# **CITY OF LAWTON**



# **ANNUAL ACTION PLAN**

# For

# Federal Fiscal Year (FFY) 2019

July 1, 2019 – June 30, 2020



Prepared by
Housing & Community Development
City of Lawton



## **Executive Summary**

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

#### 1. Introduction

A consolidated plan is required by the U.S. Department of Housing and Urban Development (HUD) as a condition for receiving funding under certain federal programs. The goals of the consolidated plan are to provide decent housing; establish and maintain a suitable living environment; and expand economic opportunities, especially for low- and moderate-income persons. The Consolidated Plan (CONPLAN) outlines the Federal programs available to meet these goals — the Community Development Block Grant (CDBG), Home Investment Partnerships (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs. The purpose of requiring a Consolidated Plan is to foster, extend, and strengthen partnerships among all levels of government and the private sector, both for-profit and non-profit organizations, in meeting housing and community development goals.

Lawton's CONPLAN is a five-year planning document that identifies the City's overall needs for affordable and supportive housing, homeless shelters and services, and community and economic

development. The Consolidated Plan also defines the City's strategies, priorities, and objectives for addressing the community's needs. The City of Lawton (hereafter referred to as the City) Consolidated Plan for Federal Fiscal Year (FFY) 2016 through 2020 was approved by the City Council on April 26, 2016. The CONPLAN covers the five fiscal years from FFY 2016 through FFY 2020 (July 1, 2016-June 30, 2021).

This DRAFT Annual Action Plan implements the City's CONPLAN strategy and serves as Lawton's application for federal funds under HUD's CDBG and HOME programs. This Annual Action Plan is for FFY 2019 funding and covers the City's program year from July 1, 2019 through June 30, 2020. Congress has yet to approve a budget that will encompass the FFY 2019. This DRAFT Annual Action Plan for FFY 2019 uses the City's allocations from the previous year: CDBG allocation of \$700,988 and \$382,354 in HOME Program funds. We also expect to receive \$17,306 in CDBG program income (PI) and \$16,490 in HOME program income for the FFY 2019.

Housing and Community Development (HCD) will continue as the lead agency for coordination and development of the CONPLAN. For that purpose, HCD is responsible to provide community leadership, to plan and coordinate the consolidated planning process, and to develop the CONPLAN and the Annual Action Plan for submission to HUD. The point of contact for the consolidated planning process is the Supervisor for Housing and Community Development. The office is located at 1405 SW 11th Street, Lawton, Oklahoma 73501. The telephone number is (580) 581-3347.

#### 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 2019 Annual Action Plan is the fourth Action Plan of the CONPLAN and continues to place emphasis on affordable housing and homelessness.

HOME funds have been allocated for down payment assistance to low income homebuyer(s), whole house rehabilitation, non-profit housing construction, and owner-occupied rehabilitation. CDBG funds have been used to support public service activities which continue to be a priority of the community. The decline in the low-moderate income neighborhoods and the possible loss of code enforcement officers due to budget constraints has been the motivating factor to fund two (2) code enforcement officers with CDBG grant money. CDBG funding continues to support a myriad of activities to address homelessness.

#### 3. Evaluation of past performance

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

The FFY 2016-2020 Consolidated Plan includes strategies, with a particular focus on low and moderate income individuals and families, to provide safe, decent and affordable housing; to end homelessness by moving individuals and families from homelessness to permanent housing; to provide a safe and suitable living environment with adequate public facilities and services to ensure a high quality of life; and, to expand economic opportunities by providing financial resources and technical assistance to businesses in creating jobs and providing retail and commercial services with particular focus in the Neighborhood Revitalization.

The City of Lawton has been successful in attaining the goals and objectives contained in the 2016-20 Consolidated Plan, 2016-17 First Action Plan Year, 2017-18 Second Year Action Plan, and 2018-19 Third Year Action Plan strategies. The activities undertaken addressed the overall program goals of the formula grant programs and include providing decent housing and suitable living environment, and expanding economic opportunities principally for persons of low and moderate income.

The Consolidated Plan, First, Second, and Third Year Action Plans addressed **housing goals** by providing funding and engaging in program activities that include support for nonprofit and for-profit housing developers to rehabilitate and construct new affordable housing; support for Community Housing Development Organizations to rehabilitate and construct new affordable housing; support for the City of Lawton Housing Authority to modernize public housing units; funding to assist with emergency repairs of housing; support for down payment and closing cost assistance to expand homeownership opportunities; funding for activities that support the City's housing rehab program. Activities undertaken in the FFY 2018-19 Third Action Plan Year have addressed these goals and are on target to meet projected outcomes by fiscal year end on June 30, 2019. The goal of providing a **suitable living environment** was addressed in the Consolidated Plan, First, Second, and Third Action Year Plans by continuing ongoing programs that address specific community needs. The 2017-18 Second Action Plan Year strategy called for continued support for homeless services through the Continuum of Care Program; local funding of capacity building activities for neighborhood organizations; CDBG funding to provide neighborhood improvements and removal of slum and blight conditions in low-income areas.

#### 4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The purpose of this "Citizen Participation Plan" is to encourage broad citizen participation and provide Lawton's citizens impacted or affected by federal housing and community development programs, particularly low- and moderate-income citizens of the community, opportunities to participate in the consolidated and annual planning process. The Citizen Participation Plan outlines a process through which citizens may exercise their privilege to participate in the planning process to influence community development. It also ensures that the housing and community development needs of all persons within the community are considered and addressed through the planning process. Further, it provides flexibility to meet the community's current and changing needs. Citizens will be provided a minimum of thirty (30) days to review and provide comments following publication of the draft plan or substantial

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amendment to the plan. The Citizen Participation Plan will be considered for adoption or substantial amendment at a minimum of two (2) public hearings, with at least fifteen (15) day notice.

#### 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 public participation process for the completion of the 2019-2020 Fourth (4th) Action Plan Year began on February 25, 2018 with the publication of a Notice of Public Meetings and followed by two (2) community input sessions that took place in the Lawton City Council Chamber on April 11, 2019 at 1:30 p.m. and April 23, 2018 at 6:00 p.m.

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

There were not any comments received by phone or mail nor did anyone speak at the public hearings.

#### 7. Summary

The City of Lawton's strategic mission for community development is to provide for ongoing community revitalization by leveraging Federal and local resources with private investment and non-federal sources to ensure the provision of decent housing, suitable living environment and expanded economic opportunity for all residents of the community. In addition to the City's formula grant activities, local efforts have been undertaken to ensure economic momentum. Substantial private investment is also planned and underway throughout the City. Citizen involvement and input from local non-profits and service providers has been instrumental in identifying priority needs, strategic objectives, and funded activities for the Fourth Year Action Plan. A substantial amendment may be required from time to time as the City adapts to changing needs and priorities within an Action Plan year. A substantial amendment to the Consolidated Plan is defined as an amendment that adds a new sub-grantee, transfers funds from one activity to another involving 30% or more of the funds, or cancels an activity.

## 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	LAWTON	HOUS	NG AND COMMUNITY DEVELOPMENT
HOME Administrator	LAWTON	HOUS	NG AND COMMUNITY DEVELOPMENT

Table 1 – Responsible Agencies

## **Narrative (optional)**

The lead agency for overseeing the development of the Annual Action Plan and for administering programs covered by the Plan is the Housing and Community Development (HCD) Division of the City of Lawton. For that purpose, HCD is responsible to provide community leadership, to plan and coordinate the consolidated planning process, and to develop the Annual Action Plan for submission to HUD. The point of contact for the consolidated planning process is the Supervisor of Housing and Community Development who is located at 1405 SW 11th Street, Lawton, Oklahoma 73501 in the Housing and Community Development offices located on the northeast side of the building. The telephone number is (580) 581-3347.

#### **Consolidated Plan Public Contact Information**

For questions and or comments regarding this Plan, please contact Christine James, Administrator, Housing & Community Development, City of Lawton, 1405 SW 11th Street, Lawton, OK 73501, phone # (580)581-3350 or email: cjames@lawtonok.gov.

## AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

#### 1. Introduction

The lead agency for overseeing the development of the 2019-2020 Fourth (4th) Action Plan Year and for administering programs covered by the Plan is the Housing & Community Development Division of the City of Lawton, Community Services Department. The Southwest Oklahoma Continuum of Care (CoC) Committee is comprised of several homeless service providers who provide guidance on allocation and expenditure of funds and resources. Citizen input on allocations and expenditures of federal grant funds is received from the Citizens through the citizen participation plan process and the City Planning Commission. HCD also receives input through the year from concerned citizens and community leaders which are considered when developing the plan.

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

The City routinely communicates with Lawton Housing Authority (LHA) to understand their programs and needs. The City continues to provide them with funding each year to assist some of their public housing units as indicated within our Action Plan. The LHA has housing units within the City limits, and we have discussed with them the potential for additional units. Early discussions have been held with LHA to consider the possibility of making joint application for a future Choice Neighborhood Grant. The City actively interacts on an on-going basis with our Continuum of Care (CoC) subrecipients, including a number of mental and private service agencies that provide various types of assisted housing. Several homeless service providers within the CoC specialize in assisting individuals with mental health concerns. Besides the Continuum of Care Committee, Housing & Community Development Division staff participates in the Coalition to End Poverty.

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.

Lawton Housing Authority (LHA) is the lead agency for the Southwest Oklahoma Continuum of Care (CoC). The City has placed an emphasis on housing the chronically homeless using a housing first approach. Housing homeless veterans has also been an emphasis of this program and the CoC coordinates with the Veteran's Administration for VASH vouchers and case management. Additionally, the City will be collaborating increasingly with Lawton Support Services (LSS) to provide services to veteran's families as LSS is the local provider of the supportive services for Veteran's Families. If an individual or family demonstrates that they are at imminent risk of being homeless, LHA and LSS can help address the issues leading to that situation and provide case management to avoid it.

The Southwest Oklahoma CoC has an increase focus on homeless youth. There is a new initiative started by a broad based group of service/housing providers, faith based organizations; volunteer advocates and service recipients. This group provides insight and feedback on the Plan objectives to meet the needs of people who are homeless and have special needs including people with serious health issues. The Coalition plans to update the City's 10-Year Plan to End Homelessness and works to provide awareness to elected officials, interested parties and the public about homelessness and people who have special needs.

