



O K L A H O M A

Boundless - Vibrant - Original

Consolidated Plan 2013-2017



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Executive Summary:

Enid, a metropolitan city in Garfield County, Oklahoma serves as the county seat. As of the 2010 Census, there were 49,379 people, 18,955 households, and 12,567 families residing in the city. Located in Northwestern Oklahoma, Enid sits at the eastern edge of the Great Plains, 70 miles North of Oklahoma City.

Currently, Enid is enjoying a robust economy. In recent years, several local employers have expanded, there has been significant retail and commercial office construction, the number of employed persons has grown steadily, and the city's unemployment rate is 5.4%. The Enid real estate market appears to be increasingly active, and rental rates and housing prices increased moderately in the past years. All of these factors indicate a steady increase in demand for rental and owner occupied housing units in the next five years, despite forecasted population and household declines.

The city's 2010 median household income is \$38,056. The largest percentage of Enid's households are in the \$35,000 to \$50,000 income bracket. Approximately 31.48% of the households earn below \$25,000 and about 17% earn below \$15,000 annually. Household income levels are expected to increase over the next five years but will likely remain below state and county levels. According to US HUD data, 40.3% of Enid's overall households have low and moderate incomes (based on 80% of the median household income for a family of four in Garfield County or approximately \$38,177.)

I. Introduction:

The 2013-2017 Consolidated Plan represents Enid's vision for improving the quality of life in the low-and moderate income clientele and areas of Enid. The plan addresses long term goals and objectives for improving the quality of life for financially challenged residents and states specific plans for making improvements throughout the next year.

Since inception of the Community Development Block Grant program in the mid 1970's, Enid has been a designated entitlement city. As such, the city receives an annual allocation of CDBG funds to carry out a wide range of community development activities directed toward revitalizing neighborhoods, economic development and providing improved community facilities and services with maximum feasible priority to activities that primarily benefit low- and moderate-

income persons. To obtain funds, the city develops its own programs and funding priorities by preparing a:

- Five-Year Consolidated Plan, a comprehensive long-term review of development needs for housing, services, public improvements and facilities, and economic growth. At least 70% of CDBG funds must be spent on activities to benefit people with low and moderate incomes. The remaining 30% can be used to aid in the prevention or elimination of slums and blight or to meet an urgent need.
- One-year Action Plan identifying how CDBG funds will be used to achieve proposed outcomes and respond to identified community needs.
- Consolidated Annual Performance Evaluation Report at the close of each project year summarizing activities undertaken to meet objectives set forth in the Consolidated Plan.

This 5-year plan covers the period of July 1, 2013-June 30, 2017. For fiscal year 2013, Enid's CDBG allocation is approximately \$384,950. Of this amount, approximately \$150,000.00 is dedicated to a Section 108 Loan Guarantee repayment until 2019, and \$70,000 is set-aside for program administration. At this time, the City does not foresee receiving funds for reallocation. However, should funds become available they will be added to the overall annual allocation.

The 2013 allocation is approximately a 5% decrease from last year. Over the past several years the allocation for CDBG has significantly decreased, with an overall cut of approximately 50%. In 2010 the funding allocation for the City of Enid was \$674,782.00 compared to this year's anticipated allocation of \$384,950.00. Additionally, in 2006 HUD proposed a new CDBG allocation formula that the Government Accountability Office (GAO) is studying. Given this proposed formula and other federal budget cuts, the city is uncertain of future CDBG allocations.

The Community Development Block Grant Department within the City of Enid is responsible for developing the Consolidated Plan, program administration and implementation of housing and community development activities and initiatives. Program staff, in concert with the city funding committee, review and recommend award of CDBG funds to projects that address the Plan's high priority strategies.

Actions taken to develop the 2013-2017 Strategic Action Plan include:

- Utilizing HUD’s eCon Planning Suite: IDIS Conplan tool, OneCPD Resource Exchange and CPD Maps.
- Convening a stakeholder meeting representing a cross section of community-based organizations that provide education, employment, housing, social services, health, and services for the homeless
- Conducting two formal public hearings open to all residents and interested parties following processes outlined in the Council adopted Citizen Participation Plan
- Email consultation with the State Dept. of Health and Head Start State Collaboration office regarding lead paint issues and the North Central Oklahoma Continuum of Care for homeless and chronically homeless persons
- Reviewing and analyzing documents such as Enid’s Vision 2025 Plan, Housing Needs Assessment and Market Analysis, and HUD data sets
- Assigning Plan priorities
- Identifying obstacles to meeting underserved needs

Overall input from citizens reflect a wide range of ongoing community development needs including infrastructure replacement and upgrades, demolition, code enforcement, urban forest, transportation, housing, public services, as well as, economic development and continued fueling of the city’s economic expansion by assisting micro businesses and revitalization of the downtown area.

Over the next five year, independent analysis identified affordable housing needs to be rehabilitation of owner and rental dwellings, and single and multi-family new construction affordable to households at and below 80% of the family median income. The non-homeless special needs category indicates a growing need for rental and owner housing suitable for elderly households at all levels of care; independent living, assisted living, and nursing care. Enid’s very low-income disabled households face a higher incidence of housing problems (rent burden, payment burden, physical deterioration, incomplete facilities) than the general population.

Data from the Northern Oklahoma Continuum of Care Service area indicates a relatively low incidence of homelessness.

The 2013–2017 Plan will replace the 2008-2012 Consolidated Plan. Included in the Consolidated

Plan is a five-year strategic plan and a one-year annual action plan beginning with fiscal year 2013 and ending in fiscal year 2017. The strategic plan describes needs, goals, and measurable objectives for a wide range of community development activities, such as housing, homelessness, and non-housing community development. The Action plan describes the specific projects and activities that the jurisdiction will undertake in the coming one year.

The Consolidated Plan for Enid is comprised of seven sections.

- **Section I, Introduction to the Consolidated Plan for Enid**, introduces the plan.
- **Section II, Citizen Participation Plan**, describes the process for collecting information and feedback from Enid citizens.
- **Section III, Objectives Summary Matrix**, is a detailed table, which serves as a helpful guide to the measurable objectives set forth by the Consolidated Plan.
- **Section IV, Community Profile and Housing Market Analysis** provides a detailed analysis of existing conditions in Enid including population characteristics and demographic trends. *Section IV* also includes a detailed analysis of availability, affordability, accessibility, and adequacy of housing units in Enid.
- **Section V, Strategic Plan** gives background information on housing, homelessness, education, economic development, and infrastructure. The Strategic Plan then identifies needs and issues associated with each area and establishes five-year goals with specific objectives that address those needs.
- **Section VI, Action Plan**, begins to address the objectives set forth by *Section V* by describing activities, projects and programs that Enid will undertake during the next five years (2013-2017). It also provides an analysis of Department expenditures and a detailed description of the monitoring procedures utilized by the City of Enid during the first year of the Consolidated Plan.
- **Section VII, Supporting Materials**, provides additional necessary information that includes target area profiles, definitions, service provider tables and certifications. eCon Planning Suite.

In May 2012, HUD's Office of Community Planning and Development (CPD) introduced the eCon Planning Suite, a collection of new online tools to help grantees create market-driven, leveraged housing and community development plans. These tools are designed to help grantees with the needs analysis and strategic decision making required for the Consolidated Plan.

One of these tools, the Consolidated Plan Template will be required for all Consolidated Plans

submitted on or after November 15, 2012. Grantees that are scheduled to submit a Consolidated Plan to HUD after this date will use the template for both the Consolidated Plan and the Year 1 Action Plan.

The Consolidated Plan Template provides a number of benefits to grantees, including:

- ❖ The Consolidated Plan Template provides a uniform, web-based format to help grantees ensure their Consolidated Plan includes all the required elements per the regulations. The template also includes a Quality Check that grantees can use to review the plan for missing information and discrepancies before submitting the final version to HUD.

- ❖ With the incorporation of the Consolidated Plan and Annual Action Plan into IDIS Online, all of the key reporting elements of the grants management cycle are integrated into one system. This will help ensure cohesiveness between the goals described in the Consolidated Plan and Action Plan and the outcomes tracked in IDIS and reported in the Consolidated Annual Performance and Evaluation Report (CAPER) and make the Consolidated Plan a useful management tool.

- ❖ Many of the data tables within the Consolidated Plan Template are pre-populated with the latest housing and economic data. The data is provided to help grantees develop their funding priorities in the Strategic Plan and to save time in searching for and compiling the data. The Consolidated Plan Template is integrated with the CPD Maps tool. The maps and data sets available in CPD Maps can help grantees assess market conditions and present the information in a compelling fashion. The CPD Maps tool is publicly available so that community stakeholders will also have access to the same data sets. The Consolidated Plan Template allows grantees to easily insert maps and data tables from CPD Maps throughout the document.

