



Consolidated Annual Performance & Evaluation Report

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CAPER

Community Development Block Grant
Program

CITY OF ENID 401 W. Owen K. Garriott Road, Enid, OK 73701

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Mayor – David M. Mason
City Manager - Jerald Gilbert
Assistant City Manager - Scott Morris

Commissioners

Ward 1 – Cheryl Patterson
Ward 2 – Derwin Norwood
Ward 3 – Keith Siragusa
Ward 4 – Whitney Roberts
Ward 5 – Rob Stallings
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The final version of Enid’s Consolidated Annual Performance and Evaluation Report (CAPER) presents information and figures for the CDBG program year 2023, on accomplishments and expenses for activities and projects conducted during the period of July 1, 2023, through June 30, 2024. All information and public comments received are incorporated into the final version prior to its submittal to HUD on or before September 29, 2023.

The final version of the CAPER will be available on September 30, 2024, at www.enid.org. The City of Enid accepted verbal and written comments on the Draft CAPER until 6:00 p.m. on, September 18, 2024, via e-mail to Kristen Day, CDBG Coordinator Kristen.day@enig.org or mail:

City of Enid
ATTN: CDBG Program/CAPER
P.O. Box 1768
Enid, OK 73702

Reasonable notice and opportunity to comment was given. A notice of availability of the 2023 Consolidated Annual Performance and Evaluation Report for the City of Enid Community Development Block Grant Program was published and posted on September 04, 2024 complying with the required 15-day comment period. The notices were also posted at the administration building and on the City of Enid website. Any comments regarding this report will be accepted and added to the final version before submission to the Department of Housing and Urban Development.

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NOTICE OF PUBLIC AVAILABILITY OF THE PROGRAM YEAR 2023 (PY-23) CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT FOR THE CITY OF ENID COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

City of Enid – CDBG Department
P.O. Box 1768
Enid, OK 73702
Email: Kristen.day@enid.org
Phone: 580-234-0400 ext. 7211

TO ALL INTERESTED AGENCIES, GROUPS AND PERSONS:

This notice is the City of Enid's announcement of the intention to file the PY-23 Consolidated Annual Performance and Evaluation Report (CAPER) with the U.S. Department of Housing and Urban Development (HUD). The CAPER details the progress of the activities as set out in the Action Plan for the 2023 program year running from July 1, 2023 to June 30, 2024.

The Draft FY 23/24 Consolidated Annual Performance & Evaluation Report (CAPER) document is available for a 15-day public review and comment period to begin on September 4 2024 and continues through September 18 2024 at 6:00 PM and is available at the following locations:

Enid Public Library, 120 W. Maine
City of Enid, Office of the City Clerk, 401 W. Owen K. Garriott
City of Enid, Office of CDBG, 401 W. Owen K. Garriott (email request to Kristen.day@enid.org)
Online at www.enid.org

Contact the Community Development Block Grant (CDBG) Coordinator at kristen.day@enid.org to request a digital copy of the report or submit written comments and/or any feedback that you may wish to express regarding the report. All such comments should be received by the CDBG office at the City Administration Building located at 401 W. Owen K. Garriott, or by email as noted, on or before the conclusion of the comment period on September 18 2024.

Kristen Day, CDBG Coordinator, City of Enid

Publication/posting September 04, 2024, Enid News & Eagle

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan.

91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

This Consolidated Annual Performance and Evaluation Report (CAPER) describes the activities undertaken during the 2023 program year beginning July 1, 2023 and ending June 30, 2024 using Federal funds granted to the City of Enid by the U.S. Department of Housing and Urban Development (HUD) under the Community Development Block Grant (CDBG) program. Activities and accomplishments described in this report primarily benefit low-income and moderate-income residents of the City of Enid, neighborhoods with high concentrations of low-income and moderate-income residents, and the city as a whole.

