norman. Homeownership and housing rehabilitation opportunities for low to moderate income families are offered using a variety of funds including leveraging of private dollars. Affordable and subsidized rental units are available locally through various federal and state grant programs.

During the next year the City's Revitalization Division will continue to network to enhance the institutional structure for affordable housing delivery. Staff will coordinate activities among the public and private agencies' efforts to realize the prioritized goals of the Action Plan.

The NOAH Committee (Norman Oklahoma Affordable Housing) has been resurrected and is actively pursuing affordable housing development with a public/private partnership. There is a new realization from providers as well as the general public that without some sort of catalyst, that the development of affordable, integrated, and accessible housing will not happen on its own. This group is meeting monthly to discuss opportunities utilizing primarily HOME funds to leverage private development.

The City of Norman will continue to serve as the lead agency for the Continuum of Care planning process for homelessness. The goal will be to expand and improve the efficiency of the granting processes during program year. In addition, the Executive Committee of the Continuum of Care is undertaking the process of the development of a true collaborative homeless resource center.

The Revitalization Division will participate in the update of the previously scheduled Norman 2025 Land Use Plan as well as other planning initiatives including the Center City Visioning Committee and the Griffin Hospital Redevelopment Committee.

Monitoring

1. Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

Program Year 5 Action Plan Monitoring response:

The Revitalization Division has established a comprehensive set of standards and procedures to evaluate its own performance in meeting the goals and objectives outlined in the Consolidated Plan.

The Staff will monitor activities on an on-going basis to ensure federal and state regulations and statutory requirement are met. The Staff along with the City's Finance Department has standards and procedures for monitoring grant funds. The City is also monitored by HUD, Oklahoma Department of Commerce, and the City's external auditing firm.

Staff will continue regular desk monitoring of requests for payment of all CDBG and HOME expenditures. Site visits will continue to be made to contractors during the program year. Correspondence regarding timeliness of program expenditures will continue to all contracting entities.

Lead-based Paint

1. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

Program Year 5 Action Plan Lead-based Paint response:

Objective 1.1; Objective 1.2; Objective 1.3; Objective 1.4; Objective 1.5

The City of Norman will continue to reduce the number of units containing lead-based paint hazards, primarily through its housing rehabilitation programs. The City is constantly bringing houses into lead safe condition through the Owner Occupied Rehabilitation Program and is continually educating owners and contractors concerning lead hazards.

According to the Cleveland County Health Department, in 2010 (the most recent data available) there were an estimated 17,598 children under the age of 6 in Cleveland County. Of these children 1,704 (1,774 in 2009 data) were tested for an elevated blood lead level. Five children (0.3%) tested positive for a Elevated Blood Lead Level of greater than 10 micrograms per deciliter of blood, in 2009 data six children tested positive. The geometric mean blood lead level of all children tested was 1.4 micrograms per deciliter. In 2006 the State of Oklahoma designated twenty-one high-risk target areas (HRTA) for Childhood Lead Poisoning, no areas within the City of Norman or Cleveland County were identified as high-risk.

HOUSING

Specific Housing Objectives

*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.
Objective 1.1; Objective 1.2; Objective 1.3; Objective 1.4; Objective 1.5; Objective 2.1; Objective 4.1
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.
Federal, State, and Local public and private resources for each project are listed Project Summary Sheets located in Appendix A of this document.

Needs of Public Housing

1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.
2. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

Program Year 5 Action Plan Public Housing Strategy response:
Objective 1.3; Objective 2.1

Norman Housing Authority (NHA) is committed to providing families in assisted housing with opportunities for growth and development. All recipients of Section 8 rental assistance are provided counseling through a case management and supportive service referral program based on the Family Self-Sufficiency model. The mission of the Family Self-Sufficiency program is achieved through the coordination and the broadening of the existing resources to help low- and moderate-income persons to become economically independent and self-sufficient.

The Norman Housing Authority has made a strong commitment to assisting homeless families and homeownership opportunities for residents receiving rental assistance. Activities that the City of Norman is working on with the Housing Authority include the following:

- The City will continue to work with NHA to provide technical assistance and support for the current and any additional Shelter Plus Care applications through the Continuum of Care Application Process
- The City of Norman and the Norman Housing Authority along with the Norman Community Reinvestment Council will sponsor educational seminars for landlords and tenants in regard to the Oklahoma Tenant-Landlord Laws. This training will be conducted by Legal Aid of Oklahoma.
- The City and the Norman Housing Authority will continue to be the lead agencies for the Norman Oklahoma Affordable Housing roundtable meetings.

