

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The scope of the CAPER includes the wide range of activities undertaken in the past year using CDBG and HOME funds to address the priorities previously identified in the planning process. The statutory purpose of the CDBG program is “Decent housing and a suitable living environment and expanding economic opportunities for principally low-and moderate-income persons.” The U.S. Department of Housing and Urban Development provides funds that allow the City of Norman to plan and provide services that meet the goal of assisting low/moderate income persons to secure for themselves better housing, better jobs, a better living environment, and more complete community services.

The City of Norman did not use any funds outside the three national objectives and did not trigger any relocation cost. Norman did not use CDBG funds for Economic Development. No CDBG funds were used for any groups of limited clientele that did not fall within the categories of presumed limited clientele or did not meet low-and moderate-income guidelines. The City of Norman does not have a HUD approved Revitalization Strategy.

As is the usual case, a large roadblock in meeting the identified goals and objectives, is the availability of funding to address the needs. On the other hand it has become apparent to other stakeholders in the community, that the availability of CDBG and HOME funds are not a given and there needs to be additional funding sought to address the identified problems. In addition, this realization had led to increased involvement from other City departments and the community at large. This is true especially in the need to address the increased needs of the precariously housed and persons experiencing homelessness.

The Affordable Housing Accomplishments includes acquisition of property for affordable rental housing (1 unit); acquisition/rehabilitation on one affordable rental unit; and acquisition of one property for Habitat which affordable homeowner housing will be constructed upon. The Community Development accomplishments include the Original Townsite, Old Silk Stocking, and First Courthouse neighborhoods which are part of the CDBG Neighborhood Project. Current activities include multiple neighborhood meetings to determine scope of projects to be developed. As mentioned, the Homeless programs have changed since the development of the Consolidated Plan due to staff reassignment. Current efforts include TBRA (4) and housing start up kits for persons exiting homelessness into permanent housing. The Housing Rehabilitation accomplishments include a total of 24 Emergency repairs; 16 accessibility modifications and two accessibility modifications for local non profits.

The actual accomplishment data for the rehab program fluctuates year by year depending on the demand for assistance and the size and complexity of each project. In this program year for instance, there were numerous small owner occupied projects undertaken, such as replacement of a water service line or water heater which allowed staff to assist more households than anticipated but still within the designated budget.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Affordable Rental/Owner Housing	Affordable Housing	CDBG: \$140000 / HOME: \$	Rental units constructed	Household Housing Unit	20	1	5.00%	4	1	25.00%
Affordable Rental/Owner Housing	Affordable Housing	CDBG: \$140000 / HOME: \$	Rental units rehabilitated	Household Housing Unit	5	11	220.00%			
Affordable Rental/Owner Housing	Affordable Housing	CDBG: \$140000 / HOME: \$	Homeowner Housing Added	Household Housing Unit	5	1	20.00%	0	1	
Affordable Rental/Owner Housing	Affordable Housing	CDBG: \$140000 / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	29		0	0	

Affordable Rental/Owner Housing	Affordable Housing	CDBG: \$140000 / HOME: \$	Housing for Homeless added	Household Housing Unit	0	0		0	0	
Affordable Rental/Owner Housing	Affordable Housing	CDBG: \$140000 / HOME: \$	Housing for People with HIV/AIDS added	Household Housing Unit	0	0		0	0	
Community Development	Non-Housing Community Development	CDBG: \$ / HOME: \$60000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10000	7065	70.65%	1673	7065	422.30%
Homelessness	Homeless	CDBG: \$ / HOME: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	139		0	139	
Homelessness	Homeless	CDBG: \$ / HOME: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	30	4	13.33%			
Homelessness	Homeless	CDBG: \$ / HOME: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0		0	0	
Homelessness	Homeless	CDBG: \$ / HOME: \$	Housing for Homeless added	Household Housing Unit	10	0	0.00%			
Housing Rehabilitation	Affordable Housing	CDBG: \$ / HOME: \$	Facade treatment/business building rehabilitation	Business	0	0		0	0	

Housing Rehabilitation	Affordable Housing	CDBG: \$ / HOME: \$	Rental units rehabilitated	Household Housing Unit	0	11		15	11	73.33%
Housing Rehabilitation	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	150	29	19.33%	20	29	145.00%
Housing Rehabilitation	Affordable Housing	CDBG: \$ / HOME: \$	Businesses assisted	Businesses Assisted	0	2		0	2	

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG	HOME
White	36	2
Black or African American	1	1
Asian	1	0
American Indian or American Native	2	1
Native Hawaiian or Other Pacific Islander	0	0
Total	40	4
Hispanic	0	0
Not Hispanic	40	4

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

The racial and ethnic data for this CAPER was pulled from housing rehabilitation activities in IDIS. These numbers only include direct benefit activities not area benefit.