Through the funding cycle all funds were allocated to programs that would further the goals of the consolidated plan and the CDBG program. Local needs included social services, housing, and economic development. The priorities, goals, strategies, activities, and services contained in the plan were designed to improve overall livability, with the main objectives being Accessibility, Affordability and Sustainability. The City of Enid has an Americans with Disabilities (ADA) Coordinator on staff. All projects completed under the City of Enid, regardless of funding source are subject to ADA regulations and compliance. No project will be approved without conforming to this act.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

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Goal	Category	Funding	Indicator	Expected	Actual	Unit of Measure	Percent Complete
Administration	Other-Administration		Other	1	0	Other	0
Clearance/Demolitions/Code Enforcement	Non-housing Community Development		Buildings Demolished	2	0	Buildings	0
Community Development/Public Facilities	Non-housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefited	230	439	Persons Assisted	190.87%
			Homeless Person Overnight Shelter	0	18	Persons Assisted	0
			Overnight/Emergency Shelter/Transitional Housing Beds added	0	0	Beds	0
Community Development/Public Facilities Parks	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	3000	3915	Persons Assisted	130.50%
Community Development/Public Services	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	145	0	Persons Assisted	0

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			Public Service Activities other than Low/Moderate Income Housing Benefit	0	58	Persons Assisted	0
Economic Development	Non-Housing Community Development		Jobs Created/retained	3	0	Jobs	0
			Businesses Assisted	0	5	Businesses Assisted	0
Housing and Homeless Prevention	Affordable Housing Homeless		Rental Units Rehabilitated	5	0	Household Housing Unit	0
			Homeowner Housing Rehabilitated	30	27	Household Housing Unit	90%

Table 1 - Accomplishments - Program Year

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Goal	Category	Funding	Indicator	Expected	Actual	Unit of Measure	Percent Complete
Administration	Other-Administration	CDBG \$450,000.00	Other	1	0	Other	0
Clearance/Demolitions/Code Enforcement	Non-housing Community Development	CDBG \$6,000.00	Buildings Demolished	2	0	Buildings	0
Community Development/Public Facilities	Non-housing Community Development	CDBG \$928,819.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefited	1150	439	Persons Assisted	38.17%
			Homeless Person Overnight Shelter	0	18	Persons Assisted	0
			Overnight/Emergency Shelter/Transitional Housing Beds added	0	0	Beds	0
Community Development/Public Facilities Parks	Non-Housing Community Development	CDBG \$248,137.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	15,000	3915	Persons Assisted	26.10%
Community Development/Public Services	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than	725	0	Persons Assisted	0

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		\$325,000.00	Low/Moderate Income Housing Benefit				
			Public Service Activities other than Low/Moderate Income Housing Benefit	0	58	Persons Assisted	0
Economic Development	Non-Housing Community Development	CDBG	Jobs Created/retained	15	0	Jobs	0
		\$75,000.00	Businesses Assisted	0	5	Businesses Assisted	0
Housing and Homeless Prevention	Affordable Housing Homeless	CDBG	Rental Units Rehabilitated	25	0	Household Housing Unit	0
		\$731,032.00	Homeowner Housing Rehabilitated	150	27	Household Housing Unit	18%

Table 2 - Accomplishments - Strategic Plan to Date

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

The City of Enid continues to implement the goals and objectives identified in the five-year consolidated plan to achieve development of a viable urban community. The City’s CDBG entitlement allocation for 2023 was \$491,970.00. In the 2023 Action Plan, projects were chosen based upon citizen input, statistical data and consultation with community-based organizations, state agencies and city departments. The City identified eleven (11) projects total including administration.

Five public facilities improvement projects were selected for funding and identified as high-priority needs in the community. Those agencies provide services to disabled persons, at-risk youth, and shelter for the homeless, women victims of domestic violence, dating violence, sexual assault, and stalking, and children.

One Housing/Homeless prevention project was completed to provide emergency repairs and barrier removal for low-to-moderate income beneficiaries to prevent homelessness. The households utilizing the program are able to remain in their homes because it is no longer a health and safety issue to remain in their homes and Americans with Disabilities Act (ADA) barriers are removed.

One economic development project provided assistance to two microenterprise businesses to retain jobs.

Three public service activities were funding including one senior program and four youth services projects to provide services to at-risk and homeless-unsheltered youth in the community.