Barriers to Affordable Housing

1. Describe the actions that will take place during the next year to remove barriers to affordable housing.

Program Year 5 Action Plan Barriers to Affordable Housing response:

Objective 1.1; Objective 1.2; Objective 1.3; Objective 1.4; Objective 1.5

Actions that will be undertaken to remove barriers to affordable housing include the following:

- The City of Norman will be preparing an update to the Norman 2025 Land Use Plan. Staff will participate and monitor this process to insure that the maintenance or development of affordable housing is not deterred.

HOME/ American Dream Down payment Initiative (ADDI)

1. Describe other forms of investment not described in § 92.205(b).
2. If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.

No HOME funding will be utilized for homebuyer activities.

3. If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:
 - a. Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
 - b. Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
 - c. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
 - d. Specify the required period of affordability, whether it is the minimum 15 years or longer.
 - e. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community. State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

No HOME funding will be utilized for the refinancing of existing debt.

4. If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:
 - a. Describe the planned use of the ADDI funds.
 - b. Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.
 - c. Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

The City of Norman does not receive ADDI funding.

HOMELESS

Specific Homeless Prevention Elements

*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

1. Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction's plan for the investment and use of funds directed toward homelessness.
Objective 2.1; Objective 3.1; Objective 3.2
 - a. The 2013 awards of Continuum of Care funding for renewal applications is still pending. Renewal funding in the following amounts is proposed: \$43,895 is proposed to be reallocated to Food and Shelter for permanent housing for the chronic homeless from East Main Place Transition Housing Program (closed 3/2014), \$51,337 to Food and Shelter Chronic Outreach Program, \$47,157 for the Shelter + Care Program operated by Progressive Independence, \$91,342 for the Shelter + Care Program operated by HOPE Community Services, four separate SHP projects are proposed for renewal for Food and Shelter that total \$67,571. Each of these renewals was for a one year period. There is one renewal that is in Tier Two status as well in the amount of \$32,769. The Cleveland County Continuum of Care is still implementing the changes required with the revision of the Continuum of Care Programs.
 - b. The allocation of 2013 Emergency Solutions Grant Program awards are currently under contract with the Oklahoma State Department of Commerce. This is the first year that the Continuum of Care was allocated a specific amount and selected and ranked the applicants for awards. Food and Shelter was awarded \$100,000 and Thunderbird Clubhouse was awarded \$79,848 after Salvation Army withdrew their application for \$50,000. The \$29,848 application that Thunderbird Clubhouse had submitted was amended to include this amount. The RFA for the 2015 Allocation of ESG funds has been released and will be submitted June 2015 for contract period beginning October 2015.
2. Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.
Objective 2.1; Objective 3.1; Objective 3.2
 - a. Emergency Shelter: This year's plan will not specifically address the need for additional emergency shelter beds. Lack of funding sources is the major shortcoming here, as well as an agency that is willing to undertake development of these beds. There is a provision utilizing ESG funding to allow for motel placements when suitable Emergency Shelter beds are not available.

- b. Transitional Housing: With the recent closure of East Main Place Transitional Housing Program, providers have embraced the opportunity to explore the initialization of a Rapid Rehousing Program for households with children. Work groups have been established and are actively pursuing this change in program delivery.
- c. Permanent Supportive Housing: Development of additional PSH beds will be undertaken by collaborative applications for Continuum of Care funding by the Norman Housing Authority and supportive service providers when appropriate. Development of PSH beds may also be achieved by utilizing HOME, CDBG or private funding.

While the City of Norman has ceased funding public services with CDBG funding this year a pilot program is being established utilizing HOME funds to provide TBRA for chronic homeless utilizing a Housing First philosophy. The City of Norman has formally joined the 100,000 Homes Campaign and representatives are scheduled to attend a Boot Camp in late May/early June to begin preparations for the first Registry Week. Several representatives of agencies have undergone training in the VI-SPDAT assessment tool.

The City serves as the lead agency in the Continuum of Care (CoC) planning committee. The City utilizes the CoC Exhibit 1 and the accompanying projects (Exhibits 2) as part of the yearly Action Plan to address specific objectives for the homeless in Cleveland County and particularly in Norman. The City of Norman works to bring homeless service providers, government entities and private business together to create an effective plan to help end and prevent homelessness in our community. The City has appointed the Mayor's ECHO 2015 Committee on Homelessness. City Officials, along with community partners and homeless providers, meet quarterly to discuss and seek ways to assist those homeless persons and families.

