



Annual Action Plan 2021

**City of Shawnee Oklahoma
Shawnee Urban Renewal Authority**



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Executive Summary

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

1. Introduction

The Five-Year Consolidated Plan is a document, required by the U.S. Department of Housing and Urban Development (HUD), that identifies a city's priority housing and community development needs for very low-, low-, and moderate-income city residents and the strategies the community has developed to address them. The Consolidated Plan serves as a planning document meeting the federal government statutory requirements in 24CFR 91.200-91.230, the Annual Action Plan is the mechanism where the programs and projects are authorized and funded. The first year Annual Action Plan is included in the 2020-2024 Five Year Consolidated Plan. This Action Plan covers the second year of the ConPlan period beginning July 1, 2021 through June 30, 2022. The U.S. Department of Housing and Urban Development (HUD) defines the City of Shawnee as an entitlement community due to its population and demographics. As an entitlement community, the City of Shawnee receives an annual allocation of Community Development Block Grant (CDBG).

This plan is the product of public outreach, public hearings, and consultation with multiple agencies that serve the needs of low and moderate-income residents of Shawnee and agencies that serve the needs of special populations.

The Annual Action Plan contains a range of goals, objectives, and outcomes formulated to address needs identified for homelessness, affordable housing, non-housing community development, barriers to affordable housing, fair housing, lead based paint hazards, institutional structure, and coordination. The overall goals included:

- Continue to collaborate with homeless providers to supply a continuum of services.
- Support services aimed at the prevention and elimination of homelessness and rapid rehousing ofThis Consolidated Plan will provide guidance for Shawnee for the period July 1, 2021—June 30, 2022.

The City of Shawnee must submit an Annual Action plan every year to illustrate not only its housing and community development needs but also a coordinated plan to meet those needs.

This Consolidated Plan establishes a unified, coordinated vision for community development that benefits low-income residents and areas for the years 2020-2024. Shawnee gathers input from citizens and its community development partners to determine its housing and community development needs, and to undertake specific actions with those strategies. A key element of this Consolidated Plan is the collaborative nature of the process.

2. Summarize the objectives and outcomes identified in the Plan

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

, Shawnee 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. Shawnee will consider certifications of consistency for other federal application assistance.

The primary needs were identified:

1. Need for rehabilitation assistance to low-income homeowners who require assistance for their homes to meet Housing Quality Standards.
2. Need for affordable housing both rental and owner.
3. Need for removal of houses considered blights to the local neighborhood.
4. Need for affordable housing options for families and individuals in need of supportive housing.
5. Need for economic opportunities to low and very low-income residents and strengthen the community economic base.

Need for homeless to housing continuum.

3. Evaluation of past performance

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

An evaluation of past performance revealed that the majority of our goals were met. Those that weren't met were due to decreased CDBG funding. In the capacity of lead agency the City of Shawnee 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 Shawnee.

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 affordable housing programs through CDBG housing rehabilitation activities and new construction programs with the intent of accomplishing the stated objectives.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The City of Shawnee Citizen Participation Plan outlines ways in which the citizens of Shawnee can participate in its CDBG program. 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 process is designed to encourage citizens, interested parties and public and private agencies opportunity for reasonable and timely access to information and records relation to the Consolidated Plan.

The City of Shawnee 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 City of Shawnee, 16 W. 9th Street on a day selected in the normal work week.

Notices of the hearings will be published in the Shawnee News Star 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:

- City Hall
- Salvation Army
- Central Oklahoma Community Action Agency
- Public Housing Authority
- Senior Citizen Center
- Library
- Central Oklahoma Economic Development District
- Shawnee News Star (to publish notices)

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

1. Community Development and Housing Needs

1. CDBG Program Purpose, i.e. meet one of three (3) national objectives;

- Provide benefit to low and moderate income persons
- Aid in the prevention or elimination of slums or blight

Meet other community development needs having particular urgency posing a serious or immediate threat to the health or welfare of a community.

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

All comments are accepted.

