

**2010-2014
Draft Consolidated Plan**

**Community Development Block Grant
Oshkosh, WI**



OSHKOSH
ON THE WATER

Prepared for:

U.S. Department of Housing and Urban Development

Prepared by the Community Development Department
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Approved by HUD:



5-Year Consolidated Plan 2010-2014 Oshkosh, WI

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GENERAL

Executive Summary

The Consolidated Plan for Housing and Community Development Programs describes the needs for housing assistance and non-housing community development. The City of Oshkosh has prepared this Plan for prioritizing the allocation of housing and other assistance monies that may become available from the federal government over a five-year period from May 1, 2010 to April 30, 2015.

The Plan is a creative approach to community development that encourages communities to work in collaboration to develop a comprehensive vision for action to achieve community objectives.

The Plan consolidates the planning, application and reporting requirements of the Department of Housing and Urban Development (HUD) Community Development Block Grant Program (CDBG).

The Plan also seeks to promote a comprehensive approach to address urban issues, improve accountability to achieve results and include a strong element for citizen participation.

Strategic Plan

This Plan establishes three basic goals for assistance to low and moderate income persons: First, to provide decent affordable housing; second, to provide a suitable living environment; and third, to expand economic opportunities.

This plan is due every three, four, or five years. The grantee community determines the length of period.

This plan serves as a 5-year Strategic Plan for the City of Oshkosh, Wisconsin beginning in 2010 and ending in 2015. Each program year begins May 1 and ends April 30.

Oshkosh has chosen to complete 5-year Plan but may consider an update or amendment near 2013-2014 because of the close proximity of the 2010 Census being completed. The results of the 2010 Census are anticipated to be released in 2012-2013, which is an opportune time to utilize the most current statistical data available to focus attention, be a basis for the allocation of CDBG funds, to provide a strategy for carrying out HUD programs, and act as an action plan that provides a basis for performance assessment.

General Questions

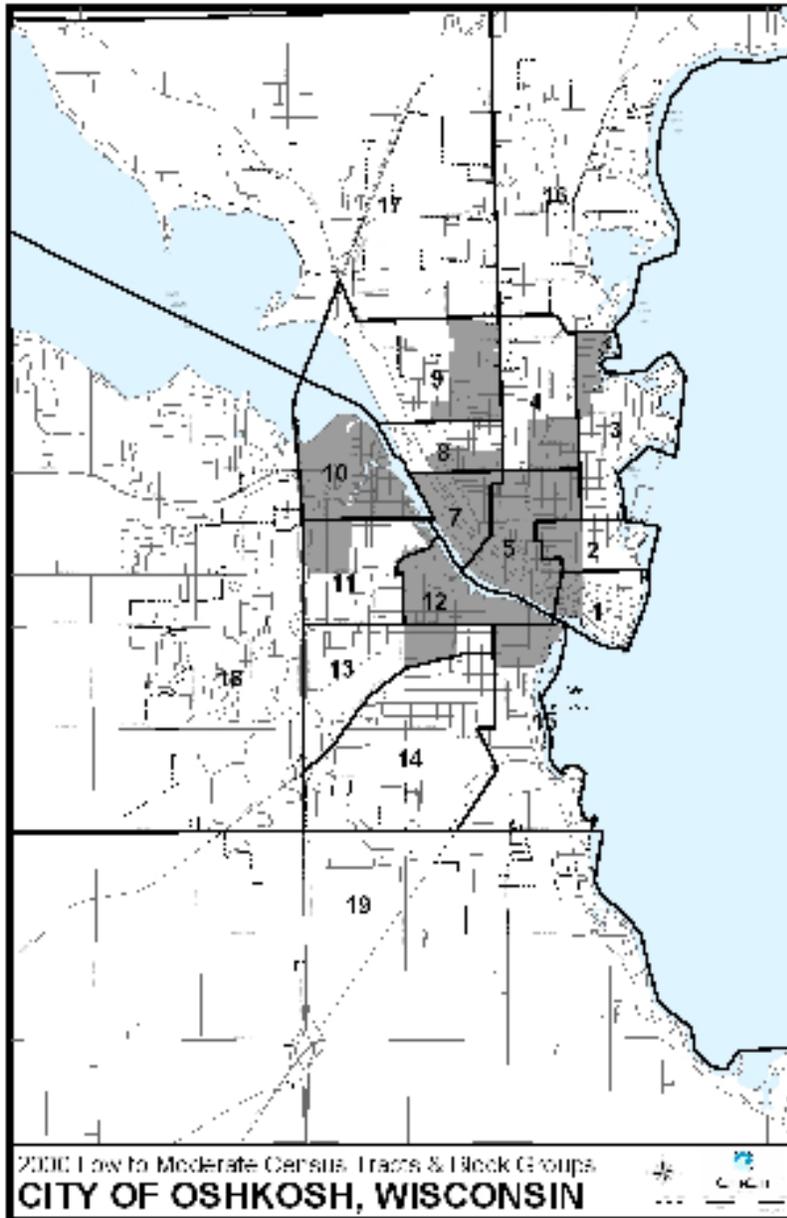
1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed.

Oshkosh is a community of approximately 62,196 persons and 24,082 households in east central Wisconsin. Oshkosh has seen steady and consistent growth over the past 40 years. This growth can be largely attributed to continued strong enrollments at the campuses of the University of Wisconsin – Oshkosh and Fox Valley Technical College, the expansion of local hospital and clinic facilities, the growth of retail businesses serving and expanding the regional market, and the attraction of new companies to the area.

Assistance in Oshkosh will be directed primarily to low and moderate income census tracts and block groups, as shown on the following map.

Within these geographic areas, priority will be given to the following:

- Areas with higher density and areas with high concentrations of rental housing
- Areas most significantly affected by foreclosure and housing abandonment
- Priority areas identified in the City Comprehensive Plan, 2005-2025
- Historic Districts, especially those with high levels of slum and blight



AREAS OF MINORITY CONCENTRATION

The 2006-2008 American Community Survey 3-Year Estimates data shows the racial makeup of Oshkosh as 91.6% White, 2.9% Black or African American, 0.4% American Indian and Alaskan Native, 2.9% Asian, 1.1% some other race and 1.00% two or more races. 2.3% of the population is Hispanic or Latino of any race.

However, for the purposes of this Plan, “areas of minority concentration” will be defined as census block groups with over 150 persons answering with a “Non-White” race in the 2000 Census. Census block groups with institutionalized populations such as the State of Wisconsin Correctional Facility, the University of Wisconsin-Oshkosh dormitories, the Winnebago County Mental Health Institution, and the Park View Health Center were excluded as housing and

supportive services are currently provided to these populations. The block groups with the highest number of racial/minority concentrations are as follows:

AREAS WITH HIGHEST NUMBER OF RACIAL/MINORITY CONCENTRATIONS		
Geographic Area	Number of Non-White Alone	Percent of Non-White Alone
Census Tract 5, Block Group 3	335	14.76
Census Tract 5, Block Group 2	192	23.53
Census Tract 2, Block Group 3	179	20.62

Source: 2000 U.S. Census

These three block groups are located in the Central City area and are all in low to moderate income census tracts.

2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) and the basis for assigning the priority (including the relative priority, where required) given to each category of priority needs (91.215(a)(2)).

The City of Oshkosh intends to use federal Community Development Block Grant (CDBG) funds for census block groups that have a high concentration of low-moderate income (LMI) persons. Targeted funding will be provided for items such as homebuyer’s assistance, owner-occupied and rental housing rehabilitation, demolition of slum and blight, lead-based paint abatement, historic preservation, Fair Housing and Public Services.

