

Executive Summary

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

1. Introduction

Located in central Oklahoma, just a brief 15-minute drive south of the state capital of Oklahoma City, Norman sprawls across 189 square miles. The city boasts a rich tapestry of history, a spectrum of cultural offerings, and is anchored by esteemed educational institutions, including the renowned University of Oklahoma, with an enrollment of 31,000 students. As of the 2020 U.S. Census, Norman welcomed approximately 128,026 residents, among whom thirty-one percent represented various minority groups. Reflecting socioeconomic dynamics, the median household income stood at \$57,786, while 18.8% of individuals are living in poverty. Within the 53,446 households, 42.8% fell under the umbrella of low- or moderate-income brackets, as per the HUD classification. Consolidated Plan funds are targeted toward these low and moderate income neighborhoods or toward activities that benefit all residents of the city who are low or moderate income.

The Strategic Plan lays out the direction the City intends to take in the distribution of the Community Development Block Grant and HOME funding for the 2020-2025 planning period. The priorities were determined through consultation with citizens, service providers and other City of Norman departments. Some of the programs will be targeted to individual households who qualify for the programs according to their income status (individual or direct benefit). Other programs are directed towards particular areas within Norman where the median income of the census blocks groups meets the HUD standards for area benefit. This standard states the median household income of 51% of households in the area is at or below 80% of MFI. The City's goals and objectives were identified and developed through the context of eligible uses of HUD funding and are listed below and summarized in Section SP-45.

2. Summarize the objectives and outcomes identified in the Plan

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

The City of Norman undertook a significant public input and planning process during the year leading up to the submission of the Consolidated Plan in 2020. The implementation of these goals is proposed to be continued with this Annual Action Plan. Public input was obtained through focus groups, formal and informal meetings, and public hearings. The Consolidated Plan contained a range of goals, objectives, and outcomes formulated to address needs identified for homelessness, affordable housing, non-

housing community development, barriers to affordable housing, lead based paint hazards, institutional structure, and coordination. The overall goals included:

Housing Rehabilitation

Homelessness

Community Development

Affordable Housing

For the B24 and M24 funding no budget has been established to address the goal of homelessness. There is adequate funding to continue to address this goal.

3. Evaluation of past performance

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

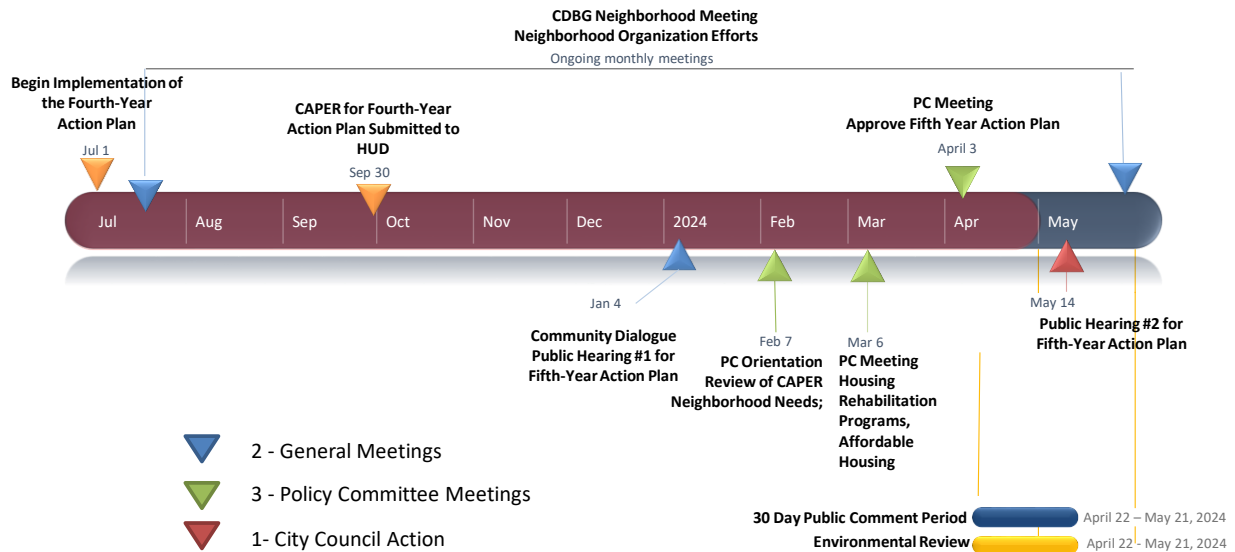
The City of Norman has a long history of successful programs funded through the Community Development Block Grant and HOME Investment Partnerships Program. Of particular importance to the health of the city have been programs that address the condition of the housing stock. The City of Norman has successfully funded housing rehabilitation activities targeting lower income and elderly households unable to properly maintain their homes. By working actively with local homeless service providers, the City of Norman has been able to facilitate the expansion of both the stock of units/beds available to homeless persons and services aimed at helping those persons find employment, housing, health care services, and educational opportunities. Details of past performance can be found in the City's Consolidated Annual Performance and Evaluation Report (CAPER).

