Executive Summary

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

1. Introduction

The 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. While the Consolidated Plan serves as a planning document meeting the federal government statutory requirements in 24CFR 91.200-91.230, the Annual Action Plan is the mechanism where the programs and projects are authorized and funded. This Annual Action Plan covers the period beginning July 1, 2019 through June 30, 2020. 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 Investment Partnerships Program (HOME) 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.

This plan is the product of public outreach, public hearings, and consultation with multiple agencies that serve the needs of low and moderate-income residents of Norman and agencies that serve the needs of special populations. A complete draft of this document has been made available for public review beginning April 3, 2019 with a draft being submitted to the CDBG Policy Committee for review, and the public was able to comment for a 30-day period beginning April 24, 2019 which included a Public Hearing held on May 14, 2019. The availability of the draft plan as well as the public hearing was advertised in the Norman Transcript and the complete document is available on the City's website www.normanok.gov and in print from the CDBG/Grants Office in the Department of Planning and Community Development.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The City of Norman undertook a significant public input and planning process during the year leading up to the submission of the Consolidated Plan in 2015. The implementation of these goals is proposed to be continued with this Annual Action Plan. Public input was obtained through focus groups, formal and informal meetings, and public hearings. The Consolidated Plan contained 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 included:

- 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 of households that have become homeless.

- Improve the condition of housing for low and moderate income homeowners.
- 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.

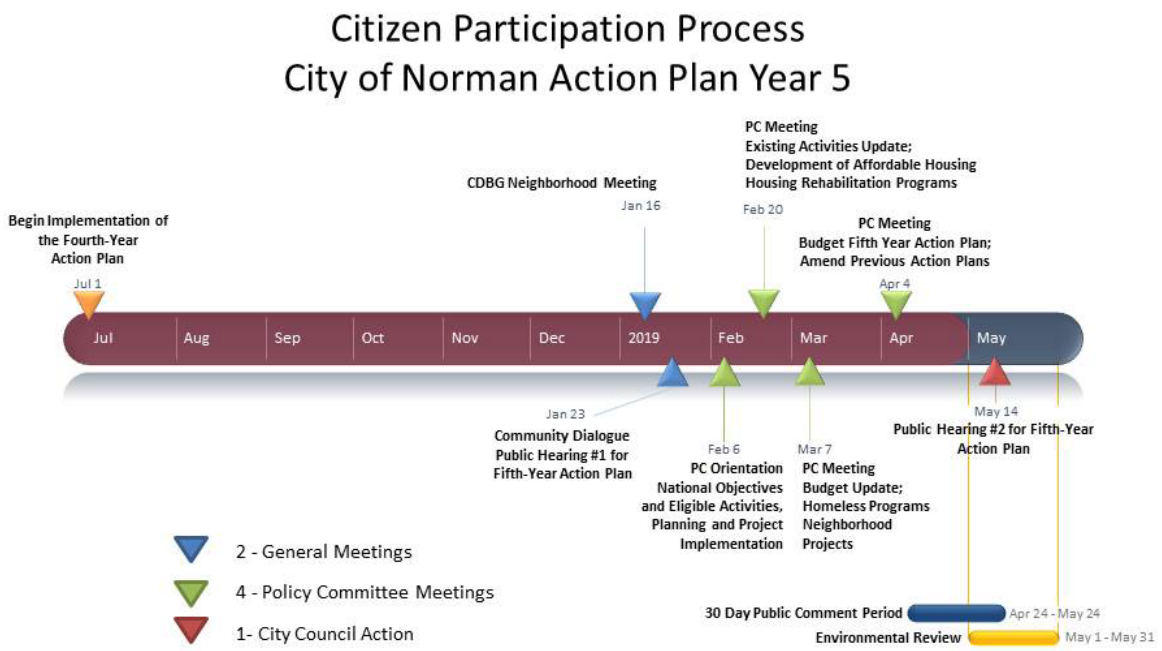
3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

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).



5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

The City of Norman abides by the Citizen Participation Plan most recently amended in May of 2014. 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.

OMB Control No: 2506-0117 (exp. 06/30/2018)

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

No Public Comments were received.

