City of Lawton

Housing & Community Development

FFY 2024 ANNUAL ACTION PLAN

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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) 2021 through 2025 was approved by the City Council on August 10, 2021. The CONPLAN covers the five fiscal years from FFY 2021 through FFY 2025 (July 1, 2021-June 30, 2026).

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 2024 funding and covers the City's program year from July 1, 2024, through June 30, 2025. Funding for FFY 2024: CDBG allocation of **$721,546** and **$430,741** in HOME Program funds. We have removed repayment requirements from our Rehabilitation Projects, so we do not have expectation of CDBG and HOME program income (PI), except for Recapture funds because of participants failing to meet the Affordability Requirements. The City was required to repay the HOME Entitlement Grant $32,431.79 for 2 Home Projects terminated before completion and $162,546.00 for failure to meet the deadline requirement for completion of 2 activities that were costs for a reconstruction project. As a result of the repayments to the HOME Program, the **$194,977.79** will be reflected in the HOME Program Income (PI) slot in the FFY 2024 AAP.

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,

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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

The FFY 2024 Annual Action Plan is the 4th Action Plan of the FFY 2021-2025 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 2021-2025 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 FFY 2021-2025 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

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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. 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 2024 Annual Action Plan strategy calls 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.

Citizens and other parties interested in providing comments or views helpful in the development of the Annual Action Plan are encouraged to do so by submitting comments or attending a public hearing. The City of Lawton's Housing and Community Development (HCD) division will receive comments on the City of Lawton's FFY 2024 CDBG/HOME Annual Action Plan which will be on file from March 4, 2024, through April 8, 2024, at the following 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 first public hearing will be conducted at the Lawton City Planning Commission Meeting on Thursday, March 14, 2024, at 1:30 P.M. in the City Hall Auditorium for the purpose of obtaining City of Lawton's residents views on housing and community development needs, including priority non-housing community development needs and affirmatively furthering fair housing. The second public hearing will be held at the Lawton City Council Meeting on Tuesday, April 9, 2024, at 2:00 P.M., in the City Hall Auditorium. Participants will have the opportunity to provide comments on the FFY 2024 Action Plan.

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 notice for the public hearings and postings were published in the Lawton Constitution on April 2, 2023. The first public hearing will be conducted at the Lawton City Planning Commission Meeting on Thursday, March 14, 2024, at 1:30 P.M. in the City Hall Auditorium for the purpose of obtaining City of Lawton's residents views on housing and community development needs, including priority non-housing community development needs and affirmatively furthering fair housing. The second public hearing will

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be held at the Lawton City Council Meeting on Tuesday, April 9, 2024, at 2:00 P.M., in the City Hall Auditorium. Participants will have the opportunity to provide comments on the FFY 2024 Action Plan.

The City of Lawton's Housing and Community Development (HCD) division will receive comments on the City of Lawton's FFY 2024 CDBG/HOME Annual Action Plan which will be on file from March 4, 2024, through April 8, 2024, at the following 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. There were no comments received.

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

There were no comments at the posting sites and there was no public participation at either hearing. There was some interaction among the City Council regarding PSO's and their qualifications. The same was true at the meeting before the City Planning Commission.

7. Summary

The City of Lawton's strategic mission for community development is to provide for ongoing community revitalization by leveraging Federal and local resources with private investment and non-federal sources to ensure the provision of decent housing, suitable living environment and expanded economic opportunity for all residents of the community. In addition to the City's formula grant activities, local efforts have been undertaken to ensure economic momentum. Substantial private investment is also planned and underway throughout the City. Citizen involvement and input from local non-profits and service providers has been instrumental in identifying priority needs, strategic objectives, and funded activities for the 4th Year Action Plan. A substantial amendment may be required from time to time as the City adapts to changing needs and priorities within an Action Plan year. A substantial amendment to the Consolidated Plan is defined as an amendment that adds a new sub-grantee, transfers funds from one activity to another involving 30% or more of the funds or cancels an activity.

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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 Gary Brooks, Administrator, Housing & Community Development, City of Lawton, 1405 SW 11th Street, Lawton, OK 73501, phone: (580) 581-3347 or email: gary.brooks@lawtonok.gov.

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

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(l))

The City routinely communicates with MIGHT CDRC, the lead agency for the Southwest Oklahoma Continuum of Care 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 Lawton Housing Authority (LHA) and Habitat for Humanity 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 several 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.

The City routinely communicates with MIGHT 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 Habitat for Humanity

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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. Eight service providers also receiving funding as a Public Service Organizations.

