



This amendment is to add the Veterans Resource Center Project. This project will temporarily house homeless veterans until permanent housing can be found and will provide those veterans with resources to keep them from becoming homeless in the future.

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 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 2020 funding and covers the City's program year from July 1, 2020 through June 30, 2021. Funding for FFY 2020: CDBG allocation of **\$712,589** and **\$376,518** in HOME Program funds. We also expect to receive **\$17,306** in CDBG program income (PI) in FFY 2020 and **\$16,490** in HOME.

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 Administrator 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 2020 Annual Action Plan is the Fifth 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), rental home rehabilitation, non-profit housing construction, and owner-occupied rehabilitation. CDBG funds have been allocated to support public service activities which continue to be a priority of the community and minor owner-occupied home repairs. The decline in the decent 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 and associated Annual 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 and associated Annual 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 2019 Fourth Year Action Plan have addressed these goals and are somewhat behind target this year because of the coronavirus pandemic. The goal of providing a **suitable living environment** was addressed in the Consolidated Plan and associated Annual Action Plans by continuing ongoing programs that address specific community needs. The FFY 2017 Second Year Action Plan 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 the "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 typically be provided a minimum of thirty (30) days to review and provide comments following publication of the draft plan or substantial amendment to the plan. The Citizen Participation Plan will typically be considered for adoption or substantial amendment at a minimum of two (2) public hearings, with at least fifteen (15) day notice. This year, due to the coronavirus pandemic, we were allowed to reduce the public notice time to five (5) days.

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 FFY 2020 Fifth Year Annual Action Plan was to begin on March 9, 2020 with the publication of a Notice of Public Hearings and followed by two (2) community input sessions that were to take place in the Lawton City Council Chamber on April 16, 2020 at 1:30 p.m. and April 28, 2020 at 6:00 p.m. Due to the coronavirus pandemic, these public hearings had to be cancelled. A cancellation was published in the paper on April 5, 2020. A new Notice of Public Hearings for the FFY 2020 Annual Action Plan was published in the paper on June 7, 2020, which opened up the public comment period on June 8, 2020. Two public hearings were held on June 11, 2020 at 1:30 p.m. and June 23, 2020 at 6:00 p.m. No comments were received via mail or phone during the public review period, nor did anyone comment at either public hearings.

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

No comments were received via mail or phone during the public review period, nor did anyone comment at either 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. Private investments are always supported 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 this Annual 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	HOUSING AND COMMUNITY DEVELOPMENT
HOME Administrator	LAWTON	HOUSING 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 Administrator 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) 581-3347 or email: cjames@lawtonok.gov.

AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

Housing & Community Development (HCD) Division of the City of Lawton is the lead agency that oversees the development of the Action Plan and for administering programs covered by the plan. HCD consults with the Southwest Oklahoma Continuum of Care (CoC) Committee, which 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 with their assistance tracking system or Homeless Management Information System (HMIS). The LHA and the Great Plains Improvement Foundation have housing units within the City limits, and we have discussed with them the potential for additional units. 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. Seven service providers also receiving funding as a Public Service Organization.

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 has allocated \$550,000.00 this year to help build a one-stop-show for homeless veterans, Safe Haven. This Safe Haven will have housing units to immediately house homeless veterans before more permanent housing can be arranged and will allow them to meet with case managers to get them any assistance they need. Through Lawton Housing Authority (LHA) and Lawton Support Services’ (LSS) assistance management system, any individual or family demonstrating 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.

In collaboration with 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 receive 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.

As the CoC lead agency, LHA consults with ESG funded agencies to develop performance standards that serve as a measure for evaluating 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 subrecipient 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.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	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

	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>In preparation of the Annual Action Plan, the Christian Family Counseling Center was consulted directly by City Staff to gauge current needs to help restore, 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.</p>
3	<p>Agency/Group/Organization</p>	<p>Lawton Support Services, Inc.</p>
	<p>Agency/Group/Organization Type</p>	<p>Services - Housing Services-Persons with Disabilities Services-homeless Service-Fair Housing</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Public Housing Needs Homeless Needs - Families with children Homelessness Needs - Veterans</p>

	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>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.</p>
4	<p>Agency/Group/Organization</p>	<p>Marie Detty Youth and Family Services, Inc.</p>
	<p>Agency/Group/Organization Type</p>	<p>Services - Housing Services-Children Services-Victims of Domestic Violence Services - Victims</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p>Homeless Needs - Families with children Domestic Violence</p>
	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>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.</p>

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	Services - Housing Services-homeless Services-Health Services-Education
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children
	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, Family Promise, was consulted directly by City Staff to gauge the need of homeless families with children to achieve 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.

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, de-concentration 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

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**

A Notice of Public Hearing was published in the local newspaper for the two public hearings that were held. The Notice also let the public know that the Annual Actin Plan was under the public review period and that comments were suggested and welcomed. No comments were received via phone or mail or at either Public Hearing.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	Non-targeted/broad community		No comments were received		
2	Public Hearing	Non-targeted/broad community		No one provided comments at either public hearing. The two public hearings were held with a Notice to Public Hearing being published in the local newspaper.		

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

On April 13, 2021, the City Council approved the Second Amendment to the 2020 Annual Action Plan which will fund the Safe Haven Veteran's Resource Center. Project This resource center is owned and will be managed by Lawton Support Services (Lawton Housing Authority). \$400,000 of HOME funds are allocated for 10 SRO units and \$150,000 of CDBG funds are allocated for infrastructure. The existing building that was once home to the Armed Services YMCA, is being renovated for the new resource center. The project is scheduled to begin late May or early June of 2021.