HOME Units report four families assisted, with TBRA.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,901,640	1,223,085
HOME	public - federal	1,107,843	629,622

Table 3 - Resources Made Available

Narrative

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
2020-2024 Target Area	14		
Community Wide	86		Eligible Area

Table 4 – Identify the geographic distribution and location of investments

Narrative

Because the majority of funds programmed are for the Housing Rehabilitation program which is available within the City Limits of Norman, a larger percentage of eligible funding is available Community Wide. Only the Community Development Activities are limited to the Target Area.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

The City of Norman leveraged CDBG funds by combining them with resources from the City's General Fund (and Capital Fund) to maximize the impact of its programs. By strategically pairing these funds, Norman is able to address critical community needs, such as housing rehabilitation and neighborhood revitalization, more efficiently. The General Fund often covers administrative costs and operational expenses, allowing a larger portion of CDBG funds to be directed towards projects. This collaboration enhances the city's capacity to improve low- and moderate-income areas while optimizing both funding sources for greater community benefit.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	2,986,598
2. Match contributed during current Federal fiscal year	37,594
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	3,024,192
4. Match liability for current Federal fiscal year	103,441
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	2,920,751

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
Jazzman Acq	03/21/2024	31,090	0	0	0	0	0	31,090
N Base Acq	12/18/2023	6,504	0	0	0	0	0	6,504

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at begin-ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
0	0	0	0	0

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	0	0	0	0	0	0
Number	0	0	0	0	0	0
Sub-Contracts						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	0	0	0			
Number	0	0	0			
Sub-Contracts						
Number	0	0	0			
Dollar Amount	0	0	0			

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		2	278,210			
Businesses Displaced		0	0			
Nonprofit Organizations Displaced		0	0			
Households Temporarily Relocated, not Displaced		0	0			
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	2	4
Number of Non-Homeless households to be provided affordable housing units	43	24
Number of Special-Needs households to be provided affordable housing units	15	16
Total	60	44

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	2	4
Number of households supported through The Production of New Units	2	0
Number of households supported through Rehab of Existing Units	58	40
Number of households supported through Acquisition of Existing Units	0	2
Total	62	46

Table 12 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

The 4 households that are reported as homeless to be provided affordable permanent housing units are those individuals that have been provided TBRA Assistance through the Ready for Zero Coordinated Case Management effort. They will continue to receive TBRA assistance until award of Section 8 Voucher, approximately six months. In addition ten households were provided housing start up kits.

The 40 non-homeless that were provided affordable units were a result of the Housing Rehabilitation Activities that were completed during the program year to improve the sustainability and affordability of these units. The 40 units received Housing Rehabilitation Assistance which includes Emergency Repairs, accessibility modifications, and Comprehensive Rehabilitation.

The 16 special-needs that were provided affordable housing were Accessibility Modification projects that improved the accessibility and affordability of the housing units.

Rental Assistance (TBRA) was provided 4 households in conjunction with the Ready for Zero Coordinated Case Management effort.

The Acquisition was one single family residence located on Jazzman Ct. that were acquired by the Norman Affordable Housing Corp with assistance from the CDBG Program. One lot was acquired for Habitat for affordable owner occupied housing.

Discuss how these outcomes will impact future annual action plans.

The Fourth Year 2023-2024 CAPER reports that the CDBG and HOME Programs are have returned to capacity after the COVID-19 Pandemic. The Community Development activities are beginning to ramp up as neighbors become more involved in the development of the activities.

Future action plans will follow this similar funding structure with related outcomes. The City of Norman constantly monitors resources for additional funds that can be utilized to compliment the Community Development efforts being undertaken with the CDBG and HOME programs.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	13	4
Low-income	10	0
Moderate-income	17	0
Total	40	4

Table 13 – Number of Households Served

Narrative Information

The Emergency Repair and Accessibility Modification activities are available to households up to 80% MFI. The Comprehensive Rehabilitation Program is available to households at or below 50% MFI. As mentioned previously due to the COVID-19 crisis the Housing Rehabilitation programs have been

curtailed to only Emergency Repair and Accessibility Modifications. The four HOME units are all TBRA activities for households exiting homelessness with limited income and resources.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