The City of Enid gives special attention to the highest priority activities identified by its stakeholders. The City of Enid gives projects that fall into the high-priority category more points than those that rank lower.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG
White	404
Black or African American	29
Asian	0
American Indian or American Native	2
Native Hawaiian or Other Pacific Islander	31
American Indian/Alaskan Native & White	95
Total	466
Hispanic	85
Not Hispanic	381

Table 1 – Table of assistance to racial and ethnic populations by source of funds

Narrative

The number of recipients, their race and ethnicity does not play a role in whether or not they are eligible to receive assistance through CDBG funded programs. The sole determining factor for eligibility is income. All races and ethnicities listed in the table above were income eligible for the programs that received CDBG funding.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	\$491,970.00	\$762,054.91
General Fund	public - local	\$1,000,000	

Table 2 - Resources Made Available

Narrative

Enid target areas represent portions of communities in which 51 percent or more of the residents are low-and moderate-income and thus eligible for CDBG, HOME and ESG activities which include projects and programs for housing, infrastructure, economic development, and the various other Consolidated Plan elements that impact quality of life.

Resources available through Enid are exclusively dedicated to the improvement of living conditions for extremely low, very low, or low-income individuals and families which are defined as persons who make at or below 30 percent, 50 percent, and 80 percent of the median family income for the area. 100% of the beneficiaries of CDBG are low-moderate income.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Low Mod Census Tracts	95	100	100% of all CDBG funding is spent on Low Moderate-Income Clientele and or in Low Mod Census Tracts

Table 3 – Identify the geographic distribution and location of investments

Narrative

CDBG assistance is made available throughout the City of Enid. However, from time to time, based on the type of activity to be undertaken, the City may target and invest CDBG funds to specific areas where 51% or more of the total household beneficiaries have low to moderate incomes. Typically, the City qualifies CDBG activities under the national objective of benefit to low-and moderate-income households. Documentation proof of income status is a requirement to benefit from CDBG programs.

Each year the City and its subrecipients leverage over \$1 million dollars with CDBG funds to complete projects. This is also true for the program year addressed in this report FY2023.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

The City’s CDBG entitlement allocation for 2023 was \$491,970.00. The City had \$270,084.91 in credits or returns for a total of \$762,054.91 to allocate. All funds were committed to projects that met the consolidated plan’s goals and objectives. During the program year, \$762,054.91 in CDBG funding was expended. Some funding spent during this fiscal year was from projects still open from the previous fiscal years. Most projects meet HUD’s Low-and Moderate-Income Clientele Benefit National Objective, meaning the beneficiary must provide proof of income eligibility for services provided with CDBG funds. However, some projects are based on location, or area benefit. Those Area benefit projects are publicly owned land or property located within the jurisdiction and are utilized to needs in the plan. The location of projects completed must be within low-moderate income areas (LMA) of the city. Subrecipients utilizing CDBG funds provide additional resources as matching/leveraging which includes private, state and local funds to increase the number of beneficiaries served.

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	35	27
Number of Special-Needs households to be provided affordable housing units	0	0
Total	35	27

Table 4 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	35	27
Number of households supported through Acquisition of Existing Units	0	0
Total	35	27

Table 5 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

The City of Enid continues its commitment to meeting housing needs during the program year Action Plan. In an effort to continue with the goals of enhancing the housing stock throughout the city limits, the City of Enid places importance on the housing priorities as identified in the Consolidated Plan throughout the application process.

Discuss how these outcomes will impact future annual action plans.

In 2023, the City also worked in conjunction with the Community Development Support Association (CDSA) to provide emergency system repairs for low-and-moderate-income single-family owner-occupied homes, barrier removal for low-and moderate-income homes, and funded project delivery costs associated with housing programs. The number assisted was 27 households thus far. The program objective is to provide decent affordable housing with an outcome of accessibility/availability.

Enid reasonably expects CDBG resources and some local revenue to address identified needs. The City may issue Certification of Consistency to the Consolidated Plan for other federal application assistance when development proposals complement affordable housing priorities and objectives of the Annual Plan. Although a low CDBG priority, affordable rental development, and rehabilitation is strongly encouraged and the need has increased during this consolidated plan period. Nonprofit and/or for-profit development enterprises can apply for competitive housing resources such as HOME, Low Income Housing Tax Credits, Federal Home Loan Bank of Topeka-Affordable Housing Program, State Housing Trust Fund, USHUD Youth Build, local faith-based initiatives similar to Group Work Camps, and/or REI's various housing programs.