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The Citizen Participation Process included two Public Hearings and multiple meetings of the CDBG Policy Committee. Consultations for the program are ongoing as staff participates in multiple community based events and committees. The process is outlined in the following timeline.

Citizen Participation Process City of Norman Action Plan Year 5



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.

No Public Comments were received.

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

No Public Comments were received.

7. Summary

Based on the needs of the community the City of Norman continues to concentrate these resources towards the provision of affordable housing. This strategy allows for the rehabilitation of owner

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

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

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

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

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

Proposed Budget

2023 (FYE24) COMMUNITY DEVELOPMENT BLOCK GRANT

CDBG 23 (FYE 24) Budget **\$941,659**

\$ 180,540 Admin, Planning & MFHC (\$15,000)
\$188,331 cap
\$143,000 Strong Neighborhood Initiatives
\$73,000 Project Staff Delivery Costs
\$70,000 Strong Neighborhoods Initiative Projects

\$25,000 Public Services *\$141,258 cap*
\$25,000 Housing Navigator (contract with NHA)
(combination of CDBG and \$33,000 of CDBG CV3 funding)
Housing Rehabilitation
\$453,119 *\$210,000 Housing Rehabilitation*
Rehab Delivery Costs
\$243,119 Rehab Projects

Capital Projects
\$140,000 *\$100,000 Norman Affordable Housing*
Acquisition of Property
\$40,000 Habitat Acquisition
Acquisition of Property

\$941,659

2023 (FYE24) HOME INVESTMENT PARTNERSHIPS

HOME 23 Budget **\$458,765**

\$40,000 Administration (\$15,000 MFHC)
\$43,873 cap
\$70,000 Community Housing Development Corporation
\$68,816 minimum
\$288,765 Affordable Housing Development

\$60,000 Strong Neighborhoods Initiative Homebuyer Program

\$458,765

\$1,400,424 Total Funding Available

Existing CDBG Funded Activities to roll to FYE24

\$ 183,830.00 Housing Rehabilitation
 \$ 17,563.00 Homeless Startup Kits

Existing CDBG Capital Projects

\$ 352,013.00 Neighborhood Initiatives
 \$ 113,106.00 Senior Center Congregate Meal Rehab

HOME Funding

\$	29,088.61	M19 HOME 20	21240014
\$	-	M20 HOME 21	21240020
\$	-	M21 HOME 22	
\$	422,341.82	M22 HOME 23	21240026
\$	443,765.00	M23 HOME 24	21240030
\$	895,195.43		

PR-05 Lead & Responsible Agencies – 91.200(b)

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

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

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

Table 1 – Responsible Agencies

Narrative (optional)

Consolidated Plan Public Contact Information

The City of Norman 2020-2025 Consolidated Plan and the Fifth Year Action Plan may be viewed at Normanok.gov or a copy requested by contacting Tara Reynolds at 405-366-5322.

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

1. Introduction

The following information is comprised of the agencies that have served on committees, provided direct input or provided input via other means, CDBG, HOME, and CoC-funded sub-recipients, and delivered the CDBG and HOME services directly. The Consolidated Plan and Action Plan process is a year-round accumulation of reports, discussions, analysis, and observations. All the agencies/groups listed below have had a part in the final product as well as decisions and discussions that happen year-round.

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

The City of Norman has a very strong commitment to agency coordination, and because of this commitment and the effort to bring community agencies and providers together this has been very successful. Because of the effort to bring all stakeholders to the table, there is a strong knowledge of community resources among the agencies, resulting in a very strong referral network, very effective discussions regarding needs analysis and service delivery resulting in minimal duplication of services.

Although the Norman Housing Authority is not formally affiliated with the City of Norman, they work closely with the City of Norman and service providers to organize resources from the federal government to address the housing needs of Norman's lowest income households. Through the Continuum of Care process, the City of Norman maintains relationships with mental health providers, homeless shelter and service providers, and other governmental agencies with specific responsibilities for homeless individuals and families. This system provides a forum for assisting these agencies grow and meet the needs of their own targeted clientele. The City of Norman also participates in a variety of other coalitions that seek to address other issues that relate to housing and service needs

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The City of Norman, the City of Moore, and the surrounding Cleveland County area comprise the Norman/Cleveland County Continuum of Care (CoC) designated as OK-504. In the past, the City of Norman was designated as the Collaborative Applicant. In April of 2022 Thunderbird Clubhouse transitioned into the role of the Collaborative Applicant with the assistance of the City of Norman. The CoC Steering Committee encompasses 88 members with an elected Executive Committee having 18 members. The Executive Committee meets on a monthly schedule with the entire Steering Committee meeting semi-annually. The City of Norman staff works actively with the Executive Committee and other designated committees in the identification of needs and coordination of resources. In the past, the City

of Norman has often brought CDBG and HOME resources to the table to supplement CoC initiatives and to serve as a local government pass through when required by funders.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

As a voting member of the Continuum of Care Executive Committee, the City of Norman is directly involved with all CoC activities including the allocation of ESG resources. The Norman/Cleveland County CoC has developed and adopted governance documents including conflict of interest policies. The documents which were developed in consultation with the City of Norman, establish guidelines for the evaluation of outcomes and performance standards that are performed by the COC.