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, MIGHT, 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, MIGHT 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 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

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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

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	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

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	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, 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.
3	**Agency/Group/Organization**	Lawton Support Services, Inc.
	Agency/Group/Organization Type	Services - Housing Services-Persons with Disabilities Services-homeless Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Families with children Homelessness Needs - Veterans

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

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5	**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.
6	**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

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	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.
7	**Agency/Group/Organization**	Center for Creative Living, Corp.
	Agency/Group/Organization Type	Services-Elderly Persons 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?	The Center for Creative Living officers attended a CDBG Workshop on March 15, 2022 and participated in a Community Services Open House on March 25, 2022 and participated in open discussions regarding the Action Plan and needs.
8	**Agency/Group/Organization**	Q.U.E.S.T. of Oklahoma, Inc.
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Employment

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	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	MIGHT CDRC consists of the Following subprograms: The Higher heights adult program helps clients to establish 90-day goals and objectives. These objectives are measured by client participation in weekly confidential meetings with client coordinators, attendance in classes and continual follow-up appointments. After 90 days the goal for the adult and the family becomes to maintain and sustain what they have achieved over the course of the next nine months, and to do this without needing outside assistance by the end of the nine-month period. The Achievers teen program focuses on "At-Risk" students 12-18 years old with the purpose of helping teens set life goals, identify the steps to meet those goals and the available resources necessary for each goal. Ultimately, the goal is for each teen to be prepared to enter adulthood. Might TLC is a nationally accredited, 3-star childcare facility with a mission to develop active and productive young citizens who are ready to enter middle school and the Achievers Program. Might also help those experiencing or at risk of homelessness by providing prevention and rapid rehousing services in the form of rental and utility payments.
9	**Agency/Group/Organization**	Grandeur of Grace, Inc.
	Agency/Group/Organization Type	Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Needs - Veterans

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	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Our Critical care program provides veterans transitioning from military to civilian life who don't have a network of family or friends to help them and may not have financial means of their own with some basic needs (such as new legal documents like drivers' licenses, social security cards, license plates, clothing, toiletries, food, blankets, etc.)

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	MIGHT	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 MIGHT CDRC.

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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 notice for the public hearings and postings were published in the Lawton Constitution on March 3, 2024. The first public hearing will be conducted at the Lawton City Planning Commission Meeting on Thursday, March 14, 2024, at 1:30 P.M. in the City Hall Auditorium for the purpose of obtaining City of Lawton's residents views on housing and community development needs, including priority non-housing community development needs and affirmatively furthering fair housing. The second public hearing will be held at the Lawton City Council Meeting on Tuesday, April 9, 2024, at 2:00 P.M., in the City Hall Auditorium. Participants will have the opportunity to provide comments on the FFY 2024 Action Plan.

The City of Lawton's Housing and Community Development (HCD) division will receive comments on the City of Lawton's FFY 2024 CDBG/HOME Annual Action Plan which will be on file from March 4, 2024, through April 9, 2024, at the following 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.

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	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.		

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)
2	CDBG Workshop	Public Service Organizations that assist low- and moderate-income members of the community.	Members of the following Public Service Organizations: C. Carter Crane, Great Plains Improvement Foundation, Family Promise, Lawton Housing Authority, Salvation Army, Center for Creative Living, Marie Detty, Darien's Voice Foundation attended and discussed the application process for Public Service Organizations, the FFY 2022 AAP, the FFY 2021-2025 CON Plan Amendment, and the 2021 HOME-ARP Grant			

OMB Control No: 2506-0117 (exp. 09/30/2021)

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)
3	Newspaper Ad	Non-English Speaking - Specify other language: Spanish Non-targeted/broad community				

OMB Control No: 2506-0117 (exp. 09/30/2021)

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)
4	Public Meeting	Community Services Open House	The Open House will focus on services available to low- to middle-income citizens, the homeless, and veterans to include affordable housing, health services, and food assistance, for the citizens of Lawton that are served by CDBG and HOME Entitlement Grant funds. The Open House is an opportunity for all citizens of Lawton to see how their Grant funds serve the community. 26 Public Service Organizations set up tables, networked and showcased services available to low- and middle-income households, the homeless, and veterans. The services available were affordable			

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)
5	Meeting with Public Service Organizations	Qualifying PSO's	All of the Public Service Organizations that qualified for grants participated in the meeting to discuss scoring and rankings for grant funding. Acknowledged their commitment and quality of service. A unanimous consensus was reached as to funding levels. The meeting was held on June 3, 2022.	All comments were positive and helpful.	All comments were accepted.	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

FFY 2024 Annual Action Plan is baseed on the 2024 CDBG Entitlement Grant of $752,674 and CDBG allocations in the future are projected to remain steady with no significant cuts anticipated. 2024 HOME funding is based on the 2024 HOME Entitlement Grant of $445,006 and HOME allocations for the future programs years is projected to remain steady as well.

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	752,674	10,000	800,000	1,565,653	3,580,350	Prior year resources include unallocated funds from previous years. Future allocations assume flat funding over the next five years.

OMB Control No: 2506-0117 (exp. 09/30/2021)

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	445,006	194,977	1,300,000	1,756,844	1,832,440	Prior year resources include unallocated funds from previous years. Future allocations assume flat funding over the next five years.