Service Area and Target Areas

The Consolidated Plan addresses the needs of the Enid service area which consists of fourteen (14) projects using seven (7) subrecipients that have signed cooperative agreements for inclusion in Enid's application for funding.

Enid was designated an Entitlement City by HUD for the CDBG Program in 1994. In order to qualify for Entitlement status, a city must have a total population of 50,000 or more persons.

Enid target areas represent portions of communities in which 51 percent or more of the residents are low- to 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. As seen in Map 1.1 Enid

Service and Target Areas, the majority of target areas are located in Census Tracts _____ of Enid.

Resources available through Enid are almost 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 (see Table 1.1).

Table 1.1 Income Categories for Extremely Low, Very Low and Moderate-Income Families

FY 2013 Median Family Income* Income \$53,300.		
Extremely Low-Income	0-30%	\$16,000.
Very Low-Income	31-50%	\$26,650.
Moderately Low Income	51%-80%	\$42,650.

**Based on a family of four*

Source: U.S. Department of Housing and Urban Development, HUD Home Program Income Limits, PY 2013

II. Citizen Participation for the 2013-2017 Consolidated

The cornerstone for the development of the Year 2013-2017 Consolidated Plan for Enid was active citizen participation. Built on participation and cooperation, the Consolidated Plan is an expression of many voices: community leaders, educators, developers, nonprofit workers and government officials, and most importantly, the views of residents living in Enid’s low- income communities. The City of Enid Citizen Participation Plan, Section II, provides details about the processes of obtaining public opinions for the Year 2013-2017 Consolidated Plan and how they will be collected in the future.

The Citizen Participation Plan emphasizes the involvement of low- and moderate-income residents including non-English speaking persons, as well as persons with mobility, visual or hearing impairments. The Plan outlines the process through which the public can access general information, receive technical assistance, provide comments on critical issues, and receive timely responses to questions raised.

In 1994, the City Commission adopted a Citizen Participation Plan as required by HUD. In April 2006, the Commission adopted an updated plan providing citizens with information on how they can participate in the City’s CDBG Program. A summary of the Plan’s main topics follows:

- a. Standards for Participation: requires 1 neighborhood level meeting and 2 community-wide meetings.
- b. Access to Adequate and Timely Information: provides for full public access to records and information regarding all aspects of the CDBG Program.
- c. Public Hearings: requires at least 2 public hearings during each Program Year (one during the Consolidated Plan's development and one after publication) and a minimum 10 day advance notice publication and notice postings of public hearings.
- d. Non-English Speaking Residents: provides for accommodation of non-English speaking residents.
- e. Obtaining Citizen Views: provides a variety of methods for the submission of citizen comments; directly to the CDBG Department, at formal public hearings, by contacting representatives within project areas or any community-wide citizen organization.
- f. Consideration of Objection to Applications: requires the City to consider all citizen comments and views and publish written explanation of comments not accepted in the Consolidated Plan, encourages citizens objections to Plan approval to be directed to USHUD.
- g. Complaints: directs complainants to the CDBG Coordinator, requires the City to provide written responses within 15 working days, calls for the maintenance and annual review of complaints for the purpose of program improvements.
- h. Technical Assistance: provides for the provision of technical assistance to anyone requesting help in the development of proposals, applications and views.
- i. Publishing the Plan: requires the City to publish its Consolidated Plan prior to submission to USHUD for approval for the purpose of gathering public views and comments.
- j. Program Amendments: requires for reasonable advance notice and opportunity to comment on substantial changes to approved Consolidated Plans.
- k. Contingency and Local Option Activities: makes provision for unapproved Consolidated Plan activities.

To identify the nature and level of needs within Enid, a survey was developed and distributed for use as part of the citizen participation process for the consolidated plan. This broad based survey included questions related to Housing, Fair Housing, Social Services, Transportation, Senior and Youth Services, Parks, Public Facilities, Public Services, Infrastructure, Homelessness, and Education. It was developed to help identify the needs, goals, and objectives of the services needed in Enid. The use of one survey, instead of having additional versions for service providers, was supported by the additional consultation efforts with various service providers to better capture their needs and opinions. The opinions of Enid residents on problems that exist at the neighborhood level and their preferred methods of mitigating them are of utmost importance when drafting needs statements, goals, objectives, and strategies for building better communities. To this end, the survey was distributed to residents throughout the service area to residents, social service providers, homeless care providers, cooperative cities, developers and nonprofits.

The results of the meetings helped us identify prominent issues.

Issues

1. Housing

- Need for permanent housing programs for homeless and those in jeopardy of becoming homeless
- Homeless prevention programs to help with emergency repairs and architectural barrier removal
- High need for case management for homeless or homeless prevention
- Quality
 - Aging structures
 - Dilapidated structures causing nuisance
 - Unsafe & unsanitary rentals, need rental rehabilitation programs
- Quantity
 - Lack of housing causes quality issues as well as affordability issues
- Affordability
 - Supply and demand causes housing cost to rise
 - Quality of housing effected by demand

2. Jobs

- Lack of high paying jobs and means of improving quality of life
- More training and educational opportunities.

3. Infrastructure

- Improve aging infrastructure especially streets and parks
 - Shade structures at public areas and recreational facilities
 - Preserve and retain water (lake that could also be used for recreation)
 - Preserve the area's heritage while continuing to grow
 - Need to maintain safe, family friendly environment
 - Need pedestrian and bicycle routes, promote healthy lifestyles and safety features
 - More recreational facilities to accommodate the entire community
4. Transportation
- Need more public transportation options
 - Need more frequent and timely intervals to get to work on time
 - Added routes at specific times of day 7-9am and 4-6pm. Added routes to Advance Foods and Mid Continent Company and other leading employer facilities as well as Vo Tech and area colleges and schools.
 - Need curb to curb options, in timely manner
 - Safer stops to load and unload
 - More affordable rates and more programs that allow free or low services to elderly, frail, disabled and low income citizens
 - Need shelters at stops to protect citizens from elements and health risk involved in being exposed to such elements including skin cancer
5. Child Care
- Needs to be more affordable for private pay parents
 - Need more options
6. Health Care
- Affordability
 - Opportunity for free healthy lifestyles, including recreation; parks, trails etc.

Over 20 diverse stakeholders participated, including the following agencies:

Community Development Support Association (CDSA)
 Metropolitan Area Planning Commission
 Garfield County Health Department
 North Central Continuum of Care
 4RKids Foundation
 Progressive Missionary Baptist Church
 Leonardo's Discovery Warehouse Museum
 Hope Outreach Homeless Ministries
 Youth and Family Services
 Young Women's Christian Association (YWCA)

Southern Heights Heritage Center
Enid Public Transit Authority
Booker T. Washington Community Center
Sandbox Learning Center, Non Profit
Community Development Block Grant Funding Committee

The information obtained through this process was one of several primary considerations in the development of goals and objectives for each planning element described in the Strategic Plan section of the 2013-2017 Consolidated Plan.

Once the Plan draft was completed, the plan was made available to the public through the internet, and advertised in major publications including the Enid News and Eagle newspaper stating that the document was under review. During the following 30-day public review period, comments and suggestions were recorded and considered for addition and/or revision to the plan. In addition, two separate public hearing were held on November 29, 2012 and on December 3, 2012 in which Enid residents voiced their opinions on the Consolidated Plan and the 2013 Annual Action Plan. All comments recorded during the public review period and public hearing was then added to the Consolidated Plan (see Appendix D).

The Request for Proposal (RFP) Process

Annually, Enid is responsible for distributing its Community Development Block Grant (CDBG) funds through a competitive Request for Proposals (RFP) process. These funds are awarded by the U.S. Department of Housing and Urban Development (HUD) on a formula basis and are distributed to governmental entities and organizations that serve low-income residents within Enid's service area, as designated by HUD. These funds are granted to organizations that contribute programs or projects that improve the quality of life for low-income residents of Enid.

PY2013, the City of Enid received fifteen (15) proposals from ten (10) local non-profit agencies in response to the competitive RFP/Application process.. The total number of project seeking funding was seventeen (17), the other two (2) projects are the set aside obligation for the City's Section 108 Loan repayment and the costs for Administration of the program. Upon receipt of these proposals, the Funding Committee and staff reviewed the proposal, scored and ranked them according to the priority needs set forth by the City's 2008-2012 Consolidated Plan.

Proposal Evaluation Process:

Overview. The proposal evaluation process included the assistance of staff from Community Development, Grants Management and Strategic and Long Range Planning Departments.

The review process was divided into two phases, the initial eligibility review (Phase I) and the proposal review (Phase II). The purpose of Phase I is to determine initial eligibility based on HUD regulations for the CDBG programs.