The Oklahoma City Continuum of Care is located adjacent to the Norman/Cleveland County CoC and because both represent a common metropolitan area and thus share a commonality in the homeless population. Regular collaboration between the two entities occurs and the common HMIS system is utilized which facilitates identification of the mobile segment of this population.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	City of Norman
	Agency/Group/Organization Type	Other government - Local Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	As a voting member of the CoC Executive Committee, the City of Norman is directly involved with all CoC activities including the allocation of ESG resources. The Norman/Cleveland County CoC has developed and adopted governance documents including conflict of interest policies. The documents which were developed in consultation with the City of Norman, establish guidelines for the evaluation of outcomes and performance standards that are performed by the COC. The Oklahoma City Continuum of Care is located adjacent to the Norman/Cleveland County CoC and because both represent a common metropolitan area and thus share a commonality in the homeless population. Regular collaboration between the two entities occurs and the common HMIS system is utilized which facilitates identification of the mobile segment of this population.

2	Agency/Group/Organization	Norman Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Norman Housing Authority was included on the staff technical team that collected and analyzed data as well as assisted in community outreach. The outcomes will be accurate data on participants served through the housing authority, and coordinated efforts on future affordable housing projects. NHA staff also assisted in significant outreach activities to low income households served through the NHA.
5	Agency/Group/Organization	Central Oklahoma Community Mental Health Center/Griffin Memorial Hospital
	Agency/Group/Organization Type	Services-Persons with Disabilities Services-Health Health Agency Publicly Funded Institution/System of Care Major Employer

	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy 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?	Consultation included participation in the CoC activities, Point in Time data collection. The agency was a participant in the creation and implementation of the Built for Zero programs. Active in regional planning for the CoC. Provides input on sheltered, unsheltered homeless and homeless gaps analysis.
6	Agency/Group/Organization	AGING SERVICES INC
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Agency was consulted through in person conversations to assist in identifying future service and facility needs. The anticipated outcome includes assistance in the City identifying service and facility needs and goals for the Action Plan.
7	Agency/Group/Organization	The Salvation Army
	Agency/Group/Organization Type	Services-homeless

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Agency was consulted through in person conversations as well as community forums to assist in identifying future service and facility needs. The anticipated outcome includes assistance in the City identifying service and facility needs and goals for the Action Plan.
8	Agency/Group/Organization	NORMAN AFFORDABLE HOUSING CORPORATION, INC.
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Agency was consulted through in person conversations as well as community forums to assist in identifying future service and facility needs. The anticipated outcome includes assistance in the City identifying service and facility needs and goals for the Action Plan.

9	Agency/Group/Organization	Thunderbird Clubhouse
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities Services-homeless Services-Health Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Agency was consulted through in person conversations as well as community forums to assist in identifying future service and facility needs. The anticipated outcome includes assistance in the City identifying service and facility needs and goals for the Action Plan.
10	Agency/Group/Organization	Food and Shelter, Inc.
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless

	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Agency was consulted through in person conversations as well as community forums to assist in identifying future service and facility needs. The anticipated outcome includes assistance in the City identifying service and facility needs and goals for the Action Plan.
11	Agency/Group/Organization	Norman CHDO 2015
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Norman 2015 CHDO is a relatively new CHDO approved for participation. Consultation has included analysis of affordable housing designed for those with a physical disability as they developed the Vicksburg Project. Additional consultation occurred as they developed in partnership with the University of Oklahoma, College of Architecture, the Hughbert Street Project. The most recent project included the construction of three single family infill properties which meet the City of Norman Visitability Standards.
12	Agency/Group/Organization	City of Norman Parks Department
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development

<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>The department was consulted through in person conversations to assist in identifying future facility needs in the implementation of the Parks Master Plan as it relates to the Neighborhood Parks in the CDBG target area.</p>
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Identify any Agency Types not consulted and provide rationale for not consulting

All service providers and agencies that provide services directly pertaining to the Consolidated Planning process have been involved in some type of consultation. Some have been consulted during other meetings and other forums. There have been no agencies left off of communication efforts or meeting invitations. The City of Norman works very hard to ensure strong and positive community collaboration.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Thunderbird Clubhouse, Inc.	Coordination in terms of homeless program delivery and strategic planning. Technical assistance to grantees, support to applicants.
Norman Land Use & Transportation Plan	City of Norman	Long-Range Comprehensive Plan. Overlap in the transportation plan occurs with land use and transportation issues in the low-income areas or areas serving low-income citizens. CDBG funds are used for sidewalk/street repair and public facility projects, all affected by the ability to reach the designated agency or area.
PHA 5 Year Plan	Norman Housing Authority	The 5-Year Plan addresses specific maintenance and planning needs of the Norman Housing Authority, which has a major role in addressing the housing needs of Norman.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

The lead agency for the Consolidated Plan as well as each Action Plan is the CDBG/Grants Division of the Planning and Community Development Department of the City of Norman. The division and department oversaw the development of the plan. Two advisory boards performed key roles:

The Community Development Policy Committee: Purpose: To develop and propose community development strategy and policy; to recommend allocation of CDBG and HOME funds. The 18 committee members are drawn from the low and moderate income neighborhoods in the CDBG Target Area and the community at large.