Projects will be targeted to LMI block groups/persons with higher density/concentrations of rental housing; areas most significantly affected by foreclosure and housing abandonment; priority areas identified in the Oshkosh 2005-2025 Comprehensive Plan; and Historic Districts, especially those with high levels of slum and blight.

With limited amount of funding available, not all needs can be addressed. The City must prioritize what projects need funding while other projects may have to wait or receive significantly smaller amounts of funding.

The City has created relationships over the years with other agencies to collaborate and share ideas. These relationships have proven useful for the City to target the high priority needs in the LMI areas. By creating these relationships and the sharing of information, this has helped greatly to overcome the obstacles of meeting underserved needs.

The City adopted the 2005-2025 Comprehensive Plan in March, 2005. Nine elements are outlined in Wisconsin comprehensive planning legislation, including a housing element, which requires the following:

- A compilation of objectives, policies, goals, maps and programs of the city to provide an adequate housing supply that meets existing and forecasted housing demand.

- The element shall assess the age, structural, value and occupancy characteristics of the city's housing stock.
- The element shall also identify specific policies and programs that promote the development of housing for residents of the city and provide a range of housing choices that meet the needs of persons of all income levels and of all age groups and persons with special needs, policies and programs that promote the availability of land for the development or redevelopment of low-income and moderate-income housing, and policies and programs to maintain or rehabilitate the city's existing housing stock.

Three types of Priority Areas are located on the following map and identified in the Comprehensive Plan based on characteristics of Oshkosh neighborhoods. Priority areas were derived from the 2000 Census at the tract and block group level, including the value and age of the housing stock, tenure of the residents (owner versus renter), and the low and moderate-income areas. This data serves as the basis for assigning the priority given to each area. Ideally, the City would prefer to use more updated data, but it will not be available until 2012. The most current data will provide a better community snapshot and may be the basis for updating or amending the Consolidated Plan when the data is available.

Priority 1 Areas are the four areas on the map shown in the darkest shade. These areas tend to have poor streets, or streets without curb and gutter, and have the greatest need for neighborhood revitalization and housing rehabilitation. All Priority 1 Areas are in LMI census tracts or block groups. Other characteristics include:

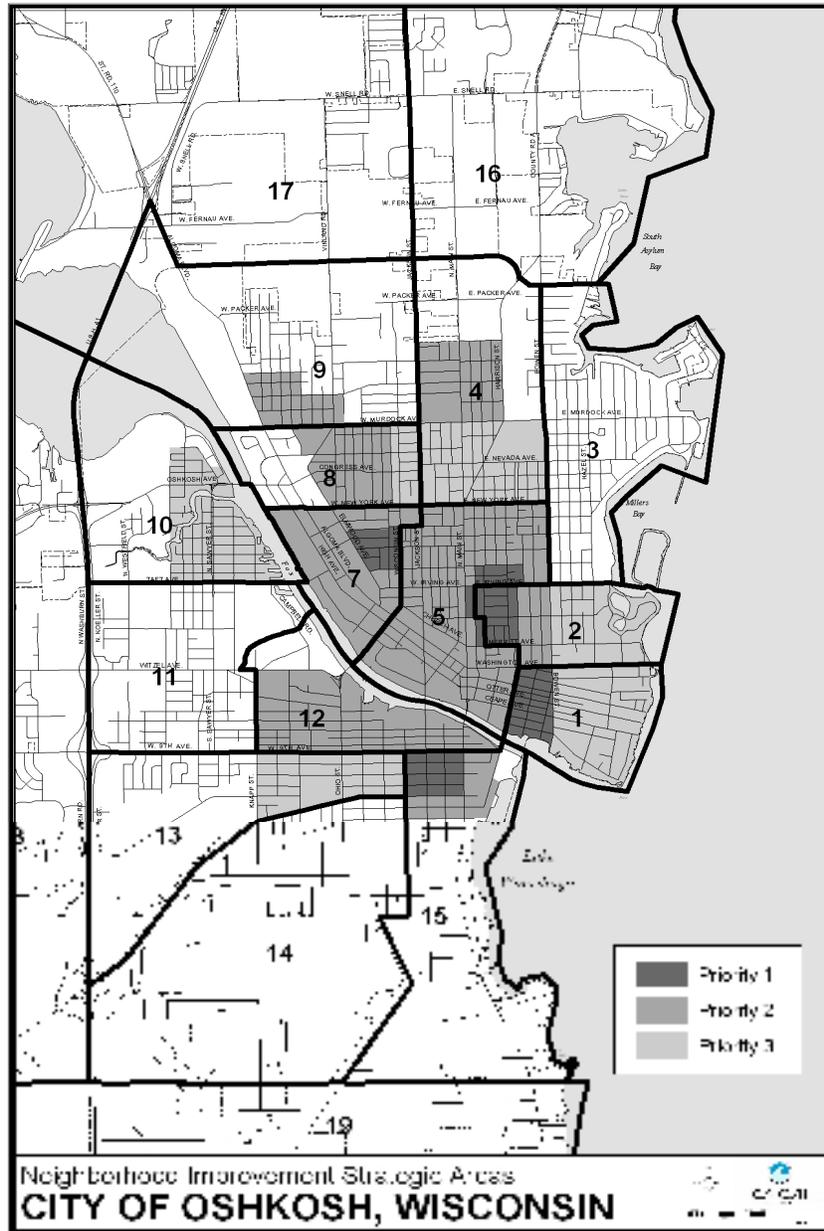
- Owner-occupied rates lower than the city as a whole.
- Percentage of homes built pre-1940 is higher than the overall percentage.
- The median year structures were built in these areas range from pre-1940 to 1955, compared to the city's median year of 1959.
- The median value for owner-occupied units ranges from 4 to 28 percent lower than the city's overall median value of \$85,500.

Priority 2 Areas are both in and out LMI census tracts and block groups and include a significant portion of the Central City area. Priority 2 Areas include most of Census Tracts 5, 7, and 12 and portions of Census Tracts 2, 4, 8, 9, and 15. Characteristics of the Priority 2 Areas include:

- Owner-occupancy rates for most of these areas are lower than the citywide rate of 57.6 percent.
- Percentage of homes built pre-1940 is higher than the overall percentage.
- The median year for structures built in these areas is in the 1940s or earlier, with some areas in the 1950s, all older than the citywide median year of 1959.
- The median value for owner-occupied units ranges from 4 to 28 percent lower than the city's overall median value of \$85,500.
- Most of the streets with a low PASER Rating (Pavement Surface & Evaluation Rating System used by the State of Wisconsin) are in these areas. A street with a low PASER rating is in need of major repair or reconstruction.

Priority 3 Areas are on the periphery of the Central City, including portions of Census Tracts 1, 2, 4, 8, 10, and 13. While these are not high priority at this time and do not have a significant amount of blighting conditions, it is expected that over the 20-year planning period, these areas may begin to experience the effects of aging neighborhoods, similar to Priority 1 and 2 Areas. Characteristics of the Priority 3 Areas include the following:

- Percentage of homes built pre-1940 is higher than the overall percentage.
- The year the structures were built in these areas, in general, is in the 1940s or earlier, compared to the city's median year built of 1959.
- The median value for owner-occupied units ranges from 8 to 30 percent lower than the city's overall median value.