7. Summary

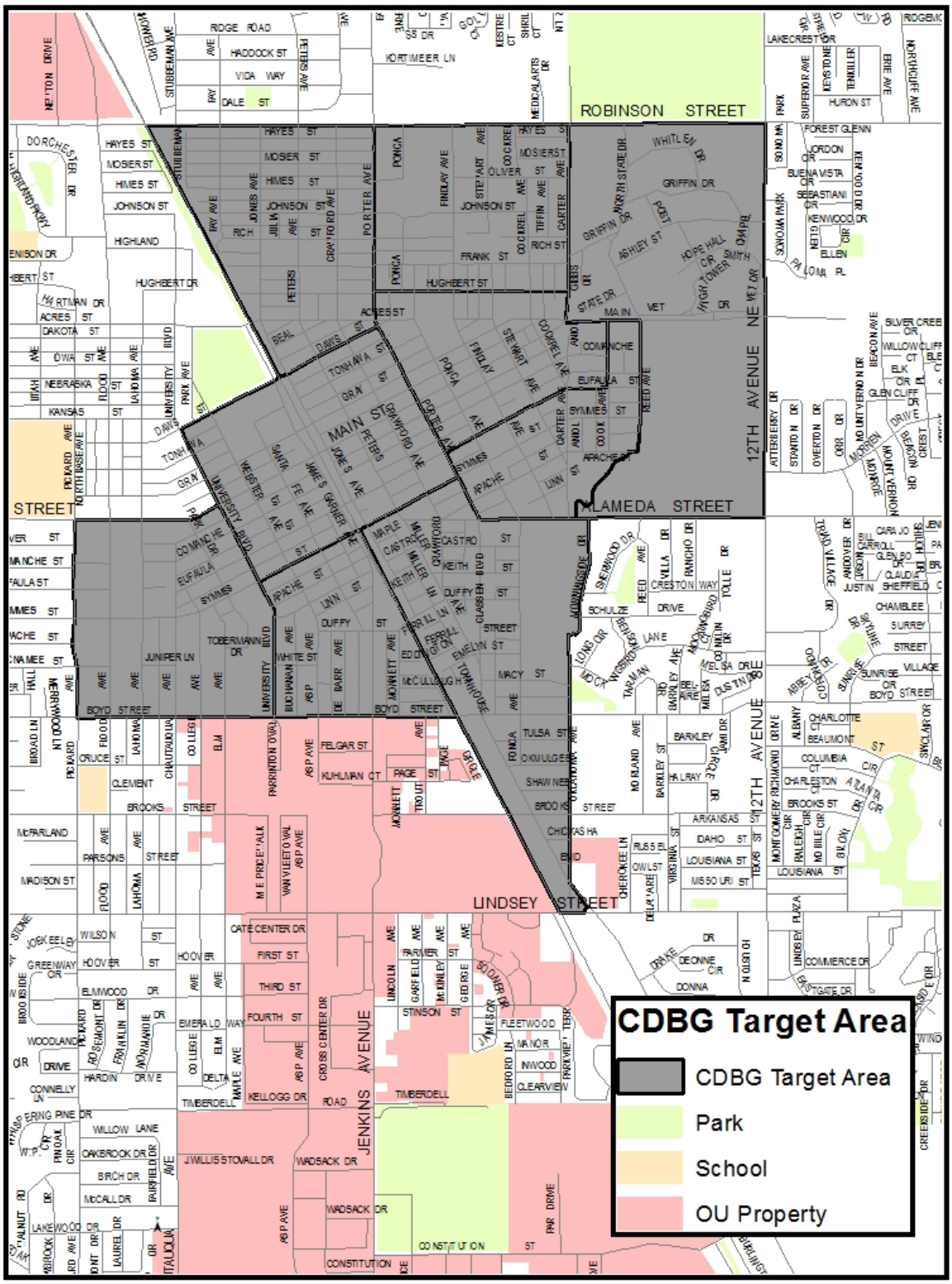
Based on the needs of the community the City of Norman continues to concentrate these resources towards the provision of affordable housing. This strategy allows for the rehabilitation of owner occupied low and moderate-income properties, modifications to improve the accessibility of both owner and renter residential units, and the utilization of HOME funds to increase the inventory of affordable housing. Included within the broad scope of affordable housing is the focus on the elimination of homelessness in our community. The CDBG Policy Committee will continue to reaffirm this strategy before each funding cycle, and funding decisions will be based upon the relevancy of the strategy.

This Fifth Year Action-Plan includes projects with objectives and outcomes that address the five-year Consolidated Plan priority needs and meet or exceed the Consolidated Plan goals. For more details about the Consolidated Plan, please refer to the City of Norman website at www.normanok.gov. The Action Plan goals are summarized throughout the plan by:

HUD Objectives - Decent Housing, Suitable Living Environment, and Expansion of Economic Opportunities; and

HUD Outcome - Increases to Availability/Accessibility, Affordability, and Sustainability

This Action Plan supports one or more Consolidated Plan Goals and one or more priority needs.