In collaboration with the City of Lawton Housing & Community Development Division staff and the Lawton Housing Authority, the Coalition organizes and executes the annual Point in Time Count (PIT) of the Homeless each January. This information is used in the annual HUD Continuum of Care (CoC) competition. The information obtained from the annual count is used to calculate need and track trends that occur in the homeless population including people who are chronically homeless and families with children.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards 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

The City of Lawton does not recieve ESG funds. However, Lawton Housing Authority (LHA) the lead agency for the Continuum of Care Committee oversees and evaluates the housing and service programs funded through the CoC, HOPWA, ESG, and City Social Services. The CoC Committee reviews proposals and makes funding recommendations to the City Council.

As the CoC lead agency, LHA consults with ESG funded agencies to develop performance standards that serve as a measure for valuating the outcomes of ESG assisted projects. The lead agency also collaborates with CoC and ESG funded agencies to develop local policies related to other ESG elements such as case management. The CoC Board ranks/determines funding allocations and monitors financial and programmatic elements of both CoC and ESG funded projects.

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

nizations and others who participated in the process tions with housing, social service agencies and other

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	GPIF C. CARTER CRANE HOMELESS SHELTER
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	In preparation of the development of the Annual Action Plan, the C. Carter Crane Homeless Shelter was consulted directly by City Staff to gauge current needs for emergency housing and temporary shelter for the homeless. All of the programs of the C. Carter Crane Shelter for the Homeless i.e. shelter, case-management, transpiration, street outreach and homeless prevention and re-housing are geared to achieve and maintain the same overall goals which are to help the client gain employment in order to develop an income stream and place them into stable housing and become a productive citizen within the Lawton community. The overall purpose of the shelter's programs is to move our clients to a situation where they are able to maintain a level of self-reliance and empowerment that will lead them out of the homeless situation that they have found themselves. Through intensive case-management and utilizing all or any of the services available to our shelter we endeavor to help them return to contributing citizenship within our community.
2	Agency/Group/Organization	CHRISTIAN FAMILY COUNSELING CENTER, INC.
	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	In preparation of the Annual Action Plan, the Christian Family Counseling Center				
was consulted. What are the anticipated outcomes of	was consulted directly by City Staff to gauge current needs to help restore,				
the consultation or areas for improved coordination?	educate and strengthen people through professional mental health service. By				
	addressing mental health needs, this program directly impacts the expansion of				
	economic opportunities for low and moderate income people. Our overall goals				
	and objectives are to help these people experience sound mental health,				
	enabling them to function in the workplace, school, family and community in a				
	productive manner. Reduction of the number of poverty level households can be				
	achieved by improving the potential economic status of clients served.				
Agency/Group/Organization	Lawton Support Services, Inc.				
	,				
Agency/Group/Organization Type	Services - Housing				
Agency/Group/Organization Type					
Agency/Group/Organization Type	Services - Housing				
Agency/Group/Organization Type	Services - Housing Services-Persons with Disabilities				
Agency/Group/Organization Type  What section of the Plan was addressed by	Services - Housing Services-Persons with Disabilities Services-homeless				
	Services - Housing Services-Persons with Disabilities Services-homeless Service-Fair Housing				
What section of the Plan was addressed by	Services - Housing Services-Persons with Disabilities Services-homeless Service-Fair Housing Housing Need Assessment				

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	In preparation of the Annual Action Plan, Lawton Support Services was consulted directly by City Staff to gauge the need for safe, affordable, and decent housing opportunities to low and moderate income individuals and families, and the elderly. The goal and objective of the program is to provide financial assistance to prevent homelessness, and provide housing relocation and stabilization services, that will not only assist families in pursuing safe, decent, and affordable housing and provide them with the tools necessary to achieve stability and self sufficiency, by linking them to much needed supportive services. Our sole focus is on housing-either financial assistance to help pay for housing, or services designed to keep people in housing or to find housing. Generally, the intent of the assistance is to transition program participants rapidly to stability, either through their own means or through public assistance, as appropriate.
4	Agency/Group/Organization	Marie Detty Youth and Family Services, Inc.
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Victims of Domestic Violence Services - Victims
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Domestic Violence
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	In preparation of the Annual Action Plan, Marie Detty Youth and Family Services was consulted directly by City Staff to gauge the need for assistance to victims of domestic violence, sexual assault and stalking along with their families that have become homeless due to these traumatic events. Residents will get assistance with finding housing and employment prior to leaving the shelter. They will also be offered counseling, educational classes, support groups and case management that will assist in self-sufficiency upon leaving the shelter.

5	Agency/Group/Organization	Roadback, Inc.			
	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?	In preparation of the Annual Action Plan, Roadback Inc., was consulted directly by City Staff to gauge the need substance abuse intervention. Roadback, Inc.'s goal in the Recovery Coaching/Case Management Program is to help reduce substance abuse and foster program participant's transition to independence with increased functioning, reduced substance use, reduced arrests, reduced homelessness, and reduced unemployment.			
6	Agency/Group/Organization	TEEN COURT, INC.			
	Agency/Group/Organization Type	Services-Education			
	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?	In preparation of the Annual Action Plan, Teen Court Inc., was consulted directly by City Staff to gauge the need to reduce the number of youthful offenders in the court system by both providing educational programs to prevent a crime from occurring and facilitating alternative adjudication for youthful non-violent crimes. Teen Court's overall goal is to reduce juvenile crime within Comanche County through positive peer pressure and educational classes intended to change attitudes and behaviors while educating these at-risk youth on the dangers of substance and alcohol abuse, resolving conflict and controlling anger and additional faulty thinking that may lead to an arrest or suspension from school ultimately dropping out before graduation.			

7 Agency/Group/Organization	Family Promise of Lawton				
Agency/Group/Organization Type	Housing				
	Services-homeless				
	Services-Health				
	Services-Education				
What section of the Plan was addressed by	Homeless Needs - Families with children				
Consultation?	Non-Homeless Special Needs				
Briefly describe how the Agency/Group/Organization	In preparation of the Annual Action Plan, Family Promise, was consulted directly				
was consulted. What are the anticipated outcomes of	by City Staff to gauge the need of homeless families with children to achieve				
the consultation or areas for improved coordination?	sustainable independence. The overall goal of the Family Promise of Lawton, Inc				
	(FPOL) is to assist homeless families with children regain their independence and				
	lasting self-reliance. FPOL does this providing intense case management and				
	structure. FPOL also helps the family reach their goal of independence by				
	providing stability; a daily routine, normal school attendance, a place to sleep				
	every night, food, as well as various other life skills.				

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

The City of Lawton consulted with all relevant agencies and municipalities, and provided an opportunity to comment and provide feedback on the Annual Action Plan priorities through a public meeting process and public comment period.

### Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Lawton Support Services	The Continuum of Care (CoC)Committee generally adheres to recommendations and priorities identified in the Consolidated Plan, and seeks to ensure a targeted distribution of resources based on need. In the Annual Action Plan, CoC, ESG and City Social services funding was allocated with oversight by the CoC Committee. This allocation process will remain in place for the 2019-2020 Fourth (4th) Action Plan Year.

Table 3 – Other local / regional / federal planning efforts

## **Narrative (optional)**

The City of Lawton maintains an ongoing dialogue with local non-profit and for-profit housing providers and developers to gauge housing needs within the metropolitan area. Solicitations for development proposals are drafted based upon current housing needs and community goals such as mixed income housing, deconcentration of poverty, infill development, and minimal design standards. Housing needs for very low income families are identified through continuing conversations and discourse with the Lawton Housing Authority. In this Fourth Action Plan Year, the City of Lawton has also reviewed helpful data, trends, and statistics for the local housing market such as demographics, market supply and demand, vacancies, average rental rates, housing costs, economic conditions and needs of the homeless.

## **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

No comments were received.

### **Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted	URL (If applicable)
			response/attenuance	comments received	and reasons	арріісавіе)
		Non-		No comments were		
1	Newspaper Ad	targeted/broad		received via in		
1	Newspaper Au	community		person, phone.		
		Community		mail, or email.		
				No one spoke or		
	Public Hearing	Non- targeted/broad community		provided		
				comments at either		
				of the public		
2				hearings. Two (2)		
2	Public Hearing			hearings were held		
				with the Notice of		
				Public Hearing		
				being published in		
				the newspaper.		

**Table 4 – Citizen Participation Outreach** 

## **Expected Resources**

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

#### Introduction

The allocations for the fourth program year are down slightly from last year with the CDBG allocation being \$700,988 and the HOME allocation being \$382,354. Last years allocations were substantially higher than previous years. Even with the decrease in allocations from last year, the allocations are close to what was expected.

Resources are still available from previous years in both CDBG and HOME. A handful of new 2018 projects will be started within the next few months mainly using funds that are at-risk. Some of the 2018 projects are expected to take 1-2 years to complete.

## **Anticipated Resources**

Program	Source of	Uses of Funds	Ехре	Expected Amount Available Year 1		Expected	Narrative Description	
	Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
CDBG	public - federal	Acquisition Admin and Planning						Prior year resources are mainly from 2018.
	reactar	Economic						110111 2010.
		Development						
		Housing						
		Public						
		Improvements						
		Public Services	668,746	17,306	468,960	1,155,012	0	

Program	Source of	Uses of Funds	Expe	cted Amour	nt Available Ye	ar 1	Expected	Narrative Description
	Funds		Annual	Program	Prior Year	Total:	Amount	
			Allocation:	Income:	Resources:	\$	Available	
			\$	\$	\$		Remainder	
							of ConPlan	
							\$	
HOME	public -	Acquisition						Prior year resources are from
	federal	Homebuyer						2014 through 2018. 2014 funds
		assistance						are at-risk and are being used
		Homeowner rehab						first.
		Multifamily rental						
		new construction						
		Multifamily rental						
		rehab						
		New construction						
		for ownership						
		TBRA	327,362	16,490	1,159,804	1,503,656	0	

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

The City of Lawton prioritizes activities that leverage federal funds with other public and private resources to address housing needs in the community.

The City has a Community Housing Development Organization (CHDO) set-aside that includes the 15% CHDO statutory minimum and a pool of HOME funds for new home construction and rehabilitation/sale activities. CHDOs are encouraged to utilize private bank financing along with the CHDO loan pool of HOME funds in providing affordable housing. Proposals for new projects are accepted when the CHDO has completed all previously funded projects. The City facilitates the transfer at no cost, of City owned vacant lots to nonprofit organizations for the construction of affordable housing. The primary lot recipients could included CHDO's, such as Great Plains Improvement Foundation (GPIF) and Habitat for Humanity. The new home construction is typically funded with private financing and other resources. When resources allow, the City also

provides local funding (general funds) to agencies that provide services to the homeless.

