

EXHIBIT B

Based on the geographies of the City of Norman, there are very few state permissible “green zones” that allow people with sex offender histories to be able to rent or own. Norman encompasses over 196 square miles. Yet, schools, parks, and day care facilities greatly limit the areas where sex offenders can live in accordance with the Oklahoma State Statute.²⁰ Stakeholders report that there are a very limited number of available apartments within the green zones that are eligible for people convicted of a sex offense to live. Within those zones, they face difficulty finding landlords willing to rent to them based on their past conviction.

“Norman has talked in the past about how they would love to have SROs. SROs in a green zone would be great.”

— Stakeholder

OTHER BARRIERS TO HOUSING

In addition to the lack of affordable units, many individuals also face barriers to housing because they do not have sufficient government issued identification or other documents to show eligibility, may have been evicted in the past, may have poor credit history, and/or lack the resources needed to cover move-in costs (security deposit, etc.).

For those individuals who continue to try to apply for affordable apartments, it usually involves paying a fee for every application form they complete even when they may be rejected because of past history. In some cases, when they apply, the rental company or landlord does not make an effort to reply to them, making it more challenging for them to afford any future opportunity that may come up. For many households experiencing homelessness, it is difficult to save for upfront first-time costs for housing. Without help from local providers, it is very challenging to transition from homelessness into housing and maintain stability long-term. This assistance is available through various providers; however, it is limited and has specific eligibility criteria. In addition, the focus groups demonstrated that some individuals experiencing unsheltered homelessness are not aware of all of the resources available, including how to obtain identification and assistance with application fees and even basic necessities and crisis management.

“Application fees are a huge barrier... people have no money - they can't afford to fill these out all the time.”

— Focus group participant

Some stakeholders shared that there are biases against people of color in terms of access to housing and services in Norman/Cleveland County. More than one individual experiencing homelessness reported having experienced discrimination when trying to access the system of care and in interactions with crisis response. One service provider indicated that they accompany their clients who are women of color when they apply for housing “to ensure fairness,” as they have seen a troubling trend of discrimination when they go without a service provider representative.²¹

²⁰ *Ibid.*

²¹ *The City of Norman has a contract with the Metropolitan Fair Housing Council of Oklahoma, Inc. to document fair housing activities under the City of Norman's Community Development Block Grant (CDBG) contract. They report annually on any housing complaint intakes/inquiries processed and formal housing discrimination claims filed with HUD. In FY 2021, 44 housing complaint intake/inquiries were processed related to Norman tenancy under the CDBG-funded fair housing contract, and 7 formal housing discrimination claims were filed with HUD's Office of Fair Housing & Equal Opportunity for violations covered under the Federal Fair Housing Act. Note that these figures are specific to CDBG-funded activities and that not all incidents of housing discrimination are formally reported.*

Some stakeholders who participated in the community engagement process noted that the CoC is very effective at housing people who are better able to navigate the system, less vulnerable, and have fewer barriers to housing than individuals with greater need and, in many cases, that are more vulnerable, facing severe mental or physical illness, and are unable to navigate the system on their own. However, there were also concerns expressed by some that the CoC had been overly focused on serving individuals with the highest vulnerability, leaving others who could be more easily and quickly housed and connected with services, like rapid rehousing, waiting longer than necessary for help. As discussed above, the existing data indicates that a significant number of the unsheltered population are currently chronically homeless and that a variety of interventions are being used to serve people experiencing chronic homelessness. However, due to data quality issues, the fact that no unsheltered January PIT count could be performed in 2021, and the ongoing impacts of the COVID-19 pandemic, additional analysis is required to better understand the current context in the region.

Coordinated Entry System data provides useful context, including the By-name-list (BNL), which tracks individuals/heads of household who are in the homeless system of care and who need housing. The BNL includes intake and assessment data, including prioritization criteria (i.e., a ranking score) that helps match individuals and families to the housing and services that best serve their needs and helps to determine the order of priority when resources become available. Keeping the BNL up to date and looking at it over time, can help the CoC and City Staff understand the need and any changes over time. See the table below of BNL data from January of each year from 2016 – 2020. One factor to note is that between 2019 and 2020, a data cleanup project removed inactive households from the list so some of the decrease seen in 2020 is the result of that data cleanup.

Table 3: Data from By-Name-List Data January 2016 – January 2020

	January 2016	January 2017	January 2018	January 2019	January 2020
Singles	43	84	97	154	64
Families	2	3	0	6	0
Non-chronic Veterans	10	5	4	5	4
Chronic Veterans	1	1	3	0	2

The City of Norman, in conjunction with other local organizations and businesses, has historically pulled together a regular event that brings a coalition together to help people obtain their birth certificates, state identification, and social security numbers/cards. Before the COVID-19 pandemic, these events were held every quarter so that individuals experiencing homelessness locally would only have to attend this one event to get the assistance needed to overcome some of the documentation barriers preventing individuals from receiving housing and benefits. Individuals who had benefited from these events were very grateful and highly praised the efficiency and benefit of this one-stop approach. Additionally, other individuals who were struggling to obtain these documents, especially during the pandemic, highlighted the importance of holding future events. Even with the one-stop opportunity on hold during COVID-19, there is an ability for people experiencing homelessness to receive documents through multiple agencies, though that can be challenging to access.