7. Summary

The City of Shawnee’s main goal is to maintain a viable urban community. The City of Shawnee receives CDBG funds as a resource to help insure some of the goals identified in the goals table are achieved. The City reserves the right to make non-substantive changes to the Consolidated Plan without opening the Plan for public comment. Changes to the Plan which will require a public comment period include a change which adds or deletes a priority, proposal of an activity that is not consistent with an existing strategy, or deletion an activity that was previously included.

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	SHAWNEE	City of Shawnee Urban Renewal

Table 1 – Responsible Agencies

Narrative (optional)

The Lead Agency is the City of Shawnee with the Shawnee Urban Renewal Authority overseeing the development of the Plan and administering the CDBG program.

The Urban Renewal Authority is responsible for insuring all community entities involved with providing housing of all types and purposes were consulted to obtain their needs, views and suggestions.

Consultation with housing, social service agencies, and other entities, was conducted by personal interviews, telephone, Internet, group meetings and other means when needed. The information gained was analyzed to determine how services were provided and the local networks that are being used to augment and coordinate services and facilities.

Consolidated Plan Public Contact Information:

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Consolidated Plan Public Contact Information

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Assistant Finance Director

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

1. Introduction

The Shawnee Urban Renewal Authority is the lead agency responsible for development and administration of programs and activities of the Action Plan and implementation of housing and community development activities and initiatives. City Commission serves as the determining body in matters related to the consolidated plan.

The CDBG Program is under the direction and oversight of the Administration Department, City Manager and Commission. Two full time employees, a CDBG Director, and Deputy Director administer the CDBG program.

The Director and Deputy Director is responsible for administering and implementing all funded activities, preparing the 5-Year Consolidated Plan and Annual Action Plans, program/project recordkeeping, and oversight to ensure compliance with all federal, state, and local Program related regulations and statutes are adhered to.

Agencies that will assist in the administration of programs and activities that will be addressed in the Five-Year Consolidated Plan, the Second Annual Action Plan and the CDBG-Coronavirus Aid, Relief and Economic Security Act (CARES) plans are:

- Housing Authority of the City of Shawnee Oklahoma
- Central Oklahoma Economic Development District (COEDD)
- Salvation Army
- Continuum of Care, Oklahoma Balance of State, East Region Lead Agency El Reno
- Red Cross
- Community Market of Pottawatomie County
- Central Oklahoma Community Action Agency (COCAA)
- Shawnee Rescue Mission
- Youth and Family Resource Center
- Sac & Fox Nation
- Citizen Potawatomi Nation
- South Central Housing
- United Way
- Red Rock
- Angel Acres
- Dana's Garden
- City of Shawnee departments

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

The City’s attempts to enhance coordination between housing providers and social service agencies by serving as a hub of communication. Annually, the City solicits feedback and information from these organizations and publishes it for review and comment. The City also invites housing providers and social service agencies to participate in focus groups and public meetings where these and other organizations are encouraged to provide input and feedback on the City’s entitlement community planning and evaluation activities. The City routinely communicates with the public housing authority to understand their programs and needs and has assisted them in the past. With budget shortfalls the City is unable to provide financial assistance for projects at this time.

Public Housing Authority was consulted with regarding the plan. Shawnee Urban Renewal Authority and the Public Housing Authority share the same goal in aiding with the prevention of homelessness in Shawnee, Oklahoma.

The Balance of State Oklahoma Continuum of Care sets goals, priorities and strategies to address the city’s homeless needs.

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

The Balance of State Region Oklahoma Continuum of Care sets goals, priorities and strategies to address the city’s homeless needs.

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

<div></div><div> The City consults with the Balance of State Region Oklahoma Continuum of Care sets goals, priorities and strategies to address the city’s homeless needs.</div>

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Central Oklahoma Community Action Agency
	Agency/Group/Organization Type	Housing Services - Broadband Internet Service Providers Foundation
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Needs - Veterans Homelessness Strategy Market Analysis Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Efforts were made to consult as broad a group of community stakeholders as possible. No agency types were excluded from participation. Shawnee's citizen participation process is designed to encourage citizens, interested parties and public and private agencies opportunity for reasonable and timely access to information and records relating to the Consolidated Plan. Consultation with housing, social service agencies, and other entities, was conducted by personal interviews, telephone, internet, meetings and other means when needed. The information gained was analyzed to determine how services were provided and the local networks that are being using to augment and coordinate series and facilities.