In addition, representatives of ten organizations have formed One Vision One Voice and are promoting a public awareness campaign on homelessness. This group has engaged the public with numerous speaking engagements and provided relative information through a coordinated social media approach. It is this group that is taking a very active role in the possible redevelopment of the Griffin Hospital Property. The goals and objectives that are outlined in the Opening Doors Federal Strategic Plan are the guiding principles that this group is utilizing in their campaign.

The primary obstacle to meeting the needs of the homeless population is the limited financial resources available to address identified priorities.

- 3. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2014. Again, please identify barriers to achieving this.

The specific action steps to address chronic homelessness are outlined in the ECHO 2015 Plan and the Continuum of Care Exhibit 1 and are attached as Appendix C in the Consolidated Plan. Elimination of Chronic Homelessness by 2015 will not be achieved in Norman, Oklahoma. Although progress has been made by all parties in implementing the action steps in the ECHO 2015 Plan, achieving compliance with this very difficult to serve population has proved to be impossible with the resources that we have available. It is very apparent that the answer is not simply building more shelters. Homelessness is a housing issue and we must begin to realign our service system to provide housing, not shelter. The ECHO 2015 Committee is currently investigating the establishment of new attainable goals related to housing placement.

The One Vision One Voice campaign is aligned with the Opening Doors Federal Strategic Plan. It is this campaign that is allowing the City of Norman to move from a shelter based service system to a housing based system with appropriate services. The City plans to address gaps for the chronic homeless by supporting the efforts of Continuum of Care Steering Committee of Cleveland County and Continuum of Care system.

Potential Obstacles:

- i. As usual the largest potential obstacle is adequate funding for the implementation of strategies. As the City of Norman enters into the 100,000 Homes Program the scarcity of appropriate, affordable housing and the costs of providing appropriate supportive services is a large obstacle.
4. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.

Service providers in Cleveland County have noticed a significant increase in family homelessness and hundreds of calls are being received indicating the imminent risk of homelessness affecting many families in our community. An active network of government agencies, non-profit organizations and churches provide a wide range of self-sufficiency programs and direct homeless prevention services such as rental assistance, utility payments, medical expense payment, transportation, emergency food and miscellaneous emergency funds to families and individuals.

- Emergency Solutions Grant Program dollars will be utilized where available to assist with homeless prevention services
 - CDBG funds will be utilized to address home repairs for those with physical disabilities and the frail elderly.
 - Over the next year a coordinated effort will be further developed to provide a central intake system utilizing existing service providers in coordination of the implementation of the HEARTH Act requirements.
5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.
Ongoing discussion will be held as to the improvement and coordination of the discharge policies of the mainstream service providers as well as governmental institutions.

Emergency Shelter Grants (ESG)

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

Program Year 5 Action Plan ESG response:
Objective 2.1; Objective 3.1; Objective 3.2

Please also refer to the Homeless Needs Table in the Needs.xls workbook of the Consolidated Plan

The City of Norman is not an entitlement community for the Emergency Shelter Grant Program. All applications for funding are submitted and approved by the Cleveland County Continuum of Care and then forwarded to the State of Oklahoma Department of Commerce for funding. The City provides technical assistance as needed to the recipient of the grant as requested.

COMMUNITY DEVELOPMENT

Community Development

*Please also refer to the Community Development Table in the Needs.xls workbook.

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.
Objective 4.1; Objective 4.2; Objective 4.3; Objective 4.4; Objective 4.5; Objective 4.6; Objective 4.7; Objective 5.1; Objective 5.2; Objective 5.3; Objective 5.4

See the Community Development Needs Table in the referenced Consolidated Plan document, listing of all the non-housing needs rated high or medium priority that are eligible for assistance.

2. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

*Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

The primary needs relative to community development is in the central or core area of the City. In the earlier years of the CDBG program, the City concentrated on street paving, major drainage projects, and parks and recreation facilities expansion and improvements. In the past five years, the major emphasis shifted to housing rehabilitation with moderate support for street paving, sidewalk construction, and parks and recreation facilities improvements. Additional emphasis has also been placed on the provision of public services.

Due to limited resources, all of the City's objectives cannot be accomplished in this year's Action Plan. The objectives were prioritized based on need; the high priority and some medium level objectives were funded.

Some objectives are also accomplished indirectly. Support and cooperation with other affordable housing providers and non-profits partners empower local residents to obtain better jobs and homeownership opportunities. Some examples are: homebuyer counseling to low income rental residents so they may become future homeowners utilizing Neighborhood Housing Services. The City is motivated to bring initiatives to Norman to promote better jobs and educational opportunities.