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

Funds are also set aside for CHDOs to assist with the development of affordable housing. Habitat for Humanity and Lawton Housing Authority are recent CHDOs that have been partially funded by the City to rehabilitate affordable housing. Additional funding for the rehabilitations has come from private funding sources. The City of Lawton continues to seek developers who can act as a CHDO and develope affordable housing on a large scale than what the City can accomplish.

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

During FFY 2022, the Lawton Urban Renewal Authority (LURA) owned several lots in the south-central area of the City and sold 61 of those lots at a discounted rate to developers willing to construct affordable housing. As of the submission of this action plan, we have no information regarding completion of any projects.

Discussion

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

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing Construction and Development	2021	2025	Affordable Housing	Lawton Heights (Zone One) Lawton View	Creation and Retention of Affordable Housing	HOME: $100,000	Rental units constructed: 1 Household Housing Unit
2	Affordable Housing Retention and Rehabilitation	2021	2025	Affordable Housing Public Housing	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area	Creation and Retention of Affordable Housing	CDBG: $151,624 HOME: $332,626	Rental units rehabilitated: 2 Household Housing Unit Homeowner Housing Rehabilitated: 34 Household Housing Unit

OMB Control No: 2506-0117 (exp. 09/30/2021)

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Homebuyer Financial Assistance	2021	2025	Affordable Housing	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area	Creation and Retention of Affordable Housing	HOME: $15,000	Direct Financial Assistance to Homebuyers: 1 Households Assisted
4	Elimination of Slum and Blight	2021	2025	Non-Housing Community Development	Lawton Heights (Zone One) Lawton View	Elimination of Slum and Blight	CDBG: $91,700	Housing Code Enforcement/Foreclosed Property Care: 4000 Household Housing Unit
5	Public Services	2021	2025	Affordable Housing Non-Housing Community Development	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area	Public Services	CDBG: $108,230	Public service activities other than Low/Moderate Income Housing Benefit: 5825 Persons Assisted
6	Public Facilities and Infrastructure	2021	2025	Non-Housing Community Development	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area	Public Facilities and Infrastructure	CDBG: $385,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 8000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 50 Households Assisted

OMB Control No: 2506-0117 (exp. 09/30/2021)

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Prevention and Elimination of Homelessness	2021	2025	Homeless	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area	Prevention and Elimination of Homelessness	HOME: $217,766	Tenant-based rental assistance / Rapid Rehousing: 10 Households Assisted Homeless Person Overnight Shelter: 2050 Persons Assisted
8	Administration	2021	2025	Administration	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area	Administration	CDBG: $378,595 HOME: $51,074	Other: 1 Other

Table 6 – Goals Summary

Goal Descriptions

1	**Goal Name**	Affordable Housing Construction and Development
	Goal Description	CDBG and HOME funding for the development of affordable housing projects for low-moderate income households; to include acquisition and reconstruction costs. Funds may be used to produce units for homeownership, single family rental units, multifamily housing, or mixed-use developments.

2	**Goal Name**	Affordable Housing Retention and Rehabilitation
	Goal Description	CDBG and HOME funding to support whole home rehabilitation, exterior improvements, and emergency repairs for low-moderate income homeowners. We have raised the limit for Emergency Repairs from $5,000 to $7,000 and the limit for Exterior Home Improvements from $10,000 to $17,000. Funds will also be provided to assist in the rehabilitation of rental units owned by Habitat for Humanity and the Lawton Housing Authority.
3	**Goal Name**	Homebuyer Financial Assistance
	Goal Description	HOME funds will be used to provide down payment and closing cost assistance to one household per year.
4	**Goal Name**	Elimination of Slum and Blight
	Goal Description	CDBG funding is allocated for two Code Enforcement Officers to concentrate their efforts on two areas of town that have the highest number of code violations.
5	**Goal Name**	Public Services
	Goal Description	CDBG funds are allocated to eligible public service activities including youth services, senior services, and counseling services.
6	**Goal Name**	Public Facilities and Infrastructure
	Goal Description	CDBG funding is provided to assist in the development or replacement of public improvements within designated neighborhoods. Sewer line replacement and the construction of new sidewalks have been identified as needed infrastructure improvements. The Patterson has also identified the need for rehabilitation. The Patterson Center provide a multitude of activities for the community from youth activities to senior activities.

7	**Goal Name**	Prevention and Elimination of Homelessness
	Goal Description	CDBG and HOME funding is allocated to overnight shelters for individuals, families, and victims of domestic violence. Funding is also allocated to homelessness prevention counseling. In FFY 2021, Lawton Housing Authority has been allocated $700,000 is HOME funds and $150,000 in CDBG funds for the renovation of the old Armed Forces YMCA building into a Veterans Resource Center that will not only provide valuable resource to homeless veterans but will have 13 SRO units for immediate temporary housing. Tenant based rental assistance will also be allocated funding for at least the first two years of the FFY 2021-2025 Consolidated Plan.
8	**Goal Name**	Administration
	Goal Description	CDBG and HOME funding to support administration and management of the federal grants. Allocation includes the CDBG Admin cap of 20%, HOME Admin cap of 10% and HAD Delivery Costs. This allocation also includes the Section 108 Loan payments for the next five years.