The City will use CDBG funds in these priority areas for housing related activities such as single- and multi-unit rehabilitation and homeownership assistance programs, and preservation of historic residential structures but may also use CDBG funds for non-housing community development needs such as:

- Neighborhood revitalization, redevelopment and streetscaping

- Neighborhood and public facilities such as parking areas, community policing and park/recreational facilities
- Analysis of zoning and other regulations to determine suitability of laws
- Survey of properties as potential local landmarks and State Historical Society nomination
- Creation and support of neighborhood associations and watch groups
- Implementation of a neighborhood service agency to coordinate and assist with neighborhood organizing and rehabilitation efforts, such as a NeighborWorks organization.
- Landlord and/or tenant training programs

The City also will use funds for the purchase, demolition, and disposition of deteriorating or blighting structures/properties. The City aims to coordinate the expenditure of CDBG funds with the implementation of the city's Capital Improvement Program (CIP). Activities funded through the CIP plan include the upgrade of streets, sidewalks, and sewer/water/storm sewer service lines.

Activities funded with CDBG funds in priority areas will meet the national objectives of benefiting LMI persons and/or preventing or eliminating slum or blighting conditions.

Also eligible in these priority areas are targeted redevelopment areas designated by the City including, but not limited to, the South Shore Redevelopment Area, Main Street Redevelopment Areas, Near East Neighborhood Area, Campus Neighborhood Area, Broad/Bay Neighborhood Area and the South Central Neighborhood Area. Eligible activities in these Central City redevelopment areas include acquisition and disposition of property, relocation and demolition of blighting structures, creation of public facilities and creation of neighborhood support initiatives.

3. Identify any obstacles to meeting underserved needs (91.215(a)(3)).

The major obstacle to meeting underserved needs in the community is that there is currently no mechanism or encouragement in place for a private-public partnership to address the priorities for neighborhood projects, therefore limited public funds are relied upon for all neighborhood projects. Private citizens are currently on their own with the responsibility for upkeep of their own properties and for the coordination of their neighborhoods to initiate neighborhood projects. Additionally, capacity of the Department of Community Development is limited in that all areas cannot to be addressed immediately and prioritization is often overshadowed by other community needs in the tight budgetary environment. Other obstacles to serving underserved needs are the lack of coordination between service providers and independent groups competing for limited grant monies. Many more obstacles are discussed elsewhere in this Plan.

Managing the Process (91.200(b))

1. Identify the lead agency or entity for overseeing the development of the plan and the major public and private agencies responsible for administering programs covered by the consolidated plan.

The City of Oshkosh Department of Community Development is the lead agency responsible for overseeing the development and implementation of this 5-Year Consolidated Plan, the annual Action Plans, and the annual Consolidated Annual Performance Evaluation Reports (CAPERs).

The Department is also the major public agency responsible for administering programs addressed in the Consolidated Plan, except for Homeless Programs. The Continuum of Care (CoC) for Homeless Programming is the Winnebagoland Housing Coalition with ADVOCAP as the local non-profit agency taking the leadership role in administration.

2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.

See response in item 3 below.

3. Describe the jurisdiction's consultations with housing, social service agencies, and other entities, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons.

Note: HOPWA grantees must consult broadly to develop a metropolitan-wide strategy and other jurisdictions must assist in the preparation of the HOPWA submission.

During the development of this Plan and throughout the performance of the community's Community Development Block Grant (CDBG) obligation, City staff consults with the Oshkosh/Winnebago County Housing Authority and the Winnebagoland Housing Coalition.

The Authority was formed in 1970 and now maintains over 950 Public Housing units including family, single, disabled, and elderly units. It also administers over 400 Rental Housing Choice Vouchers, manages the properties of six group homes, coordinates a family self-sufficiency program, and facilitates a home ownership assistance program.

The mission of Authority is to promote adequate and affordable housing, economic opportunity, and a suitable living environment free from discrimination. Their mission is to promote and ensure safe, decent, and affordable housing for our participants, as well as provide owners and developers with an opportunity to rehabilitate and develop affordable housing. The Authority also administers the Homebuyer's Assistance Program that is supported with CDBG funds. In addition, the staff at the Authority is a key participant in the preparation of the Plan as well as Annual Action Plans and Consolidated Annual Performance and Evaluation Reports (CAPERs).

The Coalition supports emergency, transitional, permanent housing and housing service solutions; assesses needs and trends based on community demographic data; educates the community about affordable housing issues; collaborates to use existing and evolving housing resources and adopts goals that enable all persons access to suitable affordable housing.

The Coalition has representatives of various housing and social service organizations. Organizations represented in the coalition include ADVOCAP, ARC-Winnebago Disability Association, Cerebral Palsy of Mideast Wisconsin, Christine Ann Domestic Abuse Services, City of Oshkosh Department of Community Development, Clarity Care, East Central Wisconsin Regional Planning Commission, Fair Housing Center of Northeast Wisconsin, Father Carr's Place 2B Shelters, Financial Information & Service Center (FISC), Habitat for Humanity, Oshkosh/Winnebago County Housing Authority, Legal Action of Wisconsin, Lutheran Homes of Oshkosh, Oshkosh Area Community Foundation, Oshkosh Area School District, Oshkosh Landlord Association, American Red Cross, Salvation Army, Wisconsin State Representative Gordon Hintz, Oshkosh Area United Way, University of Wisconsin-Extension and Winnebago County Department of Human Services. As part of this coalition, input is continually gathered

from those focusing on services that are not only housing-related but services related to individuals with disabilities, victims of domestic abuse, homeless, elderly persons, etc.

A representative from the City of Oshkosh Community Development Department meets monthly with the Coalition. A Consolidated Planning Meeting with this same group is held once per year. At these meetings, agencies are able to share what they feel are the needs in the Oshkosh area pertaining to their agency type.

Citizen Participation (91.200(b))

1. Provide a summary of the citizen participation process.

The overall objective of citizen participation is to include residents and interested agencies in the decision making process relative to planning for implementing housing and community development activities. Full participation can be achieved by providing timely and accurate information on the Community Development Block Grant (CDBG) application process, timetable, performance reports and amendments thereto.

The City of Oshkosh Department of Community Development is the agency charged with implementing citizen participation requirements.

Through this Plan, the Department will further its efforts to reach more citizens, with emphasis on low, very low, and extremely low-income residents, where housing and community development funds may be spent. Advertisements for the meetings are done on a timely basis with a reasonable amount of lead-time for individuals and organizations to adjust their schedules. If any of the scheduled times are not convenient, staff is available by appointment to meet with individuals and/or agencies to review the information and explain the process presented at the informational sessions.

Participation by extremely low, very low and low-income groups representing either neighborhood or citywide organizations are encouraged to attend these meetings, express views and fully participate in the process. These groups may include refugees, elderly, limited clientele groups, minorities and especially low and moderate-income residents of blighted areas.

The City considers the views and opinions of its citizens, public agencies and all other interested parties in conjunction with the preparation of the Annual and Consolidated Plans. Special efforts are made, not only through the planning process, but also throughout the program year to obtain input from citizens, organizations and agencies regarding the current programs that utilize CDBG funds.

On June 1, 2010, a legal public notice was published in the Oshkosh Northwestern newspaper initiating the required 30-day public review period for this Plan and notifying the public of a hearing on the Plan on July 1. Those interested were invited to view the Plan at the Department of Community Development office, the public library and on the City of Oshkosh website.

On July 6, 2010, the Oshkosh Plan Commission reviewed the 2010-2014 Consolidated Plan along with the 2010 Annual Plan to ensure consistency with the city's Comprehensive and other plans.