Federal funds provided by HUD are utilized in several ways to leverage public and private resources. The City's down payment and closing cost assistance program assists in the achievement of home ownership, and has proven to be an attractive program that stimulates significant interest among private lenders.

The City may also assist developers by providing HOME funds to document community support for Low Income Housing Tax Credit (LIHTC) applications to the Oklahoma Housing Finance Agency (OHFA) when reasonable to do so. OHFA provides bonus points for applications that receive a minimum level of funding granted to the project from the local community. LIHTC credits provide significant leverage in affordable housing developments.

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# 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 Lawton Urban Renewal Authority (LURA) still owns property in the south and southeast area of the city, and has a goal to develop some of their sites with mixed-income housing projects. Beyond this, LURA will continue the redevelopment of closeout areas under the agreements with HUD through eligible program activities that include acquisition, disposition, relocation, clearance and urban renewal completion.

LURA owns eighty-six (84) residential lots on the south side of Lawton between Lee Blvd and Bishop Road. These lots were offered in a Request for Proposals (RFP) released in March 25, 2015 to solicit project proposals for residential, commercial and/or mixed-use development on these sites. It is anticipated that redevelopment of these parcels will occur within the five (5) year Consolidated Plan period.

#### Discussion

Regarding required match contributions, HUD match reduction for fiscal distress communities is 50% of 25% match funding for the HOME program in the program year. Although match reductions or waivers cannot be projected in future years, it should be noted that the City has accumulated a significant banked match credit which will ensure that adequate leverage is available for new activities. The City of Lawton continues to prioritize funding of projects that leverage private capital and non-federal funding. It is anticipated that sufficient match will be generated from funded activities to fulfill the match requirement without the use of banked credit.

# **Annual Goals and Objectives**

## **AP-20 Annual Goals and Objectives**

## **Goals Summary Information**

Sort	Goal Name	Start	End	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year					
1	CDBG Administration	2016	2020	Administration	Unknown	Affordability of	CDBG:	Other: 1 Other
					LAWTON VIEW	Owner-	\$133,749	
					NEIGHBORHOOD	Occupied		
					REVITILAZATION	Housing		
					STRATEGY AREA	Quality of		
					DOWNTOWN - 01	Affordable		
					ZONE ONE	Owner Housing		
					DOWNTOWN - 03	Supply of		
					LAWTON VIEW	Affordable		
						Owner-		
						Occupied		
						Housing		

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Whole-House	2016	2020	Affordable	Unknown	Affordability of	HOME:	Homeowner Housing
	Rehabilitation-HOME			Housing	LAWTON VIEW	Owner-	\$245,362	Rehabilitated: 8
					NEIGHBORHOOD	Occupied		Household Housing Unit
					REVITILAZATION	Housing		
					STRATEGY AREA	Quality of		
					DOWNTOWN - 01	Affordable		
					ZONE ONE	Owner Housing		
					DOWNTOWN - 03			
					LAWTON VIEW			
3	Exterior	2016	2020	Affordable	Unknown	Quality of	CDBG:	Homeowner Housing
	Maintenance -CDBG			Housing	LAWTON VIEW	Affordable	\$40,000	Rehabilitated: 6
					NEIGHBORHOOD	Owner Housing		Household Housing Unit
					REVITILAZATION			
					STRATEGY AREA			
					DOWNTOWN - 01			
					ZONE ONE			
					DOWNTOWN - 03			
					LAWTON VIEW			
4	Emergency Repairs-	2016	2020	Affordable	Unknown	Quality of	CDBG:	Homeowner Housing
	CDBG			Housing	LAWTON VIEW	Affordable	\$30,360	Rehabilitated: 15
					NEIGHBORHOOD	Owner Housing		Household Housing Unit
					REVITILAZATION			
					STRATEGY AREA			
					DOWNTOWN - 01			
					ZONE ONE			
					DOWNTOWN - 03			
					LAWTON VIEW			

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Downpayment and	2016	2020	Affordable	Unknown	Affordability of	HOME:	Direct Financial Assistance
	Closing Costs	2010	2020	Housing	LAWTON VIEW	Owner-	\$15,000	to Homebuyers: 1
	Assistance-HOME			C	NEIGHBORHOOD	Occupied		Households Assisted
					REVITILAZATION	Housing		
					STRATEGY AREA	Supply of		
ı					DOWNTOWN - 01	Affordable		
					ZONE ONE	Owner-		
ı					DOWNTOWN - 03	Occupied		
					LAWTON VIEW	Housing		
6	CHDO Set-Aside	2016	2020	Affordable	Unknown	Supply of	HOME:	Rental units rehabilitated:
1	Project- HOME			Housing	LAWTON VIEW	Affordable	\$49,105	3 Household Housing Unit
					NEIGHBORHOOD	Owner-		
					REVITILAZATION	Occupied		
					STRATEGY AREA	Housing		
					DOWNTOWN - 01			
					ZONE ONE			
					DOWNTOWN - 03			
					LAWTON VIEW			

Sort Order	Goal Name	Start	End	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Section 108 Loan	<b>Year</b> 2016	<b>Year</b> 2020	Help Build Public	DOWNTOWN - 01	Affordability of	CDBG:	Jobs created/retained:
*	Assistance- CDBG	2010	2020	Streets and Side	DOWNTOWN - 03	Owner-	\$155,134	400 Jobs
	7.0505tarree ebba			Walks		Occupied	7133,131	100 3003
				· · · · · · · · · · · · · · · · · · ·		Housing		
						Quality of		
						Affordable		
						Owner Housing		
						Supply of		
						Affordable		
						Owner-		
						Occupied		
						Housing		
8	Delinquency	2016	2020	Non-Housing	Unknown	Supply of	CDBG:	Public service activities
	Prevention (Teen			Community	LAWTON VIEW	Affordable	\$20,349	other than Low/Moderate
	Court) Project			Development	NEIGHBORHOOD	Owner-	. ,	Income Housing Benefit:
				•	REVITILAZATION	Occupied		1300 Persons Assisted
					STRATEGY AREA	Housing		
					DOWNTOWN - 01			
					ZONE ONE			
					DOWNTOWN - 03			
					LAWTON VIEW			

Sort Order	Goal Name	Start	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9	Counseling	<b>Year</b> 2016	2020	Non-Housing	Unknown	Supply of	CDBG:	Public service activities
	Assistance (Christian	2010	2020	Community	LAWTON VIEW	Affordable	\$18,343	other than Low/Moderate
	Family Counseling			Development	NEIGHBORHOOD	Owner-	710,545	Income Housing Benefit:
	Talling Couriseiing			Development	REVITILAZATION	Occupied		300 Persons Assisted
					STRATEGY AREA	Housing		300 Persons Assisted
					DOWNTOWN - 01	Housing		
					ZONE ONE			
					DOWNTOWN - 03			
40	5	2016	2020		LAWTON VIEW	6 1 6	0000	
10	Domestic Violence	2016	2020	Non-Housing	Unknown	Supply of	CDBG:	Homeless Person
	Shelter (New			Community	LAWTON VIEW	Affordable	\$16,336	Overnight Shelter: 1800
	Direction) Project			Development	NEIGHBORHOOD	Owner-		Persons Assisted
					REVITILAZATION	Occupied		
					STRATEGY AREA	Housing		
					DOWNTOWN - 01			
					ZONE ONE			
					DOWNTOWN - 03			
					LAWTON VIEW			
11	Homeless Shelter	2016	2020	Non-Homeless	Unknown	Supply of	CDBG:	Homeless Person
	(C.Carter Crane			Special Needs	LAWTON VIEW	Affordable	\$14,330	Overnight Shelter: 350
	HomelessShelter)				NEIGHBORHOOD	Owner-		Persons Assisted
					REVITILAZATION	Occupied		
					STRATEGY AREA	Housing		
					DOWNTOWN - 01			
					ZONE ONE			
					DOWNTOWN - 03			
					LAWTON VIEW			

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
12	Drug and Alcohol	2016	2020	Non-Housing	Unknown	Supply of	CDBG:	Public service activities
	Case management			Community	LAWTON VIEW	Affordable	\$12,324	other than Low/Moderate
	(Roadback Inc)			Development	NEIGHBORHOOD	Owner-		Income Housing Benefit:
	,				REVITILAZATION	Occupied		300 Persons Assisted
					STRATEGY AREA	Housing		
					DOWNTOWN - 01			
					ZONE ONE			
					DOWNTOWN - 03			
					LAWTON VIEW			
13	Homeless Shelter	2016	2020	Non-Housing	Unknown	Supply of	CDBG:	Homeless Person
	(Family Promise of			Community	LAWTON VIEW	Affordable	\$10,318	Overnight Shelter: 100
	lawton Inc.)			Development	NEIGHBORHOOD	Owner-		Persons Assisted
					REVITILAZATION	Occupied		
					STRATEGY AREA	Housing		
					DOWNTOWN - 01			
					ZONE ONE			
					DOWNTOWN - 03			
					LAWTON VIEW			
14	lawton Support	2016	2020	Non-Housing	Unknown	Supply of	CDBG:	Public service activities for
	Services			Community	LAWTON VIEW	Affordable	\$8,311	Low/Moderate Income
				Development	NEIGHBORHOOD	Owner-		Housing Benefit: 50
					REVITILAZATION	Occupied		Households Assisted
					STRATEGY AREA	Housing		
					DOWNTOWN - 01			
					ZONE ONE			
					DOWNTOWN - 03			
					LAWTON VIEW			

Sort	Goal Name	Start	End	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year					
15	Housing	2016	2020	Affordable	Unknown	Affordability of	CDBG:	Other: 1 Other
	Rehabilitation (HAD			Housing	LAWTON VIEW	Owner-	\$132,958	
	Delivery Cost) - CDBG				NEIGHBORHOOD	Occupied		
					REVITILAZATION	Housing		
					STRATEGY AREA	Quality of		
					DOWNTOWN - 01	Affordable		
					ZONE ONE	Owner Housing		
					DOWNTOWN - 03			
					LAWTON VIEW			
16	LETA Paint the City	2016	2020		Unknown	Quality of	CDBG:	Homeowner Housing
	Project				LAWTON VIEW	Affordable	\$10,000	Rehabilitated: 40
					NEIGHBORHOOD	Owner Housing		Household Housing Unit
					REVITILAZATION			
					STRATEGY AREA			
					DOWNTOWN - 01			
					ZONE ONE			
					DOWNTOWN - 03			
					LAWTON VIEW		_	