Evaluation Activities. During Phase I of the review process, staff members reviewed all proposals assigned and determined eligibility based on the CDBG Eligibility regulations. Staff was available for one-on-one consultation and held a Training and Technical Assistance Workshop on December 11, 2012 to assist applicants with eligibility determination and proposal qualifications. The T/TA Workshop documents can be found in Appendix C.

Phase II evaluation consisted of a programmatic review of the projects by CDBG staff and the CDBG Funding Committee. The environmental and budget review is also done by CDBG staff. Following the completion of all reviews, CDBG staff members met during a funding conference to discuss evaluations and review each applicant's performance and work with legal counsel to prepare contracts for service.

Evaluation Factors

While evaluating the proposals for initial eligibility, staff used the following established evaluation factors and criteria. These criteria was included in the RFP and incorporated into the evaluation worksheets.

- Does the project meet at least one National Objective?
- Does this project address a Measurable Objective outlined in the PY2013-2017 City of Enid Consolidated Plan?
- Is this project located within the Enid service area and/or serve Enid service area residents?
- Does the organization have prior history with Enid entitlement funds? If so, how is its past performance?
- Did the proposed project fall within the category of explicitly ineligible activities?

Staff evaluated each proposal based upon these criteria, made recommendations accordingly and justified these recommendations in the roundtable discussions at the CDBG Funding Committee meeting held on March 13, 2013.

Findings

While evaluating the proposals, staff used established evaluation criteria. These criteria were included in the RFP/Application Instructions and incorporated into the evaluation worksheets. Each question on the objective review worksheets was assigned a point value. Scores were based on the following criteria:

- Priorities of the Consolidated Plan
- Completeness of proposal
- Diversity of funding base
- Availability of sources of funding for working capital
- Construction – work descriptions, plans, schedules and cost estimates (if applicable)
- Need and community impact
- Appropriate and measurable goals and objectives
- Marketing plans (if applicable)
- Program administration and operational expenses
- Organizational capacity
- Financial capacity
- Matching and/or Leveraging funds
- Duplication of services/products Geographic distribution of projects
- Funds available for allocation
- Past and current performance

CDBG 2013 FUNDING RECOMMENDATIONS

BASED ON ESTIMATED

ALLOCATION

ORGANIZATION	PROJECT/ACTIVITY	MATRIX	REQUESTED	STAFF
Section 108		ED	\$ 147,618.80	\$ 147,618.80
Administration		Admin	\$ 70,000.00	\$ 70,000.00
CDSA	Emergency Repairs	Housing	\$ 73,000.00	\$ 50,000.00
4RKids Foundation	Miracle League Field	PF	\$ 38,587.00	\$ 26,330.70
City of Enid Code Enforcement	Demolition	Clearance	\$ 50,000.00	\$ 25,000.00
CDSA	HOME Delivery	Housing	\$ 40,000.00	\$ 20,000.00
Sandbox Learning Center	HVAC/Electrical	PF	\$ 23,983.00	\$ 15,000.00
Booker T. Washington	After School	PS	\$ 30,000.00	\$ 15,000.00
Agnes House	HVAC/Roof/Windows	Pf	\$ 16,654.93	\$ 8,000.00
EPTA	Bus Pass	PS	\$ 20,000.00	\$ 8,000.00
Leonardo's Discovery Warehouse	Restroom Rehab	PF	\$ 100,000.00	\$ -
Leona Mitchell SHHC&IM	Neighborhood Cleanup	PF	\$ 50,000.00	\$ -
Sandbox Learning Center	Playground	PF	\$ 18,293.99	\$ -
EPTA	Bus Shelter	PF	\$ 55,650.00	\$ -
Progressive Missionary Baptist Church	Water line extension	PF	\$ 28,250.00	\$ -
Booker T. Washington	Summer	PS	\$ 5,000.00	\$ -
Booker T. Washington	Mentoring	PS	\$ 5,000.00	\$ -
Total Requested			\$ 772,037.72	

2013 ESTIMATED Allocation	\$ 384,949.50
Section 108 (minus)	\$ 147,618.80
Administration (minus)	\$ 70,000.00
Approximate total to distribute	\$ 167,330.70

Staff evaluated and scored each proposal based upon these criteria, made recommendations accordingly and justified these recommendations in the roundtable discussions.

Selection of Projects

Upon completion of the *Proposed Allocation Worksheet* and *Proposal Evaluation Summary*, the Director of Long Range and Strategic Planning met with the Community Development Block Grant Director to present the findings of the review process and the recommendations based on those reviews. The *Proposal Evaluation Summary* contains:

- A narrative outlining the activities throughout the RFP process and project selection;
- Proposed Allocation and Recommendation Worksheet
- Complete listings of project results with funding recommendation comments;
- Evaluation instruments used in the proposal review processes; and Summary of Enid projects.

The projects above will be assembled and included in the PY2013 Annual Action Plan. The development of the Annual Action Plan is managed by CDBG Staff and includes all proposed projects. The draft plans are available for public review and comments as of April 1, 2013. The final Public Hearing will be held on April 16, 2013 and the final document will be presented to the City Mayor and Commissioners for approval on May 7, 2013.

Implementation Activities

Once the recommended projects are submitted in the Annual Action Plan, conditionally awarded applicants begin the contract negotiation process. At that time revised budgets and statements of work are submitted and processed for contract drafting by the Grants Management section. The Consolidated Plan acts as a long-range guide for Enid activities. It evaluates issues and needs in Enid and provides an analysis of the housing conditions, homelessness population, and other community development issues. The strategic plan lists long-term goals of the department, as well as long-term objectives, which are a measurement of accomplishments.

Each year, the Request for Proposals (RFP) process gathers grant applications from organizations that seek funding for their community development programs and projects. Upon application review and selection, Enid describes the organizations selected to be subrecipients of funding, in the Annual Action Plan. At this point, the selected subrecipients become partners with the City of Enid in providing community development services to the Enid area.

Once funding has been distributed to subrecipients, Enid Grants Management provides technical assistance to the organizations to develop and manage projects so that, ultimately, their proposed accomplishments are met. Enid staff then monitors the projects throughout the year, providing assistance as needed.

At the conclusion of the program year, the performance of each subrecipient is analyzed and evaluated according to their original proposed accomplishments. A Consolidated Annual Performance and Evaluation Report (CAPER) is then drafted, which describes the expenditures of each project and evaluates the impact of the project on the targeted population.

Enid Community Development Block Grant Department

The program was authorized under Title I of the Housing and Community Development Act of 1974 to improve the quality of living conditions of low- and moderate-income residents by providing decent housing, a suitable living environment and expanding economic opportunities. The City of Enid Community Development Block Grant Department (CDBG) acting as the lead agency to U.S. Housing and Urban Development (HUD) in Enid is responsible for the development of the Consolidated Plan, the Annual Action Plan, and the Consolidated Annual Performance Evaluation Report (CAPER). The five-year strategic plan will begin July 1, 2013 and guide Enid's community development efforts until June 30, 2017. The Consolidated Plan will follow the format recommended by HUD ("Consolidated Submission for Community Planning and Development Programs," Federal Register, Vol. 60, No. 3) and its supplemental(s).

Finally, many of the statistics supporting needs, resources, strategies, goals, objectives and actions in the Consolidated Plan are based on the 2010 American Community Survey (ACS), 2000-2010 U.S. Census information, the 2005-2009 ACS Five Year CHAS data, and additional low-income information provided by the Department of Housing and Urban Development. Other resources included the North Central Oklahoma Continuum of Care Homeless Alliance, Community Development Support Association, Garfield County Health Department, Department of Human Services, Youth and Family Services, YWCA, Enid Vision 2025, Housing Needs Assessments and Market Studies, Community Needs Assessments, Oklahoma Employment Security Commission Labor Market Information, Claritas, Inc. as well as other data sources that become available throughout the process. These data sources continue to release new and updated information yearly. Enid will update the Consolidated Plan, as needed, throughout the five years.

Consolidated Plan Completeness

New Format

Prior to the Consolidated Plan Template, HUD did not require a specific format for the Consolidated Plan other than the required tables. The regulations indicate that a complete plan consists of information submitted in accordance with instructions prescribed by HUD or in such other format as jointly agreed upon by HUD and the jurisdiction. The Consolidated Plan Template in IDIS Online provides a uniform and flexible template that helps ensure the Consolidated Plan is complete per the regulations found in 24 CFR Part 91. The template is divided into seven sections:

1. Setup
2. Executive Summary
3. The Process
4. Needs Assessment
5. Housing Market Analysis
6. Strategic Plan
7. First-Year Action Plan

Each screen in the template includes a combination of data tables and narrative sections that set a baseline for HUD's expectations for the amount of information required. Grantees have the option of adding additional content, in the form of maps, pictures, text boxes, and tables, to support the baseline information. This allows grantees to customize the plan and add elements to tell a more compelling story.