2	Agency/Group/Organization	Housing Authority of the City of Shawnee
	Agency/Group/Organization Type	Housing PHA Services - Housing Services - Narrowing the Digital Divide Business and Civic Leaders Foundation Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Market Analysis Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Public housing needs.
3	Agency/Group/Organization	City of Shawnee Planning/Community Development Department
	Agency/Group/Organization Type	Other government - Local Planning organization Business Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development Lead-based Paint Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Strategic planning economic development, blight removal, and new residential development.
4	Agency/Group/Organization	POTTAWATOMIE COUNTY
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services - Broadband Internet Service Providers Health Agency Regional organization
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Shawnee has excellent cooperation and coordination with other public entities, including Pottawattamie County Health Department, the State Department of Health and Human Services and the Pottawatomie County Governmental Offices.

Identify any Agency Types not consulted and provide rationale for not consulting

All agencies were included in the consultation process.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Balance of State Region Oklahoma Continuum of Care	Homeless prevention activities utilizing CDBG funds.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

The community shows great support for the CDBG program and its projects and continually participates in public hearings and other stakeholder meetings to provide input and suggestions.

AP-12 Participation – 91.105, 91.200(c)

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

<div>The City of Shawnee held the required public hearings and public comment periods to receive comments on the draft 2021-2022 Annual Action Plan. During this time, copies of the draft report were available for public inspection, and residents and stakeholders could provide written comments to the Shawnee Urban Renewal Authority. </div>

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Hearing	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Residents of Public and Assisted Housing	Residents, including minority residents, people with limited English proficiency, people with disabilities, and assisted housing residents; Housing and service providers; Community development practitioners were encouraged to participate in the planning process.	There were no comments received.	All comments are accepted, however there were none received.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Hearing	<p>Non-English Speaking - Specify other language: Spanish</p> <p>Non-targeted/broad community</p>	<p>Residents, including minority residents, people with limited English proficiency, people with disabilities, and assisted housing residents; Housing and service providers; Community development practitioners were encouraged to participate in the planning process.</p>	<p>There were no comments received.</p>	<p>All comments are accepted, however there were none received.</p>	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

Shawnee’s CDBG allocation for 2021 is \$338,189.00. The City of Shawnee is expecting to receive about the same amount as this year for each of the plan. Approximately \$1,267,000.00 will be available through HUD's CDBG allocation for the remainder of the plan. The approximate total amount expected for this Five Year Consolidated Plan is \$1,567,000.00.

The City of Shawnee has utilized community partners, stakeholders, including multi-level government agencies, private for-profit, non-profit sectors, local health authorities and citizens to survey needs affiliated with the pandemic. Although not every need can be addressed with these funds the City of Shawnee along with our community service providers have developed a plan that prioritizes the unique needs of low-and moderate-income persons being affected by the crisis.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	338,189	0	0	338,189	1,267,000	CDBG funds will be used to carry out activities related to acquisition, administration and planning, housing, economic development, public facility improvements, and public services.
Other	public - federal	Public Services Other	0	0	0	0	0	

Table 5 - Expected Resources – Priority Table

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

The City of Shawnee does not anticipate any additional resources other than program income. While CDBG funds do not require a match, the City anticipates leveraging local, state, federal, and private funds as they address the priorities and goals outlined in the Consolidated Plan.

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

No publically owned land or property located within the jurisdiction is anticipated be used to address the needs identified in the plan.