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
17	Administration -	2016	2020	Affordable	Unknown	Affordability of	HOME:	Other: 1 Other
	HOME			Housing	LAWTON VIEW	Owner-	\$34,385	
					NEIGHBORHOOD	Occupied		
					REVITILAZATION	Housing		
					STRATEGY AREA	Quality of		
					DOWNTOWN - 01	Affordable		
					ZONE ONE	Owner Housing		
					DOWNTOWN - 03	Supply of		
					LAWTON VIEW	Affordable		
						Owner-		
						Occupied		
						Housing		
18	Code Enforcement	2016	2020	Affordable	ZONE ONE	Quality of	CDBG:	Other: 1 Other
	Activity Project -			Housing	LAWTON VIEW	Affordable	\$83,540	
	CDBG			Public Housing		Owner Housing		
				Non-Housing				
				Community				
				Development				

Table 6 – Goals Summary

## **Goal Descriptions**

1	Goal Name	CDBG Administration
	Goal	Administrative expenses for CDBG and HOME program operations and management.
	Description	

	_	
2	Goal Name	Whole-House Rehabilitation-HOME
	Goal	Provide financial assistance for the whole-house rehabilitation of owner-occupied single-family housing units.
	Description	
3	<b>Goal Name</b>	Exterior Maintenance -CDBG
	Goal Description	Provide financial assistance for exterior maintenance code violations to owner-occupied single-family housing units.
4	<b>Goal Name</b>	Emergency Repairs-CDBG
	Goal	Provide financial assistance for emergency home repairs of owner-occupied single-family housing units.
	Description	
5	Goal Name	Downpayment and Closing Costs Assistance-HOME
	Goal	Provide financial assistance to a first-time homebuyer for downpayment and/or closing cost assistance.
	Description	
6	Goal Name	CHDO Set-Aside Project- HOME
	Goal	Provide financial assistance to a qualifying CHDO in the rehabilitation of existing rental homes for low-moderate income
	Description	housing units or in the construction of new affordable housing units.
7	Goal Name	Section 108 Loan Assistance- CDBG
	Goal	Provide Section 108 Loan Program funds for the creation of jobs. The "funding" allocation noted below is the annual
	Description	debit service on the outstanding loan.
8	Goal Name	Delinquency Prevention (Teen Court) Project
	Goal	Teen Court's mission is to help reduce the number of youthful offenders in the court system by both providing
	Description	educational programs to prevent a crime from happening and facilitating alternative adjudication for youthful non-
	<u>'</u>	violent crimes.

9	Goal Name	Counseling Assistance (Christian Family Counseling
	Goal Description	Provide funding to local non-profit(s) to assist in making professional outpatient counseling services available to moderate, low and very low income people residing in the Lawton.
10	<b>Goal Name</b>	Domestic Violence Shelter (New Direction) Project
	Goal Description	Provide funding to local non-profit(s) to assist victims of domestic violence, sexual assault and stalking along with their families that have become homeless due to these traumatic events.
11	Goal Name	Homeless Shelter (C.Carter Crane HomelessShelter)
	Goal Description	Provide funding to local non-profit(s) to assist and empower the homeless achieve their goals of lasting independence and self-reliance through increased income and helping them achieve stable housing.
12	<b>Goal Name</b>	Drug and Alcohol Case management (Roadback Inc)
	Goal Description	Provide funding to local non-profit(s) to assist in the help and recovery of people of our community in the treatment of substance abuse and its related issues for individuals and families.
13	Goal Name	Homeless Shelter (Family Promise of lawton Inc.)
	Goal Description	Provide funding to local non-profit(s) to assist and empower the homeless achieve their goals of sustainable independence.
14	<b>Goal Name</b>	lawton Support Services
	Goal Description	Provide funding to local non-profit(s) to assist and empower the homeless achieve their goals of lasting independence and self-reliance through increased income and helping them achieve stable housing.
15	Goal Name	Housing Rehabilitation (HAD Delivery Cost) - CDBG
	Goal Description	Provide funding to assist low, very low and moderated household with emergency (ER) and exterior home improvement (EHIP) of owner-occupied homes.
16	Goal Name	LETA Paint the City Project
	Goal Description	Provide financial assistance for the remediation of exterior maintenance/code violations of owner-occupied single-family housing units.

17	Goal Name	Administration - HOME
	Goal	Provide administrative and management support for the HOME programs.
	Description	
18	Goal Name	Code Enforcement Activity Project - CDBG
	Goal	Provide financial funding for code enforcement officers help address code compliance issued in low-moderate income
	Description	neighborhoods within the City of Lawton.

## **Projects**

## AP-35 Projects - 91.220(d)

#### Introduction

The following initiatives and goals for the Fourth (4th) Action Plan Year are consistent with those established in the Five-Year Consolidated Plan with an effective date of July 1, 2016, and are compatible with the purposes set forth in **24 CFR Section 91.1**, that include:

- 1. Affordable Housing Programs consisting of housing rehabilitation and new construction that focus on home ownership, programs to assist lower-income persons to attain home ownership, as well as single and multi-family rental rehabilitation and new construction program activities
- 2. Economic Development activities targeting the low and moderate income areas.
- 3. The goals and objectives that are addressed in this Annual Action Plan specifically relate to the goals outlined in the 2016-2020 Consolidated Plan and the Department of Housing and Urban Development goals that include:
- 1. The provision of decent housing
- 2. The provision of a suitable living environment, and
- 3. Expanding economic opportunities principally for persons of low and moderate income.

The program activities are outlined below as they relate to availability/accessibility, affordability, and sustainability with regard to decent housing, suitable living environment and economic opportunity.

#### **Projects**

#	Project Name
1	CDBG Administration
2	Whole-House Rehabilitation-HOME
3	Exterior Maintenance-CDBG
4	Emergency Repairs-CDBG
5	Downpayment and Closing Costs Assistance-HOME
6	CHDO Set-Aside Project-HOME
7	Section 108 Loan Assistance-CDBG
8	Delinquency Prevention (Teen Court) Project
9	Counseling Assistance (Christian Family Counseling)

#	Project Name	
10	Domestic Violence Shelter (Marie Detty-New Directions Battered Women's Shelter) Project	
11	Homeless Shelter (GPIF-C. Carter Crane Homeless Shelter) Project	
12	Drug and Alcohol Case Management (Roadback, Inc.) Project	
13	Homeless Shelter (Family Promise of Lawton, Inc) Project	
14	Lawton Support Services Project	
15	Housing Rehabilitation (HAD Delivery Cost) Project-CDBG	
16	LETA Paint the City Project	
17	HOME Administration	
18	Code Enforcement Activity Project-CDBG	

**Table 7 - Project Information** 

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

Priority is assigned to housing objectives based on the amount of federal funds available, unmet needs identified in the preceding analysis as they relate to creating affordable owner housing and encouraging home ownership, and in an effort to direct funds to long term solutions to problems. Housing objectives that receive a ranking of high are the objectives that will be addressed through program activities funded in the Annual Action Year programs. Other housing criteria evaluated to provide a ranking of high priority include:

- 1. Preservation of existing housing stock, particularly in areas where the greatest concentration of lower-income persons and minorities reside. Funding is allocated to fund rehabilitation of private homes, provide for emergency home repair, exterior maintenance repair, and rehabilitation of public housing units.
- 2. Permanent housing for the chronic homeless that includes persons with serious mental illness, substance abuse, and other disabilities. Funds can be allocated to match other grant in aid programs, or to accumulate sufficient funds to start a sponsored permanent homeless housing projects.
- 3. Down payment and closing cost assistance to increase the affordability of home ownership.
- 4. Increasing the supply of affordable housing is a high priority. Community Housing Development Organizations (CHDOs) and other non-profits are eligible to apply for allocations of HOME funds to construct new homes, or purchase/rehab homes for eligible owner households.
- 5. Objectives that improve the quality of owner housing have a high priority including emergency home

repair, housing exterior maintenance and whole house rehabilitation.

6. Objectives that improve the quality of public housing have high priority.

## **AP-38 Project Summary**

**Project Summary Information** 

1	Project Name	CDBG Administration
	Target Area	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW
	Goals Supported	CDBG Administration
	Needs Addressed	Quality of Affordable Owner Housing Affordability of Owner-Occupied Housing Supply of Affordable Owner-Occupied Housing
	Funding	:
	Description	Administrative expenses for CDBG and HOME program operations and management.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	We expect to assist over two thousand (2,000) families involving the spectrum of people that make up the low-moderate income groups.
	Location Description	Program administration primarly conducted athe the Housing & Community Dedelopment office located at 1405 SW 11th Street, Lawton, OK 73501.
	Planned Activities	
2	Project Name	Whole-House Rehabilitation-HOME
	Target Area	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW
	Goals Supported	Whole-House Rehabilitation-HOME
	Needs Addressed	Quality of Affordable Owner Housing Affordability of Owner-Occupied Housing Supply of Affordable Owner-Occupied Housing
	Funding	:

	Description	Provide financial assistance for the whole-house rehabilitation of
		owner-occupied single-family housing units.
	Target Date	6/30/2020
	Estimate the number	We estimate that we will assist a minimum of eight (8) low-moderate
	and type of families that will benefit from	income owner-occupied single-family housing units.
	the proposed activities	
	<b>Location Description</b>	The activities will take place within the city limits of Lawton for any qualifying low-moderate household.
	Planned Activities	Rehabilitation of eight (8) owner-occupied homes.
3	Project Name	Exterior Maintenance-CDBG
	Target Area	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW
	Goals Supported	Exterior Maintenance -CDBG
	Needs Addressed	Quality of Affordable Owner Housing Affordability of Owner-Occupied Housing
	Funding	:
	Description	Provide financial assistance for exterior maintenance code violations to owner-occupied single-family housing units.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	We estimate that we will assist a minimum of six (6) low-moderate income owner-occupied single-family housing units.
	Location Description	The activities will take place within the city limits of Lawton for any qualifying low-moderate household.
	Planned Activities	Repair the exterior of six (6) owner-occupied homes.
	Project Name	Emergency Repairs-CDBG