To reach specific goals set for reducing and ending homelessness, the Norman/Cleveland County Continuum of Care follows a Housing First approach, which is a client-driven strategy that prioritizes both rapid placement and stabilization into permanent housing which does not have preconditions such as sobriety or minimum income threshold, or services participation requirements. To end Veteran homelessness we partner with the local VA and coordinate CoC resources with VA-funded housing and services including HUD-VASH and Supportive Services for Veteran Families (SSVF). To end chronic homelessness, our CoC follows HUD's areas of focus as follows; targeting persons with the highest and longest histories of homelessness for existing and new permanent supportive housing, create new permanent supportive housing units dedicated to individuals, youth, and families experiencing chronic homelessness, continue the dedication of existing permanent supportive units to those experiencing chronic homelessness, continuing aggressive outreach efforts by quickly identifying and engaging all persons who are currently experiencing sheltered or unsheltered chronic homelessness to those who are at imminent risk of becoming homeless. Additional collaboration is being coordinated with Ready for Zero, a national movement of communities coordinated by Community Solutions, providing support by optimizing local resources, tracking monthly housing goals, and sharing proven strategies to our Continuum. Currently the Norman/Cleveland County Continuum of Care has been certified at the Federal Level as meeting the Functional Zero status in the elimination of Veteran Homelessness. This status has been maintained since awarded.

The Coordinated Case Management Committee meets weekly comprised of over 30 agencies to discuss each by-name-list of Veterans and Chronic individuals and families experiencing homelessness. The City continued efforts in meeting underserved needs of the homeless population through participation and coordination of goals and performance measures, and a commitment to the full implementation of a centralized intake and assessment process.

Addressing the emergency shelter and transitional housing needs of homeless persons

The funding from the Emergency Solutions Grant Program (administered by the OK Department of Commerce) is an integral component to the Continuum of Care strategy and plays an important role in meeting the needs of our homeless population. This program also includes case management, homeless prevention with funding allocated for eviction, or cut-off notices, housing search and placement to assist individuals and families through the crisis of homelessness. The HOME funded TBRA program can provide rental assistance to chronic individuals and families with children, for approximately 12 units, up to 24 months based on the goal of coupling housing with supportive services geared toward economic

self-sufficiency. The agencies involved in the Continuum collectively address the need for the at-risk and homeless, and work toward providing affordable housing, and case management.

Permanent Supportive Housing for chronically homeless persons continues to be a priority for the Continuum. Individuals and households accessing emergency shelters are screened using a standardized assessment tool at intake for program eligibility and to determine level of assistance needed. The CoC agencies utilize the VI-SPDAT as adopted by the Continuum of Care. Intake staff provides linkages to mainstream resources such as employment services, and food resources to help stabilize basic needs. Intake staffs at the shelters coordinate limited resources with the CoC. Our HMIS is used as a mechanism to increase coordination and avoid duplication of services.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The CoC continued to strengthen partnerships and engagement of participating stakeholders, as well as reaching out to new partners to participate in housing and community development. The CoC partners with a large network of key stakeholders dedicated to improving discharge outcomes and assisting low-income individuals and families from becoming homeless. The CoC will continue to establish policies specific to release protocols from health care facilities, mental health facilities, and institutions by coordinating housing options. Once a person is released from a health care facility, mental health facility or institution, the developed protocol between the hospitals to identify homeless consumers and share information between entities, and coordinate a plan for housing. Coordinated Case Management staffs the requests as needed and notifies the appropriate agency best suited for assistance.

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

The Continuum strives to ensure all residents have the availability to live in safe, decent housing with adequate income to help support themselves and their family. To effectively target persons experiencing homelessness, access to affordable housing is essential to preventing, and ending homelessness in our community. To leverage the limited CoC, and ESG funding, the CoC has partnered closely with the Norman Housing Authority for access to Housing Choice Vouchers and PHA units. The Norman Housing Authority was successful in the award of an additional 90 Section 811 Mainstream

Vouchers and 30 Emergency Housing Vouchers. Coordinated Case Management (CCM) committee has revised the homeless service program to direct the focus on PH placements, and case management. The Continuum continually addresses the need for increased opportunities for rental assistance to expand the availability of PSH. Increased partner involvement helps decrease the amount of time anyone spends in shelter until they are housed permanently.