On July 13, 2010, the Oshkosh Common Council held a public hearing on the 2010-2014

Consolidated Plan along with the 2010 Annual Plan to receive any comments or views on the Plans.

2. Provide a summary of citizen comments or views on the plan.

This section will be inserted after the public hearings.

3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.

During the citizen participation process, all meetings were held in public facilities accessible to persons with disabilities so that access was not a barrier to participation. Meetings were posted in paper and electronic format in order to reach as many agencies and persons as possible and therefore trying to broaden participation as much as possible.

The phrase, “If persons planning on attending have specialized needs (interpreters, handicap accessibility, etc.), please contact the Department of Community Development at 920.236.5059” was added to all notices.

Those contacted and coordinated with during the development of this Plan include a broad cross-section of service agencies to reach as many organizations for input as possible. Agencies specifically invited that provide outreach to minorities and non-English speaking persons, as well as persons with disabilities, include: ARC-Winnebago County Disability Association, Fair Housing Center of Northeast Wisconsin, ADVOCAP, United Migrant Opportunity Services, Hmong Service Center, Oshkosh Seniors Center, Siena Transitional Living Center, Habitat for Humanity of Oshkosh and the Oshkosh/Winnebago County Housing Authority.

Also during the development of this Plan, City Department of Community Development staff continues to participate on the Winnebagoland Housing Coalition and consulted with other City departments including the Inspections Services Division regarding housing quality issues and with the Health Services Division regarding lead-based paint related issues.

4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

This section will be inserted after the public hearings

Institutional Structure (91.215(i))

1. Explain the institutional structure through which the jurisdiction will carry out its consolidated plan, including private industry, non-profit organizations, and public institutions.

The City of Oshkosh is a municipal government located in Winnebago County in east central Wisconsin. The City operates under a City Manager/Council form of government and operates its Community Development Block Grant (CDBG) funding through the Department of Community Development. All Department divisions, including Assessing, Planning and Inspections, are located at City Hall, which makes the collaboration of information very feasible.

As the lead agency in implementing the Consolidated Plan, the Department will work collaboratively with public and private agencies to address needs identified in this Plan.

Implementation will involve three main approaches:

- a) Direct provision of certain services and programs by City staff including housing rehabilitation, redevelopment activities and certain neighborhood improvement projects, as well as coordinating and assisting private groups such as Habitat for Humanity, Oshkosh Area School District and a yet to be identified neighborhood services provider, such as a NeighborWorks Agency.
- b) Working with public and private agencies, including the Oshkosh/Winnebago County Housing Authority, who serve identified populations in need and provide services that address other Consolidated Plan goals.
- c) Working with the Oshkosh Area Community Foundation and Oshkosh Area United Way to coordinate provision of funding for agencies seeking funding for activities that would be eligible for Public Services Consortium funding to maximize the expenditures of each funding agency.

2. Assess the strengths and gaps in the delivery system.

City staff maintains contact with representatives of a variety of agencies such as ADVOCAP, Winnebagoland Housing Coalition, and the Oshkosh/Winnebago County Housing Authority. These agencies provide services and serve needs related to those identified in this Plan and this contact allows staff to build and maintain relationships with agencies and keep abreast of issues and trends as they develop.

The coordination between the City, Winnebago County, Oshkosh Area Community Foundation and Oshkosh United Way in funding Public Service activities maximizes the impact and coordination of funding provided and helps to reduce duplication and redundancy of services, both public and private.

Gaps are occurring primarily due to lack of financial resources to meet needs, philosophical differences between private and public agencies, and the general policy or “political will” of the local governing bodies. Additionally, difficulty in the delivery system stems from the lack of both paid and volunteer staff hours in the public and private sectors, as well as the great amount of “red tape” associated with public and private granting agencies.

3. Assess the strengths and gaps in the delivery system for public housing, including a description of the organizational relationship between the jurisdiction and the public housing agency, including the appointing authority for the commissioners or board of housing agency, relationship regarding hiring, contracting and procurement; provision of services funded by the jurisdiction; review by the jurisdiction of proposed capital improvements as well as proposed development, demolition or disposition of public housing developments.

The City and the Oshkosh/Winnebago County Housing Authority has a very good working relationship and coordination is exemplary. In fact, until 2006 the Oshkosh/Winnebago County Housing Authority and the City were linked units. Prior to that time, the Oshkosh Housing

Authority fell under the umbrella of the City of Oshkosh Department of Community Development. In 2006, the Oshkosh Housing Authority split from the City and consolidated with the Winnebago County Housing Authority, partially because the City did not exercise review authority over the Authority budget and only organized with the Authority from a zoning and land use perspective. Additionally, there was the feeling that the goals and objectives of the Oshkosh Housing Authority were in-line with those of the Winnebago County Housing Authority and the realization that the separation was a duplication of services and staff.

The mission of Oshkosh / Winnebago County Housing Authority is to promote adequate and affordable housing, economic opportunity, and a suitable living environment free from discrimination. Their mission is to promote and ensure safe, decent, and affordable housing for our participants, as well as provide owners and developers with an opportunity to rehabilitate and develop affordable housing, which is very similar to the goals of the City's Community Development Block Grant program.

There is a high level of coordination with the Authority on a variety of issues/projects and a good working relationship exists between its Executive Director and the City. The City provides CDBG funding and some programming support to the Homeownership Assistance Program administered by the Authority. Program participants purchasing homes in Oshkosh receive assistance in the form of a grant of CDBG funds for administrative costs for purchase assistance and for rehabilitation of homes following purchase. The City also collaborates with the Authority to address needs as they develop. For example, City and Authority staff are working together to identify locations of assisted housing units and also of land that is suitable for the development of a multiple structure housing facility. Additionally, the City and the Authority are partnered in the expenditure of Neighborhood Stabilization Program funds.

Monitoring (91.230)

Describe the standards and procedures the jurisdiction will use to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

The City of Oshkosh Department of Community Development is the primary monitor of the expenditure of funds and compliance with program requirements. Staff will use quarterly reports, annual reports, and interviews to ensure projects are completed in a compliant and timely manner. Staff will use the Annual Action Plan and this 5-Year Consolidated Plan as a guide for selecting and implementing projects funded with CDBG funds. The annual Action Plan is presented to the City Plan Commission for their approval of compliance with the City's Comprehensive Plan and is adopted by the Common Council. Having this annual review by the Plan Commission ensures long-term compliance with the Comprehensive Plan and adoption by the Common Council reinforces the political will to perform identified actions. Additionally, the Consolidated Annual Performance and Evaluation Report (CAPER) is prepared to report accomplishments and findings, which are a result of our monitoring process. The CAPER is also presented to the Plan Commission and Common Council.

In an effort to better administer and monitor the allocation and delivery of the Public Services aspect of our CDBG program, the City continues to enter into an annual agreement with the Oshkosh Area United Way and Oshkosh Area Community Foundation to function as a "Public Service Consortium." Each Public Service sub recipient submits quarterly and annual reports to

the Foundation and City. Payment is made to the sub recipient after their reports are reviewed for compliance with the agency's Agreement. If necessary, follow up calls or visits are made to the agency when reports are not in accordance with the agreement or additional information is required. Toward the end of the program year, annual on-site visits are made to each Public Service sub recipient to assess agency performance and compliance with program regulations. Also at that time, the agency reports their progress, any problem areas, and the evaluator is able to make any comments and recommendations. The City intends to continue this Consortium format through the next five year period covered by this Plan.