4	Target Area	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW
	Goals Supported	Emergency Repairs-CDBG
	Needs Addressed	Quality of Affordable Owner Housing Affordability of Owner-Occupied Housing
	Funding	:
	Description	Provide financial assistance for emergency home repairs of owner-occupied single-family housing units.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	We estimate that we will assist a minimum of fifteen (15) low-moderate income owner-occupied single-family housing units.
	Location Description	The activities will take place within the city limits of Lawton for any qualifying low-moderate household.
	Planned Activities	Emergency repairs of fifteen (15) owner-occupied homes.
5	Project Name	Downpayment and Closing Costs Assistance-HOME
	Target Area	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW
	Goals Supported	Downpayment and Closing Costs Assistance-HOME
	Needs Addressed	Quality of Affordable Owner Housing Affordability of Owner-Occupied Housing Supply of Affordable Owner-Occupied Housing
	Funding	:
	Description	Provide financial assistance to a first-time homebuyer for downpayment and/or closing cost assistance.
	Target Date	6/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	We estimate that we will assist a minimum of one (1) low-moderate income first-time homebuyer.
	Location Description	The activity will take place within the city limits of Lawton for any qualifying low-moderate household.
	Planned Activities	Assist one (1) first-time homebuyer in the purchase of a home.
6	Project Name	CHDO Set-Aside Project-HOME
	Target Area	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW
	Goals Supported	CHDO Set-Aside Project- HOME
	Needs Addressed	Quality of Affordable Owner Housing Affordability of Owner-Occupied Housing Supply of Affordable Owner-Occupied Housing
	Funding	:
	Description	Provide financial assistance to a qualifying CHDO in the rehabilitation of existing rental homes for low-moderate income housing units or in the construction of new affordable housing units.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	We estimate that we will assist a minimum of three (3) low-moderate income households with affordable housing units.
	Location Description	The activities will take place within the city limits of Lawton for any qualifying low-moderate households.
	Planned Activities	Rehabiliation of three (3) existing rental housing units.
7	Project Name	Section 108 Loan Assistance-CDBG
	Target Area	DOWNTOWN - 01 DOWNTOWN - 03
	Goals Supported	Section 108 Loan Assistance- CDBG

	Needs Addressed	Quality of Affordable Owner Housing Affordability of Owner-Occupied Housing Supply of Affordable Owner-Occupied Housing
	Funding	:
	Description	Provide Section 108 Loan Program funds for the creation of jobs. The "funding" allocation noted below is the annual debit service on the outstanding loan.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	We estimate that approximately four hundred (400) low-moderate income individuals will obtain or retain a job in the 2nd Street Corridor shopping area.
	Location Description	The activites will take place along the east side of 2nd Street between Ferris Avenue and Gore Boulevard.
	Planned Activities	Make annual payment required to pay back the Section 108 Loan.
8	Project Name	Delinquency Prevention (Teen Court) Project
	Target Area	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW
	Goals Supported	Delinquency Prevention (Teen Court) Project
	Needs Addressed	Quality of Affordable Owner Housing Affordability of Owner-Occupied Housing
	Funding	:
	Description	Teen Court's mission is to help reduce the number of youthful offenders in the court system by both providing educational programs to prevent a crime from happening and facilitating alternative adjudication for youthful non-violent crimes.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	We estimate that approxamately one thousand three hundred (1300) low-moderate income persons will benefit.

	Location Description	Teen Court, Inc. has a primary location of 814 SW C Avenue, however the organization's activites are conducted at different venues across the city including the courthouse.
	Planned Activities	Reduce the number of youthful offenders in the court system by both providing educational programs to prevent a crime from happening and facilitating alternative adjudication for youthful non-violent crimes.
9	Project Name	Counseling Assistance (Christian Family Counseling)
	Target Area	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW
	Goals Supported	Counseling Assistance (Christian Family Counseling
	Needs Addressed	Affordability of Owner-Occupied Housing
	Funding	:
	Description	Provide funding to local non-profit(s) to assist in making professional outpatient counseling services available to moderate, low and very low income people residing in the Lawton.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	We estimate that approxamately three hundred (300) low-moderate income persons will benefit.
	Location Description	Christian Family Counseling Center, Inc. organization's activities are conducted at 5002 SW Lee Boulevard.
	Planned Activities	Assist in making professional outpatient counseling services available to moderate, low and very low income people residing in the Lawton.
10	Project Name	Domestic Violence Shelter (Marie Detty-New Directions Battered Women's Shelter) Project

	Target Area	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW
	Goals Supported	Domestic Violence Shelter (New Direction) Project
	Needs Addressed	Quality of Affordable Owner Housing Affordability of Owner-Occupied Housing
	Funding	:
	Description	Provide funding to local non-profit(s) to assist victims of domestic violence, sexual assualt and stalking along with their families that have become homeless due to these traumatic events.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	We estimate that one thousand eight hundred (1800) low-moderate persons will benefit.
	Location Description	Marie Detty organization's activites are conducted at 317 SW C Avenue.
	Planned Activities	Assist victims of domestic violence, sexual assualt and stalking along with their families that have become homeless due to these traumatic events
11	Project Name	Homeless Shelter (GPIF-C. Carter Crane Homeless Shelter) Project
	Target Area	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW
	Goals Supported	Homeless Shelter (C.Carter Crane HomelessShelter)
	Needs Addressed	Quality of Affordable Owner Housing Affordability of Owner-Occupied Housing
	Funding	:

	Description	Provide funding to local non-profit(s) to assist and empower the homeless achieve their goals of lasting independence and self-reliance through increased income and helping them achieve stable housing.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	We estimate that three hundred fifty (350) low-moderate persons will benefit.
	Location Description	C. Carter Crane Homeless Shelter organization's activities are conducted at 1203 SW Texas Avenue.
	Planned Activities	Assist and empower the homeless achieve their goals of lasting independence and self-reliance through increased income and helping them achieve stable housing.
12	Project Name	Drug and Alcohol Case Management (Roadback, Inc.) Project
	Target Area	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW
	Goals Supported	Drug and Alcohol Case management (Roadback Inc)
	Needs Addressed	Quality of Affordable Owner Housing Affordability of Owner-Occupied Housing
	Funding	:
	Description	Provide funding to local non-profit(s) to assist in the help and recovery of people of our community in the treatment of substance abuse and its related issues for individuals and families.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	We estimate that three hundred (300) low-moderate persons will benefit.
	Location Description	Roadback, Inc. organization's activities are conducted at 1114 SW A Avenue.

	Planned Activities	Assist in the help and recovery of people of our community in the treatment of substance abuse and its related issues for individuals and families.
13	Project Name	Homeless Shelter (Family Promise of Lawton, Inc) Project
	Target Area	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW
	Goals Supported	Homeless Shelter (Family Promise of lawton Inc.)
	Needs Addressed	Quality of Affordable Owner Housing Affordability of Owner-Occupied Housing
	Funding	:
	Description	Provide funding to local non-profit(s) to assist and empower the homeless achieve their goals of sustainable independence.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	We estimate that one hundred (100) low-moderate persons will benefit.
	Location Description	Family Promise of Lawton, Inc. organization's activities are conducted at 901 SW 17th Street.
	Planned Activities	Assist and empower the homeless achieve their goals of sustainable independence.
14	Project Name	Lawton Support Services Project
	Target Area	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW
	Goals Supported	lawton Support Services
	Needs Addressed	Quality of Affordable Owner Housing Affordability of Owner-Occupied Housing

	Funding	:
	Description	Provide funding to local non-profit(s) to assist and empower the homeless achieve their goals of lasting independence and self-reliance through increased income and helping them achieve stable housing.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	We estimate that fifty (50) low-moderate households will benefit.
	Location Description	Lawton Support Services organization's activites are conducted primarly at 609 SW F Avenue, but are also at various locations throughout the city.
	Planned Activities	Assist and empower the homeless achieve their goals of lasting independence and self-reliance through increased income and helping them achieve stable housing.
15	Project Name	Housing Rehabilitation (HAD Delivery Cost) Project-CDBG
	Target Area	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW
	Goals Supported	Housing Rehabilitation (HAD Delivery Cost) - CDBG
	Needs Addressed	Quality of Affordable Owner Housing Affordability of Owner-Occupied Housing Supply of Affordable Owner-Occupied Housing
	Funding	:
	Description	Provide funding to assist low, very low and moderated household with emergency (ER) and exterior home improvement (EHIP) of owner-occupied homes.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	We estimate that we will assist a minimum of twenty (20) low-moderate income owner-occupied single-family housing units.

	Location Description	The activites will take place within the city limits of Lawton for any qualifying low-moderate household.
	Planned Activities	Assist low, very low and moderated household with emergency (ER) and exterior home improvement (EHIP) of owner occupied homes.
16	Project Name	LETA Paint the City Project
	Target Area	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW
	Goals Supported	LETA Paint the City Project
	Needs Addressed	Quality of Affordable Owner Housing Supply of Affordable Owner-Occupied Housing
	Funding	:
	Description	Provide financial assistance for the remediation of exterior maintenance/code violations of owner-occupied single-family housing units.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	We estimate that we will assist a minimum of forty (40) low-moderate income owner-occupied single-family housing units.
	Location Description	The activites will take place within the city limits of Lawton for any qualifying low-moderate household.
	Planned Activities	Remediation of exterior maintenance/code violations on forty (40) owner-occupied homes.
17	Project Name	HOME Administration
	Target Area	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW
	Goals Supported	Administration - HOME

	Needs Addressed	Quality of Affordable Owner Housing Affordability of Owner-Occupied Housing Supply of Affordable Owner-Occupied Housing
	Funding	:
	Description	Provide administrative and management support for the HOME programs.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	We estimate that we will assist a minimum of twelve (12) low-moderate income households.
	Location Description	Program administration primarly conducted at the Housing & Community Development office located at 1405 SW 11th Street.
	Planned Activities	Provide administrative and management support for the HOME programs.
18	Project Name	Code Enforcement Activity Project-CDBG
	Target Area	ZONE ONE LAWTON VIEW
	Goals Supported	Code Enforcement Activity Project - CDBG
	Needs Addressed	Quality of Affordable Owner Housing Affordability of Owner-Occupied Housing Supply of Affordable Owner-Occupied Housing
	Funding	:
	Description	Provide financial funding for code enforcement officers help address code compliance issued in low-moderate income neighborhoods within the City of Lawton.
	Target Date	6/30/2020

entranta de contra	
Estimate the number	Code enforcement activities will benefit approx 10,000 individuals that
and type of families	meet the national objective of benefit to low and moderate income
that will benefit from	persons on an area basis under § 570.208(a)(1) (for Entitlements) or §
the proposed activities	570.483(b)(1) (for states) when carried out in deteriorated or deteriorating areas and when carried out in conjunction with public or private improvements, rehabilitation, or services that may be expected to arrest the deterioration of the area. This national objective may be met when code enforcement inspections are conducted on single or multifamily housing units, commercial buildings, and other publicly or privately-owned buildings. The building or facility being inspected must be located in a primarily residential area where a minimum of 51 percent of the residents in those areas are low- and moderate-income.
Location Description	The primary areas where the activities will be undertaken are:  (a) ZONE 1 - Between NW 11th Street, 26th Street, Cache Road and Rogers lane, and (b) Lawton View- Between 2nd Street, SW 26th Street, Lee Blvd and Bishop Road.
Planned Activities	Code Enforcement planned activities is the processed process whereby local governments gain compliance with ordinances and regulations regarding health and housing codes, land use and zoning ordinances, sign standards, and uniform building and fire codes. Code enforcement may take place in primarily residential, commercial, and industrial areas. The legislative language requiring "other improvements" to be made to arrest the decline of the area suggests a greater emphasis on structural issues. As a result, the CDBG program will expect that localities emphasize health and safety issues in buildings. Ancillary efforts to address violations of codes concerning vacant lots, signs, and motor vehicles are permitted in conjunction with efforts regarding buildings, but should form a minor part of the code enforcement program.