In order for formerly homeless individuals to remain housed long-term, it is imperative they have a reliable income from employment or from benefit programs. Case managers in emergency, transitional and permanent supportive housing programs determine eligibility for mainstream benefit programs and support clients in the enrollment process. This includes gathering documents such as; driver's license or identification cards, birth certificate and Social Security. The case manager will assist with completing the application forms, and scheduling initial appointments. Clients are then given referral packets to each program they are eligible, including addresses and directions to the benefits office, transportation details and program information sheets.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

Coordination of activities continues with the Norman Housing Authority (NHA). NHA is a very active participant in the efforts to reduce homelessness within Norman and utilizes their Section 8 Voucher program to assist in these efforts. Activities this year included the continuation of 90 additional Section 811 Mainstream Vouchers and 30 Emergency Vouchers. In addition, a non-profit that is sponsored by NHA, Norman Affordable Housing Corporation (NAHC), partners with the Norman CHDO 2015 to further develop affordable housing. Many non-profits in Norman utilize NAHC to provide property maintenance and asset administration for properties that they own.

In addition to being very supportive of the CDBG and HOME programs, the public housing units owned and operated by NHA are in excellent condition and all properties maintain a waiting list. Norman Housing Authority receives approximately \$500,000 yearly for renovation and maintenance expenses from HUD's Capital Fund Program

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

The Norman Housing Authority has a very active Residents Council which has representation on the Board of Directors.

Actions taken to provide assistance to troubled PHAs

The Norman Housing Authority is a High Performing PHA.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken 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. 91.220 (j); 91.320 (i)

The City of Norman is currently undergoing an update to the City of Norman Comprehensive Land Use Plan. Included within this effort is the development of a Housing Affordability Strategic Plan. These issues will be considered as this process moves forward. Currently there are no public policies that either limit or encourage the development or maintenance of affordable housing.

Multiple presentations have made to the Norman City Council to brief them on the need for additional affordable housing and the efforts of the CDBG and HOME programs.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

Reliable data collection is necessary in order to assess the needs of the community and to sufficiently address gaps in serving those needs within the community. It was indicated in the past that not only is there a lack of financial resources to address the needs of underserved populations, but that there is a need for additional collaboration between organizations that aim to serve those needs.

Strides toward proper data collection have been made through the HMIS system for CoC and ESG funded programs. By assessing the needs of the homeless population, we have come to learn much about other sub-populations of homeless individuals. This has enabled us to better focus our efforts.

Utilizing the ARPA funding awarded to the City of Norman, 6.2 million dollars was set aside targeted towards Affordable Housing. CDBG staff has worked along the City Council in the development of a RFP for a partnership between the City and a LIHTC Developer in pursuing a tax credit project to address the affordable housing shortage in Norman. The City and the selected LIHTC Developer completed an application to OHFA in the January 2024 application cycle and was awarded funding to construct 75 units in partnership with the selected LIHTC Developer. Construction is anticipated to begin late fall 2024. No CDBG or HOME Funds were utilized.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

Any housing unit that is rehabilitated using City of Norman CDBG funds or HOME funds must address Lead Based Paint hazards that are present in accordance with the HUD Lead Safe Housing Rule. When Lead Inspection/Risk Assessment are required they are completed before work begins as part of the project development phase by a licensed lead inspector. Once work is completed, a clearance test is performed, again by a licensed lead inspector.

The City of Norman has continued to implement HUD's Lead-Safe Housing Rule for all housing programs in 2023. Specifically the owners of all housing units built prior to 1978 enrolled in a City Housing Rehabilitation Program receives the "Protect Your Family from Lead in Your Home: and the "Lead Safe Certified Guide to Renovate Right" pamphlets to educate them on the dangers of lead poisoning. In addition these pamphlets are made available to the general public at the Building Permit desk. Staff has completed all of the Lead Safe Housing Updates as provided by HUD Exchange and continues to conducted investigations into applying for the Lead Safe Housing Grant Program.

What this investigation discovered is that within Cleveland County there is a very low (practically zero) incidences of Elevated Blood Lead Levels as reported to the Cleveland County Health Department. As a result of this investigation, the decision was made to not apply for the grant and continue with the current protocols. Staff will continue communications with the Cleveland County Health Department to monitor this situation and take appropriate action of changes are noted.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

Working closely with multiple non-profits to develop housing opportunities, the City continued to address the needs of the low and moderate income persons by providing a mixture of housing, public services including corresponding supportive services, thus attempting to reduce the number of families in poverty.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