Discussion

The City of Shawnee is uncertain if any program income will be received during this plan year. If any program income funds are recieved the City of Shawnee will use them to leverage projects within the plan to offset current funding and are used before any CDBG funds are drawn.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing Rehab & Emergency Repairs	2020	2024	Affordable Housing	City wide (determined by need and eligibility)	Decent, Safe & Affordable Housing	CDBG: \$250,000 CDBG-CV CARES: \$0	Homeowner Housing Rehabilitated: 30 Household Housing Unit
2	Clearance and Demolition	2020	2024	Non-Homeless Special Needs	City wide (determined by need and eligibility)	Clearance and Demolition	CDBG: \$20,552 CDBG-CV CARES: \$0	Buildings Demolished: 5 Buildings
3	Administration	2020	2024	Administration	City wide (determined by need and eligibility)	Administration and Planning	CDBG: \$67,637 CDBG-CV CARES: \$0	Other: 1 Other

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Housing Rehab & Emergency Repairs
	Goal Description	<p>The housing rehabilitation program is designed to assist those of low income with emergency repairs and housing rehabilitation to prevent them from becoming homeless. The beneficiaries can be individuals, families with or without children, elderly, frail, veterans, person with disabilities or any other demographic as long as they are low income and own their home. The City of Shawnee will utilize CDBG funds to prevent homelessness by providing housing rehabilitation services to approximately 25 homeowners per year that are in jeopardy of losing their homes due to unsafe hazards. 5 emergency repairs are anticipated making the total annual goal for housing and homeless prevention, 30 households.</p> <p>The five-year planned goal is to assist 125 households through the rehab program and 25 emergency repairs. The total households to receive benefits from this program over the five-year plan period is 150.</p>
2	Goal Name	Clearance and Demolition
	Goal Description	To assist low-moderate income residents with demolition of structures deemed unsafe or a hazard to public health and safety.
3	Goal Name	Administration
	Goal Description	Planning, administration, management, and oversight of federal, state, and local funded programs.

Projects

AP-35 Projects – 91.220(d)

Introduction

The City of Shawnee has reviewed all proposed activities for eligibility under 24 CFR Subpart C and has determined eligibility under HUD guidelines as established for the Community Development Block Grant program. The activities planned for this year will meet HUD national objectives. The annual action plan describes the City’s plans for the expenditure of federal dollars for the coming fiscal year. The activity will specifically address objectives and priorities identified in the 2020-2024 Consolidated Plan.

Projects

#	Project Name
1	REHAB; SINGLE UNIT RESIDENTIAL EMERGENCY REPAIRS
2	CLEARANCE/DEMOLITION-4
3	ADMINISTRATION & PLANNING 21A

Table 7 - Project Information

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

All allocation priorities support the overall priorities of the Consolidated Plan and address underserved needs of lack of affordable housing, homeless services and homeless prevention activities. The main obstacle in addressing underserved needs is that the needs of the community far outweigh the funding available to address those needs. CDBG assistance is made available throughout the City of Shawnee. 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. Activities based on area benefit are mainly infrastructure and public facilities improvement projects such as public parks, sidewalks, and street and drainage improvements located in low income census tracts of the city. Typically, the City qualifies CDBG activities under the national objective of benefit to low- and moderate-income households.

AP-38 Project Summary
Project Summary Information

1	Project Name	REHAB; SINGLE UNIT RESIDENTIAL EMERGENCY REPAIRS
	Target Area	City wide (determined by need and eligibility)
	Goals Supported	Housing Rehab & Emergency Repairs
	Needs Addressed	Decent, Safe & Affordable Housing
	Funding	CDBG: \$250,000
	Description	The housing rehabilitation program is designed to assist those of low income with emergency repairs and housing rehabilitation to prevent them from becoming homeless. The beneficiaries can be individuals, families with or without children, elderly, frail, veterans, person with disabilities or any other demographic as long as they are low income and own their home.
	Target Date	9/1/2023
	Estimate the number and type of families that will benefit from the proposed activities	25-30 low-moderate income households.
	Location Description	
	Planned Activities	The City of Shawnee will utilize CDBG funds to prevent homelessness by providing rehabilitation services to homeowners that are in jeopardy of losing their homes due to unsafe hazards.
2	Project Name	CLEARANCE/DEMOLITION-4
	Target Area	City wide (determined by need and eligibility)
	Goals Supported	Clearance and Demolition
	Needs Addressed	Clearance and Demolition
	Funding	CDBG: \$20,552
	Description	Provide demolition services to provide a safe living environment.
	Target Date	9/1/2023
	Estimate the number and type of families that will benefit from the proposed activities	5 low-moderate income households per year will be assisted.
	Location Description	Citywide based on income eligibility.