Stakeholder interviews and focus groups highlighted an increased need for housing-based case management, landlord engagement, and legal assistance to support reducing existing barriers to identifying and connecting households to affordable permanent housing and helping them to stabilize and maintain that housing.

Recommendations

AFFORDABLE HOUSING

- Commit to additional permanent supportive housing units. Consider a wide range of options, including rehabilitation or renovation of existing buildings and new construction as well as utilizing as many vouchers as possible for persons experiencing homelessness (to be used at the locations of their choice):
 - Establish a five-year Countywide Housing Development Pipeline that identifies an achievable path to establish new housing so that households with members who have disabilities can exit homelessness and attain stability.
 - Evaluate the feasibility and next steps for non-traditional housing options, such as repurposed motels and accessory dwelling units (ADUs).
 - Establish a shared housing program that can increase the housing available to single adults by using 2- and 3-bedroom homes for individuals exiting homelessness.
 - Support the addition of mainstream and HUD-VASH vouchers as available.
- Identify funding and partnership options that would increase the availability of permanent housing for single adults, including short- and medium-term rental assistance, PSH, and new development.
- Consider adopting policies that require set asides for all new development dedicating a certain proportion or number of units for extremely low-income households.
- Identify potential sites and provide land, aggressively expedite development and offer other incentives for PSH development.
- Widely advertise the eligibility criteria and necessary process for obtaining housing assistance
- Prioritize the development of single-room occupancy (SROs) buildings, which provide small furnished single rooms within multi-tenant buildings providing housing for residents with low or minimal income who may be transitioning out of long-term homelessness.

Recommendations

AFFORDABLE HOUSING (cont'd)

- Identify potential sites and provide land, aggressively expedite development and offer other incentives for PSH development.
- Widely advertise the eligibility criteria and necessary process for obtaining housing assistance.
- Prioritize the development of single-room occupancy (SROs) buildings, which provide small furnished single rooms within multi-tenant buildings providing housing for residents with low or minimal income who may be transitioning out of long-term homelessness.

“An SRO is a good alternative and people who are not accepting services would be more open to an SRO.”

— *Stakeholder*

LANDLORD ENGAGEMENT

- Invest in staffing to develop and lead a year-round landlord engagement campaign to educate the general public and recruit landlords.
- Develop a robust landlord engagement campaign, which can include targeted outreach to landlords, education and training, developing a speakers' bureau, annual luncheons, landlord and tenant awards, and other efforts such as:
 - Develop an outreach message and ensure it reaches landlords and property managers. Publicize the program in landlord and business association publications and at meetings and gatherings. Engage participating landlords in the program to tell their stories of success to their peers.
 - Create materials that help explain the advantages for the landlord and the steps the programs take to ensure the properties are respected, the clients are supported, and rent is paid. Utilize landlord testimonials whenever possible highlighting benefits such as the reliability of external support if issues arise and risk mitigation back-up for damages if they are to occur.
- Address barriers for individual tenants by creating a portfolio for the client by including letters of support from community members who know the client or by adding information about the client's background and the steps they have taken to improve their housing stability. Help with criminal record expungement, credit repair, and eviction expungement, if needed. Provide opportunities for potential tenants to meet landlords one-on-one to create personal connections.

Recommendations

LANDLORD ENGAGEMENT (cont'd)

- Establish a landlord risk mitigation fund that provides compensation if issues between landlord and tenant arise. Ensure landlords have a liaison they can call if they have concerns. When a client is not a good fit for a unit, programs should move quickly to prevent the need for an eviction proceeding.
- Consider creating financial incentives for landlords renting to voucher holders. The incentive program could include bonuses for new and/or returning landlords. Additionally, provide coverage for application fees and assistance with security deposits and move-in costs to help ensure vouchers are utilized and used equitably.
- Develop shared talking points to deepen landlord's awareness and understanding of how homeless-serving programs work, how supportive services are provided to program participants, and how the landlord mitigation fund is provided (see below).
- Create a bridge of support between landlords and clients to have a positive experience and continue building the relationship in the local program over time. Landlords often express gratitude about the ability to fill vacant units quickly without the cost of advertising and appreciate having the monthly rent guaranteed.
- Train and support providers to enable conversations with landlords to respond to their concerns and ensure that providers are taking important steps to cultivate ongoing relationships with landlords who are part of their programs.
- Ensure that each agency has a formalized practice protocol for being responsive to participating landlords, including providing timely assistance during a crisis as well as accepting and responding to their feedback.

HOUSING ASSISTANCE

- Designate a countywide housing navigator who can meet in-person with individuals and families experiencing homelessness. Provide outreach in the streets, at encampments, and at partner organizations, and train staff from other organizations to better provide housing navigation assistance.
- Conduct a countywide advertising campaign to highlight the availability of various types of rental assistance programs, including emergency and temporary rental assistance.