Projects

AP-35 Projects – 91.220(d)

Introduction

The following initiatives and goals for the 4th Annual Action Year Plan are consistent with those established in the Five-Year Consolidated Plan with an effective date of July 1, 2021, 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. The goals and objectives that are addressed in this 4th Annual Action Year Plan specifically relate to the goals outlined in the 2021-2025 Consolidated Plan and the Department of Housing and Urban Development goals that include:

a. The provision of decent housing

b. The provision of a suitable living environment, and

c. 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 regarding decent housing, suitable living environment and economic opportunity.

City of Lawton formula grant funding allocations, recommended for adoption the 4th Action Year Plan (fiscal year July 1, 2024, through June 30, 2025), follow the priorities established in the five-year Consolidated Plan that expires June 30, 2026. The FFY 2021-2025 Consolidated Plan contains specific funding recommendations to implement the goals established in the five-year Plan tables to the extent possible depending on federal funding allocations awarded to the City of Lawton.

The funding recommendations for the 4th Year Action Year were considered by the City Planning Commission on March 14, 2024**,** and received their favorable recommendation. Final Plan approval was granted by the City Council on April 9, 2024.

Projects

#	Project Name
1	Whole Home Rehabilitation-HOME

#	Project Name
2	Exterior Housing Improvement Program
3	Emergency Repair
4	First Time Home Buyer Assistance
5	Section 108 Loan Payment - CDBG
6	Public Service Organizations
7	Homeless Programs and Prevention
8	Slum and Blight Code Enforcement
9	Public Facilities and Infrastructure Improvements
10	CDBG Administration
11	HOME Administration
12	CHDO Set-Aside

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. Public infrastructure improvements is also a priority to provide safe and sanitary living conditions.

AP-38 Project Summary

Project Summary Information

OMB Control No: 2506-0117 (exp. 09/30/2021)

1	**Project Name**	Whole Home Rehabilitation-HOME
	Target Area	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area
	Goals Supported	Affordable Housing Retention and Rehabilitation
	Needs Addressed	Creation and Retention of Affordable Housing
	Funding	HOME: $330,593
	Description	Provide financial assistance to low-income homeowners for whole home rehabilitations of their single-family dwelling.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	The City of Lawton will assist 8 extremely low-, very low- and low-income households who own and occupy an attached or detached single-family principal dwelling in bringing the dwellings up to an acceptable standard.
	Location Description	Rehabilitation projects may occur anywhere within the City of Lawtion city limits.
	Planned Activities	The City of Lawton will assist extremely low-, very low- and low-income households who own and occupy an attached or detached single-family principal dwelling in bringing the dwellings up to an acceptable standard. This assistance is in the form of a forgivable loan. Housing rehabilitation funds shall be used for those repairs necessary to bring the structure to a basic acceptable living condition and to comply with city codes, HUD's regulations, lead-based paint (LBP) requirements, and rehabilitation standards. The HCD is authorized to use CDBG and HOME funds, subject to HUD regulations and local policies, to provide homeowner rehabilitation assistance for qualified applicants. The City of Lawton is removing the repayable portion of the project in an effort to better assist those households participating in the project.
2	**Project Name**	Exterior Housing Improvement Program
	Target Area	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area
	Goals Supported	Affordable Housing Retention and Rehabilitation
	Needs Addressed	Creation and Retention of Affordable Housing Prevention and Elimination of Homelessness
	Funding	CDBG: $85,000

OMB Control No: 2506-0117 (exp. 09/30/2021)

	Description	The city will assist very low- and low-income households who own and occupy an attached or detached single-family principal dwelling in need of exterior housing improvement. This assistance is in the form of a grant and must be used for exterior painting and/or siding, windows, doors, and roofing to improve the exterior condition of houses.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	The city will assist 12 very low- and low-income households who own and occupy an attached or detached single-family principal dwelling in need of exterior housing improvement. This assistance is in the form of a grant and must be used for exterior painting and/or siding, windows, doors, and roofing to improve the exterior condition of houses.
	Location Description	This project may occur anywhere within the city limits of the City of Lawton.
	Planned Activities	The city will assist very low- and low-income households who own and occupy an attached or detached single-family principal dwelling in need of exterior housing improvement. This assistance is in the form of a grant and must be used for exterior painting and/or siding, windows, doors, and roofing to improve the exterior condition of houses.
3	**Project Name**	Emergency Repair
	Target Area	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area
	Goals Supported	Affordable Housing Retention and Rehabilitation
	Needs Addressed	Creation and Retention of Affordable Housing Prevention and Elimination of Homelessness
	Funding	CDBG: $70,000
	Description	The city will assist very low-and low-income households who own and occupy an attached or detached single-family principal dwelling in need of an emergency repair. This assistance is in the form of a grant and must be used for items that threaten the health and/or safety of the household.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	The city will assist 12 very low-and low-income households who own and occupy an attached or detached single-family principal dwelling in need of an emergency repair.