On November 9, 2020, the City of Lawton was notified that an error was found in HUD's formula allocations. As a result, the City of Lawton's CDBG allocation was reduced by \$108 and the HOME allocation reduced by \$69.

The 2020 allocations are slightly higher than last year with \$712,589 being allocated in CDBG funds and \$376,518 being allocated in HOME funds. Unfortunately, the coronavirus pandemic has set us back in spending funds as efficiently as we had hoped. Therefore, we still have quite a bit of funds remaining from previous years. We have allocated remaining funds to several projects that we hope can get underway in the near future. At this time, there are not enough projects identified to allocate all funds available. We continue outreach and research in the hopes to

find qualifying projects.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	712,481	17,306	935,393	1,665,180	0	Spending previous years funding is our top priority. Several projects have been allocated funds to spend prior years' money. At this time, there are not enough projects identified to allocate all funds available.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	376,449	16,490	1,275,127	1,668,066	0	Spending previous years funding is our top priority. At this time, there are not enough projects identified to allocate all funds available.

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

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 of Lawton has allocated funds for the development of a one-stop-shop for homeless veterans. The Lawton Housing Authority is managing the project and they have received additional funds through private donations and resources.

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.

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 include 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.

If appropriate, describe publicly 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 residential 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. These lots are available to the City of Lawton or CHDO for development of low-income rental housing.

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 has allocated funds to a drainage project that will be designed in house by City of Lawton engineers, so additional match funds will be accumulated with this project.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	CDBG Administration	2016	2020	Administration	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW	Affordability of Owner- Occupied Housing Quality of Affordable Owner Housing Supply of Affordable Owner- Occupied Housing Supply of Affordable Rental Housing Quality of Public Facilities & Infrastructure	CDBG: \$142,517	Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Whole-House Rehabilitation-HOME	2016	2020	Affordable Housing	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW	Quality of Affordable Owner Housing	HOME: \$275,132	Homeowner Housing Rehabilitated: 8 Household Housing Unit
3	Exterior Maintenance - CDBG	2016	2020	Affordable Housing	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW	Quality of Affordable Owner Housing	CDBG: \$100,090	Homeowner Housing Rehabilitated: 12 Household Housing Unit
4	Emergency Repairs-CDBG	2016	2020	Affordable Housing	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW	Quality of Affordable Owner Housing	CDBG: \$60,000	Homeowner Housing Rehabilitated: 20 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Down payment and Closing Costs Assistance-HOME	2016	2020	Affordable Housing	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW	Affordability of Owner-Occupied Housing	HOME: \$15,000	Direct Financial Assistance to Homebuyers: 1 Households Assisted
6	CHDO Set-Aside Project- HOME	2016	2020	Affordable Housing	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW	Supply of Affordable Rental Housing	HOME: \$256,478	Rental units constructed: 2 Household Housing Unit Rental units rehabilitated: 2 Household Housing Unit
7	Section 108 Loan Assistance- CDBG	2016	2020	Help Build Public Streets and Side Walks	DOWNTOWN - 01 DOWNTOWN - 03	Quality of Public Facilities & Infrastructure	CDBG: \$133,136	Jobs created/retained: 400 Jobs