Organizations receiving CDBG assistance are encouraged to pursue additional leveraging funds through avenues, such as private donations, competitive grants, foundations, or federal programs. The proposed public facility improvement, public services, and housing activities in the 2023 funding cycle will leverage over \$1,000,000.00 with their CDBG funding.

The City of Enid addresses priority areas of removal of architectural barriers for those with disabilities and the rehabilitation of existing owner units including emergency repairs to prevent homelessness.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	14	0
Low-income	6	0
Moderate-income	7	0
Total	27	0

Table 6 – Number of Households Served

Narrative Information

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The City of Enid annually assesses its progress in meeting goals outlined in the 2023-2027 Five Year Consolidated Plan through development of the Consolidated Annual Performance Evaluation Report (CAPER). The CAPER provides an opportunity for the City to evaluate the performance of its programs and services, and to determine whether adjustments to the current 5-year goals are needed. The City looks to performance in a given year, and trends over time, to inform and calibrate future goals and outcomes. The City will continue to prioritize homeless prevention opportunities for low to moderate income families. Decreased and lack of adequate funding has impacted and will continue to negatively impact community development, economic development and other services provided that depend greatly upon CDBG funding. The City of Enid will continue to work closely with Community Development Support Association (CDSA) and other service providing agencies in pursuing additional affordable housing opportunities.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

The City of Enid supports the national movement to end chronic homelessness. Organizations in Enid are working towards addressing homelessness by partnering with the North Central Oklahoma Continuum of Care and have adopted a plan to end homelessness. The City of Enid faces the barrier of limited funding, however, is committed to provide non-financial support to organizations such as YWCA, Salvation Army, Community Development Support Association, Forgotten Ministries, Hope Outreach and Youth and Family Services, that work with the North Central Oklahoma Continuum of Care to further the action to end chronic homelessness. The City of Enid will take the following steps to assist: (1) staff awareness and knowledge of the plan, (2) make plan available to the public, (3) review plan annually and include key stakeholders in notification of CDBG process, and (4) offer technical training to interest agencies.

The City recognizes that the prevention of homelessness is a more efficient and less costly mechanism of support than back end services. As a result, the City acted to foster and maintain affordable housing by establishing programs and by providing funding assistance to Community Housing Development Organizations for homeless prevention efforts in the form of barrier removal and emergency housing repairs for low-income households.

Addressing the emergency shelter and transitional housing needs of homeless persons

To prevent homelessness, the City of Enid attempts to keep families in their homes by offering emergency repair assistance through CDSA. The City of Enid also has access to the North Central Oklahoma Continuum of Care 10-year plan to end homelessness available for the public. Many non-profit service providers assist with emergency shelter and transitional housing needs of homeless persons in the community. The CDBG Coordinator provides resource referrals to those in need.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The City of Enid continues its commitment to create diverse housing opportunities and ensure the availability and affordability of a variety of housing options by collaborating with the development community and housing organizations to build affordable housing as demonstrated with the partnership on two development projects. CDSA continues to offer a down payment assistance program for low to moderate income households to assist families with the purchase of homes.

While the entitlement amount that the City receives for CDBG is inadequate to address all homeless

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needs, funds allocated toward emergency repair and barriers removal through CDSA assists individuals to remain in their homes and avoid the prospect of homelessness. In total, the City allocated \$146,206.30 to assist with housing rehabilitation needs through CDSA during the fiscal year 2023.

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

While the City of Enid does not receive emergency shelter grants funds directly, the City desires to support agencies and shelters who address and provide homeless needs. As part of the North Central Oklahoma Continuum of Care, the City supports their efforts to address homelessness and serves on the North Central Continuum of Care board. The City has an official Memorandum of Understanding with the Continuum and the CDBG staff serves on the Continuum's Ten (10) year plan to end homelessness committee. By educating staff and offering support, the City hopes to continue collaborative efforts to pursue additional funding to address homelessness.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The City of Enid does not have a public housing agency that it works directly with; however, there is a local organization (CHDO), Community Development Support Association (CDSA), which receives HOME funds from the Oklahoma Housing Finance Agency (OHFA). CDSA provides services to residents to help them become more involved in management and participate in homeownership. This organization is not designated as troubled by HUD and is not performing poorly. In fact, CDSA is operating astoundingly.