	Planned Activities	Demolition of dilapidated structures to prevent unsafe and hazards to citizens.
3	Project Name	ADMINISTRATION & PLANNING 21A
	Target Area	City wide (determined by need and eligibility)
	Goals Supported	Administration
	Needs Addressed	Administration and Planning
	Funding	CDBG: \$67,637
	Description	Administration indirectly benefits all low moderate-income families served using CDBG funding.
	Target Date	9/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Administration and Planning.

AP-50 Geographic Distribution – 91.220(f)

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

Shawnee 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. Shawnee is becoming less segregated both in total numbers and location. The US Census Bureau reported in 2010 there are 27,939 White (73.1%), 1,261 (4.2) Black or African American, 4,225 (14.2) American Indian and 238 (0.8) Asian residing within the city of Shawnee (see Table 1). Of the total population only 5.1% reported being Hispanic or Latino. Note that minority populations increased in all census tracts.

Service and Target Areas, the majority of target areas are located in Census Tract of Shawnee.

Resources available through Shawnee 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.

Geographic Distribution

Target Area	Percentage of Funds
City wide (determined by need and eligibility)	100

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

CDBG assistance is made available throughout the City of Shawnee. 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.

Discussion

The City of Shawnee has had success in its geographic allocation of housing and community development investments by utilizing the citywide policy and basing eligibility determinations according to income rather than area benefit.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

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.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	150
Special-Needs	0
Total	150

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	25
Acquisition of Existing Units	0
Total	25

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

Discussion

The City of Shawnee provides affordable housing by assisting with rehabilitation and emergency repairs of existing homes to help prevent homelessness.

Approximately 25 households are planned to receive housing rehabilitation and emergency repairs assistance.

The non-homeless goal for the 2021 program year is to assist 150 households.

AP-60 Public Housing – 91.220(h)

Introduction

The City of Shawnee doesn't have adequate funding to assist the public housing authority with current needs.

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

Shawnee does have a public housing authority. The public housing authority is composed of housing of differing ages and construction. The need for modernization and repairs is considerable. Capital and modernization needs over the next five years are estimated to be over 4 million dollars. Due to lack of funding Shawnee will not expend any CDBG funds on public housing projects. The funding will be used strictly for homeless prevention efforts in the form of emergency repairs to owner occupied dwellings.

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

The housing authority shares information with residents through the year about home ownership training classes and encourages homeownership.

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

The housing authority is not designated as troubled.

Discussion

Support for homeless households will be accomplished by providing resources and referrals to local agencies that specialize in that area. The City of Shawnee currently utilizes the CDBG allocation for homeless prevention by providing housing rehabilitation and emergency repairs assistance.

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

Introduction

Shawnee relies on the areas Continuum of Care partnering agencies to address homeless needs of the City. The CoC covers the geography of 13 counties and includes the city of Shawnee. The Continuum is responsible for identifying Shawnees' homeless and homeless prevention priorities through consultations with its member organizations serving homeless individuals and families with children and concerned citizens.

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

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

The city purchased and rehabilitated three, transitional housing structures for the homeless, two single-family houses and one duplex. One of the structures has been made accessible for the handicapped.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Continuum agencies help 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

The City of Shawnee supports the national movement to end chronic homelessness by 2020. Organizations in Shawnee are working towards addressing homelessness by partnering with the East Central Oklahoma Continuum of Care and have adopted a plan to end homelessness. The City of Shawnee faces the barrier of limited funding, however, is committed to provide non-financial support to organizations that work with the East Central Oklahoma Continuum of Care to further the action to end chronic homelessness.