City of Enid: Citizen Participation Plan

The U.S. Department of Housing and Urban Development (HUD) requires a five-year Consolidated Plan for Housing and Community Development. This process satisfies the minimum statutory requirements for four CPD formula programs (Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG) and Housing Opportunities for Persons with AIDS (HOPWA) with a single submission.

The statutes for the grant programs set forth three basic goals, which are closely related to HUD's major commitments and priorities. *Each of these goals must give maximum priority to the benefit of low and very-low income persons.*

- 1) Programs are to provide decent housing
- 2) Provide suitable living environment
- 3) Expand economic opportunities

The City of Enid Citizen Participation Plan outlines ways in which the citizens of Enid can participate in its CDBG, HOME, ESG and HOPWA programs. Its purpose is to encourage public participation in the planning process, as well as to meet the requirements of the U.S. Department of Housing and Urban Development.

The City of Enid Citizen Participation Plan is available for public review at any time. Copies of the plan may be obtained through the City of Enid CDBG Department or on the city's website (www.enid.org). This April 2006 Citizen Participation Plan amends the City of Enid's October 1994 Citizen Participation Plan to update the actions that the City of Enid's CDBG Department will take to encourage the participation of all residents.

I. STANDARDS FOR PARTICIPATION

With the City of Enid's population expected to exceed 50,000, it is required by Federal Regulations that the citizen participation process be provided at the community wide level as well as the neighborhood level in areas where a significant amount of activity is proposed or ongoing. These levels of participation shall meet the following standards:

There shall be involvement both at the (1) neighborhood level by scheduling meetings at times and places convenient to the residents of the neighborhood and at the (2) community-wide level through meetings to be held in the City Commission Chambers of the City of Enid, Administration Building, 401 W. Owen K. Garriott, in the program processes.

The Consolidated Plan is the planning document that outlines the partnerships between housing providers, human service agencies, neighborhoods and the business community for addressing specific community needs. The Consolidated Plan will document housing and community development needs and identify strategies to meet those needs in the City of Enid. There is a five year Consolidated Plan and a yearly

Annual Action Plan – these will both be referred to as the “Consolidated Plan” for the remainder of this document.

Citizens, non-profits and other interested parties are invited and encouraged to become involved throughout all stages of the CDBG program. Areas of involvement include:

1. Development of the Citizen Participation Plan
2. Development of the Consolidated Plan (5-yr plan and Annual Action Plan)
3. Assessment of Performance (Consolidated Annual Performance Evaluation Report – CAPER)

II. ACCESS TO ADEQUATE AND TIMELY INFORMATION

Citizens, public agencies, and other interested parties, including those most affected, will have the opportunity to receive information, review and submit comments on any proposed submission concerning the proposed activities, including the estimated amount proposed to benefit low to extremely low-income residents.

All areas of citizen participation shall be conducted in an open manner with freedom of access to all interested persons, non-profit organizations and other interested parties.

Citizens shall be provided adequate and timely information, so as to enable them to be meaningfully involved in important decisions at various stages of the programs. Information may include but is not limited to federal regulations and other issues to have an understanding of the programs.

The City of Enid will provide full public access to program records and information, particularly to those of low and moderate income and to those residing in lower-income and blighted neighborhoods. Such disclosures will be consistent with the laws regarding personal privacy and obligations of confidentiality. Any such request for access to records should be made so in writing to the City of Enid, CDBG Department, P.O. Box 1768; Enid, OK 73702. The telephone number is (580) 234-0400. The City of Enid may charge reasonable fees for the duplication and provision of material. Documents relevant to the program shall also be made available for review at the City

of Enid Office of Community Development during the hours of 8 a.m. to 5 p.m. Monday through Friday. Such documents include:

1. The total amount of grant funds (CDBG and others received) planned to be available for eligible activities including planning and administration,
2. The range of activities that may be undertaken with the funds and the kinds of activities that have been previously funded in the City of Enid.
3. The process that is to be followed in preparing and approving the Consolidated Plan and the proposed schedule of meetings and hearings,
4. All mailings and promotional material,
5. Record of hearings and CDBG Funding Committee meetings,
6. All key documents, including all prior applications, letters of approval, grant agreements, the citizen participation plan, performance reports, evaluation reports, and other reports required by HUD,
7. Documents regarding other important program requirements, such as contracting procedures, environmental review policies, fair housing and other equal opportunity requirements and relocation provisions, and
8. Average scores by CDBG Funding Committee for each funding request (CDBG application) and once approved the minutes from the meeting in which the funding recommendations were determined.

Additionally, copies of the Citizen Participation Plan, Consolidated Plan, Annual Action Plan and the Annual Performance Report will be made available at locations convenient to persons affected by the program and to handicapped persons:

- Community Development Support Association (CDSA)
- Booker T. Washington Community Center (BTW)
- Southern Heights Community Organization (SHCO)
- Enid Public Library
- Carver Educational Center
- City of Enid website: www.enid.org/cdbg.htm.

The current Citizen Participation Plan and Annual Action Plan will be available on the City of Enid website at www.enid.org.

III. PUBLIC HEARINGS

The City of Enid shall conduct public hearings to obtain views of citizens, particularly those persons affected by the programs, i.e., low and very low income persons, and those residents of blighted neighborhoods, public agencies and to hear interested

parties to respond to proposals and comment at all stages of the Consolidated Plan submission process. Topics of interest at the public hearings will include but not be limited to: 1.) identifying housing and community development needs, 2.) reviewing proposed uses of funds and, 3.) reviewing previous program performance.

The City of Enid will hold at least two public hearings during each program year cycle, with one held before the proposed consolidated plan is published for comment and at least one after the proposed plan is available for review. The hearings will be held in the City Commission Chambers located at the Dr. Martin Luther King, Jr. Municipal Complex, 401 W. Owen K. Garriott on a day selected in the normal workweek. At least one of these hearings will be held during a regularly scheduled City Commission meeting, which are held on the 1st and 3rd Tuesday of each month at 6:30 p.m.

Notices of the hearings will be published in the non-legal section of the Enid News and Eagle Newspaper at least ten (10) calendar days prior to each hearing. The notices will also be sent to the following local public service agencies for posting:

- Community Development Support Association (CDSA)
- Booker T. Washington Community Center (BTW)
- Southern Heights Community Organization (SHCO)
- Enid Public Library
- Carver Educational Center
- City of Enid website: www.enid.org/cdbg.htm

Additionally, local radio stations and the Public Education Government Access System (PEGASYS) will be provided news releases to aid in informing the public. Accessibility to the handicapped will be provided at the location of each public hearing.

IV. NON-ENGLISH SPEAKING RESIDENTS

In the event that a significant number of non-English speaking resident can reasonably be expected to participate, the City of Enid will provide accommodations for non-English speaking residents in the case of public hearings.

V. OBTAINING CITIZEN VIEWS

The City of Enid encourages all citizens; particularly those persons affected by the programs, i.e., low- and moderate-income persons, and those residents of blighted neighborhoods, to submit their views and proposals concerning the programs.

Citizens may submit their views and proposals in one of the following manners:

1. Contact the CDBG Department located in the Dr. Martin Luther King, Jr. Municipal Complex, 401 W. Owen K. Garriott Road any time throughout the program. However, to be truly meaningful, such input is encouraged at the earliest possible stage of planning before decisions are made through the public hearing process.
2. During formal public hearings (see section on public hearings).
3. Contact a representative of a project area or any community-wide citizen organization (i.e., SHCO, CDSA).
4. Contact the City Commissioner representing your Ward.
5. At neighborhood meetings or any other meeting that is held in conjunction with the program(s).

Once a proposal is received regarding any phase of the programs, the appropriate City department will respond. Written proposals will receive a written response stating the reasons the action was taken, regardless of whether the action is positive or negative. An oral request requires only an oral response, but in some cases a written response may be offered. Most oral proposals can and will be responded to during the hearings. Every effort will be made to respond to views and proposals prior to the final hearing where practicable or within fifteen (15) working days of receipt.

VI. CONSIDERATION OF OBJECTIONS TO APPLICATIONS

Citizens, particularly those persons affected by the programs, i.e., low- and very-low income persons, and those residents of blighted neighborhoods, public agencies and other interested parties will be given a period of not less than 30 calendar days, prior to the submission of the consolidated plan to comment. The City of Enid will consider the views of all citizens, public agencies, and other interested parties in preparing the final Consolidated Plan and attach a summary of such comments to the final submission. The summary of citizen comments will include a written explanation of comments not accepted and the reasons these comments were not accepted.