Even though Enid does not have a public housing authority, the City of Enid works closely with the Community Development Support Association (CDSA) in pursuing additional public housing. In 2007, the City of Enid approved site plans for the Roosevelt Park Apartments, proposed by a developer in a qualified census tract. The City also created a tax increment finance district to help fund the construction of the affordable housing complex, which includes 48 apartments. The project was completed and is at capacity offering affordable housing to the citizens of Enid. In addition to assisting with the development of the Roosevelt Park Apartments, completed in 2009, the City of Enid worked with the Carland Group LLC, who proposed the east side redevelopment project consisting of 30 single family detached homes located on scattered sites in a low/moderate area. To support the tax credit application for the redevelopment project, the City passed a resolution of support and transferred ownership of two in-fill lots for the project. The project was approved for funding by the Oklahoma Housing Finance Authority, the single-family dwellings in low income census tracts of the city were filled to capacity at that time. That project was completed and all units occupied at this time. Carland Group, LLC, then proceeded development of the Forrest Ridge addition, another single-family dwelling in the same area of Enid, and has also completed this project, with all units occupied at this time.

Two separate developers are currently as of this FY 2023 report pursuing low income duplex units, one in the Forrest Ridge addition and the other in another low-income area of Enid.

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

Enid does not have a public housing authority. However, the City does encourage participation in homebuyer classes offered by the local CHDO. Mortgage underwriting has become more stringent over the past few years making it more difficult to achieve homeownership.

Actions taken to provide assistance to troubled PHAs

Enid does not have a public housing authority.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken 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. 91.220 (j); 91.320 (i)

Barriers to affordable housing can be directly related to the supply and demand issues we currently face. The need for housing is so great in this area that it causes the cost to acquire to rise. Some affordable housing in Enid is not considered decent. The City of Enid promotes decent affordable housing efforts however, the lack of state, local or federal regulations on the conditions to rent, the barrier will be difficult to overcome. Substandard housing laws for the state are outdated and do not address most issues causing substandard housing problems.

Enid does not maintain public policies such as zoning, building codes, land use controls, fees or growth limitations that discourage the maintenance, improvement or development of affordable housing. The policies that Enid maintains are for public health and safety and have not been found to cause barriers to affordable housing. Similarly, the City does not restrict return on investment associated with developing or operating residential properties. The issue of affordable housing has a lot to do with high construction costs, construction liabilities, high cost to maintain rental properties and increased lending approval practices. The City promotes development of rental housing for persons in the 50% and 60% MFI market segment, by: Increasing awareness of development opportunities in the city by marketing the Qualified Census Tract advantage to tax credit developers and results of housing market analysis

- Providing “Resolutions of Support” and “Community Support” to proposed IRS Section 42 LIHTC proposals seeking competitive allocations of tax credits from the OHFA.
- Examining possible contributions of direct value to developments such as; waiver of fees, tax abatements, public improvements and donations/discounts on real property and/or materials.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

Expansion of homeownership within the community is hampered by the cost of entry-level for-sale housing units. According to our most recent Housing Demand Study conducted in 2022 by RDG Planning and Design recent construction of apartment complexes and single family detached housing is offering more affordable and varied options. Housing is 63.3% owner occupied. Current median home value in Enid is \$112,800, with a 1971 median year built. Affordable homes in the \$60,000 to \$124,000 are the only range that Enid has a surplus to the demand for the Household Income level. Enid does have a lower than average cost burden for housing compared to other benchmark communities. Based on the 2013-2017 Comprehensive Housing Affordability Strategy (CHAS) data the City of Enid has determined that no group, including low-moderate, are underserved below averages. Of existing stock, the average cost of a single-family home in Enid is \$136,000. Current new single-family home prices at \$160,000 and average new home sale prices of approximately \$250,000 creates an affordability gap for median household incomes of \$48,853. This gap is even larger for households of 2 to 4 persons with incomes at or below US HUD’s Garfield County income threshold for low- and moderate-income families of \$35,200 to \$44,000. To help alleviate the housing gap, the City plans to market and promote the housing market analysis to inform developers of the housing needs and provide incentives for development.