	Location Description	This project may occur anywhere within the city limits of the City of Lawton.
	Planned Activities	The city will assist very low-and low-income households who own and occupy an attached or detached single-family principal dwelling in need of an emergency repair. This assistance is in the form of a grant and must be used for items that threaten the health and/or safety of the household.
4	**Project Name**	First Time Home Buyer Assistance
	Target Area	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area
	Goals Supported	Homebuyer Financial Assistance
	Needs Addressed	Creation and Retention of Affordable Housing
	Funding	HOME: $15,000
	Description	The city will assist low-income households with homeownership opportunities by providing financial and technical assistance to allow first-time homebuyers to purchase a property within in the Lawton city limits.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	The city will assist 2 low-income households with homeownership opportunities by providing financial and technical assistance to allow first-time homebuyers to purchase a property within in the Lawton city limits.
	Location Description	This project may occur anywhere within the City of Lawton city limits.
	Planned Activities	The city will assist low-income households with homeownership opportunities by providing financial and technical assistance to allow first-time homebuyers to purchase a property within in the Lawton city limits. Assistance for down payment and closing costs may be provided based on need.
5	**Project Name**	Section 108 Loan Payment - CDBG
	Target Area	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area
	Goals Supported	Prevention and Elimination of Homelessness
	Needs Addressed	Prevention and Elimination of Homelessness

	Funding	CDBG: $138,103
	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	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	We estimate that approximately four hundred (400) low-moderate income individuals will obtain or retain a job in the 2nd Street Corridor shopping area.
	Location Description	The activities will take place along the east side of 2nd Street between Ferris Avenue and Gore Boulevard.
	Planned Activities	Make annual payment required to pay back the Section 108 Loan.
6	**Project Name**	Public Service Organizations
	Target Area	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: $112,901
	Description	Provide financial assistance to qualifying Public Service Organizations to assist low and moderate income person within the community.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	The City estimates that approximately eight thousand low or moderate individuals will be assisted by this project.
	Location Description	This project may take place anywhere within the city limits of Lawton, but will take place at each individual Public Service Organization's office.
	Planned Activities	Provide financial assistance to qualifying Public Service Organizations to assist approximately 8,000 low or moderate income individuals within the community.
7	**Project Name**	Homeless Programs and Prevention

	Target Area	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area
	Goals Supported	Prevention and Elimination of Homelessness
	Needs Addressed	Prevention and Elimination of Homelessness
	Funding	CDBG: $280,000
	Description	
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	The City estimates that ten (10) households will be assisted by TBRA.
	Location Description	This project may take place anywhere within the city limits of Lawton.
	Planned Activities	Provide financial assistance to the Lawton Housing Authority for a Tenant Based Rental Assistance program to prevent homelessness.
8	**Project Name**	Slum and Blight Code Enforcement
	Target Area	Lawton Heights (Zone One) Lawton View
	Goals Supported	Elimination of Slum and Blight
	Needs Addressed	Elimination of Slum and Blight
	Funding	CDBG: $91,700
	Description	Provide financial assistance to fund Code Enforcement Officers who work two designated areas of town with the most slum and blighted properties.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	The City estimates that four thousand (4,000) properties will be addressed by this project.
	Location Description	The target areas of this project are located within the central areas of town; Lawton View and Lawton Heights (Zone One).
	Planned Activities	Provide financial assistance to fund 2 Code Enforcement Officers who work two designated areas of town with the most slum and blighted properties.

9	**Project Name**	Public Facilities and Infrastructure Improvements
	Target Area	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area
	Goals Supported	Public Facilities and Infrastructure
	Needs Addressed	Public Facilities and Infrastructure
	Funding	CDBG: $455,000
	Description	Provide financial assistance for the repair, rehabilitation, or replacement of public facilities and/or infrastructure.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	The City estimates that eight thousand fifty (8,050) will benefit from this project.
	Location Description	This project may take place anywhere within the city limits of Lawton.
	Planned Activities	Provide financial assistance for the replacement of sewer line segments within low and moderate neighborhoods to maintain safe and sanitary living conditions and assist with the rehabilitation of the H. C. King Community Center Kitchen and the Patterson Community Center bathrooms located within a low-income neighborhood
10	**Project Name**	CDBG Administration
	Target Area	
	Goals Supported	Administration
	Needs Addressed	Administration
	Funding	CDBG: $150,534
	Description	Provides funding for general administrative management, oversight, and coordination costs and carrying charges for planning, administering, and conducting CDBG and HOME Program activities. In accordance with 24 CFR 570.200(g), the CDBG Program allows up to 20 percent of annual funding for administration.
	Target Date	6/30/2024