Any person wishing to object to the approval of the Consolidated Plan is encouraged to do so in writing to the appropriate HUD Area Office. HUD will consider objections made on the following terms:

1. The stated needs and objectives are inconsistent with available facts and data.
2. Activities scheduled to be undertaken are inappropriate in meeting the needs and objectives the City has identified.
3. The Consolidated Plan does not comply with the overall requirements of citizen participation.
4. The City proposes ineligible program activities.

HUD will consider objections anytime during the duration of the program. However, objections should, if possible, be submitted within 30 days of the Notice of Publication that the application has been submitted to HUD. Objections may be sent to:

U.S. Department of Housing and Urban Development
Community Planning and Development
301 NW 6th Street, Suite 200
Oklahoma City, OK 73102-2807

VII. COMPLAINTS

Complaints regarding program activities affected by the Consolidated Plan may be directed to the City of Enid, CDBG Coordinator, located on the second floor of the City Administrative Building, 401 W. Owen K. Garriott, (580) 234-0400.

Basic information will be recorded including: the date, name, address, and telephone number of the complainant, convenient hour to be contacted, and nature of the complaint. Records will also be maintained regarding: whom the complaint was referred, a due date for response and the ultimate disposition.

Every reasonable effort will be made to provide a written response to all written complaints received concerning the program within fifteen (15) working days. When it appears that it will take longer than fifteen (15) working days to produce a suitable response, an interim oral response will be made to assure the complainant that their complaint has been received and a response is forthcoming.

The complaint log will be reviewed annually to determine the number and types of complaints. This analysis will provide an opportunity for overall program improvements and corrective actions.

Any person who feels they have received an unsatisfactory response or otherwise remains dissatisfied, may direct the complaint to:

U.S. Department of Housing and Urban Development
Community Planning and Development
301 NW 6th Street, Suite 200
Oklahoma City, OK 73102-2807

VIII. TECHNICAL ASSISTANCE

To further citizen participation, particularly from those persons affected by the programs, i.e., low and very-low income persons, and those residents of blighted neighborhoods, the City of Enid will provide technical assistance to groups and individuals requesting assistance in the development of proposals (applications) and views. Technical assistance shall be provided to:

- (a) Citizen organizations, so they may adequately participate in planning, implementing and assessing program performance.
- (b) Groups and individuals of low- and moderate-income as well as groups and individual residents of blighted neighborhoods.
- (c) Citizens that are organizing and operating activities directed toward the accomplishment of one of the community development goals and objectives.

Such assistance will include at least one annual applicant workshop where staff will provide information and assistance on funding applications. Additional technical assistance will be available by individual appointments with CDBG staff.

IX. PUBLISHING THE PLAN

To assure that all affected citizens have sufficient opportunity to review and provide comment, the City of Enid will publish, prior to its submission, a summary of the proposed Consolidated Plan in a non-legal section of the Enid News and Eagle newspaper. The summary will list the activities that were awarded funding as well as the amount of funding awarded. The summary will also include a list of the locations where a copy of the entire plan may be examined. A copy of the proposed plan will be available for review at:

- Community Development Department (City of Enid Admin Building)
- Community Development Support Association (CDSA)
- Booker T. Washington Community Center (BTW)
- Southern Heights Community Organization (SHCO)
- Enid Public Library
- Carver Educational Center
- City of Enid's website: www.enid.org/cdbg.htm

The City of Enid will provide notice regarding HUD's response (approval or disapproval) of the Consolidated Plan through a notice in the Enid News and Eagle newspaper.

X. PROGRAM AMENDMENTS

Prior to the submission to HUD of a ¹substantial change in the use of funds proposed in the program activities, the City of Enid will provide reasonable notice of, and opportunity to comment on, the proposed change. If HUD approval is needed prior to

¹ Substantial Change - (a) Change in Purpose- if an activity changes with respect to the objectives as originally described in the Consolidated Plan; (b) Change in Scope – if the scale and/or nature of the activity changes to the extent that there is a significant increase or decrease in program funds expended, or if changes/revisions within the original budget allocation exceed the greater of \$20,000 or 25% of the original budget for all projects approved within the Annual Action Plan; (c) Change in Location – if the originally approved project is neighborhood specific and the project location is changed to an area outside of its census tract; and (d) Change in Beneficiaries – if the percentage of low-income persons receiving service/assistance decreases 25% or more.

adopting the amendment, the City of Enid shall hold a public hearing concerning the adjustment. The public hearing will follow the guidelines established herein.

XI. CONTINGENCY AND LOCAL OPTION ACTIVITIES

Should any of the activities in the Consolidated Plan received disapproval from HUD, funds may be set aside by the City of Enid for any unforeseen contingencies. Activities that will replace those that have been disapproved are required to be selected through the same citizen participation process as stated herein.

The City conducted one stakeholder meeting and two formal public hearings in the development of the Consolidated Plan. The stakeholder meeting targeted a cross section of community-based. Formal public hearings were widely advertised. All published notices invited interested parties to submit written comments directly to the CDBG Coordinator.

Prior to opening the meeting to public comments, attendees received background information regarding the meeting’s purpose, national Program objectives and the City’s general anticipated uses. The City has a Section 108 loan guarantee until 2019 for approximately \$150,000.00 and intends to set-aside \$70,000.00 of the CDBG allocation for administration. Attendees were invited to suggest priority needs for the next 5 years across key areas including community development, economic development and housing.

On April 5, 2013, the Draft Consolidated Plan for 2013 through 2017 was published for public comment. Additional public comments were accepted at the April 17, 2013 City Commission meeting during the public hearing and again on May 7, 2013 where the final Plan will be presented. City Commission Persons, the Mayor, City Manager, CDBG Funding Committee Members and City staff will be in attendance.

A chronology of meetings and public hearings conducted as part of the Consolidated Plan follows.

November 8, 2012 Community Needs Assessment	Stakeholders Meeting
November 29, 2012 Community Needs Assessment	1 st Public Hearing
December 3, 2012 Annual Action Plan	2 nd Public Hearing

February 12, 2013 Community Input of Year One Activities and Projects	3 rd Public Hearing
April 16, 2013 Community Input of Year One Activities and Projects	4 th Public Hearing

Community residents and organizations comments clustered into the following CDBG categories:

- Public facilities and improvements
- Code Enforcement
- Clean up and demolition
- Public Services
- Nonprofit Capacity Building
- Rehabilitation commercial/industrial and housing
- Affordable housing- new construction, homebuyer, rental, and homeless

Specific comments from each meeting are included in the appendix.

In addition to conducting local focus groups and holding multiple public hearings, Enid broadens public participation by accepting citizen and other interested parties’ comments throughout the year. At least two public hearings are held in conjunction with City Commission meetings, which typically results in drawing approximately 30-40 attendees per meeting.

Public hearings are publicized in the Enid News and Eagle, Shoppers Edge, on PEGASYS (Enid’s local community access cable channel), on two local radio stations, Press Releases issued by the City of Enid Public Relations Office, posted throughout the City Administration Building and on the City of Enid calendar located on the City’s internet website.

Enid also invites the participation of a variety of social service organizations that serve children, elderly, disabled, homeless and persons with HIV/AIDS including:

- _ Community Development Support Association
- _ Booker T. Washington Community Center
- _ YMCA
- _ Southern Height Community Center
- _ YWCA
- _ Salvation Army
- _ Department of Human Services

- _ Garfield Co. Child Advocacy Center
- _ Our Daily Bread
- _ Hope Outreach
- _ Christmas in Action
- _ Northern Oklahoma Development Authority
- _ Youth and Family Services

III. Enid’s 5-year Strategic Plan Goals, Objectives, Activities and Outcomes

From 2013 to 2017, Enid intends to invest the majority of CDBG funds on a citywide basis to activities demonstrating significant leveraging of limited CDBG resources while benefiting low to moderate-income persons both directly and through community growth. [Leveraging is defined as increasing the impact of CDBG assistance by combining grant funds with other resources such as public, private, foundation funding, and/or quantifiable in-kind resources such as volunteer labor, land, equipment, etc.]

In order to aggregate results across the broad spectrum of programs funded by CDBG, the city adopted HUD’s program goals, objectives, activities and outcome categories. Priorities are identified as High-Needs addressed with CDBG and/or leveraging other funds; Medium- If funds are available, these needs will be addressed; and; Low-Needed but not pursued by the City. Enid will consider certifications of consistency for other federal application assistance.