Priority Needs Analysis & Strategies (91.215(a))

1. Describe the basis for assigning the priority given to each category of priority needs.

Priority will be given to low to moderate-income (LMI) areas to ensure compliance with HUD guidelines and to provide the largest impact on those areas most in need. LMI areas are shown on the map on page 4 and were established on the basis of 2000 Census data. LMI areas are Census Tracts and Census Block Groups in which 51 percent or more of the households have an income below 80 percent of the Median Family Income (MFI) for the area. LMI areas are established every 10 years following a new census. New data is anticipated to be released in 2012, the ideal time to update this Plan.

Basis for assigning other priorities is given to LMI persons in need of housing related assistance including rehabilitation, as well as other assistance to address emerging housing needs that will maximize benefits to those needing them the most. The following priorities have been established within the LMI census tracts and block groups:

- Areas with higher concentrations of LMI households.
- Areas of higher volumes and increasing rates of foreclosure.
- Areas of higher concentrations of density and rental housing than the city wide average.
- Areas identified as Priority 1 Neighborhood Improvement Strategic Areas in the City's 2005-2025 Comprehensive Plan.
- Historic Districts listed on the National Register of Historic Places within LMI areas.
- Areas targeted for intensive enforcement of building and property maintenance codes in the City's 2005-2025 Comprehensive Plan.

2. Identify any obstacles to meeting underserved needs.

There are many obstacles such as lack of resources, cost increase of rehabilitation projects, lack of consensus on approach to addressing problems, refusal of households to accept assistance, high foreclosure rates and fear of borrowing, regulations regarding use of CDBG funds and providers unwillingness to cooperate with other agencies to make resources available and to share information.

Lead-Based Paint (91.215(g))

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.

The following tables show the estimated number of housing units that contain lead-based paint hazards occupied by extremely low-income and very low-income households.

Based on the information in the table, approximately 14,805 dwelling units in the city may contain lead paint. As discussed elsewhere in this Plan, there is a higher concentration of low-income households in the older parts of the city. Based on this, the City staff estimate that 50 percent (or 5,434) of the LMI households are living in units containing at least some lead paint. Obviously, the only true way to determine the lead based paint hazard is to test for the presence of lead in household dust, soil, paint, etc. and to evaluate the condition of the paint containing lead. There has been no comprehensive testing done for lead hazards in residential properties in the community. For this reason, and all the other reasons discussed, it is not possible to determine the actual lead paint hazard.

ESTIMATED NUMBER OF HOUSING UNITS OCCUPIED BY LMI HOUSEHOLDS THAT CONTAIN LEAD-BASED PAINT	
Owners	
LMI owner households	4,671
Estimate of percentage of LMI owner households living in units containing lead paint	50%
Estimate of LMI owners living in property containing lead paint	2,335
Renters	
LMI rental households	7,155
Number of LMI rental households living in Housing Authority units which are lead free	956
Balance renting private units	6,199
Estimate of percentage of LMI rental households living in units containing lead paint	50%
Estimate of LMI renters living in property containing lead paint	3,099
Estimated number of LMI households living in housing containing lead paint	5,434

Source: 2000 U.S. Census and 2000 CHAS Data Book

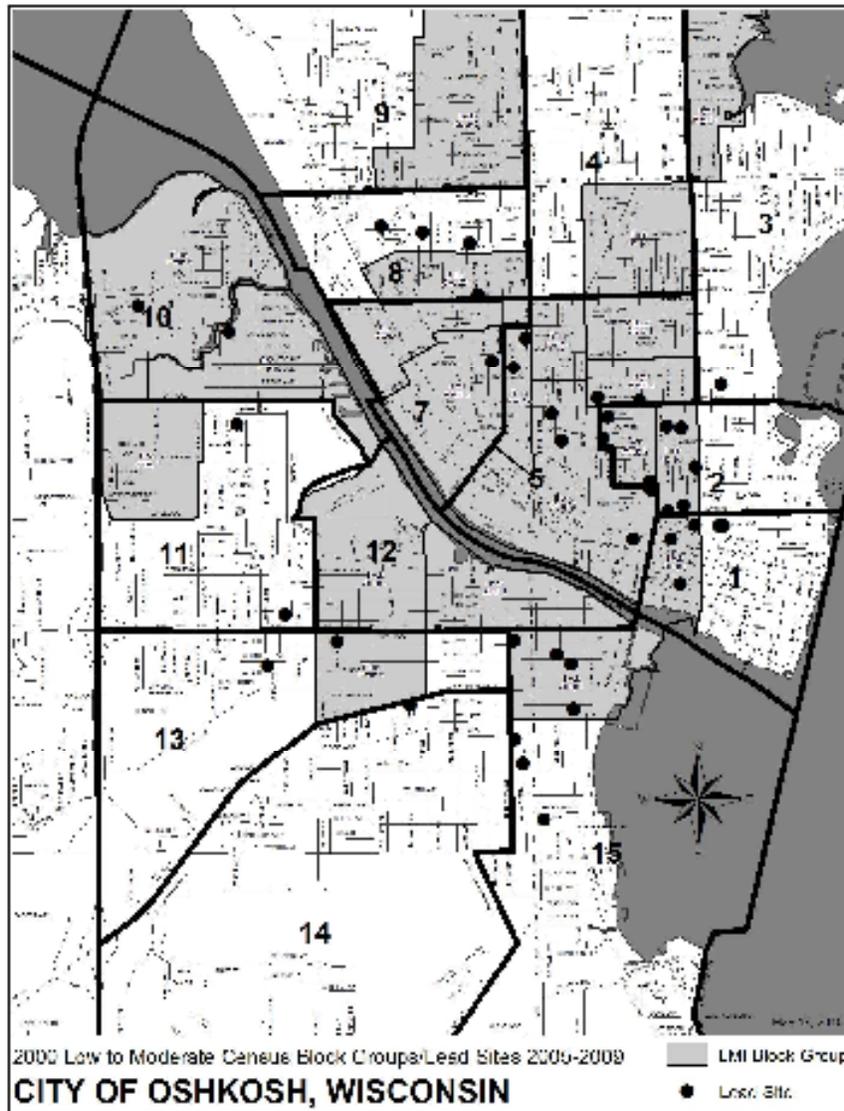
ESTIMATED LEAD-BASED PAINT HAZARD			
Year of Construction	Number of Dwelling Units	Estimated % with Lead Paint	Estimated # of Units Containing Lead Paint
Pre-1940	8,020	90%	7,218
1940-1959	5,029	80%	4,023
1960-1979	5,749	62%	3,564
TOTAL			14,805

Source: 2000 U.S. Census and 2000 CHAS Data Book

- 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.

State Law requires that all cases of elevated blood lead level be reported to the City Public Health Department. The addresses of all reported cases of elevated blood lead levels in children are kept on record at City Hall. Of the 43 cases reported from 2005 to 2009, 24 cases involved renter-occupied units and 19 cases involved owner-occupied units. The following map shows the locations of reported cases of lead poisoning from 2005 through 2009 and illustrates the high correlation between reported cases of elevated blood lead levels and low to moderate income census tracts.



The City continues to implement applicable HUD lead paint regulations in owner and renter occupied housing rehabilitation projects. The Department of Community Development will continue to cooperate with the City Health Department to provide CDBG rehabilitation assistance to income qualified owner-occupied households with children with elevated blood lead levels. The Department of Community Development's Housing Rehabilitation Specialist is trained to use the City's XRF machine, which was purchased with administrative funds from a

HUD demonstration lead paint reduction program. The Department will continue to maintain the XRF machine using CDBG funds; however the machine will become obsolete within two years and will need to be replaced.