	Estimate the number and type of families that will benefit from the proposed activities	This is an administrative project.
	Location Description	This is an administrative project.
	Planned Activities	Provides funding for general administrative management, oversight, and coordination costs and carrying charges for planning, administering, and conducting CDBG and HOME Program activities. In accordance with 24 CFR 570.200(g), the CDBG Program allows up to 20 percent of annual funding for administration.
11	**Project Name**	HOME Administration
	Target Area	
	Goals Supported	Administration
	Needs Addressed	Administration
	Funding	HOME: $44,500
	Description	Provides funding for planning and administrative expenses for the HOME Programs housing development activities described in the Annual Action Plan. The HOME Program allows 10 percent of the annual funding allocation for administration.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	This is an administrative project
	Location Description	This is an administrative project
	Planned Activities	Provides funding for planning and administrative expenses for the HOME Program's housing development activities described in the Annual Action Plan. The HOME Program allows 10 percent of the annual funding allocation for administration.
12	**Project Name**	CHDO Set-Aside
	Target Area	Lawton Heights (Zone One) Lawton View Lawton Downtown Economic Development Project Area
	Goals Supported	Affordable Housing Retention and Rehabilitation
	Needs Addressed	Creation and Retention of Affordable Housing

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	Funding	HOME: $66,751
	Description	Provide financial assistance to a qualifying CHDO in the rehabilitation of existing rental homes for low-moderate income housing units or in the construction of new affordable housing units.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	We estimate that we will assist a minimum of two (2) low-moderate income households with affordable housing units.
	Location Description	The activities will take place within the city limits of Lawton for any qualifying low-moderate households.
	Planned Activities	Rehabilitation of two (2) existing rental housing units.

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 City of Lawton's population of 91,055 makes up about 75% of Comanche County's population as per July 1, 2021, U.S. Census Bureau estimates. The community is racially diverse with a total minority population exceeding 43%. The minority population in Lawton remains in transition. As per July 1, 2021 U.S. Census Bureau estimates, persons of Hispanic or Latino origin represent 15% of the total population. African American persons, the largest minority/ethnic population in Lawton, comprise of 19.8% of the total population. Black and African America families are disproportionately located in Census tract 16.00 which is in the south-central area of the city. Poverty continues to be concentrated in the central part of Lawton which has the oldest housing stock with the most housing problems.

Geographic Distribution

Target Area	Percentage of Funds
Lawton Heights (Zone One)	15
Lawton View	60
Lawton Downtown Economic Development Project Area	5

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City targets resources strategically to support neighborhood revitalization efforts in the areas with the greatest community need. The central area of Lawton has the highest concentration of poverty, highest percentage of minorities, the highest percentage of housing problems, and the oldest structures and infrastructure in Lawton. The City will continue to focus on areas where most federal funds will be expended to benefit the largest numbers of low income residents and areas of greatest need within the community.

Discussion

The City of Lawton strives to invest a total of 80% of federal CDBG and HOME funds within the three local targeted areas. The three target areas lie within the central part of the city where the community need is the greatest. The City continues to prioritize housing with safe and sanitary living conditions for all residents within the City of Lawton.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The data listed below supports 10 families with tenant based rental assistance, 7 whole home rehabilitations, 5 exterior housing improvements, 9 emergency repairs, 3 rental unit rehabilitations, and 4 new rental unit.

One Year Goals for the Number of Households to be Supported	
Homeless	10
Non-Homeless	47
Special-Needs	0
Total	57

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	10
The Production of New Units	4
Rehab of Existing Units	21
Acquisition of Existing Units	0
Total	35

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

Discussion

The City of Lawton's highest priority is affordable housing. The City strives to rehabilitation existing structures to maintain them as viable affordable housing units. Whole home rehabilitations, exterior housing improvements, and emergency repair programs are for low-income homeowners and give the homeowners the ability to remain in their homes. New efforts are underway to purchase dilapidated homes for rehabilitation into affordable rental units. The City of Lawton will work with the Lawton Housing Authority and Habitat for Humanity to implement the development of affordable housing for low-income households.

AP-60 Public Housing – 91.220(h)

Introduction

The Lawton Housing Authority (LHA) is responsible for the administration of public housing projects and some of the Section 8 Housing Choice Vouchers. There are currently 1,094 household in publicly assisted housing with a waiting list of over 100 for public housing and waiting list of 55 for Section 8 Vouchers. Increasing the public housing stock for low-income families continues to be a priority for the City of Lawton. The City continues to search for partnerships for the development of affordable housing.

The Oklahoma Housing Finance Agency (OHFA) has an application for a Housing Tax Credit Development in Lawton that would bring 72 new affordable units to the westside of the City of Lawton. The location of this project would be outside of the poverty center of town and is close to employment opportunities such as Goodyear Tire, Republic Paper, and Bar S which are all establish industries. The application was approved as a 9% Tax Credit by OHFA Board of Trustees.

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

The City of Lawton will continue to work with the Lawton Housing Authority and Habitat for Humanity to rehabilitate existing affordable rental units to prevent them from becoming unoccupiable and will search out opportunities to purchase dilapidated homes that could be rehabilitated into affordable rental units.