Chart

I. GOAL...		
<i>Development of a viable urban community.</i>		
II. OBJECTIVES...		
Suitable Living Environment	Decent Housing	Expanded Economic Opportunities
III. ACTIVITIES...		
▶ Clearance and Demolition Medium	▶ Removal of Architectural Barriers High	▶ Planned Repayment of Section 108 Loan Principal High
▶ Code Enforcement	▶ Rehabilitation of existing	

<p>Medium</p> <ul style="list-style-type: none"> ▶ *Planning High ▶ *General Program Administration High 	<p>owner units including emergency repairs High</p> <ul style="list-style-type: none"> ▶ Production of new rental units High ▶ Rehabilitation of existing rental units High ▶ Production of new owner units High ▶ Construction of housing Medium 	<ul style="list-style-type: none"> ▶ Transportation High ▶ Employment Training to develop community workforce Medium ▶ Micro-Enterprise Assistance Low
<ul style="list-style-type: none"> ▶ **Public Services Medium ▶ Public Facilities and Improvements Medium 		
<ul style="list-style-type: none"> ▶ Residential Historic Preservation Low 		
IV. OUTCOMES...		
<ul style="list-style-type: none"> ▶ SL-1 Availability/Accessibility of Suitable Living Environment ▶ SL-2 Affordability of Suitable Living Environment ▶ SL-3 Sustainability of Suitable Living Environment 	<ul style="list-style-type: none"> ▶ DH-1 Availability/Accessibility of Decent Housing ▶ DH-2 Affordability of Decent Housing ▶ DH-3 Sustainability of Decent Housing 	<ul style="list-style-type: none"> ▶ EO-1 Availability/Accessibility of Economic Opportunity ▶ EO-2 Affordability of Economic Opportunity ▶ EO-3 Sustainability of Economic Opportunity

*Per §570.205 and 206, General Program Administration and Planning costs are subject to a statutory limitation that not more than 20% of grant funds plus program income may be used.

**Per §570.201 CDBG public service assistance is subject to a statutory limitation that not more than 15% of grant funds may be used and it must either be a new service or services that demonstrate a quantifiable increase in the level of existing services above those provided by or on behalf of the city.

ANTICIPATED 2013 ALLOCATION & DISTRIBUTION
 CDBG Allocation \$384,950.00
 Section 108 Loan Repayment \$150,000.00

IV. Profile

V. Program Year 2013-2017 Consolidated Plan Strategic Plan

Mission:

The City of Enid's mission is to provide a clean, safe community with an abundance of meaningful public resources including Fire, Police, Utilities, Parks, and Infrastructure Maintenance presented with excellent public service in a friendly, reliable manner to foster enjoyment of Enid's great quality of life.

The Strategic Plan introduces an analysis of current conditions within each community development topic. It then gives an analysis of specific needs within Enid Oklahoma as they relate to each topic. The needs analysis is then followed by Enid's goals and measurable objectives which will be used as a guide for accomplishments over the next five planning years.

The Strategic Plan is organized according to the following community development topics:

- Housing
- Homelessness
- Non-Housing Community Development
- Public Facilities
- Public Services
- Infrastructure
- Economic Development, Education and Workforce Development
- Other Non-Housing Community Development
- Anti-Poverty Strategy
- Intergovernmental Coordination and Partnerships
- Monitoring Plan

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.

Enid, located in the north central part of the state within Garfield County, is the second largest city in the northern portion of the state. The city is an urban community of 75.43 square miles with approximately 21,255 housing units and 247.72 persons per square mile.

The city, easily accessible by State Highway 412 to Interstate 35, is a major national transportation artery contiguous to the state's largest metropolitan community, Oklahoma City. The community's proximity to the major state and national highways systems allow residents

and businesses immediate access to all other parts of Oklahoma, surrounding states, nation, Canada, Mexico and South America. The city's commuting pattern shows a 4.5% increase in day time population indicating more workers enter the city to work than leave it for employment in outlying areas and other cities.

Enid compares well to the state as a whole across several demographic and economic measures.

- Median household income is relatively equal to the statewide median at \$38,056 vs. \$38,770 respectively.

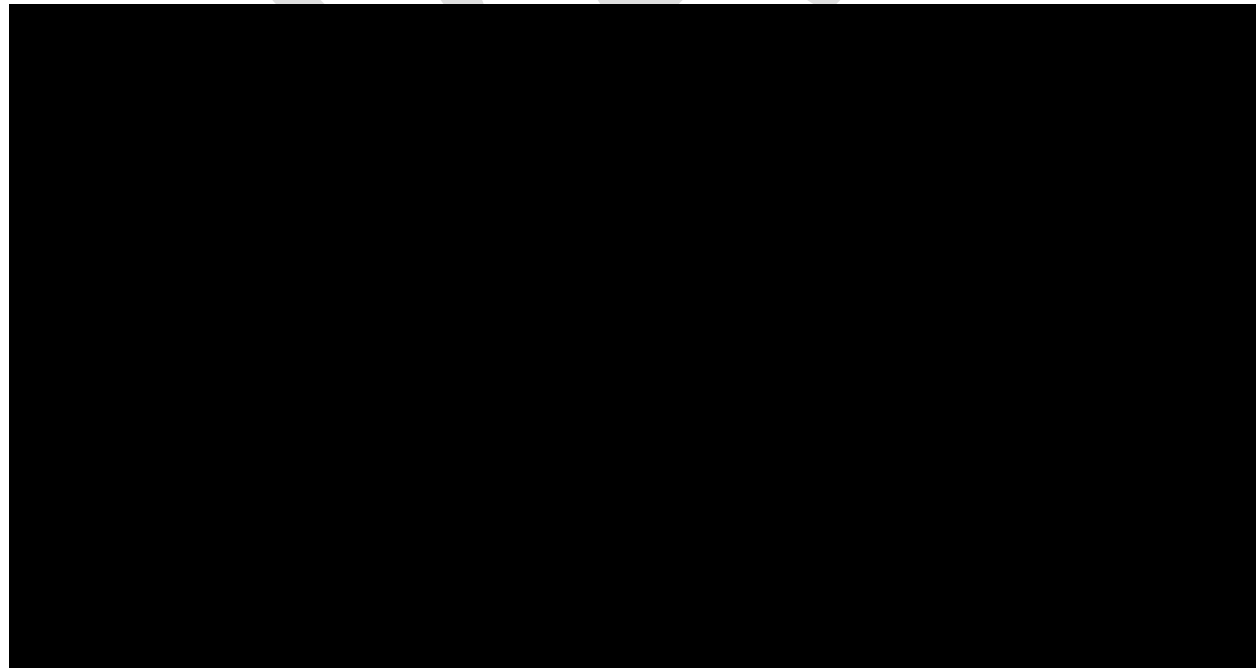
- Per capita income is relatively the same as the statewide per capita income; \$20,596 (Enid) vs. \$20,935 (state).

- Education attainment measures favorably compared to the state as a whole with 89.3% of the city's adult population possessing a high school diploma or higher vs. 84.3% for the state and 28.2% of the city's adult population possess a Bachelor's degree or higher vs. 22.1% for state.

- Has a lower poverty rate among families at 8.1% while the state is 12.8%.

- Unemployment data for Garfield County, the smallest geography for which unemployment data is provided by the Federal and State governments was 3.3% during August 2007 while the state's unemployment rate was 4.2 according to the Oklahoma Employment Security Commission.

According to US HUD's 2000 Census income data for the community there are 10 Census Tracts (these are not numbered contiguously) and 45 Block Groups within the city. In CT 11, Block 2 the city has about 1.5 acres which is Chisholm High School.



Of the 45 Census Block Groups, 40 are composed of households where greater than 20% are consider to be low and moderate income. Only Census Tract 0010.00 Block Groups 2 and 3 and

Census Tract 0013.00 Block Groups 1, 2 and 4 are composed of 20% or less low and moderate income households. This high percentage of low and moderate income households appears to correlate with the high percentage of households earning under \$35,000 a year at approximately 44% and the percentage of service industry, sales and office jobs (approximately 45%) typically associated with lower pay ranges.

The 2010 Census shows Enid’s total population was approximately 49,379 persons. Racially, the City is predominantly Caucasian at approximately 81.6% (40,300 persons). Approximately 10% (5,066 persons) are Hispanic or Latino, approximately 4% (1,768 persons) are Black, approximately 2% (1,144 persons) are American Indian, approximately 1% (531 persons) are Asian, approximately 2% (1,082 compared to 2000 Census data there were 237 Pacific Islander persons) are Native Hawaiian or Pacific Islander and approximately 5% some other race alone and 4% reported to be two or more races. It is noteworthy these percentages do not total 100% due to rounding. Considering the racial composition of the City as a whole, there are some areas that might be considered “minority concentrations”. One area particularly noteworthy is CT7 BGs1 through 5 where there is a concentration of Hispanic/Latino populations. Block Groups where minority percentages are at least two times their percentage for the city as whole are highlighted in the following table.