City Health Department staff has also been trained to use the XRF machine and also have access to the equipment.

Staff from the City Health Department visits the homes of children where there have been reported cases of elevated blood lead levels. Staff will then provide information on how to clean, on lead hazard reduction and on childhood lead poisoning. The Department also has a commercial grade HEPA filter vacuum available to lend to households where there are reported cases of elevated blood lead levels.

Additionally, all contractors used to perform lead hazard reduction work must be trained and certified by the State in a lead hazard reduction discipline and associated with a certified lead company. The City prefers to work with State Certified general contractors as part of their housing improvement programs, as most projects disturb lead based paint or control/abate lead paint hazards. However, the general contractor may subcontract the lead work to a certified lead subcontractor.

HOUSING

PLEASE ALSO SEE HOUSING NEEDS TABLE IN APPENDIX

Housing Needs (91.205)

- 1. Describe the estimated housing needs projected for the next five year period for the following categories of persons: extremely low-income, low-income, moderate-income, and middle-income families, renters and owners, elderly persons, persons with disabilities, including persons with HIV/AIDS and their families, single persons, large families, public housing residents, victims of domestic violence, families on the public housing and section 8 tenant-based waiting list, and discuss specific housing problems, including: cost-burden, severe cost- burden, substandard housing, and overcrowding (especially large families).**
- 2. To the extent that any racial or ethnic group has a disproportionately greater need for any income category in comparison to the needs of that category as a whole, the jurisdiction must complete an assessment of that specific need. For this purpose, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category as a whole.**

The 2000 Comprehensive Housing Affordability Strategy Data Book (CHAS) shows that 49 percent of all Oshkosh households were classified as being of extremely low, very low or low-income. Extremely low-income households are those with incomes of less than 30 percent of the median family income (MFI) for the area. Very low-income households are those with incomes less than 50 percent of the MFI for the area. Low-income households are those with incomes less than 80 percent of the MFI for the area. The 2000 Census shows 24,082

households in Oshkosh. The following breakdown shows the number of extremely low, very low and low-income households:

HOUSEHOLDS		
Extremely Low-Income	11%	2,588
Very Low-Income	16%	3,381
Low-Income (Moderate)	22%	5,358
Total LMI Households	49%	11,327

Source: 2000 CHAS Data Book

HOUSING OCCUPANCY TYPE WITH ANY HOUSING PROBLEMS BY HOUSEHOLD INCOME LEVEL		
Income Level	Renter Households	Owner Households
Extremely Low-Income	76%	81%
Very Low-Income	57%	49%
Low-Income (Moderate)	12.5%	23%

Source: 2000 CHAS Data Book

Approximately 32 percent of the renter households and 15 percent of the owner households report housing problems, which may include costs in excess of 30 percent of income, overcrowding, and/or poor conditions.

EXTREMELY LOW-INCOME

Approximately 11 percent or 2,588 Oshkosh households fall into the Extremely Low-Income (ELI) category. These households have the most severe housing problems. Over three-fourths or 2,000 households in this group reported housing problems including cost burdens¹ greater than 30 percent of MFI and more than half or 1,379 households reported cost burdens in excess of 50 percent of MFI.

The Small Related and Elderly Households are more numerous than the Large Related Households in this category. However, the “All Other Households” are more numerous than the other three categories possibly because of the presence of a significant number of University students renting off-campus housing. This may distort the picture for this entire category of extremely low-income.

The 2000 CHAS data shows that ELI renters are almost three times as many as ELI owners.

Small Related Renter Households and Small and Large Related Owner Households in this category were the most likely to have housing problems such as cost burdens and substandard housing, etc.

People in this income range are also most likely to become homeless or be threatened with homelessness.

¹ Cost burden is the fraction of a household's total gross income spent on housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payment, taxes, insurance, and utilities.

VERY LOW-INCOME

Approximately 16 percent or 3,381 Oshkosh households fall into the Very Low-Income (VLI) category, not including the ELI households. More than half or 1,778 of these households report cost burdens greater than 30 percent of MFI and only about 9 percent or 324 had cost burdens in excess of 50 percent of MFI.

The Small Related and Elderly Households are more numerous than the Large Related Households in this category. However, once again, the "All Other Households" is the largest group in the very low-income category just as it is in the extremely low-income category again possibly impacted by University off-campus housing.

The 2000 CHAS data shows that VLI renters are almost two times as many as VLI owners.

Large Related Renter Households and "All Other Household" Owner Households were the most likely to have housing problems such as cost burdens and substandard housing, etc.

LOW-INCOME (MODERATE)

Approximately 22 percent or 5,358 Oshkosh households fall into the Low-Income (moderate) (LI) category, not including the ELI and VLI households. Approximately 15 percent or 835 of these households report cost burdens greater than 30 percent of MFI and only about 1.7 percent or 91 households report cost burdens in excess of 50 percent of MFI.

The "All Other Households" is the largest group in the LI category just as it is in the extremely ELI and VLI categories, again possibly impacted by University off-campus housing.

The 2000 CHAS data shows that there are about the same amount of LI renters as LI owners.

Large Related Renter Households and "All Other Household" Owner Households were the most likely to have housing problems such as cost burdens and substandard housing, etc.

THE ELDERLY

Elderly who can no longer maintain a single-family house and may need daily assistance and companionship are seeing increases in choices in housing due to recent new construction of housing complexes marketed for 62-plus age groups.

Keeping this growing population in their homes and providing assistance may also be an effective approach to restraining housing costs for this group. This may involve physical modifications or rehabilitation to the houses and continued evolution in social service and medical delivery.

A high percentage of the elderly have housing cost needs. Approximately 1,266 elderly households (35 percent of the total elderly) had housing cost burdens in excess of 30 percent of MFI in 2000.

PERSONS WITH DISABILITIES

Because not all persons with disabilities require special or subsidized housing, these comments are based on housing needs of those who require specialized housing, assistance to live

outside a nursing home and/or subsidized housing. These comments do not address needs for nursing home beds.

The City does not anticipate a significant change in the demand for housing for persons with disabilities during the time period covered by this Plan, assuming existing County, State and Federal government programs are funded at current levels.

There will be the need for affordable accessible single family rental units for developmentally disabled persons being released from State funded facilities and for those currently in either Community Based Residential Facilities (CBRFs) or licensed adult family homes that are not accessible.

PERSONS WITH HIV/AIDS

According to the State of Wisconsin Department of Health Services, Winnebago County saw an increase in reported HIV cases in 2009 and increases were at least 10% higher in 2009 compared to the average during 2004-2008.

As of December 31, 2009, there are 93 reported cases of HIV infection for persons presumed alive. 47 of those cases are persons with AIDS.

The City does not maintain information on the number of persons or households containing persons diagnosed with HIV/AIDS living in the city. The City is not aware of an expressed or known need for housing for this population. However, Winnebago County is served by the AIDS Resource Center of Wisconsin (ARCW), which provides safe and affordable housing for people with HIV disease. ARCW's comprehensive housing program provides residential housing, intensive housing counseling and financial assistance in the form of rent, utility and security deposit payments to people with HIV and their families to help them secure safe and affordable homes.

PUBLIC HOUSING & SECTION 8

Residents of Public Housing are by definition low-income, but as individual households, they may have little else in common. Even among those currently low-income, we find many who have been, or will be at some future point, financially independent. As they are a diverse group, their needs and deficits vary widely.