The Continuum of Care Executive Committee: Purpose: To implement the community's plan for homeless services; to make policy recommendations regarding addressing homelessness; to make regular reports to the community on the progress towards elimination of homelessness. The 18 committee members are drawn from the following community resources: housing and other service providers; current or formerly homeless individuals; faith leaders; and researchers.

AP-12 Participation – 91.105, 91.200(c)

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

The lead agency for the Consolidated Plan is the CDBG/Grants Division of the Planning and Community Development Department of the City of Norman. The division and department oversaw the development of the plan. Two advisory boards performed key roles:

The Community Development Policy Committee: Purpose: To develop and propose community development strategy and policy; to recommend allocation of CDBG and HOME funds. The 18 committee members are drawn from the low and moderate income neighborhoods in the CDBG Target Area and the community at large.

The Continuum of Care Executive Committee: Purpose: To implement the community's plan for homeless services; to make policy recommendations regarding addressing homelessness; to make regular reports to the community on the progress towards elimination of homelessness. The 88 Oversight Committee members are drawn from the following community resources: housing and other service providers; current or formerly homeless individuals; faith leaders; and researchers. An 18-member Executive Committee, a Data Committee consisting of 8 members and also a Governance Committee with 8 members oversee all activities of the Continuum.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
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1	Public Meeting	<p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>The Community Dialogue Public Hearing was held on January 3, 2025. Invitations were directed to every Social Service Agency in Norman utilizing the United Way of Norman and the Continuum of Care mailing lists. Invitations were also sent to households who have participated in the CDBG process in the past including the target neighborhoods. In addition to advertising on the City of Norman media outlets, a legal notice was placed in the Norman Transcript announcing the meeting. A total attendance of 10</p>	<p>Comments were directed at overall needs of the low income and special needs populations of Norman. The discussion emphasis other than the impact of the Corona Virus was placed on general welfare and affordable housing.</p>	<p>No written comments were received and all verbal comments were duly recorded and considered.</p>	
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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)
			individuals was recorded at the in-person meeting held at the Norman City Hall.			

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The priorities and accomplishment goals outlined in this document are based on assumptions about future funding levels for the Consolidated Plan programs. In all cases, the City of Norman has used the presumption of level-funding of each program at Federal Fiscal Year 2020 levels as outlined below. Because these programs are subject to annual Congressional appropriations as well as potential changes in funding distribution formulas or the number of communities eligible to receive entitlement grants, the accomplishment projections and planned activities are subject to change with availability of funding.

Fiscal Year 2023 provided a modest increase in CDBG Entitlement and HOME Investment Partnerships funding.

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	941,659	0	550,000	1,491,659	0	

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	458,765	0	840,000	1,298,765	0	

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

CDBG and HOME funding will leverage a significant amount of additional resources including federal, state, and local funding. The City of Norman Social and Voluntary Services Commission annually funds \$250,000 in social services through local general revenue. CDBG funds and social service funding are often provided to similar agencies and implemented to maximize funds available and build agency capacity for services. HOME funding often leverages significant investment from private entities

The U.S. Department of Housing and Urban Development (HUD) requires that the Participating Jurisdictions (PJs) that receive HOME funding match \$.25 of every dollar. The matching requirement mobilizes community resources in support of affordable housing. The City of Norman expects to receive approximately \$400,000 in HOME funding for FY2025 and beyond, requiring an annual match requirement of \$100,000. HUD allows cities to rollover excess match from previous years and to date the City of Norman has banked over 2.8 million dollars of excess match.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The Oklahoma Department of Mental Health and Substance Abuse Services is collaborating with the City of Norman on the possible redevelopment of Griffin Memorial Hospital (GMH). GMH is located within the CDBG Target Area and as part of the redevelopment; land and or structures could be utilized to meet these identified needs. In addition, Norman Regional Hospital has recently announced the concentration of their activities at the Tecumseh Campus and a potential redevelopment of the Porter Avenue Campus which is located within the CDBG Target Area.