Census Tract & Block Group	Hispanic/Latino	Black	American Indian	Asian	Native Hawaiian/Pacific Islander
% Total Pop	5%	4%	2%	1%	1%
CT2/BG1			6%		
CT5/BG1		10%			
CT6/BG2		12%	6%		
CT6/BG3		8%			
CT7/BG1	12%		4%		8%
CT7/BG2	15%				
CT7/BG3	10%				
CT7/BG4	11%				
CT7/BG5	13%				
CT7/BG6			4%		

CT14/BG1			5%		
CT14/BG3			5%		
CT14/BG5		9%	4%		
CT14/BG6				7%	
CT1/BG4		8%			

Note: The data presented above was obtained from three sources, the U.S. Census Bureau, Clairitas, Inc. (a nationwide private sector demographics provider) and the Oklahoma Employment Security Commission. On a measure by measure basis, where available, 2007 estimates were used.

One Census Tract, CT 0007.00, is a Qualified Census Tract (QCT); an area designated by the Secretary of Housing and Urban Development in which 50% or more of the households have an income which is less than 60% of the area median gross income or has a poverty rate of at least 25%. This QCT designation holds special value in terms of the Internal Revenue Service’s Section 42 Low Income Housing Tax Credit Program. Under this program, rental developments located within QCTs are entitled to a 30% increase in eligible basis resulting in additional development equity under the Program’s regulations. Oklahoma’s Tax Credit allocating agency, the Oklahoma Housing Finance Agency, awards additional points to QCT rental development proposals under its competitive funding system.

Enid plans to make CDBG funds available on a citywide basis with project eligibility determined on a case-by-case, activity-by-activity basis. However, should geographic targeting of resources become necessary due to unforeseen needs or opportunities, the specific geography (ies) will be publicized and qualified under one or more of the three CDBG national objectives.

Assignments of Priorities for the Consolidated Plan are based on consideration of citizen input; data generated by the Housing Needs Analysis; input from social service agencies, health and educational providers; City Commission; and funding availability. Using the US Department of Housing and Urban Development’s priority needs categories, individual priorities are assigned as follows:

- ✚ High Priority-Activities to address this unmet need will be funded by the locality with federal funds, either alone or in conjunction with the investment of other public or private funds.
- ✚ Medium Priority-If funds are available, activities to address this unmet need may be funded by the locality with federal funds, either alone or in conjunction with the investment of other public or private funds.
- ✚ Low Priority-Needed but not pursued by the city. Will consider certifications of consistency for other entities’ applications for federal assistance.

3) The city’s primary obstacle to meeting underserved needs is limited CDBG funding availability in relation to project needs, demands and staffing. Available funds are divided among competing needs in

affordable housing, community development, supportive public services and economic development. Additionally, all funded activities are labor intensive, and governed by numerous federal regulatory requirements that require constant staff oversight and monitoring. Enid does not receive a direct allocation of funds from USHUD's other formula driven entitlement Programs (HOME, ESG and HOPWA).

Other obstacles include:

- The dependence of social service organizations on CDBG funding coupled with the complexity and costs associated with their pursuit of outside city resources
- A significant change in the State HOME Participating Jurisdiction's (PJ) funding methodology associated with the award of housing rehabilitation funds. Under the State PJ's system, HOME rehabilitation is awarded using a chance lottery drawing that does not consider local housing needs or demand resulting in the City's loss of access to what had been otherwise dependable funding based on the merit of City's housing needs.
- Substantial shortage of skilled workers for local employers

Basis for Assigning Priorities

City of Enid funding priorities are determined by analyses of need in the community. Priorities are largely determined by the severity of unmet needs. For instance, affordable housing priorities that were considered a high need level, were based upon the large number of extremely low-income (less than 30% MFI) households, and combined with the considerable housing affordability deficit for those families.

Funds made available to the City of Enid will be used to address the needs shown in the Continuum of Care Homelessness Gaps Analysis, Housing Needs, Non-Homeless, and Community Needs tables. Each identified area of need is prioritized relative to other needs within each category. Priorities for community needs were assigned according to research, survey results from local governments and citizen participation. A high priority indicates that City of Enid will expend HUD entitlement funds on that particular activity. A medium priority indicates that additional funds will be expended if available, and HUD entitlement funds may be spent.

Obstacles to Meeting Underserved Needs

In the attempt to meet the needs of Enid's low-income population, many obstacles exist. Socio-economic issues such as:

- physical or mental health problems,
- lack of affordable child care,
- poor credit history,
- low educational attainment,
- lack of or under-employment, and
- lack of transportation to service locations or employment centers

These socio-economic issues may regularly put opportunities out of reach for disadvantaged persons. Many times, if an individual or family has more than one of these problems, these barriers can compound on each other, causing a seemingly impossible situation in which quality of life improvements are unlikely.

Lack of public awareness of available programs is a major obstacle to community development efforts. In an effort to increase public awareness, the City of Enid makes information on community development services available to persons upon request, Request for Proposals (RFP) meetings, and professional consultation workshops. In addition, all public notices, press releases, and invitation letters are complete with City of Enid CDBG contact information. Public awareness is also addressed at the subrecipient level by individual City of Enid affiliated service providers.

Another major obstacle of many non-profit service providers is capacity building, or the ability to bring the organization to the point of being fully staffed and functional. This may be very difficult for organizations that begin with little or no resources, other than CDBG funding. In addition, the CDBG staff closely scrutinizes and tracks the sub-recipient's stated match and leveraging sources and proposed budget.

Personal issues of the disadvantaged often become obstacles to community development efforts, in addition to the logistical difficulties of service providers. After years of poverty and low quality of life, disadvantaged persons may tend to become apathetic and believe that their living or working situation will never change. These feelings may cause a lack of motivation and willingness to seek out a better life, resulting in a major obstacle to serving the financially disadvantaged. When combined with substance abuse or a physical or mental disability, feelings of helplessness and lack of motivation may make the journey to self-sufficiency or the transition to permanent housing seem impossible.

Compliance with Federal, State and Local Regulations

Projects using Community Development Block Grant (CDBG), funds will conform to HUD regulations and where applicable state and local codes. City of Enid and/or its subrecipients will maintain policies and procedures, operating guides/manuals, standards, and records as required by HUD. These documents include but are not limited to: Site and Neighborhood Standards, policies and procedures for affordability and recapture, citizenship policy, Multi-unit Housing Concentration Policy, property and building standards, direct homeownership and rehabilitation assistance operating manuals, eligibility guides, and grievance procedures.

PAST PERFORMANCE

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.

Enid's Consolidated Plan for 2002-2007 outlined 40 priority needs (high, medium, and low). A self-evaluation found that overall 77% of the needs outlined were accomplished. Of the 16 identified high priority needs the City achieved 100%.



The Plan included designating the Southern Heights/East Park neighborhood as a Neighborhood Revitalization Strategy area. During the NRSA designation period, the city increased annual CDBG funding to 41% of its allocation. Over an 11-year period, the city invested approximately \$1,675,346 of CDBG funds in the area. Accomplishments include NRSA cleanup projects, facility improvements to the Booker T. Washington Center, establishment of

Phillips Southern Heights Park, summer youth programs, sidewalk repairs, emergency repairs, owner-occupied rehabilitation, homebuyer education, design and construction of a landmark gateway, and support of numerous micro enterprises. To carry forward the momentum gained, CDBG funding was provided for stakeholder development training and the Southern Heights Community Organization received a CDBG capacity building grant to complete a strategic plan to provide concrete steps to continue to revitalize the area once the designation expires in 2008.



The wider community shares many of the NRSA's community development needs. 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.

HUD performed an on-site review of the CDBG Departments' compliance with Federal Labor Standards in June 2005. They stated, "The city's CDBG department



did an excellent job administering and enforcing labor standard requirements”. HUD’s remote performance assessment conducted in September 2005 confirmed activities were eligible, cited 100% benefit for low and moderate-income persons exemplary, and commended staff for diligence in program implementation.

Managing the Process

The CDBG Department of the City of Enid is the lead agency responsible for development and administration of programs and activities of the Consolidated Plan. A CDBG Funding Committee composed of representatives from higher education, adult education, oil industry, elder care assisted living and city commission reviews and makes final recommendations for funding for City Commission’s approval. City Commission serves as the determining body in matters related to the consolidated plan.