## 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

Projects funded by this plan will be conducted for the benefit of low- and moderate-income persons and families throughout the city. Other housing projects under the CDBG and HOME programs, the Section 8 Program, and the local public housing authority's programs provide housing and conduct housing activities throughout the City of Lawton. CDBG and HOME Program projects for this annual plan were selected and recommended based on citizen input, review, and analysis of the Lawton community's priority needs.

### **Geographic Distribution**

Target Area	Percentage of Funds
Unknown	
LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA	
DOWNTOWN - 01	
ZONE ONE	10
DOWNTOWN - 03	
LAWTON VIEW	10

**Table 8 - Geographic Distribution** 

### Rationale for the priorities for allocating investments geographically

CDBG and HOME Program projects for this annual plan were selected and recommended based on citizen input, review, and analysis of the Lawton community's priority needs outlined in the Consolidated Plan, and the most recent Comanche County Community Needs Assessment. A summary of the proposed expenditures and projects for the implementation of the annual plan is provided in this plan.

#### Discussion

These entitlements, designed to assist in keeping low- and moderate-income clients in livable homes has been a success throughout the entire city. Too many of our clients are elderly, on a fixed income from Social Security, completely incapable of paying for the extent of the work that needs to be done to repair their homes. These massive reductions in funding levels will result in deaths as elderly or handicapped are trapped in homes that are substandard. The blame will be placed on the heat or the cold, but the reality will be the inability of these programs to complete the necessary work to assist the citizens of this great nation.

# **Affordable Housing**

# AP-55 Affordable Housing – 91.220(g)

#### Introduction

The objectives of the 2016-2020 Consolidated Plan were developed through review and analysis of CHAS data, consultations with service providers, input from citizens on the development of the plan, and an analysis of community needs and objectives as identified in the Needs Analysis.

The objectives that address housing, homeless, non-homeless special needs populations and community development needs were given a priority ranking based on the expectation of funding during the term of the Consolidated Plan. Objectives that received a high ranking will be prioritized by funded program activities in each Annual Action Year program. Activities receiving a low rating remain areas of need, and will been assisted during the term of this Consolidated Plan as resources allow.

In general, the objectives contained in the Consolidated Plan primarily focus on stimulating neighborhood revitalization by encouraging the development and rehabilitation of affordable owner housing and by activities that stimulate affordable home ownership. Please refer to the Strategic Plan Priorities and Annual Action Plan goals for specific annual goals and activities.

The one year housing goals noted below are based on proposed goals and activities for the 2019-2020 Annual Action Plan. It is anticipated that these annual goals will be largely consistent over the five (5) year term of this Plan, provided that annual allocations are not substantially reduced.

The numbers for rehabilitation include whole house rehab, public housing unit rehabs, and emergency home repairs. Units purchased using down payment assistance are included in the production of new units field.

One Year Goals for the Number of Households to be Supported		
Homeless	250	
Non-Homeless	50	
Special-Needs	200	
Total	500	

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through		
Rental Assistance	300	
The Production of New Units	2	
Rehab of Existing Units	30	
Acquisition of Existing Units	2	
Total	334	

Annual Action Plan 2019

### Table 10 - One Year Goals for Affordable Housing by Support Type

#### Discussion

The Consolidated Plan identifies a gap between the low incomes in the community and the high cost of housing. It also outlines the strategy for addressing affordable housing needs in the community. The overall goal of local affordable housing strategy is, with the resources available, to preserve and expand affordable housing in the community. The primary mechanism will continue to be through local housing assistance programs, which provide rehabilitation to existing low-income homeowners, purchase assistance for first-time low-income home buyers, emergency assistance and exterior housing improvement to very low-income homeowners. The Lawton Housing Authority (LHA), Oklahoma Housing Finance Agency (OHFA), eight (8) HUD subsidized multifamily dwellings, and three (3) new affordable tax credit multifamily dwellings provide rental units for very low-income renters in the community.

# **AP-60 Public Housing — 91.220(h)**

#### Introduction

As capital improvement funding from HUD continues to decrease, Lawton Housing Authority (LHA) continues to struggle with deferred maintenance issues. Although resources are scarce, the City will continue to assist in rehabilitation of public housing units. The City of Lawton is again partnering with Great Plains Improvement Foundation to remodel/ renovate three (3) single family homes that would be rented to low-moderate income indididuals. We are also partnering with Habitat For Humanity to build five (5) new homes that would be sold to low-moderate income individuals. Lack of resources presents a challenge to achieve these objectives, however the city and it's partner organizations are well position to overcome these challenges.

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

The City of Lawton will continue to work with LHA to increase the overall quality of public housing. Presently, the Housing Authority has sufficient resources to maintain and manage their properties; however, are unable to make all of the needed upgrades and repairs. All housing is considered "average" by the Housing Authority. The City will provide HOME funding to assist with the rehabilitation of approximately of fifty (50) public housing units.

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

The LHA has an approved Section (5)(h) Homeownership Program. This program allows the LHA to sell scattered site homes to income-qualified applicants. Proceeds from these home sales will be reinvested in additional housing properties to continue the home ownership process. LHA also has a Section 8 Homeownership Program that allows the Section 8 voucher holder to utilize their monthly voucher to assist in the payment of their monthly mortgage payments for up to 30 years. These homeowners will work with LHA or LSS to select a newly constructed or remodeled home and apply for HOME First-time Homebuyer (FTHB) funds to assist with downpayment and closing cost assistance. The LHA will pursue opportunities in order to increase the number of affordable housing units available in Lawton such as Section 202, Section 811, Tax Credits, and private financing. There is also our FTHB which we project one (1) homes in the current fiscal year.

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

### provided or other assistance

Not Applicable

#### Discussion

The Lawton Housing Authority (LHA) administers the public housing rental projects owned by the Housing Authority and administers the Section 8 rental assistance voucher program. Section 8 is a Federal program that provides rental assistance to low and very-low income families to obtain decent, safe and sanitary housing. The subsidy provides that an eligible tenant must pay (the higher of) 30% of adjusted income or 10% of gross income as their share of the rent; Section 8 funds make up the difference between the amount paid by the tenant and the fair market rent established for the rental unit by the Housing Authority and HUD.

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

In 2009 the Homeless Prevention and Rapid Rehousing (HPRP) program was created by the American Recovery and Reinvestment Act. This unprecedented funding offered an opportunity to change the way homeless services are delivered in the City of Lawton (City). This program featured a coordinated effort by homeless service providers to introduce person-centered planning, service coordination, financial assistance, and needs based supportive services.

The City and local service providers manage a community-wide effort to prevent and end homelessness within the Continuum of Care by building inter-agency partnerships. These partnerships work together to provide members of the community with the necessary tools to remain in their homes or to obtain appropriate affordable permanent housing. All community partners work to provide a streamlined process of screening, assessment, referral, service coordination, direct assistance and follow up to individuals and families who are in need of safe, affordable and stable housing.

# 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

In order to reach unsheltered homeless individuals and families, CDBG funds are used to assist Public Service Organizations outreach activities to help connect this population with emergency shelter, housing, and/or services. Assistance is sometimes extended to non-facility based medical/mental health care if recipients of that care are unable or unwilling to access an appropriate health facility. Activities supported in the Fourth Action Plan Year to address homelessness include CDBG and HOME funds. Tenant Based Rental Assistance (TBRA). ESG funds continue to support housing and case management activities for families and veterans.

### Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Lawton will continue to support, within its available resources, local public and private agencies' efforts to address homelessness in the community. The strategy for addressing homeless needs is outlined in the Consolidated Plan. For 2019, Great Plains Improvement Foundation, Inc. (C. Carter Crane Homeless Shelter), Lawton Support Services, and Marie Detty (New Directions Domestic Violence Shelter) have requested from the Oklahoma Department of Commerce, an Emergency Shelter Grant (ESG).

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

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

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

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 following organizations provide emergency shelters, transitional housing, and permanent

supportive housing for homeless persons within the City of Lawton:

(a) Great Plains Improvement Foundation, Inc.

C. Carter Crane Emergency Homeless Shelter

Sixteen (16) single-family transitional units at various locations in the community

Developmentally Disabled Group Home: (b) Marie Detty Youth and Family Services, Inc.

Teen Emergency Homeless Shelter.

Parker Pointe Children Group Home

New Directions Battered Women Shelter and Transitional Housing (c) Salvation Army Corps Emergency Homeless Shelter (d) Family Promise Shelter Organization, using rotating places of worship to provide the meals, shelter, and volunteers to take care of the clients. (e) Jim Taliaferro Mental Health Center's five (5) transitional units for mentally disabled persons at various locations in the community (f) J. Roy Dunning Children's Shelter. (g) Lawton Housing Authority provides priority Section 8 vouchers (if available) to homeless persons or families.

#### Discussion

The overall goal of local homeless programs is to assist homeless families and individuals to progress from homelessness to self-sufficiency. Implementation of the strategy relies on a system of public and private homeless providers who, through their collaborative efforts, pursue a continuum of care approach to address the economic, human, and social needs of homeless families and households. The City will continue to support and work with local homeless agencies to improve the linkage between housing providers and other continuum of care providers. The Support of Applications by Other Entities Report identifies programs for addressing homelessness, which are supported by the Consolidated Plan strategy. The City will support applications for funding by existing homeless shelters, transitional facilities, and service providers to increase funding for operations at past levels of service.

# AP-75 Barriers to affordable housing – 91.220(j)

#### Introduction:

The Consolidated Plan identifies the high level of housing prices relative to the low incomes earned by the community's low-income population as the major obstacle to affordable housing in Lawton. This barrier to affordable housing is being addressed. The housing programs outlined in this plan were developed to address the problem of near term affordability of housing.