CDBG Target Area

OMB Control No: 2506-0117 (exp. 06/30/2018)

2019 (FYE20) COMMUNITY DEVELOPMENT BLOCK GRANT BUDGET

CDBG 19 Budget **$850,844**

$150,418 Admin, Planning & MFHC ($10,000) *$ 170,167 cap*

$102,452 Public Services *$127,626 cap*

$35,000 CART Bus Pass Program
$67,452 Public Services - Homeless Services Coordination

$262,974 ***Housing Rehabilitation***

$158,974 Housing Rehabilitation-Rehabilitation Delivery Costs
$50,000 Accessibility Modifications Program
$54,000 Origional Townsite - Exterior Property Maintenance Program

$235,000 ***Neighborhood Projects***

$185,000 Small Scale OT Improvements - Driveway Project
$50,000 Tree Planting Project

$100,000 ***Norman Affordable Housing, Acquisition of Property***

$850,844

2019 (FYE20) HOME INVESTMENT PARTNERSHIPS BUDGET

HOME 18 Budget **$374,974**

$15,000 Administration ($10,000 MFHC)

$56,248 Community Housing Development Corporation

$213,726 Affordable Housing Development

$90,000 Tenant Based Rental Assistance

$20,000 TBRA Chronic Individuals
$35,000 TBRA Non-Chronic
$35,000 TBRA Progressive Independence

$374,974

OMB Control No: 2506-0117 (exp. 06/30/2018)

PR-05 LEAD & RESPONSIBLE AGENCIES – 91.200(B)

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

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

Agency Role	Name	Department/Agency
CDBG Administrator		CDBG/Grants Division, Planning and CD
HOME Administrator		CDBG/Grants Division, Planning and CD

TABLE 1 – RESPONSIBLE AGENCIES

Narrative (optional)

The City of Norman CDBG/Grants Division is located within the Planning and COmmunity Development Department.

Consolidated Plan Public Contact Information

Inquiries regarding this Action Plan or the Consolidated Plan may be directed to:

Lisa D. Krieg
CDBG/Grants Manager

City of Norman
PO Box 370
Norman, OK 73070

lisa.krieg@normanok.gov

AP-10 CONSULTATION – 91.100, 91.200(B), 91.215(L)

1. Introduction

The following information is comprised 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(l))

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.

Although the Norman Housing Authority is not formally affiliated with the City of Norman, they work 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 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 18 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 for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

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 jurisdiction's 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
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. 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 Market Analysis Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	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.

3	**Agency/Group/Organization**	United Way of Norman
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Provides analysis and needs assessments via grant application to nonprofit entities in Norman. The Agency was consulted through in person conversations to assist in identifying future service and facility needs. The anticipated outcome includes assistance in the City identifying service and facility needs and goals not only for the 2015-2020 Plan but updating the City of Norman annually the needs as they are presented. Currently a Community Needs Assessment is underway with a several representatives, including the CDBG/Grants Manager, from the City of Norman serving on the Committee.

4	**Agency/Group/Organization**	City of Norman Public Works and Utilities Departments
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consults with CDBG staff regarding analysis of low to moderate income neighborhood conditions and strategy to repair such areas. Anticipated outcomes include priority of projects where CDBG funds can be utilized for small neighborhood scale projects.
5	**Agency/Group/Organization**	City of Norman Parks Department
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The department was consulted through in person conversations to assist in identifying future facility needs in the implementation of the Parks Master Plan as it relates to the Neighborhood Parks in the CDBG target area.
6	**Agency/Group/Organization**	Central Oklahoma Community Mental Health Center/Griffin Memorial Hospital
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless Services-Health Services - Victims Health Agency Publicly Funded Institution/System of Care Major Employer

What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation included participation in the CoC activities, OVOV, Point in Time data collection. The agency was a participant in the creation and implementation of the ECHO 2015 and the ZERO:2016 programs. Active in regional planning for the CoC. Provides input on sheltered, unsheltered homeless and homeless gaps analysis.

7	**Agency/Group/Organization**	Progressive Independence
	Agency/Group/Organization Type	Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Agency was consulted through in person conversations 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 Action Plan.
8	**Agency/Group/Organization**	Aging Services of Cleveland County, Inc.
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Agency was consulted through in person conversations 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 Action Plan.

9	**Agency/Group/Organization**	Variety Care
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Agency was consulted through in person conversations as well as community forums 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 Action Plan.
10	**Agency/Group/Organization**	The Salvation Army
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Agency was consulted through in person conversations as well as community forums 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 Action Plan.

11	**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 Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Agency was consulted through in person conversations as well as community forums 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 Action Plan.

12	**Agency/Group/Organization**	Thunderbird Clubhouse
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities Services-homeless Services-Health Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Agency was consulted through in person conversations as well as community forums 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 Action Plan.

13	**Agency/Group/Organization**	Women's Resource Center
	Agency/Group/Organization Type	Services - Housing Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Agency was consulted through in person conversations as well as community forums 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 Action Plan.
14	**Agency/Group/Organization**	Food and Shelter, Inc.
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Agency was consulted through in person conversations as well as community forums 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 Action Plan.