Those agencies include:

COCAA (Shawnee, Seminole, Prague, Guthrie)

Shawnee Rescue Mission

Salvation Army

Family Resource Center (Seminole, OK)

Shawnee Urban Renewal Authority (Shawnee, OK)

Youth and Family Resource Center (Shawnee, OK)

Oklahoma Baptist University

Maranatha Outreach Center (Stroud, OK)

Project SAFE (Shawnee, OK)

Creeks Behavioral Health Services (Okemah, OK)

Shawnee Public Schools (Shawnee, OK)

United Way of Pottawatomie County Success By 6 (Shawnee, OK)

The Chosen House (Chandler, OK)

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

The City of Shawnee 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.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

Shawnee's homeless prevention strategy over the next program year action plan will be to:

Make CDBG funded emergency repair assistance available to undertake owner occupied rehabilitation and to provide community support for local applications seeking state and federal homeless and at-risk funding.

Encourage and assist locally funded nonprofits to access homeless funding. Currently, HUD manages five programs that directly combat homelessness, and it coordinates with the Department of Defense on the sixth program. In addition to these "targeted" programs, HUD also funds "mainstream" programs that can provide additional assistance to persons who are homeless. As contrasted with targeted programs, HUD's mainstream programs are not meant to exclusively serve homeless households. However, they are programs for which homeless persons are generally eligible because of their low-income or disability status.

Discussion

The City of Shawnee uses its CDBG funding for homeless prevention programs through emergency repairs and owner-occupied rehabilitation of homes.

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

Introduction:

Development policies of the City of Shawnee are designed to protect the health, safety and welfare of its citizens. The City is continually reviewing its regulations to address changing conditions and barriers to affordable housing. The City does not aid builders that build affordable housing. Low-income housing projects do not receive special tax breaks.

However, according to the City Community Development Department, costs for developing land is considerably less in Shawnee than many of the other suburban communities in the Oklahoma metropolitan area and inspection and permit fees are waived for community development housing projects.

The rehabilitation assistance program is directed toward providing a safe living environment in affordable housing. However, given that approximately 2,000 housing units in Shawnee have problems, the direct impact of the annual rehabilitation of about fifteen (15) to twenty-five (25) houses is small. However, housing rehabilitation tends to encourage other properties in the neighborhood to make improvements, as they are able.

The City comprehensive Plan adopted in 2005 proposes residential design changes that are designed to reduce costs of development. These proposals include narrowing street width requirements in local neighborhoods and reducing lot size requirements. These changes will reduce amount of paved street, water, sewer, electric, natural gas and other capital improvements and services required for each house. The International Building Codes will be adopted by the City by mid-year allow reduced requirements for remodeling of houses while still protecting the safety, health and welfare of residents. The City does not restrict return on investment associated with developing or operating residential properties.

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 Shawnee is not considered decent. The City of Shawnee promotes decent affordable housing efforts but since there isn't any state, local or federal regulations on the conditions to rent, the barrier will be difficult to overcome.

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

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.

Expansion of homeownership within the community is hampered by the cost of entry-level for-sale housing units. 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 \$38,056. This gap is even larger for households of 2 to 3 persons with incomes at or below US HUD’s Pottawattamie County income threshold for low- and moderate-income families of \$32,900 to \$37,000. 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.

Homeownership becomes more feasible for low-income households when down-payment assistance, below market interest rate mortgage loans, and/or homebuyer education are 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.

Discussion:

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.

AP-85 Other Actions – 91.220(k)

Introduction:

Obstacles to meeting underserved needs are related to limited resources and staffing.

Actions planned to address obstacles to meeting underserved needs

The City of Shawnee is creative in finding ways to overcome limited resources and staffing issues to ensure high priority needs are met.

Actions planned to foster and maintain affordable housing

The City of Shawnee 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 Shawnee places importance on the housing priorities as identified in the Consolidated Plan throughout the application process.

The objective for the FY 2021 program year is to perform owner-occupied rehabilitation to bring structures to housing quality standards, home repair projects for system replacements, emergency assistance and demolition for the elimination of blighted structures. The objective is to provide safe, decent, affordable housing for low to moderate-income families.

Through the next program year, the City of Shawnee hopes to identify and address priority areas of emergency repairs.