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

Near term, affordability of housing for Lawton's low- and moderate-income families and households is addressed by implementation of the housing programs funded in this plan. The First-Time Homebuyer Program (FTHB) and the transitional housing programs provide housing opportunities for families and households who, due to their current economic circumstances, could not otherwise afford housing. While the total need for affordable housing is not beyond the reach of the community, limited available resources must be allocated to the highest priorities established in the Consolidated Plan to address the shortfall.

#### **Discussion:**

The City of Lawton remains committed to ensuring equal housing opportunity for all persons. Proposed Action Plan activities for 2019-2020 provide direct support for the provision of fair housing training, compliance, and complaint processing functions. Staff will continue to monitor affordable housing barriers and provide resources where needed to ensure compliance.

## **AP-85 Other Actions – 91.220(k)**

#### Introduction:

The local and federal resources are insufficient to address all needs, even those of high priority. In some instances, there are perceptions in the community that affordable housing will decrease area property values as well as facilitate other societal problems (NIMBY issues). There is a lack of interest from service providers in developing permanent supportive housing for the chronically homeless (lack of developers).

#### Actions planned to address obstacles to meeting underserved needs

Fair Housing Activities are funded with CDBG under General Program Administration. The services are provided by Lawton Housing Authority which investigates and reports on fair housing for the City to ensure equitable access and opportunity for all persons.

Grant funds covered under the Consolidated Plan and other grant funds are utilized to provide services and activities that benefit the various segments of lower-income populations in a responsible and comprehensive manner. Funds are allocated to activities that are not duplicative or competitive. Funds are allocated to activities that are designed to serve all segments of the population in the areas of concentrated lower-income persons.

The primary weakness in the delivery system is lack of funds to address the identified needs within the community. The City continues to address underserved needs by prioritizing the programs believed to provide the most benefit to the greatest number of lower-income residents in concentrated low-income neighborhoods.

### Actions planned to foster and maintain affordable housing

In general, the objectives contained in the Consolidated Plan primarily focus on stimulating neighborhood revitalization by encouraging the development and rehabilitation of affordable owner housing and by activities that stimulate affordable home ownership. The Consolidated Plan rental housing objectives call for the creation of affordable rental housing to address special needs populations and for targeting affordable rental housing for the elderly and families by size and income range.

Funds for activities that support new housing construction under the HOME program are provided to the Community Housing Development Organization Program (CHDO). The successful CHDOs are awarded HOME CHDO set-aside funds to construct, and in some cases, rehabilitate existing housing units in targeted neighborhoods.

Housing rehabilitation activities are provided through CDBG and HOME Assistance Program citywide. Funding is allocated to conduct owner occupied whole house rehabilitation activities for eligible lower income households. A priority for use of HOME and CDBG funding allocated for housing will be to

reverse patterns of gentrification by incentivizing mixed income housing. A second priority for use of both HOME and CDBG funding for housing will be to reverse patterns of low income concentration in certain economically challenged areas by incentivizing mixed income housing through the aggregation of assisted housing activities. Single Unit Rehabilitation is addressed by CDBG and HOME funding through eligible program.

#### Actions planned to reduce lead-based paint hazards

The Lawton City Council has adopted a Lead-Based Paint Policy that provides for compliance with the requirements of 24 CFR Part 35 regarding assessment and treatment of lead-based paint hazards.

The City funds various activities that fall into the category of residential rehabilitation. Effective September 15, 2000, whenever residential rehabilitation activities funded by the City are conducted, the regulations prescribed for lead-based paint, contained at 24 CFR Part 35 will be the guide for achieving compliance. Under the regulations, the City is required to adopt proper approaches to Lead Hazard evaluation, to provide regulatory notifications to the homeowner, to perform Lead Hazard evaluation, and to follow safe work practices and clearance requirements.

The City is directly involved in alerting and educating households participating in our programs about lead hazards, and indirectly through each of its sub recipients, Community Housing Development Organizations (CHDO's), and other for-profit and nonprofit organizations providing housing. All applicants seeking housing assistance from the City receive a pamphlet informing them of the dangers of lead hazards. If assistance is granted, the applicant signs for this information at loan closing.

Two (2) out of the four (4) HCD staff are licensed and certified as lead-based paint risk assessors and inspectors. One (1) additional staff member is scheduled to attend lead-based paint risk assessor and inspector courses in the spring. The services of the licensed staff are used by most of the City's housing providers receiving Federal funds from the City and other non-profit housing providers contract for the services.

The HCD staff members are also trained in NITON Spectrum Analyzer/Radiation Safety. Emergency home repair is conducted for the City by a sub-grantee capable of independently performing lead-based paint responsibilities. Additionally, sub-grantees, non-profit borrowers, CHDOs, and other funding recipients carry out lead-based paint responsibilities directly or through the City's inspectors.

### Actions planned to reduce the number of poverty-level families

The City continues to support local programs, within given funding levels, which assist households with incomes below the poverty line to help reduce the number of poverty level households by improving their economic status through education, job training and job placement, and other support services. The Jim Taliaferro Mental Health Center and GPIF's transitional housing program, along with other supportive housing and services for extremely low- and low-income persons and families, directly

**Annual Action Plan** 

supports these efforts to reduce poverty and homelessness in the community. Some programs that are part of the City's efforts to combat poverty are addressed below.

## Actions planned to develop institutional structure

The organizational structure for implementing local affordable and supportive housing programs involves a variety of public and private entities working independently and in collaboration to meet the community's affordable housing needs. The structure generally is effective and adequate for implementing activities and programs to meet community needs. However, opportunities exist for significant improvement in the current structure's effectiveness. Activities that support and enhance the effectiveness of the institutional structure include the following:

The Fourth Tuesday Forum sponsored by the United Way of Southwest Oklahoma

- 1. LFS Habitat for Humanity, Inc.
- 2. Southwest Oklahoma Continuum of Care Task Force
- 3. Lawton Support Services, Inc.
- 4. Great Plains Improvement Foundation, Inc.
- 5. Lawton Housing Authority

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

See LHA Five-Year and Annual PHA Plan adopted by the LHA Board. This plan is adopted by reference as part of this year's annual plan.

#### **Discussion:**

In addition to the above initiatives, direct home ownership assistance is provided with HOME funds to down payment and closing cost assistance provider(s). CDBG funds may be used to provide down payment and closing costs assistance if actual funding exceeds current projections.

At the present time, HOME down payment assistance provides a loan up to \$14,999 with the forgivable portion being forgiven at the rate of 1/60th per month over a five-year affordability period to eligible homebuyers. When HOME funds are utilized, the maximum sales price of the home cannot exceed 95% of the area median sales price of homes in the jurisdiction. The limits are published annually by HUD and enforced in the City's program.

# **Program Specific Requirements**

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

#### Introduction:

The City of Lawton offers a "no wrong door" approach, with providers being well linked to available resources through networking connections gained via the Coalition To End Poverty. In addition to this, 211 is the information and referral agency which provides information about eligibility and referrals to service agencies. 211 conducts public awareness campaigns throughout the year with public service advertisements located on television, radio, on city buses and signage. People are linked to public benefits through provider agencies.

# Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

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

1. The total amount of program income that will have been received before the start of the	
next program year and that has not yet been reprogrammed	17,306
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:	17,306

#### **Other CDBG Requirements**

1. The amount of urgent need activities

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%

0

# HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

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

In FFY 2019-2020, we are anticipating \$16,490 in HOME program income. We also have unallocated funds from previous years that are available to re-allocate.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The Homebuyer Assistance Programs funded by the City of lawton will utilize the Recapture Method provided in the HOME Regulations at 92.254(a)(5)(ii). Recapture provisions ensure that the participating jurisdiction recoups all or a portion of the HOME assistance to the homebuyers, if the housing does not continue to be the principal residence of the family for the duration of the period of affordability. As the participating jurisdiction, the City of Lawton may structure its recapture provisions based on its program design and market conditions. The period of affordability is based upon the total amount of HOME funds subject to recapture described in paragraph (a)(5)(ii)(A).

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

The City, as the participating jurisdiction, will recoup all or a portion of the HOME assistance to the homebuyers, if the assisted housing is transferred voluntarily or involuntarily during the period of affordability based on the availability of net proceeds. Net proceeds are defined as the sales price minus superior loan repayment (other than HOME funds) and any closing costs. Only the direct subsidy provided to the homebuyer, i.e., down payment and closing cost assistance and/or the difference between the fair market value of the property and a reduced sales price attributable to HOME funds, will be recouped pro-rata based on the forgivable loan terms and on the reduction during affordability period provided in the HOME regulations at 92.254(a)(5)(ii)(A)(2).

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City of Lawton does not anticipate using HOME funds during the 2019-2020 Action Plan Year to refinance existing debt secured by multifamily housing.

The City's HOME allocation for the FFY 2019 program year is estimated at \$327,362. Additionally, \$16,490 of HOME program income is available for a total of \$343,852 for funding the projects. The HOME Program funding provides funds to support Lawton's local housing programs. The funds may be used to assist low- and moderate-income homeowners, homebuyers, and renters in the purchase, construction, rehabilitation, or rental of decent, safe, sanitary, and affordable housing. HOME funds also support Community Housing Development Organization (CHDO) activities to develop affordable housing. The Great Plains Improvement Foundation, Inc. (GPIF), the Lawton-Fort Sill Habitat for Humanity, Inc. (Habitat), and the Lawton Support Services, Inc. (LSS) are designated as CHDOs in Lawton.

# **Attachments**

#### **Citizen Participation Comments**

## PUBLIC HEARING NOTES

A Public Notice regarding the public review and comment period for Annual Action Plan for FFY 2019 was published in the Lawton Constitution on Sunday, February 24, 2019. The notice also gave the dates and times for the two public hearings that were held to receive comments.

The Annual Action Plan for FFY 2019 was available for public review and comments beginning February 25, 2019 through March 27, 2019 at the following public locations: City Clerk's office located at City Hall, Housing & Community Development office within the Owens Multi-Purpose Center, Lawton Public Library, H.C. King Community Center, and Patterson Community Center. No public comments were received.

At a public hearing before the Lawton City Planning Commission on March 28, 2019, the Housing and Community Development office presented its Annual Action Plan for FFY 2019 to the commissioners and public. The public hearing was opened and closed with no one coming forward to provide comments. After the public hearing was closed, the commissioners provided their recommendation, which was to recommend the plan as drafted by staff.