15	**Agency/Group/Organization**	Norman Police Department
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Collaboration with the Norman Police Department includes representation on the Continuum of Care Executive Committee, Coordinated Case Management Team, and the development of the Homeless Outreach Team. Provides information from a public safety viewpoint regarding homelessness issues.
16	**Agency/Group/Organization**	Norman CHDO 2015
	Agency/Group/Organization Type	Housing Community Housing Development Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Norman 2015 CHDO is a relatively new CHDO approved for participation. Consultation has included analysis of affordable housing designed for those with a physical disability as they developed the Vicksburg Project. Additional consultation occurred as they developed in partnership with the University of Oklahoma, College of Architecture, the Hughbert Street Project.

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.
2015-2020 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 been awarded CDBG Disaster Recovery funding, Homeless Prevention and Rapid Recovery funding as well as Neighborhood Stabilization Program funding from the State of Oklahoma previously.
Norman 2025 Land Use and Transportation Plan	City of Norman	Long-Range Transportation Plan. Overlap in the transportation plan occurs with land use and transportation issues in the low-income areas or areas serving low-income citizens. CDBG funds are used for sidewalk/street repair and public facility projects, all affected by the ability to reach the designated agency or area.
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

Narrative (optional)

The lead agency for the Consolidated Plan as well as each Action Plan is the CDBG/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 18 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 18 committee members are drawn from the following community resources: housing and other service providers; current or formerly homeless individuals; faith leaders; and researchers.

AP-12 PARTICIPATION – 91.105, 91.200(C)

1. Summary of citizen participation process/Efforts made to broaden citizen participation
Summarize citizen participation process and how it impacted goal-setting

The lead agency for the Consolidated Plan is the CDBG/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 18 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 61 Oversight Committee members are drawn from the following community resources: housing and other service providers; current or formerly homeless individuals; faith leaders; and researchers. A 17 member Executive Committee, a Data Committee consisting of 8 members and also a Governance Committee with 8 members oversee all activities of the Continuum.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	The Community Dialogue Public Hearing was held on January 23, 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 12 individuals was recorded.	Comments were directed at overall needs of the low income and special needs populations of Norman. Using a facilitator an exercise was conducted with the participants to spur discussion. Both positive and negative comments were encouraged. Specific emphasis was placed on transportation and affordable housing.	No written comments were received and all verbal comments were duly recorded and considered.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Hearing	CDBG Neighborhood Target Area	On January 16, 2019 a meeting was held jointly for the current CDBG Target Neighborhood. Direct mailing to previous participants, City of Norman calendar announcement as well as newspaper announcement of meeting was done. An attendance of 12 individuals was reported. One written comment was received.	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. One written comment was received from a neighbor who was unable to attend the meeting.	

TABLE 4 – CITIZEN PARTICIPATION OUTREACH

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 past cases, the City of Norman has used the presumption of level-funding of each program at Federal Fiscal Year levels. 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.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 5				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	850,844	0	3,111,086	850,844	0	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 5				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	374,974	0	1,344,415	374,974	0	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 5 - 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 will receive $374,974 in HOME funding for FYE2020 and beyond, requiring an annual match requirement of over $90,000.

HUD allows cities to rollover excess match from previous years and to date the City of Norman has banked over 2 million dollars of excess match.

The City of Norman anticipates that CDBG and HOME funds will leverage additional resources. Non-Entitlement funds that maybe used to further the goals of the Strategic Plan may include: private foundations, organizations, and individuals. The following leveraged resources are possible during the Consolidated Plan:

City of Norman General Funds: The annual City of Norman budget commits resources for the priority activities including public parks, facilities and infrastructure.

Affordable Housing Resources: Affordable Housing Developments are likely to utilize a variety of funding sources available at the State and national level including but not limited to: Low Income Tax Credits, Low Income Mortgage Bond Funds, Private Mortgage Financing, Historic Tax Credits, and Federal Home Loan Funds. Each of these sources is anticipated to be accessed individually or together for affordable housing developments.

Philanthropy: Private funding from national, state and local funders including the United Way of Norman, Private Foundations, and private donors.

New Market Tax Credits: NMTC's were created in 2000 as part of the Community Renewal Tax Relief Act and recently reauthorized by congress to encourage revitalization efforts. NMTC program provides tax credit incentives for equity investment.

Section 8 Funds: The Section 8 Voucher Program is primarily administered through the Norman Housing Authority. A small number of vouchers for special populations are available through the Oklahoma Housing Finance Agency.

Continuum of Care Fund: Project funds awarded by the US Department of Housing and Urban Development to non-profit homeless service providers to assist in housing and service provision to homeless households and individuals.

Emergency Solutions Grant Matching Funds: The 1:1 matching requirements are met through private resources contributed by non-profit providers. Matching funds are monitored by the Oklahoma Department of Commerce.

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 the spring of 2015 the Urban Land Institute conducted a five-day Advisory Services Panel dedicated to the potential redevelopment of this site. Currently the City of Norman and the Oklahoma Department Mental Health and Substance Abuse Services are negotiating a Memorandum of Understanding outlining a partnership of this redevelopment opportunity.