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Counseling Assistance (Christian Family Counseling)	2016	2020	Non-Housing Community Development	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW	Supply of Affordable Owner-Occupied Housing	CDBG: \$19,283	Public service activities other than Low/Moderate Income Housing Benefit: 350 Persons Assisted
9	Delinquency Prevention (Teen Court) Project	2016	2020	Non-Housing Community Development	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW	Supply of Affordable Owner-Occupied Housing	CDBG: \$21,264	Public service activities other than Low/Moderate Income Housing Benefit: 4000 Persons Assisted
10	Domestic Violence Shelter (New Direction) Project	2016	2020	Non-Housing Community Development	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW	Supply of Affordable Owner-Occupied Housing	CDBG: \$17,276	Public service activities other than Low/Moderate Income Housing Benefit: 1500 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
11	Homeless Shelter (C. Carter Crane Homeless Shelter)	2016	2020	Non-Homeless Special Needs	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW	Supply of Affordable Owner-Occupied Housing	CDBG: \$15,270	Public service activities other than Low/Moderate Income Housing Benefit: 1200 Persons Assisted
12	Drug and Alcohol Case management (Roadback Inc)	2016	2020	Non-Housing Community Development	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW	Supply of Affordable Owner-Occupied Housing	CDBG: \$13,264	Public service activities other than Low/Moderate Income Housing Benefit: 200 Persons Assisted
13	Homeless Shelter (Family Promise of Lawton Inc.)	2016	2020	Non-Housing Community Development	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW	Supply of Affordable Owner-Occupied Housing	CDBG: \$11,258	Public service activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
14	Lawton Support Services	2016	2020	Non-Housing Community Development	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW	Supply of Affordable Owner-Occupied Housing	CDBG: \$9,273	Public service activities other than Low/Moderate Income Housing Benefit: 20 Persons Assisted
15	Housing Rehabilitation (HAD Delivery Cost) - CDBG	2016	2020	Affordable Housing	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW	Quality of Affordable Owner Housing	CDBG: \$107,864	Other: 1 Other
16	Administration - HOME	2016	2020	Affordable Housing	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW	Quality of Affordable Owner Housing	HOME: \$46,398	Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
17	Code Enforcement Activity Project - CDBG	2016	2020	Affordable Housing Public Housing Non-Housing Community Development	ZONE ONE LAWTON VIEW	Quality of Affordable Owner Housing	CDBG: \$79,400	Housing Code Enforcement/Foreclosed Property Care: 2500 Household Housing Unit
18	Tenant-Based Rental Assistance	2018	2020	Affordable Housing Public Housing Homeless	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW	Affordability of Owner-Occupied Housing	HOME: \$170,000	Tenant-based rental assistance / Rapid Rehousing: 100 Households Assisted
19	Housing Reconstruction	2018	2020	Affordable Housing	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW	Affordability of Owner-Occupied Housing	CDBG: \$20,000 HOME: \$500,000	Homeowner Housing Added: 2 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
20	Public Facility Improvement	2018	2020	Non-Housing Community Development	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW	Quality of Public Facilities & Infrastructure	CDBG: \$311,000 HOME: \$150,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 47550 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 40 Households Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 10 Beds
21	Public Infrastructure	2018	2020	Non-Housing Community Development	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW	Quality of Public Facilities & Infrastructure	CDBG: \$550,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 300 Households Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	CDBG Administration
	Goal Description	Administrative expenses for CDBG and HOME program operations and management.
2	Goal Name	Whole-House Rehabilitation-HOME
	Goal Description	Provide financial assistance for the whole-house rehabilitation of owner-occupied single family housing units.
3	Goal Name	Exterior Maintenance -CDBG
	Goal Description	Provide financial assistance for exterior maintenance code violations to owner-occupied single-family housing units.
4	Goal Name	Emergency Repairs-CDBG
	Goal Description	Provide financial assistance for emergency home repairs of owner-occupied single-family housing units.
5	Goal Name	Down payment and Closing Costs Assistance-HOME
	Goal Description	Provide financial assistance to a first-time homebuyer for down payment and/or closing cost assistance.
6	Goal Name	CHDO Set-Aside Project- HOME
	Goal 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.
7	Goal Name	Section 108 Loan Assistance- CDBG
	Goal Description	Provide Section 108 Loan Program funds for the creation of jobs. The "funding" allocation noted below is the annual debt service on the outstanding loan.
8	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 Lawton.

9	Goal Name	Delinquency Prevention (Teen Court) Project
	Goal Description	Provide financial assistance to a local non-profit to assist in reducing the number of youthful offenders in the court system by providing both educational programs to prevent a crime from happening and facilitating alternative adjudication for youthful non-violent crimes.
10	Goal Name	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 Homeless Shelter)
	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	Goal Name	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	Goal Name	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	Administration - HOME
	Goal Description	Provide administrative and management support for the HOME programs.
17	Goal Name	Code Enforcement Activity Project - CDBG
	Goal Description	Provide financial funding for code enforcement officers help address code compliance issued in low-moderate income neighborhoods within the City of Lawton.
18	Goal Name	Tenant-Based Rental Assistance
	Goal Description	Continue to provide financial assistance to the Lawton Housing Authority for a tenant based rental assistance program that benefits low-income residents with needed rental assistance to prevent homelessness.
19	Goal Name	Housing Reconstruction
	Goal Description	Provide financial assistance for the purchase of dilapidated homes or homes at risk of becoming dilapidated, demolition, reconstruction of a new home and selling of the home to qualifying homeowners.
20	Goal Name	Public Facility Improvement
	Goal Description	Provide financial assistance for needed improvements or upgrades to public facilities in qualifying neighborhoods.
21	Goal Name	Public Infrastructure
	Goal Description	Provide financial assistance to fund needed improvements or upgrades to existing public infrastructure located in qualifying neighborhoods or to install/construct new public infrastructure in qualifying neighborhoods.

Projects

AP-35 Projects – 91.220(d)

Introduction

The following initiatives and goals for this Annual 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	Down payment and Closing Cost Assistance-HOME
6	CHDO Set-Aside Project-HOME
7	Section 108 Loan Assistance-CDBG
8	Counseling Assistance (Christian Family Counseling) Project
9	Delinquency Prevention (Teen Court) Project

#	Project Name
10	Domestic Violence Shelter (Marie Detty-New Directions Battered Women's Shelter) Project
11	Homeless Shelter (GFIP-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	HOME Administration
17	Code Enforcement Activity Project-CDBG
18	Tenant-Based Rental Assistance Project
19	Housing Reconstruction
20	Public Facility Improvement
21	Public Infrastructure

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 live by investing in public facilities and public infrastructure.

Finding qualified contractors to perform housing rehabilitations and construction projects has been a struggle over the past few years. Many small companies don't have the financial means to construct a project and wait for phased reimbursement and larger companies are busy with other projects that have higher profit margins. Oklahoma City struggles with the same issues even with their larger pool of contractors. The City of Lawton will continue to overcome this obstacle.

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 Supply of Affordable Rental Housing Quality of Public Facilities & Infrastructure
	Funding	CDBG: \$142,496
	Description	Administrative expenses for CDBG and HOME program operations and management.
	Target Date	7/1/2021
	Estimate the number and type of families that will benefit from the proposed activities	This is an administrative project.
	Location Description	
	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
	Funding	HOME: \$275,063
	Description	Provide financial assistance for the whole-house rehabilitation of owner-occupied single-family housing units.