Specific recommendations from the 2022 Housing Study by RDG Planning and Design include focused areas of rehabilitation, demolition as needed, connecting infill lots, reasonable construction, and neighborhood improvement programs to improve more affordable housing stock for lower income citizens. City of Enid Code Enforcement, CDBG, and other departments are working together with community partners towards these goals.

Homeownership becomes more feasible for low-income households when down-payment assistance, below market interest rate mortgage loans, and/or homebuyer education is available. In addition to the need for down payment, closing cost assistance, or interest subsidy, an often-cited homeownership barrier is poor credit or no credit history. To ease the purchase gap on the affordable housing market segment and address credit, the City encourages nonprofit and local banking partners to offer financial and/or homebuyer education and seek homebuyer assistance resources from OHFA's HOME and SFMRB Programs, the FHLB's AHP Program and REI's down payment, closing cost and mortgage financing assistance programs. Similarly, the high cost of developing new rental properties developments results in contract rents unaffordable to low, very low and even moderate-income households. Higher development costs result in larger long-term mortgage amounts with higher monthly payments. In turn, higher contract rent structures are needed in order to produce adequate revenues to service debt. Working closely with community development organizations, the City hopes to create additional tax credit projects to promote the development of affordable housing. To off-set the high development costs associated with affordable rental property development, nonprofit and for-profit development partners access state and national affordable housing grant and loan funds. This "soft" public financing can then be used by development entities to reduce and/or eliminate hard development costs and long-term debt resulting in cost savings that are passed on to low-income residents in the form of lower more affordable rents.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

Actions taken to reduce lead-based paint hazards in Enid are that requirements are incorporated with the use of any federal funding requiring a lead pain hazard evaluation and abatement. CDBG funds can be used to mitigate.

The City follows state and federal regulations prohibiting the use of lead-based paint (LBP) and relies on subrecipients to advise households receiving CDBG assistance. Staff distributes informational materials detailing the dangers of LBP at the local annual Home Show held in April and on-going basis through the department. Enid has no real time data linking income to the incidence of residential lead-based paint hazards. However, the City estimates that 5,697 units built prior to 1978 contain lead-based paint. 68% of the homes built before 1940 contain lead-based paint; 43% built between 1940 and 1959 contain lead; and, 8% built from 1960 to 1978.

An LBP inspection is ordered immediately and properties must pass the inspection before project occurs. If the property fails inspection, repairs are required and must be completed by an experienced contractor. All contractors participating in the programs are required to be Environmental Protection Agency (EPA)-certified. To educate consumers and contractors, Enid distributes the EPA's lead pamphlet to all homeowners and occupants before work begins. Interim controls are put into place on each project to reduce human exposure to contaminants, including specialized cleaning, painting, temporary containment and ongoing monitoring of lead-based paint hazards to potential hazards. Inspectors test the areas that will be impacted by rehabilitation and take necessary measures to abate the conditions.

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All occupants are advised of any lead hazard evaluations, reports and recommendations of the hazard reduction activities and clearances. Staff, contractors, subrecipient agencies, community-based organizations, nonprofit organizations and other participating public agency staff all receive information on lead hazards, and key staff are sent to HUD-sponsored trainings. The CDC also distributes notices to all Section 8 property owners and managers to notify them about regulatory requirements. Emergency shelter housing participating in the County's voucher program are also subject to health and safety inspections, and routine inspections are required in many of the multi-family dwellings to ensure that units are maintained in accordance with HUD requirements.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

The City of Enid partners with communities, community-based organizations and non-governmental organizations including advocacy groups, on community-based initiatives. The CDBG Coordinator participates on behalf of the City with organizations and serves as a liaison to contribute to the empowerment and inclusion of low-moderate income individuals.

The City of Enid provides access to infrastructure and urban services to all citizens regardless of income level. The City initiates intergrated programs for the improvement of the urban environment and supports economic development through collaboration with the Enid Regional Development Alliance (ERDA).