Discussion

The priorities identified with the Fifth Annual Action Plan are the outcome of an extensive, comprehensive effort to identify community needs. This Plan assesses the available resources available to meet those needs. The City of Norman's investments will leverage public and private funds to address the affordable housing, community development and special needs populations' needs.

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	2015	2019	Affordable Housing	Community Wide	Need for Housing Rehabilitation Housing and Services forPersons with Special Needs	CDBG: $262,974	Homeowner Housing Rehabilitated: 29 Household Housing Unit
2	Community Development	2015	2019	Non-Housing Community Development	2015-2019 CDBG Target Area	Public Improvements	CDBG: $235,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 5870 Persons Assisted
3	Homelessness	2015	2019	Homeless	Community Wide	Housing and Services for the Homeless	CDBG: $67,452	Public service activities for Low/Moderate Income Housing Benefit: 39 Households Assisted
4	Affordable Rental Housing	2015	2019	Affordable Housing	Community Wide	Availibility of Affordable Rental Units	CDBG: $100,000 HOME: $359,974	Rental units constructed: 4 Household Housing Unit

TABLE 6 – GOALS SUMMARY

Goal Descriptions

1	**Goal Name**	Housing Rehabilitation
	Goal Description	The City of Norman will utilize the Housing Rehabilitation Program to address the sustainability and affordability of the affordable housing in Norman. The Comprehensive Rehabilitation Program (6 units) will be available for owner occupied households at or below 50% MFI, community wide. The Emergency Repair Program (20 units) will be available to address a situation that threatens the safety or sanitation of an owner occupied household at or below 80% MFI. The Accessibility Modification Program (10 units) is available for both owner occupied and renter occupied units at or below 80% MFI. Non-Profit entities are also eligible for Accessibility Modification assistance.
2	**Goal Name**	Community Development
	Goal Description	A project is being planned to provide and plant trees within the target area to offset the loss of the tree canopy due to age. This will be the second year this project is being undertaken. This project is budgeted at $50,000. A driveway project is planned for the Original Townsite Neighborhood. This project will be the installation of drive approaches/driveways along at minimum one block to be identified at a later date. This project is budgeted at $185,000. In addition funds ($35,000) will be provided to offset the cost of free bus passes to moderate income citizens of Norman to provide public transportation.
3	**Goal Name**	Homelessness
	Goal Description	Efforts to address homelessness include dedicated staff support to the Coordinated Case Management and the Built for Zero activities.
4	**Goal Name**	Affordable Rental Housing
	Goal Description	Utilizing HOME funds and working with an approved CHDO and other partners, affordable housing will be developed within Norman. In addition TBRA will be provided utilizing HOME funds. CDBG Funds will be utilized to allow for acquisition of property for affordable rental housing.

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 January with a public hearing to consider overall needs of the low and moderate income populations.

Projects

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

TABLE 7 - PROJECT INFORMATION

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

These funding priorities were developed, evaluated and set by the CDBG Policy Committee. The CDBG Housing Rehabilitation Activities (with the exception of Renter Occupied Accessibility Projects) are completed and the investment secured by the use of a Deferred Payment Loan. This document is filed at the Cleveland County Courthouse against the property for a period of four years. There is no interest charged and it is forgiven to a balance of zero at the end of the four years. Any funds that are recaptured due to a sale of the property are considered Program Income and utilized in future Housing Rehabilitation Projects.

1	**Project Name**	Administration
	Target Area	Community Wide
	Goals Supported	Housing Rehabilitation Homelessness Community Development Affordable Rental Housing
	Needs Addressed	Need for Housing Rehabilitation Availibility of Affordable Rental Units Housing and Services forPersons with Special Needs Housing and Services for the Homeless Public Improvements
	Funding	CDBG: $850,844 HOME: $374,974
	Description	General Administration for the CDBG and HOME Programs including Fair Housing Activities
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Administration activities. Accomplishments will be reported in activity that generates benefits.
	Location Description	Community Wide within the city limits of Norman. Administration offices are located at 201-A West Gray, Norman, OK 73069
	Planned Activities	Administration activities including Fair Housing.

2		
	Project Name	Public Services
	Target Area	Community Wide
	Goals Supported	Homelessness
	Needs Addressed	Housing and Services forPersons with Special Needs Housing and Services for the Homeless
	Funding	CDBG: $850,844 HOME: $374,974
	Description	Public Service activities will include the oversight and direct administration of the Built for Zero Program to address homelessness, including HMIS, and the administration of the CDBG Bus Pass Program in conjunction with the operator of the Public Transit Service.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The proposed funding will provide for 5,000 bus passes for low/moderate citizens. It is estimated that 30 individuals will be housed in conjunction with the Built for Zero Program.
	Location Description	Services available community wide. Administration of these activities will be located at 201-A West Gray, Norman, OK 73069.
	Planned Activities	CDBG Bus Pass Program and Coordinated Case Management/Built for Zero including HMIS.