	Target Date	7/1/2021
	Estimate the number and type of families that will benefit from the proposed activities	The City of Lawton estimates that 8 moderate- or low-income households will be assisted by this project.
	Location Description	This project may take place anywhere inside the city limits of Lawton.
	Planned Activities	Provide financial assistance for the whole-house rehabilitation of 8 owner-occupied single-family housing units.
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
	Funding	CDBG: \$100,019
	Description	Provide financial assistance for exterior maintenance code violations to owner-occupied single-family housing units.
	Target Date	7/1/2021
	Estimate the number and type of families that will benefit from the proposed activities	The City of Lawton estimates that 12 low-income households will be assisted by this project.
	Location Description	This project may take place anywhere inside the city limits of Lawton.
	Planned Activities	Provide financial assistance for exterior maintenance code violations to 12 owner-occupied single-family housing units.
	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
	Funding	CDBG: \$60,000
	Description	Provide financial assistance for emergency home repairs of owner-occupied single-family housing units.
	Target Date	7/1/2021
	Estimate the number and type of families that will benefit from the proposed activities	The City of Lawton estimates that 20 low-income households will be assisted by this project.
	Location Description	This project may take place anywhere inside the city limits of Lawton.
	Planned Activities	Provide financial assistance for emergency home repairs of 20 owner-occupied single-family housing units.
5	Project Name	Down payment and Closing Cost Assistance-HOME
	Target Area	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW
	Goals Supported	Down payment and Closing Costs Assistance-HOME
	Needs Addressed	Affordability of Owner-Occupied Housing
	Funding	HOME: \$15,000
	Description	Provide financial assistance to a first-time homebuyer for down payment and/or closing cost assistance.
	Target Date	7/1/2021

	Estimate the number and type of families that will benefit from the proposed activities	The City of Lawton estimates that 1 moderate- or low-income household will be assisted by this project.
	Location Description	This project may take place anywhere inside the city limits of Lawton.
	Planned Activities	Provide financial assistance to 1 first-time homebuyer for down payment and/or closing cost assistance.
6	Project Name	CHDO Set-Aside Project-HOME
	Target Area	Unknown LAWTON VIEW NEIGHBORHOOD REVITALIZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW
	Goals Supported	CHDO Set-Aside Project- HOME
	Needs Addressed	Affordability of Owner-Occupied Housing
	Funding	HOME: \$256,478
	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	7/1/2021
	Estimate the number and type of families that will benefit from the proposed activities	The City of Lawton estimates that 4 low-income households will be assisted by this project.
	Location Description	This project may take place anywhere inside the city limits of Lawton.
	Planned Activities	Provide financial assistance to a qualifying CHDO in the rehabilitation of 2 existing rental homes for low-moderate income housing units or in the construction of 2 new affordable 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 Public Facilities & Infrastructure
	Funding	CDBG: \$133,136
	Description	Provide Section 108 Loan Program funds for the creation of jobs. The "funding" allocation noted below is the annual debt service on the outstanding loan.
	Target Date	7/1/2021
	Estimate the number and type of families that will benefit from the proposed activities	The City of Lawton estimates that 400 moderate- or low-income individuals will obtain or maintain a job.
	Location Description	This project may take place in the downtown distance of the City of Lawton.
	Planned Activities	Provide Section 108 Loan Program funds for the creation or retention of 400 jobs. The "funding" allocation noted below is the annual debt service on the outstanding loan.
8	Project Name	Counseling Assistance (Christian Family Counseling) Project
	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	Supply of Affordable Owner-Occupied Housing
	Funding	CDBG: \$19,283
	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	7/1/2021
	Estimate the number and type of families that will benefit from the proposed activities	The City of Lawton estimates that 350 moderate- or low-income individuals will be assisted by this project.
	Location Description	This project may take place anywhere inside the city limits of Lawton.

	Planned Activities	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.
9	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	Supply of Affordable Owner-Occupied Housing
	Funding	CDBG: \$21,264
	Description	Provide funding to local non-profit(s) to assist in reducing 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	7/1/2021
	Estimate the number and type of families that will benefit from the proposed activities	The City of Lawton estimates that 4,000 moderate- or low-income individuals will be assisted by this project.
	Location Description	This project may take place anywhere inside the city limits of Lawton.
	Planned Activities	Provide funding to local non-profit(s) to assist in reducing 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.
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	Supply of Affordable Owner-Occupied Housing
	Funding	CDBG: \$17,276
	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.
	Target Date	7/1/2021
	Estimate the number and type of families that will benefit from the proposed activities	The City of Lawton estimates that 1,500 moderate- or low-income individuals will be assisted by this project.
	Location Description	This project may take place anywhere inside the city limits of Lawton.
	Planned Activities	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	Project Name	Homeless Shelter (GFIP-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 Homeless Shelter)
	Needs Addressed	Supply of Affordable Owner-Occupied Housing
	Funding	CDBG: \$15,270
	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	7/1/2021
	Estimate the number and type of families that will benefit from the proposed activities	The City of Lawton estimates that 1,200 moderate- or low-income individuals will be assisted by this project.