To address these needs the City will:

Provide emergency system repairs and rehabilitation for low- to moderate-income single-family owner-occupied homes. The number expected to be assisted is approximately 15-25 households. The objective is to provide decent affordable housing with an outcome of accessibility/availability.

The City may issue Certification of Consistency to the Consolidated Plan for other federal application assistance when development proposals compliment affordable housing priorities and objectives of the Annual Plan. Affordable rental development and rehabilitation is strongly encouraged however the City can only address owner assistance at this time due to lack of adequate funding to address all needs of the housing crisis. 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.

Actions planned to reduce lead-based paint hazards

The City follows state and federal regulations prohibiting the use of lead-based paint (LBP) and relies on sub recipients to advise households receiving CDBG assistance. The City is in compliance with HUD Title X, regulations regarding paint poisoning; notification that the property may contain lead—based paint and the advisability of blood lead level screening for children under seven years of age. Staff distributes informational materials detailing the dangers of LBP on an ongoing basis through the department. 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. The City of Shawnee will provide funding to test and mitigate lead-based paint issue and will not allow federal dollars to be spent unless all laws and regulations are followed.

The City of Shawnee relays detailed information to citizens regarding the hazards of lead-based paint. All contractors are provided with the EPA Office of Pollution Prevention and Toxics brochures "Protect Your Family from Lead in Your Home" and "Reducing Lead Hazards When Remodeling Your Home" as well as other helpful information to prevent contamination or health risks.

Important information for readers regarding LBP.

Lead is a highly toxic metal that may cause a range of health problems, especially in young children. When lead is absorbed into the body, it can cause damage to the brain and other vital organs, like the kidneys, nerves and blood.

If your home was built before 1978:

- Wipe down flat surfaces, like window sills, with a damp paper towel and throw away the paper towel,
- Mop smooth floors (using a damp mop) weekly to control dust,
- Take off shoes when entering the house
- Vacuum carpets and upholstery to remove dust,
- If possible, use a vacuum with a HEPA filter or a "higher efficiency" collection bag,
- Pick up loose paint chips carefully with a paper towel and discard in the trash, then wipe the surface clean with a wet paper towel,
- Take precautions to avoid creating lead dust when remodeling, renovating or maintaining your home,
- Test for lead hazards by a lead professional. (Have the soil tested too).

For your child:

- Have your child's blood lead level tested at age 1 and 2. Children from 3 to 6 years of age should have their blood tested, if they have not been tested before they live in or regularly visit a house built before 1950, They live in or regularly visit a house built before 1978 with on-going or recent renovations or remodeling. They have a sibling or playmate who has or did have lead poisoning

- Frequently wash your child's hands and toys to reduce contact with dust,
- Use cold tap water for drinking and cooking
- Avoid using home remedies (such as *arzacón*, *greta*, *pay-loo-ah*, or *litargirio*) and cosmetics (such as kohl or alcohol) that contain lead
- Certain candies, such as *tamarindo* candy jam products from Mexico, may contain high levels of lead in the wrapper or stick. Be cautious when providing imported candies to children
- Some tableware, particularly folk terra cotta plates and bowls from Latin America, may contain high levels of lead that can leach into food.

Actions planned to reduce the number of poverty-level families

Measures to reduce the number of poverty level families includes enhanced training and education opportunities and expansion of business and industry and jobs for every citizen, especially very low and low-income persons. The Urban Renewal Authority, the City administration, Public Housing Authority and the Continuum provide forums for coordination and integration of programs to serve the low-income and underserved families of Shawnee. 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.

Actions planned to develop institutional structure

Shawnee plans to continue 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. We plan to encourage participation from each of the organizations to assist with achieving our vision.

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

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.

Discussion:

Lack of adequate funding has caused many efforts to become more and more challenging.

Program Specific Requirements

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

Introduction:

CDBG assistance is made available throughout the City of Shawnee. 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.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

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

Other CDBG Requirements

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

The City of Shawnee Five Year Consolidated Plan covers 2020-2024 with this being the Second Year Action Plan. –Shawnee Urban Renewal Authority

Stephanie Morgan