3		
	Project Name	Housing Rehabilitation
	Target Area	Community Wide
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Need for Housing Rehabilitation
	Funding	CDBG: $850,844 HOME: $374,974
	Description	Housing rehabilitation projects including project delivery costs. The Comprehensive Rehabilitation Program operates on a waiting list which is approximately eighteen months long. Emergency Repair and Accessibility Modification Projects are undertaken as they are identified.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that a total of 29 households will receive rehabilitation assistance.
	Location Description	Rehabilitation projects will be undertaken community wide. Housing Rehabilitation Delivery will be at 201-A West Gray, Norman, OK 73069
	Planned Activities	Comprehensive Housing Rehabilitation Projects, Emergency Repair Projects, Accessibility Modification Projects.

4		
	Project Name	Affordable Rental Housing
	Target Area	Community Wide
	Goals Supported	Homelessness Affordable Rental Housing
	Needs Addressed	Availibility of Affordable Rental Units Housing and Services for the Homeless
	Funding	CDBG: $850,844 HOME: $374,974
	Description	Development of affordable rental housing including CHDO Activities. Also includes TBRA Activities
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	It is anticipated that two affordable rental units will be developed including CHDO Activity. TBRA Assistance will be provided to an estimated twelve households
	Location Description	Community Wide
	Planned Activities	Development of Affordable Rental Housing by acquisition of property, new construction, and/or rehabilitation and the provision of Tenant Based Rental Assistance.

AP-50 GEOGRAPHIC DISTRIBUTION – 91.220(F)

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

The allocation of CDBG resources is targeted to best meet the priority needs of low and moderate income persons. While every consideration is given to opportunities to target a specific geographic eligible area, in the Third Annual Action Plan the City has allocated the majority of the available resources programs that operate city-wide on direct benefit eligibility. The City of Norman will make all housing programs and housing development projects available city-wide, in order to ensure the city is not concentrating low income or minority populations through affordable housing projects. Three projects are budgeted this program year to be conducted within the designated CDBG Target Area. The projects are designated as a tree planting project, driveway replacement project, and an exterior property maintenance project.

Geographic Distribution

Target Area	Percentage of Funds
2015-2019 CDBG Target Area	34%
Community Wide	66%

TABLE 8 - 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 applicants 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 is minimal compared to the Target Area. It should be noted that the majority of public service programs are located within the CDBG target area and provide convenient access to neighborhood residents.

Discussion

By utilizing prior year funds for housing rehabilitation programs, the Fifth Year Action Plan was able to include several identified neighborhood projects.

AFFORDABLE HOUSING

AP-55 AFFORDABLE HOUSING – 91.220(G)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	30
Non-Homeless	50
Special-Needs	0
Total	80

TABLE 9 - ONE YEAR GOALS FOR AFFORDABLE HOUSING BY SUPPORT REQUIREMENT

One Year Goals for the Number of Households Supported Through	
Rental Assistance	12
The Production of New Units	2
Rehab of Existing Units	29
Acquisition of Existing Units	1
Total	44

TABLE 10 - ONE YEAR GOALS FOR AFFORDABLE HOUSING BY SUPPORT TYPE

Discussion

Support for homeless households will be accomplished by Coordinated Case Management (50). Tenant Based Rental Assistance will be provided to 12 households. The Production of new units will be accomplished with HOME funds in conjunction with CHDO activities (2) and the Housing Rehabilitation units will be Comprehensive Rehabilitation Program (6), Emergency Repair Program (20), and Accessibility Modification Program (3) for a total of 29 units. One unit will be acquisition of an existing property with CDBG funds.

AP-60 PUBLIC HOUSING – 91.220(H)

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. The City of Norman and the Norman Housing Authority share common goals relating to special needs populations and the preservation and expansion of the availability of affordable housing. 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 programmed in the 2018 HOME allocation will continue to be utilized for Tenant Based Rental Assistance for the Built for Zero Program. These TBRA funds will be administered in conjunction with the vouchers the Norman Housing Authority has provided for this effort. A second target population of non-chronic households will be able to access TBRA funds in conjunction with the Coordinated Case Management process. In addition, TBRA funds will be utilized for persons with a severe physical disability who are exiting nursing facilities to permanent housing. This activity will be coordinated by Norman Housing Authority and Progressive Independence.

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 regularly engages with management on facility needs, management policies, and/or security issues. The Norman Housing Authority and the City of Norman will continue to support resident engagement through support for public service programs which operate at NHA sites as well as through the recognition of Resident Organizations in the development of future plans.

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

The Norman Housing Authority is a high-performing agency.

Discussion

The provision of HOME funds for TBRA was programmed at $40,000 for two consecutive years. In evaluating the participation, the remaining funds will need to be supplemented in the upcoming year to maintain the current level of service. As mentioned above, two additional populations will become eligible for HOME TBRA with this year's allocation.