	Location Description	This project may take place anywhere inside the city limits of Lawton.
	Planned Activities	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	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	Supply of Affordable Owner-Occupied Housing
	Funding	CDBG: \$13,264
	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	7/1/2021
	Estimate the number and type of families that will benefit from the proposed activities	The City of Lawton estimates that 200 moderate- or low-income individuals will be assisted by this project.
	Location Description	This project may take place anywhere inside the city limits of Lawton.
	Planned Activities	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	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	Supply of Affordable Owner-Occupied Housing
	Funding	CDBG: \$11,242
	Description	Provide funding to local non-profit(s) to assist and empower the homeless achieve their goals of sustainable independence.
	Target Date	7/1/2021
	Estimate the number and type of families that will benefit from the proposed activities	The City of Lawton estimates that 50 moderate- or low-income individuals will be assisted by this project.
	Location Description	This project may take place anywhere inside the city limits of Lawton.
	Planned Activities	Provide funding to local non-profit(s) to assist and empower the homeless achieve their goals of sustainable independence.
14	Project Name	Lawton Support Services Project
	Target Area	Unknown LAWTON VIEW NEIGHBORHOOD REVITALIZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW
	Goals Supported	Lawton Support Services
	Needs Addressed	Supply of Affordable Owner-Occupied Housing
	Funding	CDBG: \$9,273
	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	7/1/2021
	Estimate the number and type of families that will benefit from the proposed activities	The City of Lawton estimates that 20 moderate-or low-income individuals will be assisted by this project.
	Location Description	This project may take place anywhere inside the city limits of Lawton.

	Planned Activities	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	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
	Funding	CDBG: \$107,864
	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	7/1/2021
	Estimate the number and type of families that will benefit from the proposed activities	This project is for the delivery cost of providing rehabilitation assistance.
	Location Description	This project may take place anywhere inside the city limits of Lawton.
	Planned Activities	Provide funding to assist low, very low and moderated household with emergency (ER) and exterior home improvement (EHIP) of owner-occupied homes.
16	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

	Funding	HOME: \$46,398
	Description	Provide administrative and management support for the HOME programs.
	Target Date	7/1/2021
	Estimate the number and type of families that will benefit from the proposed activities	This is an administrative project.
	Location Description	This project may take place anywhere inside the city limits of Lawton.
	Planned Activities	Provide administrative and management support for the HOME programs.
17	Project Name	Code Enforcement Activity Project-CDBG
	Target Area	LAWTON VIEW NEIGHBORHOOD REVITALAZATION STRATEGY AREA ZONE ONE LAWTON VIEW
	Goals Supported	Code Enforcement Activity Project - CDBG
	Needs Addressed	Quality of Affordable Owner Housing
	Funding	CDBG: \$79,400
	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	7/1/2021
	Estimate the number and type of families that will benefit from the proposed activities	The City of Lawton estimates that 2,500 moderate- or low-income households will be assisted by this project.
	Location Description	This project may take place within two specific areas in town, Zone One and Lawton View.
	Planned Activities	Provide financial funding for code enforcement officers help address code compliance issued in low-moderate income neighborhoods within the City of Lawton.
	Project Name	Tenant-Based Rental Assistance Project

18	Target Area	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW
	Goals Supported	Tenant-Based Rental Assistance
	Needs Addressed	Affordability of Owner-Occupied Housing
	Funding	HOME: \$170,000
	Description	Provide funding to a qualifying CHDO for the management and implementation of a tenant-based rental assistance program that assists low-income households with rental assistance for up to 24 months.
	Target Date	7/1/2021
	Estimate the number and type of families that will benefit from the proposed activities	The City of Lawton estimates that 100 moderate- or -low-income households will be assisted by this project.
	Location Description	This project may take place anywhere inside the city limits of Lawton.
	Planned Activities	Provide funding to a qualifying CHDO for the management and implementation of a tenant-based rental assistance program that assists low-income households with rental assistance for up to 24 months.
19	Project Name	Housing Reconstruction
	Target Area	Unknown LAWTON VIEW NEIGHBORHOOD REVITILAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW
	Goals Supported	Housing Reconstruction
	Needs Addressed	Affordability of Owner-Occupied Housing
	Funding	CDBG: \$20,000 HOME: \$500,000

	Description	Provide funding for the purchase of dilapidated homes or homes at risk of becoming dilapidated, demolition, reconstruction of a new home and selling of the home to qualifying homeowners.
	Target Date	7/1/2021
	Estimate the number and type of families that will benefit from the proposed activities	The City of Lawton estimates that 2 moderate- or low-income households will be assisted by this project.
	Location Description	This project may take place anywhere inside the city limits of Lawton.
	Planned Activities	Provide funding for the purchase of dilapidated homes or homes at risk of becoming dilapidated, demolition, reconstruction of a new home and selling of the home to qualifying homeowners.
20	Project Name	Public Facility Improvement
	Target Area	Unknown LAWTON VIEW NEIGHBORHOOD REVITALAZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW
	Goals Supported	Public Facility Improvement
	Needs Addressed	Quality of Public Facilities & Infrastructure
	Funding	CDBG: \$161,000
	Description	Provide funding for needed improvements or upgrades to public facilities located in qualifying neighborhoods.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	The City of Lawton estimates that 47,550 moderate- or low-income individuals will be assisted by this project.
	Location Description	This project may take place in any low- or moderate-income neighborhood within the city limits of Lawton.