Homeownership becomes more feasible for low-income households when down-payment assistance, below market interest rate mortgage loans, and/or homebuyer education is available. In addition to the need for down payment, closing cost assistance, or interest subsidy, an often-cited homeownership barrier is poor credit or no credit history.

To ease the purchase gap on the affordable housing market segment and address credit, the City encourages nonprofit and local banking partners to offer financial and/or homebuyer education and seek homebuyer assistance resources from OHFA's HOME and SFMRB Programs, the FHLB's AHP Program and REI's down payment, closing cost and mortgage financing assistance programs.

Similarly, the high cost of developing new rental properties developments results in contract rents unaffordable to low and very low-income households. Higher development costs result in larger long-term mortgage amounts with higher monthly payments. In turn, higher contract rent structures are needed in order to produce adequate revenues to service debt. Working closely with community development organizations, the City hopes to create additional tax credit projects to promote the development of affordable housing.

The City of Enid continues to work closely with CDSA to help families move to economic self-sufficiency by improving conditions in which low-income people live and supporting partnerships among providers of services to low-income people.

Through the City's continued support of Northern Oklahoma College (NOC) with the Section 108 Loan to assist with the purchase of the Enid campus, opportunities for further education are provided at an affordable rate. Northern Oklahoma College (NOC), Northwestern Oklahoma State University (NWOSU), and Autry Technology Center worked together to provide expanded economic and educational opprotunities to the community at a lower tuition cost than other regional and state universities.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

The City of Enid has developed and continues to improve a well structured institutional framework to meet the goals and functional requirements of the CDBG program. The process established for preparing plans, funding allocations and administration of the program requires an open public process where citizens and local agencies participate in identifying needs and gaps, decision-making on priorities and implementation of plans, projects and activities.

Once funds are allocated, the City staff and participating agencies work together under a clearly defined framework of procedures to ensure success in carrying out the funded programs and projects. The City of Enid assesses the current system and makes improvements on an on-going basis.

Enid plans to continue its strong community involvement and citizen participation by inviting organizations such as local and county governments, health departments, non-profit providers, school representatives, community housing development organizations, and state organizations to attend public hearings and meetings regarding the City's vision for a viable and urban community. The City encourages participation from each of the organizations to assist with achieving our vision.

By serving on various committees, CDBG Department staff acquires additional knowledge of needs and coordinates efforts to assist with addressing those needs. CDBG staff works closely with other city departments to identify and address gaps in structure.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The City works closely with local public housing agency, private housing developers and social service agencies to meet the needs for housing. In addition, the CDBG Coordinator provides information to citizens about resources available in the area which include local service agencies, public and private. The City also strongly encourages agencies that receive CDBG funds to work closely together to improve referrals, identify service gaps and recommend solutions.

Various collaborative efforts have been instituted to support coordination between housing and service providers. The Human Services Alliance of Greater Enid consists of organizations such as education, governance, health, welfare, mental health, substance abuse, teen engagement, advocacy and mentorship programs. Leaders from those organizations meet to discuss needs and implement programs to create a suitable living environment for all citizens.

To off-set the high development costs associated with affordable rental property development, nonprofit and for-profit development partners access state and national affordable housing grant and loan funds. This "soft" public financing can then be used by development entities to reduce and/or eliminate hard development costs and long-term debt resulting in cost savings that are passed on to low-income residents in the form of lower more affordable housing.

Identify actions taken to overcome the effects of any impediments identified in the jurisdiction's analysis of impediments to fair housing choice. 91.520(a)

The City of Enid continues its commitment to create diverse housing opportunities and ensure the

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availability and affordability of a variety of housing options by collaborating with the development community and housing organizations to build affordable housing as demonstrated with the partnership on all development projects. The City of Enid promotes Fair Housing in many ways. The CDBG Coordinator is listed as the Fair Housing Coordinator and continually provides information and services to citizens; including renters, homebuyers, home sellers, mortgage lenders, brokers and investment property owners/landlords. The CDBG Coordinator is accessible to members of the community making it easy for citizens to file complaints when they feel they have been discriminated against in the housing market. Educating the general public, landlord's, property managers and realtors through trainings, public service announcements and distribution of information is helpful to the community in prevention and alleviation of Fair Housing discrimination.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