See Section B of the Executive Summary for specific goals and objectives

Antipoverty Strategy

1. Describe the actions that will take place during the next year to reduce the number of poverty level families.

Program Year 5 Action Plan Antipoverty Strategy response:
Objective 5.3; Objective 6.1; Objective 6.2; Objective 6.3

The goal of the City is to address issues relating to poverty through assistance to both outside agencies and City programs. The Revitalization Division maintains contacts with other agencies supplying services to low income residents such as the Norman Housing Authority, various homeless service agencies, and local non-profit agencies with programs that benefit elderly, children and families.

The Norman Housing Authority operates the Family Self-Sufficiency programs to promote the development of local strategies to coordinate the use of assistance under the public housing program with public and private resources, enable participating families to increase earned income, reduce or eliminate the need for welfare assistance, and make progress toward achieving economic independence and self-sufficiency. The FSS program supports HUD's strategic goals of helping HUD-assisted renters make progress toward housing self-sufficiency welfare reform and help families develop new skills that will lead to economic self-sufficiency. As a result of their participation in the FSS program, many families have achieved stable, well paid employment, which had made it possible for them to become homeowners or move to other non-assisted housing. The City signs NHA's certificate of consistency for its submission to funding sources.

All local non-profit agencies serving the homeless offer some level of supportive services to program participants, ranging from family counseling to job skill development, all of which are intended to promote self-sufficiency and prevent a return to poverty and homelessness.

In addition to the Federal Source of funding mentioned previously, including Emergency Repair and Continuum of Care funds, the following sources of funding are being used to address poverty level households in the community:

- a. State of Oklahoma Department of Mental Health and Substance Abuse Services for substance abuse and mental health treatment;
- b. Funding by the Community Services Block Grant to Central Oklahoma Community Action Agency to help meet the basic needs of low income Cleveland County residents;
- c. Workforce Investment Act funding;
- d. USDA Commodity Foods Program;
- e. Cleveland County Department of Human Services for multiple social service programs;
- f. Funding through United Way of Norman for multiple social service agencies;
- g. Funding through the Social and Voluntary Services Commission of the City of Norman for numerous social service agencies;
- h. Faith based administered funding to meet basic needs;
- i. Funding for homeless prevention activities through the Federal Emergency Management Agency;

It should be noted that many of these sources of funding are available to poverty level households as well as to those that are homeless or are in danger of becoming

homeless.

NON-HOMELESS SPECIAL NEEDS HOUSING

Non-homeless Special Needs (91.220 (c) and (e))

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.
Objective 1.1; Objective 2.1; Objective 6.1; Objective 6.2; Objective 6.3

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 that will improve the quality of life for all Norman residents, including individuals and families with special needs.

2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

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 Oklahoma City. Oklahoma City 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 who are responsible for the administration of for federal grant funds, monitors grant activities to insure funds are being spent appropriately.

Housing Opportunities for People with AIDS

*Please also refer to the HOPWA Table in the Needs.xls workbook.

1. Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.

2. Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.
3. Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.
4. Report on annual HOPWA output goals for the number of households assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.
5. Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.
6. Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.
7. Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.
8. Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.
9. Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.

Program Year 5 Action Plan HOPWA response:

The City of Norman is not a recipient of HOPWA funding

Specific HOPWA Objectives

Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.

Program Year 5 Specific HOPWA Objectives response:

The City of Norman is not a recipient of HOPWA funding

Other Narrative

Include any Action Plan information that was not covered by a narrative in any other section.

Activity Descriptions

City of Norman Housing Programs

Owner-Occupied Housing Rehabilitation Program: The City will continue to provide CDBG funds for the rehabilitation of low income (50% and below MFI) owner occupied housing units citywide. The program will be implemented in accordance with the "City of Norman Housing Handbook," which is incorporated fully in this Plan by reference. Funds are provided in the form of a Deferred Payment Mortgage that is forgiven over a period of four years. These mortgages are due in full upon transfer of title for the property. The cost of the required lead hazard control will be in the form of a grant to the property owner. In addition to program delivery costs an estimated total of \$300,000 of unexpended prior-year CDBG funding as well as any program income generated will be utilized for this project year. Rehabilitation Delivery costs of \$168,558 is included in the CDBG program to allow for appropriate administration of the housing programs.

Owner Occupied Emergency Repair Program: The City will continue to provide CDBG funds for addressing urgent repair needs of low income (80% and below MFI) owner-occupied housing units citywide. The program will be implemented in accordance with the "City of Norman Housing Handbook," which is incorporated fully in this Plan by reference. Funds are provided in the form of a Deferred Payment Mortgage that is forgiven over a period of four years. These mortgages are due in full upon transfer of title for the property. In addition to program delivery costs a estimated \$100,000 of unexpended prior-year CDBG funding as well as any program income generated will be utilized for this project year.