	Planned Activities	Owens Multipurpose Center Gym Floor Replacement and ADA Restroom Improvements \$41,000 Patterson Center Roof Improvements \$80,000 HC King Center Kitchen Improvements \$40,000 Safe Haven Veteran's Resource Center Construction/Rehabilitation (This project was added with the Second Amendment. \$400,000 towards ten SRO units and \$150,000 toward infrastructure improvements.)
21	Project Name	Public Infrastructure
	Target Area	Unknown LAWTON VIEW NEIGHBORHOOD REVITALIZATION STRATEGY AREA DOWNTOWN - 01 ZONE ONE DOWNTOWN - 03 LAWTON VIEW
	Goals Supported	Public Infrastructure
	Needs Addressed	Quality of Public Facilities & Infrastructure
	Funding	CDBG: \$550,000
	Description	Provide funding for needed improvements or upgrades to existing public infrastructure located in qualifying neighborhoods or to install/construct new public infrastructure in qualifying neighborhoods.
	Target Date	7/1/2021
	Estimate the number and type of families that will benefit from the proposed activities	The City of Lawton estimates that 300 moderate- or low-income households will be assisted by this project.
	Location Description	This project may take place in any low- or moderate-income neighborhood within the city limits of Lawton.
	Planned Activities	Provide funding for needed improvements or upgrades to existing public infrastructure located in qualifying neighborhoods or to install/construct new public infrastructure in qualifying neighborhoods.

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

The City of Lawton as a whole is fairly moderate- or low-income. There are only a few neighborhoods within the city limits of Lawton that are NOT considered moderate- or low-income. The City of Lawton strives to reach anyone in need of assistance no matter the neighborhood they live in. Our Council members do a good job relaying assistance information to their respective areas. The only two areas of town that are specifically targeted are Lawton View and Zone One through our Code Enforcement Project. These areas have been targeted because of the appearance of the neighborhoods and the higher crime rate. These areas also have a high number of rental properties that have a high tenant turnover.

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. While our Code Enforcement Project specifically targets the Lawton View and Zone One areas, the majority of the funds are not specified for target areas because most City of Lawton

neighborhoods can be considered low- or moderate-income.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The objectives of the 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 be 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	100
The Production of New Units	2
Rehab of Existing Units	40
Acquisition of Existing Units	2
Total	144

Annual Action Plan
2020

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) and the Great Plains Improvement Foundation (GPIF) provide rental units for very low-income renters in the community.

AP-60 Public Housing – 91.220(h)

Introduction

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 individuals. We would also like to partner with the Lawton Housing Authority and/or Great Plains Improvement Foundation to build two (2) new homes that would be rented to low-moderate income households to increase the available rental stock. Lack of qualifying contractors presents a challenge to achieve these objectives, however the city and its partner organizations are determined to overcome this challenge.

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

The City of Lawton will continue to work to increase the overall quality of public housing. Presently, the Housing Authority has been able to maintain and manage their properties. All housing is considered "average" by the Housing Authority. We will also continue to work with Great Plains Improvement Foundation increase affordable housing options.

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 down payment 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 this Annual 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). The City of Lawton is currently working with the Lawton Housing Authority on a Safe Haven Shelter for homeless veterans. This safe haven will not only provide for immediate temporary shelter, it

will also connect homeless veterans to needed resources.

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 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 developers 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.

Three (3) 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 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	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)

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

For 2020, we are anticipating \$16,490 in HOME program income. We also have allocated funds from previous years that we hope to spend on projects in the coming year.

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, if any. 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 2020 Action Plan Year to refinance existing debt secured by multifamily housing.

The City's HOME allocation for the FFY 2020 program year is estimated at **\$376,518**. Additionally, **\$16,490** of HOME program income and **\$1,275,127.10** is available from previous years for a total of **\$1,668,135.10** 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 2020 was published in the Lawton Constitution on Sunday, March 8, 2020, but later cancelled on April 5, 2020 due to the coronavirus pandemic. A new Public Notice regarding the public review and comment period for Annual Action Plan for FFY 2020 was published in the Lawton Constitution on Sunday, June 7, 2020. 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 2020 was available for public review and comments beginning June 8, 2020 through June 23, 2020 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. The plan was also available on the City of Lawton's website. No public comments were received.

At a public hearing before the Lawton City Planning Commission on June 11, 2020, the Housing and Community Development office presented its Annual Action Plan for FFY 2020 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 June 23, 2020, the Housing and Community Development staff presented their recommendations for the Annual Action Plan for FFY 2020 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 20-40.

Minor Amendment

The City of Lawton was notified on November 9, 2020, that an error had been found in HUD's formula allocations. As a result, the City of Lawton's CDBG allocation was reduced by \$108 and the HOME allocation reduced by \$69. According to the City of Lawton's Citizen Participation Plan, this reduction was considered a minor amendment and did not require a public notice to be published in the paper nor a public hearing held. This reduction was taken to the Lawton City Council on December 8, 2020 to make them aware of the reduction and for them to approve the Mayor signing the revised 424's and Certifications.

Page 1 of 2

Substantial Amendment

A Public Notice regarding the public review and comment period for the Second Amendment to the Annual Action Plan for FFY 2020 was published in the Lawton Constitution on Sunday, March 7, 2021. The notice gave the dates and times for the two public hearings that were held to receive comments.

The Second Amendment to the Annual Action Plan for FFY 2020 was available for public review and comments beginning March 10, 2021 through April 12, 2021 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. Some of the locations were still closed because of the Covid pandemic, but the amendment was posted on the building for review. The plan was also available on the City of Lawton's website. No public comments were received.

At a public hearing before the Lawton City Planning Commission on March 25, 2021, the Housing and Community Development office presented the Second Amendment to the Annual Action Plan for FFY 2020 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 amendment as drafted by staff.

At a public hearing before the Lawton City Council on April 13, 2021, the Housing and Community Development staff presented their recommendations for the Second Amendment to the Annual Action Plan for FFY 2020 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. The amendment was approved to fund the Veteran's Resource Center with \$400,000.00 in HOME funds and \$150,000.00 in CDBG funds.