Improvements to Housing Authority congregate sites add special purpose areas for personal care, education, crafts, games, recreation and entertainment. New policies also allow residents greater discretion to personalize apartments, just as management seeks to customize common areas to diminish institutional décor. The new spaces are intended to enhance socialization among the residents and allow support of many varied activities with broader appeal. Many residents at the congregate sites will need assistance to remain independent and active. Accordingly, the Housing Authority will continue to employ a Service Coordinator, a Wellness Coordinator and an Activity Director. Each service provider assists residents to deal with daily challenges and they work together to help residents to be fit and fully engaged in their communities.

Much of the Authority's work is facilitating understanding and contacting community resources outside the Authority. The Authority bolsters these services by hosting a meal-site serving lunch

five days a week at the congregate buildings. And, finally, a fleet of community providers delivers a vast array of services to residents.

Residents of family units need a dwelling that meets the family's needs. However, their greatest needs are frequently education and employment. The Authority primarily adds domestic stability and relies on referrals to help families access other community resources to improve educational and employment prospects.

There are 164 households on the waiting list for units owned by the Authority. At the same time, the Authority reduced the level of rent assistance to 70% of the fair market rent. This change was made due to the increasing levels of subsidies required by those households receiving assistance.

The Authority receives 413 Section 8 vouchers per year and Oshkosh is allocated 60 percent or 248 of those. As of May, 2010, there were 900 people on the waiting list for Section 8 Rental Vouchers. Of these 900, 639 are families and 261 are individuals.

PUBLIC HOUSING & SECTION 8 WAITING LISTS					
	Disabled	Elderly	Families	Individuals	Total Households
Housing Authority	24	8			164
Section 8 Rental Vouchers	55	36	639	261	900

Source: May 2010 Oshkosh/Winnebago County Housing Authority Data

The following table represents the estimated need for housing on the part of those that will be on the Authority waiting list during the five year period covered by this Plan. The adjustment factor reflects applicants who do not qualify or drop out. The high rise one bedroom units are primarily for elderly and near elderly; vouchers are for those who get a subsidy from the housing authority to rent privately owned apartments.

Clearly, demand for rent assistance currently far exceeds supply and this situation is not expected to change significantly during the time period covered by this Plan.

ESTIMATED NEED FOR PUBLIC HOUSING & SECTION 8 WAITING LISTS BY HOUSING TYPE					
Housing Type	Projected New Applications	Adjustment Factor	Eligible	Subsidized Placement	Subsidized Rental Needs Met
High Rise One Bedrooms	1455	90%	1310	435	33.2%
Scattered-site Family Units	2345	35%	821	275	33.5%
Section 8 Vouchers	4155	75%	3116	635	20.4%

Source: May 2010 Oshkosh/Winnebago County Housing Authority Data

OVERCROWDING

The supply of very large housing units that are affordable to LMI households is shrinking because of demolitions. Newer houses with four or five bedrooms are too expensive for these needy LMI households. Thus, large LMI households are forced into overcrowded situations. Further evidence of this is that searches of six months or longer is common by large families utilizing Section 8 Rental Vouchers.

HOUSING UNITS WITH MORE THAN 1.0 PERSON PER ROOM			
Year	Occupied Housing Units	Housing Units with more than 1.0 person per room	Percent
2000	24,026	442	1.8

Source: 2000 U.S. Census

DISPROPORTIONATE NEEDS OF RACIAL OR ETHNIC GROUPS

Disproportionate needs exist when the percentage of persons in a category of need who are members of a particular racial or ethnic minority is at least 10 percentage points higher than the percentage of persons in the category as a whole.

HOUSEHOLD INCOME OF RACIAL OR ETHNIC GROUPS

Annual Household Income	Total Number	White (Non-Hispanic)	Non-White	% Diff.	Black	% Diff.	Hispanic	% Diff.	Native	% Diff.	Asian	% Diff.	Pac. Islander	% Diff.
Total (Renter & Owner)														
<30%	2651	2500	151	6%	22	1%	63	2%	24	1%	32	1%	10	0%
31-50%	3505	3352	153	4%	28	1%	44	1%	14	0%	67	2%	0	0%
51-80%	5498	5362	136	2%	0	0%	48	1%	12	0%	76	1%	0	0%
>80%	11952	11659	293	2%	44	0%	115	1%	26	0%	104	1%	4	0%
Total	23606	22873	733	3%	94	0%	270	1%	76	0%	279	1%	14	0%
Renters														
<30%	1919	1814	105	5%	22	1%	45	2%	24	1%	14	1%	0	0%
31-50%	2290	2161	129	6%	28	1%	36	2%	14	1%	51	2%	0	0%
51-80%	2720	2624	96	4%	0	0%	36	1%	12	0%	48	2%	0	0%
>80%	3048	2946	102	3%	24	1%	54	2%	12	0%	12	0%	0	0%
Total	9977	9545	432	4%	74	1%	171	2%	62	1%	125	1%	0	0%
Owners														
<30%	732	686	46	6%	0	0%	18	2%	0	0%	18	2%	10	1%
31-50%	1215	1191	24	2%	0	0%	8	1%	0	0%	16	1%	0	0%
51-80%	2778	2738	40	1%	0	0%	12	0%	0	0%	28	1%	0	0%
>80%	8904	8713	191	2%	20	0%	61	1%	14	0%	92	1%	4	0%
Total	13629	13328	301	2%	20	0%	99	1%	14	0%	154	1%	14	0%

Source: 2000 U.S. Census, 2000 CHAS Data Book

Based the information in table above, there are no racial or ethnic groups experiencing a disproportionate level of housing problems compared to white households.

The table also shows that no one racial category (Black, Asian, etc) has an extreme disproportionate need. However, the sample size is so small the issue of statistical validity must

be considered, especially considering the sampling error that can occur with this level of analysis.

NON-WHITE HOUSEHOLDS AS A PROPORTION OF ALL LOW TO MODERATE INCOME RENTER HOUSEHOLDS		
Income	Number of Households	Number of Non-White Households
< 30% MFI	1,926	105
30 – 50% MFI	2,220	129
50 – 80% MFI	2,684	96
TOTAL	6,380	330
Percentage of Non-White Households		4.8%

Source: 2000 U.S. Census
MFI = Median Family Income for the area

NON-WHITE HOUSEHOLDS AS A PROPORTION OF ALL HOUSEHOLDS RECEIVING ASSISTANCE FROM THE OSHKOSH/WINNEBAGO COUNTY HOUSING AUTHORITY

Program	Total	Non-White
Voucher Recipients	230	27
Elderly Units	380	34
Family Units (Including Cumberland Court)	158	52
TOTAL	768	113
Percentage of Non-White Households		14%

Source: May 2010 Oshkosh/Winnebago County Housing Authority Data

NON-WHITE HOUSEHOLDS AS A PROPORTION OF ALL APPLYING FOR ASSISTANCE FROM THE OSHKOSH/WINNEBAGO COUNTY HOUSING AUTHORITY

Program	Total	Non-White
Voucher Recipients	812	117
Elderly Units	48	2
Family Units (Including Cumberland Court)	497	78
TOTAL	1357	197
Percentage of Non-White Households		14.5%

Source: May 2010 Oshkosh/Winnebago County Housing Authority Data

Based on the tables above, while Non-White Households make up 4.8 percent if all LMI Renter Households, they make up 14 percent of all households receiving housing subsidies from the Housing Authority. 14.5 percent of all the households on the Authority waiting list are non-white.