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

Lawton Housing Authority has set a goal of assisting three (3) families annually in achieving homeownership through the 5H Homeownership and Section 8 Homeownership Programs. Tenants are encouraged to pursue opportunities for homeownership through these programs as funding allows.

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

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 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

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

Addressing the emergency shelter and transitional housing needs of homeless persons

A local homeless program has been established in Lawton through the collaborative efforts of both, providers in the public sector and participating members of the Continuum of Care. The strategy consists of three essential elements: (1) Prevention (2) Expansion Availability of affordable housing, and (3) increased accessibility to needed services and resources. From 2007 until January 2021, Lawton Support Services as the lead agency for the SW CoC, did much to implement the strategies adopted, developing each element in lock step with one another. As Prevention resources were made available, it decreased the need for emergency shelter, and establishing a network for housing and service resources, allowed for greater availability of affordable housing, and access to services necessary to keep people in permanent housing. Equally as important, the transition process is carefully managed to ensure that people who are homeless do not experience any interruption in services or additional hardship, as a result.

In January 2021, MIGHT CDRC replaced Great Plains Improvement Foundation as the lead agency and lead HMIS. The agency offers emergency shelter services to those facing homelessness, as well as assistance with seeking employment, housing, stability, and well-being, and is thus uniquely qualified to not only build upon the work already accomplished but should expand the scope of our homeless

strategy.

The C. Carter Crane Shelter for the Homeless, is the primary provider of housing for homeless families and individuals. GPIF, a community action agency, manages one homeless shelter, and nine transitional houses for homeless families, and administers an Emergency Solutions Grant (ESG) program, which provides prevention and rehousing assistance. Additional transitional houses are required to expand the shelter's capacity to provide housing assistance for homeless families. The Director estimates the shelter can effectively manage up to 20 transitional houses without additional staffing, although she admits it would further stress an already over-extended staff. The shelter is highly dependent on volunteers and rely on volunteers to assist in delivery of over 200 homeless persons to job sites, doctor's appointments, and interviews. They facilitated over 5,000 nights (total number of beds used during the year or stated differently, a running total of each bed used in the shelter throughout the year) to clients who were in need. Over 125 working (full- and part-time) clients were given a stable environment to begin good work ethics and provided shelter, laundry facilities and transportation to their employment. The agency anticipates providing shelter to a similar number of homeless people next year. It is important to note that, like many of Lawton's human service providers, C. Carter Crane serves not only the local community, but it also draws some of its homeless clientele from Comanche County at large as well as parts of other surrounding counties. To meet future homeless needs the shelter is developing plans to expand the capacity of the shelter and has requested assistance in procuring additional transitional houses to address the needs of families, particularly large ones.

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

Service providers in the community who collaborate with the City direct homeless persons to the appropriate services and financial assistance needed to achieve independent living. Lawton Support Services has been instrumental in establishing a Coordinated Intake System (CIS) to ensure those in need are linked to required services and resources. This may include assistance in obtaining permanent housing, medical treatment, mental health treatment, counseling, supervision, and/or 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.

Transition of homeless households to permanent housing is the overall objective for those households that want to become homeowners. The transitional housing program serves as the vehicle for assistance in moving from homelessness to independent living. Households will be provided information, assistance, and access to the FTHB program to provide homeownership opportunities. Additionally, in appropriate cases, households will be provided advice and assistance in procuring financing from other sources if FTHB funds are unavailable or the households are not selected for the program.

Outreach assessment will be an ongoing effort in the community. There is a need for improved collaboration and information sharing throughout the continuum of care to develop a clearer perspective of the degree of homelessness and availability of supportive services in the community. The efforts of the Southwest Region Continuum of Care group will continue to pay dividends through better tracking of the homeless, better care and through increases in supportive services and housing as the exact nature and extent of the homeless problem in the region is identified.

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

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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 City will support applications for funding by existing homeless shelters, transitional facilities, and service providers to increase funding for operations.

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. Affordable housing stock is another major hurdle. The housing programs outlined in this plan were developed to address the problem.

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

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 will continue to work with the Lawton Housing Authority and to rehabilitate existing affordable rental units to prevent them from becoming unoccupiable and will search out opportunities to purchase dilapidated homes that could be rehabilitated into affordable rental units.

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

The City will continue to work with community partners to address the underserved needs within the community. Not one organization can address the needs alone. Nine public service organizations will be funded with CDBG funds this year, and all Nine organizations play a vital role in the wellbeing of citizens in needs. Mental health counseling, substance abuse case management, youth delinquency prevention all are homelessness prevention activities.

Actions planned to foster and maintain affordable housing

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. Along with whole house rehabilitations, exterior improvement programs and emergency repair program will allow homeowners to a maintain their homes as safe and sanitary.