Discussion

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	Housing Rehabilitation	2020	2025	Affordable Housing	Community Wide	Need for Housing Rehabilitation Housing and Services for Persons with Special Need	CDBG: \$453,119	Rental units rehabilitated: 15 Household Housing Unit Homeowner Housing Rehabilitated: 20 Household Housing Unit
2	Public Services	2020	2025	Public Services	Community Wide	Need for Housing and Services for Persons with Special Need	CDBG: \$25,000	Expansion of Landlords participating in Section 8 Program, goal 8 units.
3	Community Development	2020	2025	Non-Housing Community Development	2020-2025 SNI Target Area	Need for Housing Rehabilitation Public Improvements	CDBG: \$140,000 HOME: \$60,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1673 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Affordable Rental/Owner Housing	2020	2025	Affordable Housing	Community Wide	Availability of Affordable Rental Units Housing and Services for Persons with Special Need Housing and Services for the Homeless	CDBG: \$140,000 HOME: \$358,765	Rental units constructed: 4 Household Housing Unit

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Housing Rehabilitation
	Goal Description	Housing Rehabilitation Goals include 20 Emergency repair Projects and 15 Accessibility Repair Projects.
2	Goal Name	Public Services
	Goal Description	Expansion of the Housing Navigator Landlord Program to Increase Participation of Section 8 Available Units.
3	Goal Name	Community Development
	Goal Description	Strong Neighborhood Initiative includes the Old Silk Stocking, First Courthouse Neighborhood and Original Townsite Neighborhoods. Will include small neighborhood based improvement projects determined by residents of the area and a limited down-payment assistance program.
4	Goal Name	Affordable Rental/Owner Housing
	Goal Description	Goals include construction of 2 affordable rental units and acquisition of property for development of affordable housing by NAHC and Habitat.

Projects

AP-35 Projects – 91.220(d)

Introduction

The following projects were prioritized by the City of Norman Policy Committee after evaluating the resources that are available and the unmet needs of the community.

Projects

#	Project Name
1	Administration
2	Housing Rehabilitation
3	Public Services
4	CDBG Strong Neighborhood Initiative
5	Development of Affordable Housing

Table 7 - Project Information

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

Currently the immediate need is for affordable rental housing as the low and very low income households compete for affordable units with the student population from the University of Oklahoma. As a part of the update to the City of Norman Comprehensive Plan, a dedicated Housing Market Analysis and Housing Strategic Plan is currently under contract. These efforts will assist in development of strategies that the City of Norman can undertake to address this issue.

AP-38 Project Summary
Project Summary Information

1	Project Name	Administration
	Target Area	Community Wide
	Goals Supported	Housing Rehabilitation Community Development Affordable Rental/Owner Housing
	Needs Addressed	Need for Housing Rehabilitation Availability of Affordable Rental Units Housing and Services for Persons with Special Need Housing and Services for the Homeless Public Improvements
	Funding	CDBG: \$941,659 HOME: \$458,765
	Description	Administration for the CDBG and HOME Programs including Fair Housing Activities.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Beneficiaries are aggregated within the individual activities
	Location Description	Activities will be undertaken at the Grants Office located at 225 N. Webster, Norman, OK.
	Planned Activities	Administration of the CDBG and HOME programs.
2	Project Name	Housing Rehabilitation
	Target Area	Community Wide
	Goals Supported	Housing Rehabilitation Affordable Rental/Owner Housing
	Needs Addressed	Need for Housing Rehabilitation Housing and Services for Persons with Special Need
	Funding	CDBG: \$941,659 HOME: \$458,765
	Description	Housing rehabilitation activities include an Emergency Repair Program and an Accessibility Modification Program. These programs are available community wide.
	Target Date	6/30/2025

	Estimate the number and type of families that will benefit from the proposed activities	35 households will receive rehabilitation assistance.
	Location Description	Accessibility Modifications and Emergency Repair Assistance are available community wide.
	Planned Activities	Housing rehabilitation activities include an Emergency Repair Program and an Accessibility Modification Program. These programs are available community wide.
3	Project Name	Public Services – Section 8 Housing Navigator Program
	Target Area	Community Wide
	Goals Supported	Affordable Rental/Owner Housing
	Needs Addressed	Increasing supply of Section 8 eligible units
	Funding	CDBG: \$941,659 HOME: \$458,765
	Description	Landlord engagement through the Norman Housing Authority to expand the availability of participating landlords in the Section 8 program.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	8 units will be added to the registry of participating landlords.
	Location Description	This program is available community wide.
	Planned Activities	Engagement by dedicated staff at the Norman Housing Authority with existing property owners to increase participation on the Section 8 Program.
4	Project Name	CDBG Strong Neighborhood Initiative
	Target Area	2020-2025 Target Area
	Goals Supported	Housing Rehabilitation Community Development Affordable Rental/Owner Housing