Two on-going major partners that assist in the City’s development efforts are:

Community Development Support Association, Inc. (CDSA) a private, non-profit community action agency. The agency mission is to work with others to identify needs, secure resources, and deliver services that improve lives in our communities. CDSA receives funding from approximately forty different funding sources. The agency passes through some funding to other non-profits in the community. CDSA staff members provide services to the Enid Metropolitan Area Human Service Commission and its subcommittees including the Emergency Assistance Task Force, Youth Opportunity Task Force, and the Housing Council. CDSA provides planning and direct services through the following programs:

- [Child Care Finders](#)
- [Enid Supported Employment Program \(ESEP\)](#)
- [HELPLine](#)
- [Hispanic HELPLine](#)
- [Housing](#)
- [Housing Counseling](#)
- [Parents As Teachers \(PAT\)](#)
- [RX for Oklahoma](#)
- [Smart Start](#)
- [Workforce Investment Act \(WIA\) Adult and Dislocated Worker Program](#)
- [Workforce Investment Act \(WIA\) Youth Program](#)

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Northern Oklahoma College, a two-year higher education institution. Supported by a Section 108 loan, the College significantly affects the city’s economy through enrollment, operating and capital expenditures, and, allowing nonprofits to use the campus free of charge occasionally.

CONSOLIDATED PLAN PROCESS TIMELINE:	
October-November 2012	Begin Preparation of Consolidated Plan
November 8, 2012	*CDBG Funding Committee Meeting: Election and Application/Score Sheet Approval
November 8, 2012	Stakeholder Needs Assessment
November 29, 2012	*1 st Public Hearing: Community Needs Public Hearings
December 3, 2012	*2 nd Public Hearing :Annual Action Plan – Applications become available
December 11, 2012	Technical Assistance Workshop for Applicants
December 6, 2012- February 1, 2013	CDBG Staff available for technical assistance/questions
February 1, 2013	Grant Applications are due by 2:00 p.m.
February 12, 2013	*3 rd Public Hearing, Groups A Oral Presentations from Grant Applicants
February 13, 2013	*3 rd Public Hearing, Groups B Oral Presentations from Grant Applicants
February 15, 2013	Funding Committee rank/score sheets due to CDBG office by 2:00 pm
March 4, 2013	*CDBG Funding Committee Meeting:2013 Funding Recommendations
March 19, 2013 (or earlier)	Notice of Availability of Proposed FY13 Draft Consolidated Plan and Annual Action Plan available for 30-day comment period
April 16, 2013	*4 th /Final Public Hearing at City Commission meeting. Funding Committee presents funding recommendations to Mayor &

	Commissioners
May 7, 2013	City Commission approves grant recommendations
April 18, 2013	Notice of Availability of Final Consolidated Plan and 2013 Annual Action Plan
May 15, 2013	2013-2017 Consolidated Plan & 2013 Annual Action Plan due to HUD
June-September 2013	HUD review of ConPlan & Action Plan. Environmental Review process.
October 2013	Contracts signed and executed by Mayor
November-December 2013	Funds released and Notices to Proceed are issued.

November 8, 2012, at the Cherokee Strip Conference Center the City of Enid convened a stakeholder meeting targeting a cross section of community-based organizations. Seven (7) participants represented Community Support Development Association (housing, social service, homeless, anti-poverty nonprofit agency), Garfield County Health Department, Metropolitan Area Planning Commission, Young Women’s Christian Association (YWCA), Community Development Block Grant Funding Committee, 4RKid’s Foundation, Enid Public Transit Authority and City of Enid staff.

November 29, 2012, the City of Enid held a formal public hearing in the Enid City Council Chamber to provide the public opportunity to participate in the needs assessment phase of the plan and in planning the 2013-2017 strategies. Public hearings are open to all citizens and interested parties throughout the city. There were twenty-four total in attendance. Twenty two (22) members of the community attended the meeting along with two (2) city staff members to facilitate the discussion. Sign-up list is located in the appendix.

December 3, 2012, held another formal public hearing. Attendees included seven (7) residents and one (1) city staff. Sign-up list is located in the appendix.

November 2012-February 2013, consulted with agencies and /or department personnel for data on specific population (Homeless and HOPWA), housing, social services, health, employment,

and education. Contacted state/local health and child welfare agencies to address lead based paint.

April 2013, draft Consolidated Plan available for 30-day comment period. As required by 24 CFR 91.100(a)(4) the State Department of Commerce and Garfield County Commissioners received a copy of this plan.

April 16, 2013, conduct final public hearing

May 7, 2013, present final draft of Five Year Consolidated Plan and First Year Annual Action Plan for approval to the Mayor and City Commissioners.

May 15, 2013, submit final Five Year Plan and First Year Action Plan to the Department of Housing and Urban Development for approval.

Copies of the Consolidated Plan, Citizen Participation Plan, Annual Action Plan and Annual Performance Report are available at locations convenient to persons affected by the program and to persons with disabilities. These locations are

A: Community Development Support: 114 S Independence, Enid, OK 73701, 580-242-6131

B: Booker T Washington Community Center: 800 S 5th St, Enid, OK 73701, (580)233-9836

C: Southern Heights Community: 451 E State Ave, Enid, OK 73701, (580)234-8773

D: Enid Public Library: 120 W Maine Ave, Enid, OK 73701, (580)234-6313

E: Carver Educational Center: 815 S 5th St, Enid, OK 73701, (580)234-3479

F: Enid Administrative Offices: 401 W Owen K Garriott Rd, Enid, OK 73701, (580)234-0400 Extension 7211 and on the Internet at www.Enid.org.



LEAD-BASED PAINT

1. Estimate the number of housing units that contain lead-based paint hazards, as defined in section 1004 of the Residential Lead-Based Paint Hazard Reduction Act of 1992, and are occupied by extremely low-income, low-income, and moderate-income families.
2. Outline actions proposed or being taken to evaluate and reduce lead-based paint hazards and describe how lead based paint hazards will be integrated into housing policies and programs, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

3-5 Year Strategic Plan Lead-based Paint response:

1) 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.

Year Built	# of Units in Enid	National Percentage Containing Lead	Number of Units
Prior to 1940	3,264	68%	2,219
1940 to 1959	6,618	43%	2,845
1960 to 1978	7,921	8%	633
Total	17,803	32%	5,697

The estimate is based on applying the results of the U.S. Department of Housing and Urban Development's "National Survey of Lead and Allergens in Housing Final Report" dated April 18, 2001 to the City's housing stock built prior to 1978. This survey determined the percentage of homes containing lead paint by year of dwelling construction. This survey found that 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.

2) 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.

CDSA, a subrecipient, distributes printed materials regarding the dangers and hazards of lead paint to all households receiving owner occupied rehabilitation and emergency repair assistance. All existing dwellings constructed prior to 1978 receiving CDBG assistance undergo an assessment to determine the presence of lead-paint. Contractors performing assessment and rehabilitation work funded by Enid's CDBG Program must be State Certified Lead-Based Paint Risk Assessors. CDBG-assisted dwellings determined to contain lead paint receive appropriate abatement measures using contractors licensed and certified to mitigate lead paint hazards.

CDBG assisted households with children 6 years of age and under are required to undergo blood lead screening to determine their level of lead exposure and results are subsequently reported to the Oklahoma State Department of Health. Enid will coordinate its affordable housing activities with the Oklahoma State Department of Health's Childhood Lead Poisoning Prevention Program by asking households with children 6 years or younger to complete the Lead Exposure Risk Assessment Questionnaire in order to further identify children that may need to receive blood lead level testing.

Housing

Overview

- The most pressing housing need of low-income households is the availability of quality, affordable housing.
- In 2010, there were ___overcrowded housing units in Enid, ___ percent of the total housing stock.
- According to 2012 Housing analysis of the condition of housing in the City of Enid service area, approximately ____ single-family housing units are in need of replacement or major rehabilitation.

Enid has fared better than most U.S. counties in regards to successfully navigating the recent housing market crash and national recession of 2008. This combination of job growth and

increasing population has negatively impacted the area's ability to address housing supply and demand fluctuations.

Even though median home prices remain relatively low in Enid, restrictive lending practices have disproportionately impacted persons with marginal credit. This situation is optimal for the apartment industry as more households will opt for renting over buying. However, when analyzing housing in terms of the availability of a variety of housing products to meet a diverse population, there are significant shortfalls. Large families, low-to moderate-income families, and disabled persons may encounter obstacles when searching for affordable housing units that meet their space, accessibility, and income needs.

Household Types in Need

Low-income households

Low-income households have increased over the last five-year period. According to the 2009 Consolidated Housing Affordability Strategy (CHAS) data from HUD, ___percent of all households in the Enid service area are low- to moderate-income. Of all households with at least one housing need, __percent of those are low- to moderate-income. This represents ___ low-income households. Out of those _____ households, _____ percent have housing needs because of a housing cost burden greater than 30% of income, _____ percent because of overcrowding, and _____ percent because of a lack of plumbing infrastructure.

Document in Progress. Final Document will be available May 15, 2013