During the program year, the CDBG Department continues to proceed in accordance with the management process set forth in the consolidated plan. The CDBG Program is under the direction and oversight of the City Manager and Assistant City Manager. One full time employee, a CDBG Coordinator, is responsible for administering and implementing all funded activities, preparing the 5-Year Consolidated Plan and Annual Action Plans, program and project recordkeeping, adherence to federal and state program related regulations and statutes. A CDBG Funding Committee represented by the Mayor & Commissions represent each area of the city divided into wards similar to census tracts. The Mayor and Commissioners are from different backgrounds and a highly diverse group of individuals. The Mayor and Commissioners assist the CDBG Coordinator and City Manager in the review and recommendation of proposals to be funded with CDBG resources.

Monitoring is conducted on a regular basis in a manner consistent with the HUD regulatory guidelines that apply to CDBG funds. Depending on the nature of the fund's usage, different eligibility and compliance factors may be reviewed. CDBG Department staff keeps continuous contact with sub-recipients during the duration of the project. Funds are not released unless the CDBG staff has all supporting satisfactory documentation in order. Annual on-site monitoring visits follow the sub recipient monitoring checklist to ensure comprehensive monitoring is completed. For projects following Davis-Bacon requirements, staff meets with sub recipients before any bids are solicited and with contractors before any work can begin.

The City of Enid requires subrecipients to submit accomplishment reports on at least a quarterly basis. Subrecipients must submit notarized affidavits with each claim, as well as itemized invoice, ledger balance sheet, and proof of all receipts for expenditures.

All disbursements must be approved by the Mayor and City Commissioner's at regular monthly meetings before checks are disbursed.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The City of Enid publishes the availability of the Consolidated Annual Performance & Evaluation Report in the local Enid News & Eagle. The notice gives at least a 15-day comment period and includes details regarding the public hearing.

To ensure citizen participation in the performance report process, the city followed the Citizen Participation Plan. Notice was given regarding the availability of the plan and report. The notification

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stated that the City of Enid was accepting comments on the performance report giving citizens the opportunity to view and make public comments. A 15-day comment period was open until 6:00 p.m. September 18, 2024.

The 2023 CAPER has been prepared in accordance with the citizen participation plan for the CDBG Entitlement program. Citizens have a variety of ways to provide comments on all Community Development programs and projects throughout the year. The draft version of the 2023 CAPER publication included the instructions regarding making public comments:

COMMENTS MADE AFTER THE CLOSING OF THE COMMENT PERIOD WILL BE ACCEPTED BY THE CDBG COORDINATOR KRISTEN DAY BY EMAIL AT KRISTEN.DAY@ENID.ORG. HOWEVER, COMMENTS MADE AFTER THE COMMENT PERIOD EXPIRATION WILL NOT APPEAR IN THE OFFICIAL REPORT.

The draft CAPER was released for public comment on September 04, 2024, allowing citizens the required 15-day comment period. The comment period will close at 6:00 o'clock p.m. on September 18, 2024.

Any comments received will be listed below:

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

An evaluation of past performance revealed that the City of Enid CDBG goals were met and no changes were made to the program objectives. Any quantitative goals that weren't met were due to decreased CDBG funding. Throughout the previous five years Enid's citizen participation plan was adhered to. In the capacity of lead agency, the City of Enid consulted with various representatives of city and county departments, health organizations, schools, nonprofit organizations etc. to ensure that none of the needs in our community were overlooked. Additionally, the City met with the citizens to obtain input. Overall, the citizen plans to meet the identified goals with specific emphasis on the needs of low- and moderate-income persons and families in the City of Enid. All goals achieved benefit 100% of the clientele served were of low mod income. CDBG staff strives to meet all CDBG program requirements while also following city and state mandated requirements. To ensure sub-grantees understand their responsibilities, staff provides training, technical assistance, and monitors projects regularly based on the type of activity and complexity. The past needs are a basis for determining current needs. There continues to be a strong need for housing and homeless prevention projects that are provided by CDSA. To ensure that all low-income households have the opportunity to improve quality of life, the City of Enid is making CDBG resources available citywide based on Low-moderate income clientele (LMC) basis.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

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[BEDI grantees] Describe accomplishments and program outcomes during the last year.

N/A