	Needs Addressed	Need for Housing Rehabilitation Public Improvements
	Funding	CDBG: \$941,659 HOME: \$458,765
	Description	Efforts concentrated in two-LMI Target Neighborhoods. Small public improvements, Exterior Property Maintenance and Down Payment Assistance Program to increase homeownership opportunities.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	1,673 persons reside within these three CDBG Target Neighborhoods and will benefit from the improvements.
	Location Description	Census Block Group 400272002.002
	Planned Activities	Efforts concentrated in three-LMI Target Neighborhoods. Small public improvements, Exterior Property Maintenance and Down Payment Assistance Program to increase homeownership opportunities.
4	Project Name	Development of Affordable Housing
	Target Area	Community Wide
	Goals Supported	Affordable Rental/Owner Housing
	Needs Addressed	Availability of Affordable Rental Units Housing and Services for Persons with Special Need Housing and Services for the Homeless
	Funding	CDBG: \$941,659 HOME: \$458,765
	Description	Acquisition of property with or without rehabilitation for affordable housing development.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Acquisition of two sites with CDBG funding. Development of 3 units with HOME funding
	Location Description	Undetermined at this time.

	Planned Activities	Acquisition of property with or without rehabilitation; rehabilitation of existing units or new construction of renter or owner occupied affordable units.
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AP-50 Geographic Distribution – 91.220(f)

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

The majority of projects planned are Direct Benefit activities. A limited number of Target Area (Area Benefit) projects are proposed.

Geographic Distribution

Target Area	Percentage of Funds
Community Wide	86
2020-2025 Target Area	14

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Rationale behind allocating investments geographically include ensuring the City of Norman is affirmatively furthering fair housing with housing programs offered city wide with qualification based upon the applicant's income for a direct benefit. The designated CDBG Target Area consists of contiguous block groups in the core of Norman with 51% or more of the population at 80% or below AMI, in order to ensure the achievement of a CDBG National Objective. While there are other areas in the City of Norman that meet this low-mod income criterion the infrastructure needs are minimal compared to the Target Area.

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Norman will support a variety of affordable projects including rehabilitation (owner and rental), acquisition, and the production of new units.

One Year Goals for the Number of Households to be Supported	
Homeless	2
Non-Homeless	43
Special-Needs	15
Total	60

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	2
The Production of New Units	2
Rehab of Existing Units	58
Acquisition of Existing Units	0
Total	62

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

Discussion

AP-60 Public Housing – 91.220(h)

Introduction

The City of Norman and the Norman Housing Authority have a very viable working relationship, and the partnership between agencies spans beyond Consolidated Plan items. The Norman Housing Authority sees the community as a big picture and not just in relation to the services they provide. Successful partnerships between the Norman Housing Authority and the community will only continue to become stronger.

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

Existing CARES Act funding will allow for the continuation of the Housing Navigator program in conjunction with the Norman Housing Authority. To complete the 2024-2025 program year, \$25,000 of CDBG Public Service funding is added to the remaining CARES Act Funding.

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

Efforts to increase participation by public housing residents are ongoing with planned activities at each site to encourage participation. The Residents Council is very active and participates fully in all decision making.

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

The Housing Authority of the City of Norman (OK-139) is designated as a High Performing Housing Authority.

Discussion

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

Introduction

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

The Cleveland County Continuum of Care has adopted the use of the VI-SPDAT assessment tool. This tool is instrumental in assessing unsheltered individuals needs and assigning a vulnerability index to them. It is this information that the Coordinated Case Management Team reviews in determining the placement into permanent housing. This tool is utilized by all the homeless service provider's year around; and this effort is also concentrated during the operation of a winter warming shelter and the January point-in-time count. OK504 collaborates closely with the Oklahoma City CoC and as they are currently developing an alternative to the VI-SPDAT, OK504 will align with the eventual assessment tool once released.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Norman plans to support the efforts of the Continuum of Care homeless service provider's efforts to provide emergency and transitional housing needs for households who are experiencing homelessness.

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

As mentioned previously, case management is the most effective method of assisting all homeless (chronic, individuals, families with children, veterans, and unaccompanied youth) both obtain housing and remain housed. Utilizing pre-programmed funding that is remaining, the City of Norman's Annual Action Plan contributes to helping homeless persons make the transition to permanent supportive housing and independent living by providing funds for Housing Start-up Kits will be used to increase the funding that is available for permanent housing.

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.

As mentioned previously, case management is the most effective method of assisting all homeless (chronic, individuals, families with children, veterans, and unaccompanied youth) both obtain housing and remain housed. The City of Norman's Annual Action Plan contributes to helping homeless persons make the transition to permanent supportive housing and independent living by providing funds for Housing Start-up Kits.

The City of Norman assists in the coordination of many of these efforts with the Continuum of Care. The CoC monitors the discharge planning policies of the systems of care and attempts to intervene when these policies result in the potential for homelessness. The CoC also coordinates the Emergency Solutions Grant Program in that it evaluates the funding priorities related to prevention activities and sets the levels of assistance.

Discussion

Norman prides itself in a decades-long track record of successful partnerships among public and private sector entities in regard to homelessness and other special needs activities. The Consolidated Plan delivery system is an example of this. Communication and cooperation between the City of Norman's Grants Division and the partner agencies and organizations that administer activities is strong. Staff has worked closely with the organizations involved with the Consolidated Plan programs to improve regulatory compliance, monitoring, cooperation and partnership among agencies, and technical capacity of organizations involved with project delivery.