Exterior Improvement Program: A new program under development to be implemented this year would allow low and moderate income (80% and below MFI) owner-occupied properties located within the City Limits of Norman that have been cited by a City of Norman Code Compliance Officer for exterior property maintenance violations to be eligible for financial assistance utilizing CDBG funds. A maximum project of \$5,000 will be allowed to address items including but not limited to: exterior property maintenance, removal of storage buildings, driveway replacement/installation, and dead/diseased tree removal. A total of ~~\$334,037~~ \$239,037 of CDBG funding has been allocated for this project year.

Owner Occupied Accessibility Modification Program: The City will continue to provide CDBG funds for addressing accessibility modification needs of low and moderate income (80% and below MFI) owner-occupied housing units city wide. The program will be implemented in accordance with the "City of Norman Housing Handbook," which is incorporated fully in this Plan by reference. Funds are provided in the form of a Deferred Payment Mortgage that is forgiven over a period of four years. These mortgages are due in full upon transfer of title for the property. Budgeting for these activities is included in the budget for owner occupied rehabilitation units and can be accessed upon demand.

Renter Occupied Accessibility Modification Program: The City will continue to provide CDBG funds for addressing accessibility modification needs of low and moderate income (80% and below MFI) renter-occupied housing units city wide. The program will be implemented in accordance with the "City of Norman Housing Handbook," which is incorporated fully in this Plan by reference. Projects are coordinated with the landlord upon request of a qualified tenant. Budgeting for these activities is included in the budget for owner occupied units and can be accessed upon demand.

Accessibility Modification for Non-Profit Entities: Funding in the form of a grant is available to 501(c)(3) entities to make accessibility modifications to their place of business, whether leased or owned. These grants are available one time only per agency for a maximum amount of \$6,000. Budgeting for these activities is included in the budget for owner occupied units and can be increased upon demand.

Other Housing Programs

Community Housing Development Organization (CHDO): After HUD approval of HOME program funds the City of Norman will consider entering into a contract with a certified CHDO in compliance with the HOME regulations. A minimum of \$47,711 of HOME funds will be reserved for CHDO activities but may be increased with funds set-aside for development of affordable housing.

Development of Affordable Housing Program: A total of \$198,550 of HOME funding will be utilized alone or in conjunction with other funding sources to purchase, rehabilitate, or construct units to be utilized as rental housing for populations at or below 80% of Median Family Income.

Community Facilities, Services, and Economic Development

CART: The City of Norman will continue to support the provision of public transportation to the low and moderate income citizens of Norman by setting aside \$25,000 of CDBG funds and \$10,500 of General Funds to provide for a bus pass program. In addition the City of Norman General funds will provide approximately \$400,000 of general operating subsidy to the CART system.

Acquisition of Property

~~\$50,000~~ *\$75,000* of CDBG funding will be provided to facilitate the expansion and/or relocation of services and/or housing for the Homeless. *With Amendment No. One, the Acquisition of Property is designated for the purchase of approximately 3.5 acres by Food and Shelter, Inc. from the Oklahoma Department of Mental Health and Substance Abuse Services generally located at the intersection of East Main Street and Reed Avenue.*

ADA Sidewalk Repair

The proposed project includes removal of ADA trip hazards from existing sidewalks within the University Neighborhood. \$70,000 of CDBG funding will be provided for this joint project with the City of Norman Public Works Department.

Planning and Administration

Administration, Community Development, Housing and Neighborhood

Planning: \$144,392 of CDBG funding and \$31,806 of HOME funding will be used to provide consultation and personnel costs and associated overhead for the administration of CDBG and HOME funded projects including data collection, research, and program planning to meet HUD Consolidated Plan and Action Plan requirements for continued CDBG funding and HOME funding. In certain instances these costs will be utilized for the contracting of entities to provide needed consultation services. These funds will help implement the recommendations of the City of Norman Consolidated Plan 2010-2014. Funding will also be provided to continue neighborhood planning and revitalization efforts in the five target neighborhoods. Funds will also be used for Consolidated Planning purposes, including data collection, collection of information needed to maintain and implement the City of Norman's Analysis of Impediments to Fair Housing Choice, developing the 2015-2019 Consolidated Plan as well as the 2015 Action Plan, and preparing the Consolidated Annual Performance Report for 2013-2014. Funds will enhance efforts to coordinate with other agencies and organizations providing supportive services and additional resources to support CDBG program objectives; such as the Cleveland County Continuum of Care and the Norman Housing Authority among others.