Grantee SF-424's and Certification(s)

OMB Number 4040-0304
 Expiration Date: 12/31/2022

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Pre-application <input type="checkbox"/> Application <input checked="" type="checkbox"/> Change/Continuation Application	* 2. Type of Application: <input type="checkbox"/> New <input type="checkbox"/> Continuation <input checked="" type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text" value="No Decrease Award"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>		5b. Federal Award Identifier: <input type="text"/>
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="City of Lawton"/>		
* a. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="NONE 00-0000000"/>	* a. Organizational DUNS: <input type="text" value="074272865000"/>	
d. Address:		
* Street1: <input type="text" value="211 SW 10th Street"/>	Street2: <input type="text"/>	
* City: <input type="text" value="Lawton"/>	County/Parish: <input type="text"/>	
* State: <input type="text" value="OK - Oklahoma"/>	Province: <input type="text"/>	
* Country: <input type="text" value="USA - UNITED STATES"/>	* Zip / Postal Code: <input type="text" value="75501 3844"/>	
e. Organizational Unit:		
Department Name: <input type="text" value="Community Services"/>	Division Name: <input type="text" value="Housing & Community Develop."/>	
f. Name and contact information of person to be contacted on matters involving this application:		
* First Name: <input type="text" value="Christine"/>	* Last Name: <input type="text" value="Jones"/>	
* Middle Name: <input type="text"/>	* Suffix: <input type="text"/>	
Title: <input type="text" value="Housing & Community Development Administrator"/>		
Organizational Address: <input type="text"/>		
* Telephone Number: <input type="text" value="580-581-3147"/>	* Fax Number: <input type="text" value="580-581-3145"/>	
* Email: <input type="text" value="christine.jones@lawbook.gov"/>		

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="City or Township Government"/> Type of Applicant 2: Select Applicant Type: <input type="text"/> Type of Applicant 3: Select Applicant Type: <input type="text"/> * Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="U.S. Department of Housing and Urban Development"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text" value="31-216"/> C/FDA Title <input type="text" value="Community Development Block Grant (CDBG) Program"/>	
* 12. Funding Opportunity Number: <input type="text"/> * Title: <input type="text"/>	
13. Competition Identification Number: <input type="text"/> Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
* 15. Discipline Title of Applicant's Project: <input type="text" value="Executive Annual Action Plan for FY 2020 includes a variety of CDBG projects, including elder care housing, public services, home rehabilitation, economic development, and infrastructure improvements."/>	
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424

16. Congressional Districts Of:
 * a. Agency: * b. Program/Project:

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:
 * a. Start Date: * b. End Date:

18. Estimated Funding (\$):

* a. Federal	712,481.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	935,392.92
* f. Program Income	17,308.00
* g. TOTAL	1,665,179.92

* 19. Is Application Subject to Review By State Under Executive Order 13372 Process?
 a. This application was made available to the State under the Executive Order 13372 Process for review on
 b. Program is subject to E.O. 13372 but has not been selected by the State for review.
 c. Program is not covered by E.O. 13372.

* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)
 Yes No
 If "Yes" provide explanation and attach

21. "By signing this application, I certify (1) to the statements contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances" and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001)
 " I AGREE
 * The list of certifications and assurances, or an internal site where you may view this list, is contained in the announcement or agency specific instructions.


Authorized Representative:

Prefix: * First Name:
 Middle Name:
 Last Name:
 Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:  * Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 40211-00019
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per 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 this 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 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, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify 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:


1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (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.
2. 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 of, modify the use of, or change the terms of the real property title 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 include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. 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 progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or prevents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded 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).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. 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 Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1085-1086), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicap; (d) the Age Discrimination 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 relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§230 dd-3 and 230 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.) as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made, and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 424-D (Rev. 7-87)
Prescribed by OMB Circular A-102

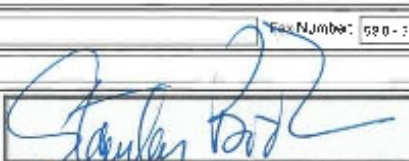
11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and Federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. 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 Federal funds.
13. Will comply, 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 Federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total 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 Act of 1969 (P.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 EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal 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) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-206).
16. 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 ensuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§468a-7 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 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 laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking 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 trafficking in persons during the period of time that the award is in effect (2) Procuring 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 subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Lawton	DATE SUBMITTED 12/15/20

SF-210 (Rev. 7-87) Back

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input type="checkbox"/> Application <input checked="" type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input type="checkbox"/> New <input type="checkbox"/> Continuation <input checked="" type="checkbox"/> Revision	* If Reason (select appropriate letter(s)): <input type="text" value="H - FEDERAL AWARDS"/> * Other Specify: <input type="text"/>
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="City of Lawton"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN) <input type="text" value="EIN# 75-5005287"/>	* c. Organizational JURIS <input type="text" value="074272855000"/>	
d. Address:		
* Street1	<input type="text" value="210 SW 30th Street"/>	
Street2:	<input type="text"/>	
* City:	<input type="text" value="Lawton"/>	
County/Parish:	<input type="text"/>	
* State:	<input type="text" value="OK - Oklahoma"/>	
Province:	<input type="text"/>	
* Country:	<input type="text" value="USA - UNITED STATES"/>	
* Zip / Postal Code:	<input type="text" value="75581-1444"/>	
e. Organizational Unit:		
Department Name <input type="text" value="Community Services"/>	Division Name <input type="text" value="Housing & Community Develop"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text"/>	* First Name: <input type="text" value="Charlotte"/>	
Middle Name: <input type="text"/>		
* Last Name: <input type="text" value="Carter"/>		
Suffix: <input type="text"/>		
Title: <input type="text" value="Housing & Community Development Administrator"/>		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text" value="580-581-3557"/>	Fax Number: <input type="text" value="580-581-3516"/>	
* Email: <input type="text" value="charlie.carter@cityoflawtonok.gov"/>		