The City of Norman works closely with a variety of agencies to develop partnerships to identify and respond to emergening needs in the City. By serving on boards and as advisors to multiple civic partnerships, the City is able to provide leadership and strategic assistance to make program responsive to community needs.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The City of Norman encourages agencies including the Norman Housing Authority to partner with each other. Cooperation with non-profit agencies that serve the City of Norman residents is necessary to meet the housing and supportive service needs of the community. The City of Norman hosts and facilitates a Coordinated Case Management Conference each Tuesday morning for all homeless service providers to assist with the case management of this complex population. In addition to the homeless service providers being present, representatives from the regional mental health center, the housing authority and other ancillary organizations also attend and assist.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

The Analysis of Impediments to Fair Housing was updated in 2020. The impediments that were identified were institutional in nature primarily related to the scarcity of financial assistance for housing resulting from the reduction of Section 8 vouchers being available for use. The City of Norman is offering use of HOME funds for TBRA to help offset this issue.

One issue that was identified with previous CAPER's was the low percentage of assistance that was provided to ethnic groups and minorities by the Housing Rehabilitation Program. Outreach efforts were increased to low/mod neighborhoods that had a higher than average number of minorities and ethnicities. A direct mail was made to each of these neighborhoods that described the availability of the housing rehabilitation program.

CR-40 - Monitoring 91.220 and 91.230

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

Performance monitoring is an important component of the long term success of the federal grant programs. It helps ensure that the recipients of federal funds adhere to the purposes and requirements of the program as set forth by legislative regulations and funds are disbursed in a timely fashion.

1. Program and comprehensive planning compliance was managed by active involvement by the staff. Public service contracts are monitored for overall regulatory compliance, with required reporting and expenditures prior to payment to agencies. Infrastructure projects are inspected daily, payrolls checked weekly, and quantities measured prior to payment. Checklists were utilized to insure bid documents included all required language. Housing program processes have been in place for decades and continue to comply with all requirements.
2. 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.
3. Minority/Women Business Outreach Program efforts are designed to ensure the inclusion, to the maximum extent possible, of minorities and women and entities owned by minorities and women, in all contracts entered into by the City of Norman. There were no contracts reported to MWBE in the Fourth Year CAPER.
4. It is the City of Norman's Department of Planning and Community Development Department's policy to not recommend funding for projects that are not in compliance with the approved Consolidated Plan.
5. As a part of the Housing rehabilitation Program, a survey is sent to each applicant at the conclusion of the project. Of the 40 projects, nineteen returned surveys. While some clients complained about minor issues, all were very complimentary of the program, the staff, and the contractors. Any items noted were investigated and corrective action taken when warranted.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

Legal Notice was placed in the Norman Transcript on September 14, 2024 announcing the documents are available for Public Review. In addition a copy of the draft CAPER was provided to each member of the Advisory Committee for review. No comments were received as the date of submittal. Any comments received within the 15 day Public Comment Period will be forwarded to HUD for inclusion. At time of submittal, no comments have been received.

As part of the Citizen Participation Process, the CDBG Policy Committee receives regular updates from staff on all projects as they are undertaken.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction’s program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

No changes are warranted at this time. Program objectives will continue to be monitored and adjustments explored as needed. With the emergence from the COVID-19 Crisis and the subsequent award of CARES Act funding changes were made to the Citizen Participation Plan to address difficulties in public gatherings. These changes were incorporated within the recent Consolidated Plan and approved by HUD. Currently all CDBG meetings are held in person.

As the response from the City of Norman towards this crisis evolves, it may be necessary to reassess the priorities that were established previously. Any change of program priorities will be conducted in compliance with the Citizen Participation Plan.

The new Section 3 requirements will require additional recordkeeping and education to contractors. In FY23-24 no activities were undertaken which triggered Section 3 compliance. The City of Norman has developed a specific webpage to encourage potential and existing contractors to investigate and educate themselves on the Section 3 Program and will provide assistance as requested.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-50 - HOME 24 CFR 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in 24 CFR §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

Annual HQS inspections are scheduled annually in the fall of each year at the Tuscan Village HOME Rental Project. These inspections are made to the units that are not occupied by Section 8 recipients. The units that are occupied by Section 8 recipients are inspected annually by the Norman Housing Authority. The inspections made in the Fall of 2023 had few minor issues (one missing window screens and one broken closet door lockset) which were immediately taken care of by the property owner. This development consists of 16 units, 11 of which are floating HOME units. Annual inspections are made on each unit whether it is currently designated as a HOME Assisted unit or not. Staff receives monthly tenant updates for each completed project to insure that the balance of HOME Assisted Units is maintained. The ten year Period of Affordability for this activity was completed in June of 2024. A final desk monitoring was conducted which demonstrated that the property was adequately occupied and in a stable financial position. Discussions with the owner indicate that the property will remain affordable at the current rents with no plans for disposition of property.