The City of Norman's Strategic Plan Goals contribute to helping persons make the transition to permanent housing and independent living by supporting and in certain instances providing funding to facilities operated by agencies that serve these populations and by expanding housing options available to these populations. The City of Norman Social and Voluntary Services Commission administers over \$250,000 annually in local government revenue to assist social service providers serving these populations.

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

Introduction:

The City of Norman will continue to provide the Analysis of Impediments to Fair Housing (AI). Past and present AI's have indicated that Norman has done well in avoiding systematic impediments to fair housing choice, although affordability remains an important challenge. City ordinances, regulations, administrative policies, procedures and practices do not impede housing choice.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

A review of the City of Norman housing policy indicates there are no institutional barriers to obtain affordable housing. The city has adopted the 2018 International Codes (Building, Residential, Fire, Mechanical, Plumbing and Fuel Gas); the 2006 Energy Code; and the 2018 National Electrical Code. The 2015 International Property Maintenance Code that has been adopted as the minimum housing code is similar to the requirements of HUD's Housing Quality Standards. The minimum housing code is enforced through pro-active code compliance for the exterior of the properties while the interior is enforced on a complaint basis. The city does not impose rent controls. Regulations that are designed to protect the health, safety, and welfare of citizens may affect the cost of housing. However, these regulations are not designed to discourage the availability of affordable housing. Therefore, the City of Norman does not propose actions or reform steps to remove or restructure such policies in the coming five-year period.

Discussion:

The primary obstacle to meeting all of the identified needs, including those identified as affordable housing activities is the general lack of funding resources available to the public and private agencies who serve low and moderate income residents.

AP-85 Other Actions – 91.220(k)

Introduction:

This Annual Action Plan provides a basis and strategy for the use of federal funds granted to the City of Norman by the U.S. Department of Housing and Urban Development (HUD) under the Community Development Block Grant (CDBG) and Home Investment Partnerships Program (HOME). This Action Plan covers the period beginning July 1, 2024 through June 30, 2025. Programs and activities described in this plan are intended to primarily benefit low and moderate-income residents of the City of Norman, neighborhoods with a high concentration of low-income and moderate-income residents, and the city as a whole.

Actions planned to address obstacles to meeting underserved needs

The primary obstacle to meeting all of the identified needs, including those identified as high priorities is the general lack of funding resources available to the public and private agencies who serve low and moderate income residents. Norman, due to being an entitlement community, is not eligible for state CDBG or HOME funding. Since no state dollars are available for community development activities, the city's general fund is based upon sales tax revenues and has been stretched. This leaves little room for expansion of community development funding at the local level. Furthermore, the City of Norman's entitlement grants have been reduced over the last several years further limiting the funds available to address the needs in the community. Staff continues to look for other funding opportunities to leverage projects and priorities in the Consolidated Plan.

Actions planned to foster and maintain affordable housing

The City of Norman will continue to work with Norman Affordable Housing Corporation (NAHC) in efforts to provide affordable housing. NAHC is a 501(c)(3) that is sponsored by the Norman Housing Authority. NAHC works very closely with the designated Community Development Housing Organization for the City of Norman, CHDO 2015. The City of Norman will be releasing an RFP for a consultant to develop a Strategic Housing Plan for the City. Within this plan, a focus will be on furthering the ability to encourage the development of Affordable Housing.

Actions planned to reduce lead-based paint hazards

The City of Norman will continue to reduce the number of units containing lead-based paint hazards, primarily through its housing rehabilitation programs. Each rehabilitation project is required to be lead-safe upon completion of rehabilitation activities. The City of Norman will continue to utilize a licensed

risk assessor to provide lead hazard evaluation for projects requiring an assessment.

Actions planned to reduce the number of poverty-level families

One purpose of the Consolidated Plan Programs and other initiatives in Norman is to reduce the number of persons in poverty. The emphasis in Norman is to help people rise out of poverty, rather than temporarily easing their situation. Although essential short-term direct aid such as emergency food and shelter is provided, the strongest community support is for programs to address the root causes of poverty and assisting people in becoming self-sufficient in the long-term. Two key components of helping people attain self-sufficiency are employment and housing. Examples of programs that directly influence people's ability to escape poverty include job education and placement services as well as housing advocacy, homeless prevention and rental assistance. Projects that indirectly affect poverty include those that improve the community at-large and provide transportation and child care services that help people access employment and services. CDBG, HOME, CoC and State ESG funds are often used as matching funds for other grants that also contribute to reducing the number of families living in poverty. Thus, the power of these federal dollars is leveraged to a greater extent. Recognizing that limited Consolidated Plan dollars should be focused where the need is greatest; Norman gives preference to projects that directly benefit low and moderate income residents or serve low and moderate income neighborhoods over those that will benefit the city as a whole. This strategy will ensure that scarce resources are directed to best serve those who have the greatest need, including those areas with the greatest concentration of poverty. In addition to Consolidated Plan programs, a number of other public, private, and partnership initiatives have been designed to assist in the reduction of poverty rates including the Cleveland County Workforce Development Program.