At a public hearing before the Lawton City Council on April 23, 2019, the Housing and Community Development staff presented their recommendations for the Annual Action Plan for FFY 2019 to the Lawton City Council and public, as well as the recommendation from the Lawton City Planning Commission. The public hearing was opened and closed with no one coming forward to provide comments. After the public hearing was closed, the council approved the plan as drafted by staff by adopting Resolution 19-38.

# **Grantee SF-424's and Certification(s)**

GMB Number: 4040-0004 Expiration Date: 12/84/2019

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#### ASSURANCES - CONSTRUCTION PROGRAMS

OMR Number: 4040-0009 Expiration Dale: 02/26/2022

Public reporting burean for this collection of information is estimated to everage 15 minutes par response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20563.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Defain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, pertain Fedoral assistance awarding agencies may require applicants to cartify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant; I certify that the applicant:

- Has the legal authority to apply for Federal assistance, and the institutional managerial and financial capacitally (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
- Will give the awarding agency, the Comptroller General
  of the United States and, if appropriate, the State,
  the right to examine all records, books ipagers, or
  documents related to the assistance; and will establish
  a proper accounting system in accordance with
  generally accepted accounting standards or agency
  directives.
- 3. Will not dispose of, modify the use of, or change the terms of the real property bile or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will legislate a coverant in the ritle of real property acquired in whole or in part with Federal assistance funds to assure non-ciecnimination during the useful life of the project.
- Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
- 5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish prograssive reports and such other information as may be required by the assistance awarding agency or State.
- Will initiate and complete the work within the applicable time frame after recoipt of approval of the awarding agency.
- Will astablish spleguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of persons or organizational conflict of increst, or personal gain.

- 8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4783) relating to prescribed attandards of merit systems for programs funced under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- Will comply with the Lead-Based Point Poisoning Prevention Act (42 U.S.C. §§4801 at acc.) which prohibits the use of lead-based paint in construction or rehabit atlon of residence structures
- Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) Which prohibits discomination on the basis of race, color or national origin, (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1581 1683, and 1685-1686), which prohibits discriminalign on the bacle of sax; (c) Section 604 of the Rehabilitation Art of 1973, as amended (29) U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Distrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse. Office and Treatment Act of 1972 (P.L. 92-255), as amended roleting to condiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abusc and Alcoholem Prevention, Treatment and Rehabilitation Ad of 1970 (P.L. 91-616), as amended, relating to nondisorimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 cc. 3), as smended, relating to confidentiality of slephol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1958 (42 U.S.C. §§3001 ct seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing: (i) any other nandlacrimination provisions in the specific statuets) under which application for Federal assistance is being made; and () the requirements of any other nondiscrimination statue(s) which may apply to the application.

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Standard Form 4240 (Rev. 7-97) Prescribed by OMB Circular A-102

- 11 Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Politics Act of 1970 (P.L. 91-548) which provide for fair and equitable treatment of porsons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purpheses.
- Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Feriera Tunds.
- 13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copoland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreemants.
- 14. Will comply with flood insurance purchase requirements of Section 102(s) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which rogates recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the Iolal cost of insurable construction and acquisition is \$10,000 or more.
- 15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Aut of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) retification of violating facilities pursuant to EO 11736; (c) protection of wellands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11968; (e) assurance of project consistency with the approved Slate management program developed under the Coestal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of

- Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) profection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) profeccion of endengered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
- Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
- 17 Will assist the awarding Agency in essuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11592 (identification and protection of historic properties), and the Archaeotypical and Historic Preservation Act of 1974 (16 U.S.C. §\$469a-1 et seq.).
- 18. Will cause to be performed the required lineroial and compliance audits in accordance with the Single Audit Act Americanes of 1896 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- 19 Will comply with all applicable requirements of all other Federal aiws, executive proers, regulations, and policies governing this program.
- 29. Will comply with the requirements of Section 106(g) of the Trafficking Victima Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award reciplants or a sub-reciplent from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Producing a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or eubawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE	
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APPLICANT ORGANIZATION	DATE SUBMITTED	
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Application for Federal Assists	ince SF-424	
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*Email cjame#2lawtopok.gov		

9. Type of Applicant 1: Select Applicant Type:	_
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- Areas Affected by Project (Cities, Counties, States, etc.):	
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#### ASSURANCES - CONSTRUCTION PROGRAMS

ONS Number: 4040/0009 Expiration Date: 62/28/2022

Public reporting burden for (his collection of information is extimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the cats needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including auggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0342), Washington, DC 20503,

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, blease contact the Awarding Agency. Further, certain Fedoral assistance awarding agencies may require applicants to certify to additional assurances, it such is the case, you will be notified.

As the duly authorized representative of the applicant: I certify that the applicant:

- Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capebility (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
- Will give the awarding agency, the Comptroller General
  of the United States and, if appropriate, the State,
  the right to examine all records, books, papers, or
  documents related to the assistance; and will establish
  a proper accounting system in accordance with
  generally accepted accounting standards or agency
  directives.
- 3. Will not dispose or, modify the use of, or change the terms of the real property title or other interest in the elle and facilities without permission and instructions from the exercing agency. Will record the Federal swarding agency directives and will include a coverant in the title of real property acquired in whole or in part with Federal sessiolance funds to assure non-discrimination during the useful life of the project.
- Will comply with the requirements of the assistance swarding agency with regard to the drafting, review and approval of construction plans and appoint ations.
- 5. Will provide and maintain competent and adequate angineering supervision at the construction site to ensure that the complete work conforms with the approved plane and specifications and will furnish progress we reports and such other information as may be required by the essistance awarding agency or State.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- Will establish eafaguards to prohibit employees frum using their positions for a purpose that constitutes or presents the appearance of exercised or organizational conflict of interest, or personal gain.

- Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed alandards of merit systems for programs funced under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- Wifecomply with the Lead Basser Paint Polabning Prevention Art (42 U.S.C. §§4803 et sec.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- 10. Will comply with all Fadaral statutes relating to condiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Ecucation Amendments of 1972, as amended (20 U.S.C. §§1881 1883, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29) U.S.C. 9794), which prohibite discrimination on the basis of handicaps, (d) the Age Discrimination Act of 1975, as amenized (42 U.S.C. §§6101-5107), which prohibits distrimination on the basis of age; (e) the Drug Abuse Office and Trealment Act of 1972 (P.L. 92-255), ax amended relating to conditionination on the basis of drug shuse; (f) the Comprohensive Alcohol Abuse and Alcoholism Provention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nandlacrimination on the basis of alcohol abuse or வண்கள்; (g) §§523 and 527 of the Public Hoalth Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee as amended, relating to confidentiality of alcohol. and drug abuse patient records; (F) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et eeq.), up amended, relating to nond serimination in line sale rental or financing of twoseig; { } any other nondlearimination provisions in the epecific statue(s). under which application for Federal assistance is being mede: and ()) the requirements of any other nondiscrimination statue(a) which may apply to the application.

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Standard Form 424D (Rev. 7-97) Prescribed by OMB Circular A-102

- 11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-846) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements upply to bil increasts in real property acquired for project purposee regardless of Federal participation in purchases.
- Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7:224-7:328) which limit the political softwices of employees whose principal employment politics are funded in whole or in part with Federal funds.
- 13. Will corr ply, as applicable with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for faderally-assisted construction subagreements.
- 14. Will comply with fined insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipionts in a special flood hazard area to participate in the program and to purchase flund insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 16. Will comply with environmental standard; which may be presented pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1889 (F.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11980; (d) evaluation of flood hazards in floodplains in accordance with EC 11988; (e) assurance of project consistency with the approved State menagement program developed under the Covastal Zone Management Act of 1972 (18 U.S.C. §§1451 et seq.); (f) conformity of

- Fockeral actions to State (Clean Air) implementation Plans under Section 1760) of the Clean Air Act of 1965, as amenced (42 U.S.C. §§7401 et xeq.); (g) protection of underground sources of dinking water under the Safe Drinking Water Act of 1974, as arrespried (P.L. 90-523); and, (h) procedion of endangered species under the Encangered Species. Act of 1973, as amenced (P.L. 93-206).
- Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
- Will assist the ewarding agency in assuring compillance with Section 108 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11592 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§489a-1 of sog).
- 18 Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1990 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 20. Will comply with the requirements of Section 100(g) of the Treff cking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trefficking in persons during the period of time that the award is in offset (2) Procuring a commercial sex act curing the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING DEFICIAL	TITLE	
Tauley Tool	YAYCE	
APPLICANT ORGANIZATION	DATE SUBMITTED	
City of Lasker	6-10-19	

SF-424D (Rev. 7 97; Back

#### CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing - The jurisdiction will affirmatively further fair bousing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying -10 the best of the jurisdiction's knowledge and belief:

- 1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employed of any agency, a Member of Congress, an officer or employed of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement:
- 2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or conperative agreement, it will complete and submit Standard Ferm-LEJ., "Disclosure Form to Report Lobbying," in accordance with its instructions; and
- It will require that the language of paragraph 1 and 2 of this anti-hobbying certification be included in
  the award documents for all subawards at all tiers (including subcontracts, subgrants, and commacts under
  grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose
  accordingly.

Authority of Jurisdiction —The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the logal authority to carry out the programs for which it is seeking funding, in accordance with applicable HLD regulations.

Consistency with plan -- The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consulidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701p) and implementing regulations at 24 CFR Part 13S.

Signature of Authorized Official

01

MAYOR

Title

#### Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plum that satisfies the requirements of 24 CFR 91.105.

Community Development Plan — Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of visible urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 9 and 570.

Following a Plan - it is following a current consolidated plan that has been approved by HUD,

Use of Funds - It has complied with the following criteria:

- 1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit flow- and moderate-income families or aid in the prevention or elimination of shuns or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).
- 2. Overall Benefit. The aggregate use of CDHG funds, including Section 108 guaranmed loans, during program year(s) UTY 2018 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.
- 3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 lean guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment anales as a condition of (bluining access to such public improvements.)

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) linearced from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

### Excessive Force - It has adopted and is enforcing:

- A policy pruhibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights domonstrations; and
- A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CPR Part 35, Subparts A, B, J, K and R.

Compliance with Laws .- It will comply with applicable laws.

Signature of Apphorized Official

Date

MAYOR

Title

## OPTIONAL Community Development Black Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(e):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

Signature of Authorized Official

Data

MAYOR

Title

#### Specific HOME Certifications

The HOMB partic pating jurisdiction certifies than

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOMF finds for eligible activities and costs, as described in 24 CFR §§92,205 through 92,209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92,214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing:

Signature of Authorized Official

6-16-19 Date

MAYOR

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## APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

#### Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to tile the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.