In addition to the annual inspections, each completed HOME project provides semi-annual financial statements to document the financial viability of each project.

The remaining HOME units are under the management of the Norman Affordable Housing Corporation that has an exemplary maintenance policy and has scheduled HQS inspections as part of their policies and procedures. Copies of all inspections are provided to the City of Norman. No violations were reported on any unit.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 24 CFR 91.520(e) and 24 CFR 92.351(a)

All HOME Assisted projects are fully occupied, no additional marketing of units is warranted

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

No CDBG or HOME Program Income was received.

Describe other actions taken to foster and maintain affordable housing. 24 CFR 91.220(k)

(STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 24 CFR 91.320(j)

As mentioned previously, the City of Norman has begun (08/2023) an update to the Comprehensive and Land Use Plan. This update includes a detailed Housing Market Analysis and a Housing Affordability Strategy to be incorporated within the overall project. In addition staff had prepared an application to the PROHousing NOFO due October 15, 2024. Application will include an Affordable Housing Action Plan, Zoning Ordinance, Parking Study, and the development of Pre-Reviewed Plans. If awarded, CDBG Staff will be an integral part of the development and administration of the programs.

CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	0	0	0	0	0
Total Labor Hours					
Total Section 3 Worker Hours					
Total Targeted Section 3 Worker Hours					

Table 14 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers					
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.					
Direct, on-the job training (including apprenticeships).					
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.					
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).					
Outreach efforts to identify and secure bids from Section 3 business concerns.					
Technical assistance to help Section 3 business concerns understand and bid on contracts.					
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.					
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.					
Held one or more job fairs.					
Provided or connected residents with supportive services that can provide direct services or referrals.					
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.					
Assisted residents with finding child care.					
Assisted residents to apply for, or attend community college or a four year educational institution.					
Assisted residents to apply for, or attend vocational/technical training.					
Assisted residents to obtain financial literacy training and/or coaching.					
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.					
Provided or connected residents with training on computer use or online technologies.					
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.					
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.					

Other.					
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Table 15 – Qualitative Efforts - Number of Activities by Program

Narrative

No activities were undertaken which triggered Section 3 compliance. Given the potential projects that are being developed which will trigger Section 3, the City of Norman is very concerned in the availability of contractors which meet the Section 3 criteria. The City of Norman has developed a specific webpage to encourage potential and existing contractors to investigate and educate themselves on the Section 3 Program and will provide assistance as requested.

Attachment

Legal Notice Public Comment

NORMAN TRANSCRIPT

ORDER CONFIRMATION

Salesperson: Adrian Corwin Printed at 09/12/24 11:25 by jhowe-bv

Acct #: 44622 Ad #: 58265 Status: New CHOLD

LISA KRIEG Start: 09/14/2024 Stop: 09/14/2024
 225N WEBSTER Times Ord: 1 Times Run: ***
 NORMAN OK 73069 14LEG 1.00 X 17.00 Words: 91
 Total 14LEG 17.00
 Class: N105 PUBLIC NOTICES
 Rate: OKLEG Cost: 13.65
 # Affidavits: 1
 Ad Descrpt: PUBLIC NOTICE
 Descr Cont: PUBLISHED IN THE NORMAN T
 Given by: KRIEG/EMAIL
 P.O. #:
 Contact: Created: jhowe 09/12/24 11:23
 Phone: (405)366-5464 Last Changed: jhowe 09/12/24 11:25
 Fax#:
 Email: lisa.krieg@normanok.gov
 Agency:

PUB ZONE EDT TP RUN DATES
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AUTHORIZATION

Under this agreement rates are subject to change with 30 days notice. In the event of a cancellation before schedule completion, I understand that the rate charged will be based upon the rate for the number of insertions used.

Name (print or type)

Name (signature)

PUBLISHED IN
 THE NORMAN TRANSCRIPT
 SEPTEMBER 14TH, 2024
 1 TIME
 LPXLP

PUBLIC NOTICE

Notice is hereby given that the City of Norman, Consolidated Annual Performance Report for the Community Development Block Grant Program for the period of July 1, 2023, through June 30, 2024 has been completed. Copies will be available for citizen review in the office of the CDBG/Grants Manager located at 225 N Webster, during regular business hours beginning September 15, 2024. The report will be submitted to the Department of Housing & Urban Development no later than September 30, 2024.