Actions planned to develop institutional structure

The Planning and Community Development Department, Grants Division is the lead agency of the City in the development of the Consolidated Plan and Annual Action Plans. The Staff provides fiscal and regulatory oversight of all CDBG and HOME funding. The Norman City Council acts as the final authority for the appropriation of funds for Annual Action Plan activities under the Consolidated Plan grant programs, following recommendations of the CDBG Policy Committee. In addition, the City provides opportunities to the maximum extent possible, to women and minority owned business enterprises for contract bids and services. The City of Norman encourages inclusion in the list of approved bidders for minority and women-owned businesses, and actively works to recruit new contractors into the programs administered.

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

To accomplish these goals, the City of Norman will work closely with CHDO 2015, Inc., the City of Norman CHDO, will be the agency primarily working towards the goal of Construction of Housing

objectives. The City of Norman Housing Rehabilitation staff will administer the Exterior Property Maintenance Program, Emergency Repair Program, and the Accessibility Modification Program through the City of Norman using local licensed contractors. Social service agencies will offer tenant and rental assistance as well as consultation, and will provide programing to move people from the shelter situation into housing of a more permanent nature.

Discussion:

Norman prides itself on a decades-long track record of successful partnerships among public and private sector entities. The Consolidated Plan delivery system is an example of this. Communication and cooperation between the City of Norman's Grants Division and the partner agencies and organizations that administer activities is strong. City of Norman staff has worked closely with the organizations involved in Consolidated Plan programs to improve regulatory compliance, monitoring, cooperation and partnerships among agencies, and technical capacity of organizations involved in project delivery.

Program Specific Requirements

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

Introduction:

The CDBG Policy Committee has made allocation recommendations for CDBG and HOME funding for the 2024-2025 Program Year based upon evaluation of the identified needs of the low and moderate income populations of Norman. This Action Plan is a piece of an overall Consolidated Plan and the goals are all based upon the Strategy. Program Income is minimal and when received is returned if possible to the particular activity which generated the income, and therefore not considered as part of the allocation process.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(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	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

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

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

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

The City of Norman does not plan any additional investment beyond eligible uses of HOME funds identified in 92.205.

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:

A very limited down payment assistance program is being implemented with the Target Area. To guarantee the required period of affordability a subordinate mortgage (5 year term, forgiven 20% on anniversary of mortgage annually) will be executed as part of the property purchase and filed at the Cleveland County Courthouse. This document will remain in effect for a period of five years from date of purchase. Staff will monitor the residency requirements to insure that in addition to the mortgage the property remains owner occupied. In the case of a default, the remaining balance of the mortgage will be due and payable.

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:

All units that are acquired or developed with HOME funds for the purpose of the provision of affordable housing are secured by a deed restriction filed at the Cleveland County Courthouse that is in effect for the required period of affordability. Monitoring of these units in ongoing with no identification of troubled units identified.

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

There are no plans to utilize HOME funds to refinance existing debt secured by multi-family housing rehabilitated with HOME funds. The City of Norman will subordinate CDBG and HOME funds as requested by property owners refinancing debt that meet the program requirements. The City of Norman has adopted subordination requirements that provide flexibility for property owners while insuring the affordability of the property is maintained.

The City of Norman will continue to utilize their HOME allocation to provide TBRA funds as well as the provision of funds for the development of affordable housing, both rental and owner occupied

when feasible.

- Encourage landlords to accept tenants with poor or criminal history.
- Support agencies that provide housing stabilization services.
- Promote collaboration with community based providers.

As mentioned above, job education and job placement services are very important, and are a key component in any anti-poverty strategy. In addition, case management as a whole for those who are in need of assistance is extremely important, as in many circumstances short-term financial assistance really does not solve the problem, and often times it is not even a temporary fix. In addition to Consolidated Plan programs, a number of other public, private, and partnership initiatives have been designed to assist in the reduction of poverty rates.

The overall goals of the reduction of poverty will be addressed by the collaboration between agencies to ensure gaps in services and funding are addressed, while maintaining the utilization of each funding source.

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:

A deed restriction is filed at the Cleveland County Courthouse for any HOME project with a period of affordability. Annual monitoring occurs to insure the owner is complying with the affordability requirements and property requirements.

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:

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

There are no plans to utilize HOME funds to refinance existing debt secured by multi-family housing rehabilitated with HOME funds. The City of Norman will subordinate CDBG and HOME funds as requested by property owners refinancing debt that meet the program requirements. The City of Norman has adopted subordination requirements that provide flexibility for property owners while

insuring the affordability of the property is maintained.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).
6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).
7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).