AP-65 HOMELESS AND OTHER SPECIAL NEEDS ACTIVITIES – 91.220(I)

Introduction

The City of Norman is committed to increasing the long-term housing stability and economic self-sufficiency of homeless and at-risk households and individuals. As the Collaborative Applicant for the Cleveland County Continuum of Care (OK-504), the City of Norman facilitates the application processes for both the Continuum of Care (CoC) and Emergency Solutions Grant (ESG). The ESG is administered through the Oklahoma Department of Commerce and funds are awarded based upon recommendations from the Continuum of Care Executive Committee. The CoC encourages agencies to submit applications for ESG funds to the State of Oklahoma. Recommendations are based upon a Letter of Intent to the CoC as well as a review of prior performance. In addition to ESG funds, CDBG funds will be used to provide coordination to agencies providing support services to the homeless and other persons with special needs. Previously allocated HOME funds as well as new funding will be used for Tenant Based Rental Assistance. New housing development will include units for formerly homeless households whenever possible.

Continuing with the success achieved with the 100,000 Homes Campaign, the CoC is actively participating in the Built for Zero Campaign to end Veteran and Chronic Homelessness. In February 2019, OK-504 was certified as reaching Functional Zero for Veterans. OK-504 has maintained this designation of Functional Zero for Veterans.

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 is committed to the Vulnerability Index – Service Prioritization and Decision Assistance Tool (VI-SPDAT). The VI-SPDAT is a street outreach tool used to help determine the chronically homeless and medical vulnerability of homeless individuals and to prioritize housing and service recommendations. An eight hour training was provided to all service providers in the correct administration and interpretation of the VI-SPDAT and the SPDAT. Once an individual and/or household has been identified as homeless and assessed the documents are entered into the Service Point HMIS System by the City of Norman. Utilization of the VI-SPDAT has resulted in an effective By Name List that is utilized by the Coordinated Case Management Committee to determine vulnerability and placement into available housing resources that are appropriate for their needs. The Service Prioritization Decision Assistance Tool (SPDAT), as a companion to the VI-SPDAT, is an intake and case management tool and helps service providers allocate resources in a logical, targeted way. VI-SPDAT helps identify the best type of support and housing intervention for individuals or families by relying on three categories of recommendations:

Permanent Supportive Housing: Individuals or families who need permanent housing with ongoing access to services and case management to remain stably housed.

Rapid-Rehousing: Individuals or families with moderate health, mental health and/or behavioral issues, but who are likely to achieve housing stability over a short time period through a medium or short term rent subsidy and access to support services.

Affordable Housing: Individuals or families who do not require intensive supports but may still benefit from access to affordable housing. In these cases, the tool recommends affordable or subsidized housing but no specific intervention drawn uniquely from homeless service providers.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Norman will continue to support the efforts of service providers of the Cleveland County Continuum of Care to provide emergency and transitional housing needs for households who are experiencing homelessness. In addition, the City of Norman Social and Voluntary Services Commission in FYE2019 provided in excess of $175,000 to local non-profit facilities that provide emergency and transitional services.

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 case management and a staff position to coordinate the efforts of the ZERO:2016/Built for Zero campaign. In addition dedicated TBRA funding provided by the HOME program will be used in conjunction with the ZERO:2016/Built for Zero campaign to increase the funding that is available for permanent housing. Recognizing that the pathway to permanent housing is not a one size fits all endeavor, the CoC has designed different programs with several levels of assistance that can be provided to insure housing stabilization and long term success.

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.

The City of Norman Housing Rehabilitation Programs offer both a comprehensive rehabilitation (50% and below MFI) and an emergency repair program (80% and below MFI) to assist in

maintaining the affordability of owner occupied housing. The CDBG Housing Rehabilitation Activities (with the exception of Renter Occupied Accessibility Projects) are completed and the investment secured by the use of a Deferred Payment Loan. This document is filed at the Cleveland County Courthouse against the property for a period of four years. There is no interest charged and it is forgiven to a balance of zero at the end of the four years. Any funds that are recaptured due to a sale of the property are considered Program Income and utilized in future Housing Rehabilitation Projects. Renter occupied accessibility modifications up to $6,000 are available to tenants 80% and below MFI upon permission of property owner.

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 CDBG/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. The City of Norman Social and Voluntary Services Commission administers $175,000 annually in local government revenue to assist social service providers serving these populations.

AP-75 BARRIERS TO AFFORDABLE HOUSING – 91.220(J)

Introduction:

The availability of affordable housing is somewhat determined by the relationship of supply and demand. The City of Norman will begin to address the availability of affordable housing on both the supply and demand side. By expanding economic opportunities for its residents, the demand for affordable housing will be reduced. By participating and encouraging production of affordable units including the provision of government assistance that supports low income owners, the supply of affordable housing will be maintained and expanded.

