

Yes, you can structure your **CDBG-funded strategy to reduce homelessness among existing Lawton residents** without creating new programs or facilities that may attract homeless populations from outside the area. HUD regulations allow for targeting local needs, so long as the activities benefit eligible low- and moderate-income (LMI) persons and comply with the national objectives under 24 CFR 570.

Here's how to structure your **CDBG plan to stabilize and reduce local homelessness** without expanding capacity in a way that could inadvertently draw in non-residents:

Permissible, Targeted Strategies (with Regulatory Justification)

1. Stabilize the Currently Housed at Risk of Homelessness

Use: Owner-occupied rehab & minor repair (24 CFR §570.202)

- Fund home repairs for elderly, disabled, or very low-income residents at imminent risk of displacement.
- Focus only on long-term Lawton residents.

2. Improve Existing Shelter Facilities – No Expansion

Use: Public facilities (24 CFR §570.201(c))

- Fund ADA upgrades, fire safety, and structural repairs for existing shelters (e.g., C Carter Crane, Family Promise), **but do not increase bed count**.
- Clearly restrict facility use to residents with documented ties to Lawton (e.g., last place of residence, family connections).

3. Fund Public Services with Residency Requirements

Use: Public services (24 CFR §570.201(e)), within 15% cap

- Require subrecipients (e.g., GPIF, Marie Detty, Family Promise) to:
 - Prioritize clients who lived in Lawton prior to homelessness.
 - Establish eligibility screens that emphasize local connections (e.g., last known address, voter registration, Lawton schools attendance).
- Provide case management aimed at **permanent local rehousing**, not long-term transitional support.

4. Code Enforcement and Blight Reduction in Targeted Zones

Use: Code enforcement and clearance (§570.201(d))

- Focus on deteriorated areas where vacant buildings contribute to informal encampments or safety issues.
 - Coordinate with shelter providers and police to transition encampments into stabilized housing—not into new facilities.
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✗ Avoid These Approaches to Prevent Influx of Non-Residents

- Do **not** use CDBG to **add shelter beds or construct new shelters** (which may attract new clients).
 - Avoid launching **new or highly visible outreach programs** that might draw transient populations.
 - Avoid direct promotion of services outside Lawton or on regional homeless assistance networks.
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HUD Compliance Tip

As long as your activities:

- **Benefit LMI individuals ($\leq 80\%$ AMI)**
- **Do not create new capacity or entitlement for non-residents**
- **Align with documented local need (via Con Plan and AAP)**

...you are operating within legal and regulatory boundaries under **24 CFR 570**.

Would you like help drafting program language or RFP requirements to legally reinforce the local residency preference?

You said:

can you be very specific in this plan?

ChatGPT said:

Absolutely. Below is a **precisely structured CDBG-only plan** that will help the **City of Lawton reduce homelessness among current residents** while avoiding expansion that could attract new homeless populations. Every element includes **specific activities, subrecipients, regulatory citations, and resident-focused controls**.

City of Lawton FFY 2025 CDBG Homelessness Reduction Plan (Resident-Focused)

1. Public Services – Homeless Prevention & Rehousing

Total Allocation: \$108,200 (15% max of CDBG per 24 CFR §570.201(e))

Subrecipient	Activity	Controls	CDBG Eligibility
Family Promise of Lawton	Case management and housing stabilization for homeless families with children	Require proof of previous Lawton residency (lease, school records, etc.)	24 CFR §570.201(e) – Public services
GPIF / C. Carter Crane Shelter	Supportive services (meals, ID recovery, rehousing navigation)	Prioritize clients with local family or service ties	24 CFR §570.201(e)
Marie Detty New Directions	Crisis support and case management for DV victims at risk of homelessness	Require Lawton PD referral or prior city address	24 CFR §570.201(e)

✓ **Monitoring Plan:** Subrecipients must use a “Local Residency Verification Form” approved by HCD to document eligibility.

2. Public Facility Improvements – Non-Expansion Shelter Upgrades

Total Allocation: \$144,309 (20%)

Eligible under: 24 CFR §570.201(c)

Project Location	Scope of Work	Restrictions
C. Carter Crane Shelter (GPIF)	Replace fire suppression and HVAC systems; install ADA door openers	No increase in occupancy permitted under this scope
Family Promise Facility	Roof replacement and security camera upgrades	Work must be for health/safety only

✓ Require subrecipients to certify that upgrades will not be used to expand bed capacity or draw in out-of-town clients.

3. Targeted Code Enforcement

Total Allocation: \$108,200 (15%)

Eligible under: 24 CFR §570.202(c)

Target Area	Scope	Rationale
NW Lawton Zone 2	Support two code officers in LMI neighborhoods near known encampments	Supports slum/blight elimination and rehousing
Near shelters & parks	Monitor and cite unsafe/vacant structures for cleanup and demolition	Coordinates with rehab and enforcement

✓ Coordinate with PD and housing outreach teams to ensure follow-up on illegal occupation is linked with shelter navigation.

4. Emergency Demolition of Blighted Properties

Total Allocation: \$72,200 (10%)

Eligible under: 24 CFR §570.201(d)

Property Type	Action	Intent
Vacant residential homes	Demolition and lot clearance	Remove unsafe encampment hotspots; preserve neighborhood stability

✓ Require local police and code records to confirm blight/hazard status before proceeding.

5. Owner-Occupied Housing Rehabilitation (Stabilize at-risk households)

Total Allocation: \$180,537 (25%)

Eligible under: 24 CFR §570.202(a)

Target Population	Scope of Work	Requirements
Low-income seniors, disabled homeowners	Roofs, plumbing, HVAC, ADA ramps	Must be Lawton resident 3+ years, income ≤80% AMI
At-risk families with eviction notices	Emergency repairs (up to \$5K)	Must show proof of local residence for past 24 months

✓ Use Recapture clause to protect funds if property is sold within 5 years.

6. Planning and Administration

Total Allocation: \$108,200 (15%)

Eligible under: 24 CFR §570.206

Use	Deliverables
Staffing (1 FTE)	Monitor residency documentation, ensure HUD compliance
Homeless System Strategy Development	Build coordination protocols between CDBG, CoC, and LHA
Data coordination (non-HMIS)	Maintain service use data to avoid duplication and expand only as needed

Key Policy Safeguards

- All service providers must certify **no promotional activity outside Lawton**.
- **Residency screening protocols** required for all CDBG-funded homeless services.
- No facility expansion unless shown to reduce **existing unmet need** within Lawton boundaries.
- **Service agreements** include mandatory reporting on Lawton origin rate of served individuals.