Application for Federal Assistance SF-424			
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="City or Township Government"/>			
Type of Applicant 2: Select Applicant Type: <input type="text"/>			
Type of Applicant 3: Select Applicant Type: <input type="text"/>			
* Other (specify): <input type="text"/>			
* 10. Name of Federal Agency: <input type="text" value="US Department of Housing and Urban Development"/>			
11. Catalog of Federal Domestic Assistance Number: <input type="text" value="14-239"/>			
CFDA Title: <input type="text" value="HOPE Investment Partnerships (EOMB) Program"/>			
* 12. Funding Opportunity Number: <input type="text"/>			
* Title: <input type="text"/>			
13. Competition Identification Number: <input type="text"/>			
Title: <input type="text"/>			
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/>			
		<input type="button" value="Add Attachment"/>	<input type="button" value="Delete Attachment"/>
<input type="button" value="View Attachment"/>			
* 15. Descriptive Title of Applicant's Project: <input type="text" value="Lowton's Annual Action Plan for FFY 2020 includes a variety of HOME projects, including purchase assistance to borrowers, homeowner rehabilitation assistance and CDBG assistance."/>			
Attach supporting documents as specified in agency instructions.			
<input type="button" value="Add Attachments"/>		<input type="button" value="Delete Attachments"/>	<input type="button" value="View Attachments"/>

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="054"/>	* b. Program/Project: <input type="text" value="634"/>
Attach an additional list of Program/Project Congressional Districts if needed. <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date: <input type="text" value="07/01/2020"/>	* b. End Date: <input type="text" value="06/30/2021"/>
18. Estimated Funding (\$):	
* a. Federal:	<input type="text" value="376,145.00"/>
* b. Applicant:	<input type="text"/>
* c. State:	<input type="text"/>
* d. Local:	<input type="text"/>
* e. Other:	<input type="text" value="1,275,121.00"/>
* f. Program Income:	<input type="text" value="10,490.00"/>
* g. TOTAL:	<input type="text" value="1,658,066.00"/>
* 19. Is Application Subject to Review By State Under Executive Order 12972 Process? <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12972 Process for review on: <input type="text"/> . <input type="checkbox"/> b. Program is subject to E.O. 12972 but has not been selected by the State for review. <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12972	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" provide explanation and attach: <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. "By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001) <input checked="" type="checkbox"/> ** I AGREE ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency solicitation.	
Authorized Representative:	
Prefix: <input type="text" value="Dr"/>	* First Name: <input type="text" value="Stanley"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Booker"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="Mayor"/>	
* Telephone Number: <input type="text" value="503-541-3332"/>	* Fax Number: <input type="text" value="503-591-3335"/>
* Email: <input type="text" value="stbooker@seaside.gov"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="07/20/20"/>

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 1010-0039
 Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, examining 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 (0548-0042), 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, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify 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:


1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (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.
2. 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 relating 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 title 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 include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. 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 progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§1728-1763) relating to prescribed standards of merit systems for programs funded 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).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. 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 Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, 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. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination 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, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination 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 ee-3), as amended, relating to confidentiality of a cohort and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 4240 (Rev. 1/97),
 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. 91-646) 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 apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. 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 Federal funds.
13. Will comply, 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 federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total 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 Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of food hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal 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) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. 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 assuring compliance with Section 406 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 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 laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking 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 trafficking in persons during the period of time that the award is in effect (2) Procuring 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 subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Lakota	DATE SUBMITTED 12/15/20

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 housing.

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 --To 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 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 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 cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all times (including subcontracts, subgrants, and contracts 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 legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD 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 consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.


Signature of Authorized Official

12/15/20
Date

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 plan 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 have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 576.

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 low- and moderate-income families or aid in the prevention or elimination of slums 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 CDBG funds, including Section 108 guaranteed loans, during program year(s) 2020 [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 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining 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) financed 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.

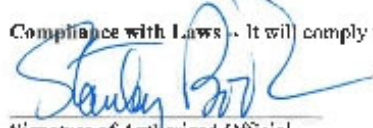
Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. 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 CFR Part 35, Subparts A, B, J, K, and R.

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



Signature of Authorized Official

12/15/20

Date

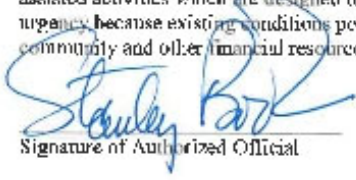
MAYOR

Title

OPTIONAL Community Development Block 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 §70.208(c):

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

12/15/20
Date

MAYOR
Title

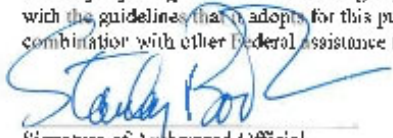
Specific HOME Certifications

The HOME participating jurisdiction certifies that:

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 HOME funds 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

12/15/20
Date

MAYOR
Title

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 file 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.