The City of Norman will continue to monitor the results of the completed Analysis of Impediments to Fair Housing (AI) as well as conduct a new Analysis of Impediments to Fair Housing (AI) as part of the 2020-2024 Consolidated Plan. 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. The City of Norman is working towards the initiation of a Comprehensive Housing Strategy. This study will be undertaken by the Norman City Council to investigate methods in which the supply of Affordable Housing may be increased.

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 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 near future.

The City of Norman has seen and expects to continue to see a significant expansion in the number of student housing units constructed, both public and private ownership. Multiple developments have recently been completed with the University of Oklahoma currently having recently completed construction of multiple new residence halls with a total of 4,200 beds. The Housing Market Analysis indicated that after completion, a total of 2,264 units that are comprised of 7,168 beds (constructed within the last five years) are available in the private market for students. As mentioned previously this substantial increase of units geared to this population without a similar increase of enrollment could adversely affect the overall vacancy rate of rental housing in Norman.

The City of Norman is currently updating the 2025 Comprehensive Plan. Included in this analysis are discussions regarding the future of development in Norman including assessing how affordable housing needs are addressed. As mentioned earlier, the City of Norman is also beginning the undertaking of a Comprehensive Housing Strategy to identify methods to increase affordable housing.

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.

AP-85 OTHER ACTIONS – 91.220(K)

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, 2019 through June 30, 2020. 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 and special needs residents. Norman, due to being an entitlement community, is not eligible for state CDBG or HOME funding. With no access to additional state dollars for community development activities, there are limitations on the sales tax based city's general fund for these types of activities. This leaves little room for expansion of community development funding at the local level. Furthermore, the City of Norman's entitlement grants have not seen any substantial increase 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.

One example of meeting the underserved needs of the community was utilizing the knowledge of the CDBG Staff, the City of Norman and Cleveland County were recently able to access over 20 million dollars of CDBG-DR funding available for damage that occurred during two Presidentially Declared Disasters in the eastern areas of Norman and Cleveland County. It is being able to capitalize on these types of occasional opportunities that will allow additional leveraging of the CDBG resources.

The City of Norman is taking an active role along with ODMHSAS in the redevelopment of the Griffin Memorial Hospital property which is included within the CDBG Target Area.

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, Norman 2015 CHDO.

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. The City of Norman will be applying for the upcoming Lead-Hazard Control and Healthy Homes funding.

Actions planned to reduce the number of poverty-level families

One purpose of the CDBG and HOME 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 CDBG and HOME 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 CDBG and HOME 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, CDBG/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 Section 3, as well as women and minority owned business enterprises for contract bids and services. The City of Norman encourages inclusion in the list of approved bidders for Section 3, 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. Norman 2015 CHDO, Inc., the approved and certified 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 Repair Program, Comprehensive Rehabilitation 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 Annual Action Plan delivery system is an example of this. Communication and cooperation between the City of Norman's CDBG/Grants Division and the partner agencies and organizations that administer activities is strong. City of Norman staff has worked closely with the organizations involved in the Annual Action 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 2019-2020 Program Year based upon evaluation of the identified needs of the low and moderate income populations of Norman. This Fifth Year Action Plan is a piece of the overall Consolidated Plan and the goals are all based upon the Strategy that was approved in the Consolidated Plan. 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(l)(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:

   Until 2013, HOME funds were allocated for a First Time Homebuyer Program through the City's Down-payment Assistance Program in collaboration with the Norman Community Reinvestment Council. This program began in 1995 was instituted to provide affordable homeownership opportunities for Norman residents with low and moderate incomes. With this program, the City elected to impose recapture requirements for a period of five years after purchase. The affordability period of five years was maintained by a Deferred Payment Subordinate Mortgage between the buyer and the City of Norman and this agreement is protected with a lien signed by the buyer for the subsidy amount and filed at the Cleveland County Courthouse. The Deferred Payment Subordinate Mortgage is limited to the down payment assistance subsidy amount and forgiven annually over a period of five years. There are still approximately twenty properties that are still within their required period of affordability. When repayment is received, the funds are utilized in the Development of Affordable Rental Housing Project Program. In a case of default or foreclosure by the applicant prior to the end of the period of affordability, the City of Norman Legal Department pursues repayment of the remaining debt from the net proceeds of the Sherriff's Sale. As of February 2019 all affordability requirements for the First Time Homebuyers program have been satisfied and all remaining liens have been released.

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. This deed restriction secures the property from resale through the period of affordability. If the property is to be sold, a new deed restriction will be executed with the new owner prior to release of the existing deed restriction to insure that the period of affordability is maintained. In the case of foreclosure or default by the owner, the City of Norman will file for repayment of the subsidy provided from the net proceeds of the liquidation. Each HOME assisted property is monitored by the City of Norman monthly for income eligibility of tenants and annually for financial performance of the project.

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 administer TBRA funds as well as the provision of funds for the development of affordable housing.

   - 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.