Actions planned to reduce lead-based paint hazards

Any home constructed before 1978, has the protentional to contain a lead based paint hazard. A lead based paint hazard is defined as lead based paint that is deteriorated which may cause adverse human health effects. All homes assisted with CDBG or HOME funds are first inspected to verify if lead based paint is detected. Not all lead based paint is in a condition that would deem it a hazard. Contractors are required to use safe work practices when in contact with a surface that contains lead based paint. Lead based paint hazards are remediated to eliminate the hazard and clearance testing is required before occupants are allowed back inside the home.

Actions planned to reduce the number of poverty-level families

The City of Lawton will continue to work with the Lawton Economic Development Agency and the Chamber of Commerce to attract higher paying jobs thereby helping to lift poverty-level families individuals out of poverty. Several new developments are on the horizon within the City of Lawton with the FISTA already under construction with renovations at the Central Mall.

Actions planned to develop institutional structure

MIGHT is applying for an Emergency Solutions Grant (ESG) program, which provides prevention and rehousing assistance. MIGHT's purpose centers on three objectives:

1. To stabilize the economic and basic needs of the family through promotion of financial, parental, and social supportive services.
2. To empower adolescents through encouragement, respect, responsibility, academia and social skills.
3. To provide quality childcare that promotes the physiological, intellectual, emotional and spiritual development of children ages 6weeks to 12 years old.

MIGHT was voted lead agency for the SW Oklahoma Continuum of Care (SWOKCoC) in June of 2022.

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

In June 2022, MIGHT replaced C. Carter Crane as the SW Oklahoma Continuum of Care (SWOKCoC) lead agency and lead HMIS. The agency offers supportive services to those facing homelessness, as well as assistance with seeking employment, housing, stability and well-being, and is thus uniquely qualified to not only build upon the work already accomplished but should expand the scope of our homeless strategy.

Discussion:

The City will continue to work with community partners to address the underserved needs within the community. Not one organization can address the needs alone. Nine public service organization will be funded with CDBG funds this year, and all nine organizations play a vital role in the wellbeing of citizens in needs. Mental health counseling, substance abuse case management, youth delinquency prevention all are homelessness prevention activities.

The Veterans Resource Center was completed on March 6, 2023 and added 13 units, 6 male, 6 female, and 1 family, for homeless Veterans. This is the first center for Veterans only. Along with the temporary shelter, resources and case management will be available to assist in the transition of Veterans from homelessness to permanent, affordable housing.

Program Specific Requirements

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

Introduction:

The City of Lawton offers a one-stop-shop for citizens needing assistance. The Great Plains Improvement Foundation runs an assistance hotline (580-595-0063) that anyone needing assistance can call and they are networked with community partners that can assist their needs. Calls are logged into the HMIS so they can be tracked to ensure needs have been met.

Community Development Block Grant Program (CDBG)
Reference 24 CFR 91.220(l)(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	1,961
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:	**1,961**

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

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as follows:

HOME program income is expected to be around $11,838. $1,300,000 in unallocated funds left over from previous years will be allocated this year. $200,000 will be allocated to a TBRA agreement with the Lawton Housing Authority. Over the next 5 years, the City expects to allocate $375,000 to the purchase and rehabilitation of dilapidated homes that can be used as affordable rental properties.

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). The City of Lawton's Recapture language was inconsistent between the First Time Homebuyer Policy in the Policy Manual and the LUHA Homebuyer Policy in the Policy Manual and the First Time Homebuyer Agreement. The language in all three documents has been updated to reflect current HOME Regulations.

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:

   10. Recapture Provisions

   1. If the new homeowner retains ownership and occupies the property as their principal residence for the minimum period of affordability described in paragraph 4. A. above, no recapture restrictions will apply.

B. The HOME-assisted housing must meet the affordability requirements for not less than a five (5) year period of affordability beginning after project completion. The affordability requirements shall apply without regard to the term or repayment of the loan and shall be imposed by a promissory note and mortgage, except that the affordability requirements may terminate upon foreclosure or transfer in lieu of foreclosure.

(a) If the housing does not continue to be the principal residence of the family for the duration of the period of affordability, the City shall recapture all or a portion of the HOME assistance to the low-income homebuyer in accordance with the executed promissory note and mortgage and the provisions below.

(b) In accordance with 24 CFR 92.254(a)(5), the CITY shall use the shared net proceeds method of the recapture requirements to ensure affordability for homeownership assistance. If the FTHB decides to sell the house within the period of affordability, the City will require recapture of all or a portion of the HOME assistance that enabled the FTHB to buy the dwelling unit as follows:

Shared net proceeds: When the net proceeds are insufficient to recapture the full or a reduced amount of the HOME investment plus enable the FTHB to recover the amount of the homeowner's down payment and any documented capital improvement investment made by the FTHB since purchase, the City and the FTHB shall proportionally divide the net proceeds as set forth in the mathematical formulas in 24 CFR 92.254(a)(5)(ii)(A)(3).

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 Third Action Plan year to refinance existing debt secured by multifamily housing.

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) and the Lawton Support Services, Inc. (LSS) are designated as CHDOs in Lawton.

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