Based on this, the City does not see a need to take any steps to address the disproportionate need of Non-White LMI Households.

Priority Housing Needs (91.215(b))

- 1. Identify the priority housing needs and activities in accordance with the categories specified in the Housing Needs Table.**
- 2. Provide an analysis of how the characteristics of the housing market and the severity of housing problems and needs of each category of residents provided the basis for determining the relative priority of each priority housing need category.**

Note: Family and income types may be grouped in the case of closely related categories of residents where the analysis would apply to more than one family or income type.

- 3. Describe the basis for assigning the priority given to each category of priority needs.**

As part of establishing priorities, the City developed the following table based on information in the Housing Needs Table (see Appendix B). Household types are listed in rank order based on the number of households in the category. Only household categories with at least 100 total households are included. Housing problems are then identified for each household type and the actual number of households with the identified problem was calculated. Housing problems are only noted if at least 20% of the households in the specified category with an identified housing problem.

Priorities were then established on the basis of both the number and the percentage of households experiencing an identified problem.

The following table identifies high, medium, and low priorities for owner and renter occupied households based on the amount of households cost burdened and the number of households with problems. Examples of household problems include overcrowding and inadequate housing.

NUMBER OF HOUSEHOLDS BY TYPE, INCOME & HOUSING PROBLEM

Number of Households	Type	Incidence and type of housing issue	Number of households with problem listed
1,519	All other renter 50–80% MFI	No significant issues	N/A
1,131	All other renter 30–50% MFI	61% cost burdened >30%	692
865	All other renter <30% MFI	82% cost burdened >30% 60% cost burdened >50%	409 519
859	Small related owner 50–80% MFI	28% cost burdened >30%	241
693	Small related renter 50–80% MFI	No significant issues	N/A
656	Elderly owner 30–50% MFI	27% cost burdened >30%	177
576	Small related renter 30–50% MFI	45% cost burdened >30%	259
549	Elderly renter <30% MFI	57% cost burdened >30% 35% cost burdened >50%	313 192
478	All other owner 50–80% MFI	36% cost burdened >30%	172
472	Small related renter <30% MFI	87% cost burdened >30% 64% cost burdened >50%	411 302
448	Elderly owner <30% MFI	57% cost burdened >30% 35% cost burdened >50%	355 157
435	Elderly renter 30–50% MFI	57% cost burdened >30%	248
348	Elderly renter 50–80% MFI	22% cost burdened >30%	77
224	Small related owner 50–80% MFI	35% any housing problem 17% cost burdened >30%	78 38
222	Small related owner 30–50% MFI	79% cost burdened >30% 41% cost burdened >50%	175 91
170	All other owner 30–50% MFI	82% any housing problem 82% cost burdened >30% 34% cost burdened >50%	139 139 58
124	Large related renter 50–80% MFI	42% any housing problem 24% cost burdened >30%	52 30
113	Large related owner 30–50% MFI	71% any housing problem 64% cost burdened >30%	80 72

Source: 2000 CHAS Data Book

High priority
Medium Priority
Low Priority

Readers should note that those households cost burdened at 30% or 50% of MFI are a subset of households counted in the category, “Any Housing Problem.”

ADDITIONAL OBSERVATIONS

In addition to assisting in identifying priorities, the following issues should be taken into account:

- “All Other Renters” contains, in large part, University of Wisconsin-Oshkosh students living off campus. Because their housing situation is both voluntary and temporary, it will be addressed in implementation of this Plan other than by use of CDBG funding for activities involving enforcement of building and property maintenance codes.
- There appears instability of the housing situation in owner households in the 30-50 percent of MFI category. These households are experiencing housing problems related to condition as well as to cost. This unfortunate combination leads to deterioration of individual properties, blighting of neighborhoods, as well as the possibility of posing an unsafe living situation for the occupants. These households are at highest risk of foreclosure as they, unlike most of the elderly homeowners, are still making mortgage payments.

4. Identify any obstacles to meeting underserved needs.

- Lack of resources (especially Section 8 rent assistance).
- Cost increase of rehabilitation projects due to lead paint hazard work are significantly reducing the overall number of households that can be assisted through rehabilitation.
- Lack of consensus on approach to addressing problems (for example, construction of affordable rental housing versus provision of rent assistance).
- Refusal of households to accept assistance (especially the elderly).
- Housing Authority policies regarding tenant selection denies access to rent assistance to those who have criminal histories or serious credit problems – those who may need assistance most.
- Mental health/AODA/Developmental issues prevent households from being able to address housing related problems on their own and from obtaining and keeping assistance.
- Regulations regarding use of CDBG funds (e.g. rent subsidies are classified as a public service activity, and there is a spending cap on funds used for public service, whereas there would be more flexibility to provide rent subsidies with CDBG if that activity was classified as a housing activity).

Housing Market Analysis (91.210)

PLEASE ALSO SEE HOUSING MARKET ANALYSIS IN APPENDIX

1. Based on information available to the jurisdiction, describe the significant characteristics of the housing market in terms of supply, demand, condition, and the cost of housing; the housing stock available to serve persons with disabilities; and to serve persons with HIV/AIDS and their families. Data on the housing market should include, to the extent information is available, an estimate of the number of vacant or abandoned buildings and whether units in these buildings are suitable for rehabilitation.

The table below shows selected market characteristics from the 2000 U.S. Census. These characteristics were used in the market analysis for Oshkosh.

SELECTED HOUSING INDICATORS FOR OSHKOSH

Total number of housing units	25,359
Occupied housing units	24,082
Vacant units and percentage	1,338 (5.3%)
Owner-occupied vacancy rate	1.3%
Renter occupied vacancy rate	6.5%
Owner-occupied units and percentage	13,851 (57.5%)
Renter occupied units and percentage	10,231 (42.5%)
Median owner-occupied home value	\$86,300
Median gross rent	\$487
Percentage of owners paying more than 30% of income for housing costs	16.1%
Percentage of renters paying more than 30% of income for housing costs	31.9%
Percentage of housing units built prior to 1960	51.4%

Source: 2000 U.S. Census

EXISTING HOUSING SUPPLY

According to the 2000 Census, of the 24,082 occupied housing units in Oshkosh, 57.5 percent were owner-occupied and 42.5 percent were renter-occupied. There was a 1.3 percent vacancy rate in owner-occupied and 6.5 percent vacancy rate in renter-occupied units. The owner-occupied housing information is shown below in detail for each of the city's Census Tracts.

OWNER OCCUPANCY RATES BY CENSUS TRACT

Census Tract	Owner-Occupied Units in 1990		Owner-Occupied Units in 2000		Percent Change in Owner Occupied Units from 1990 to 2000
	Number	Percent	Number	Percent	
1	750	55%	763	57%	1.7%
2	496	40%	509	42%	2.6%
3	1,143	65%	1,195	66%	4.5%
4	786	63%	804	63%	2.3%
5	862	45%	928	35%	-1.0%
6*	75	9%	*	*	*
7	199	24%	143	17%	-28.1%
8	874	58%	946	61%	8.2%
9	655	67%	732	62%	11.8%
10	538	46%	636	48%	18.2%
11	906	48%	960	46%	6.0%
12	556	56%	535	56%	-3.8%
13	806	67%	832	68%	3.2%
14	1,255	72%	1,348	70%	9.5%
15	878	62%	908	58%	3.4%
16	30	23%	318	50%	960%
17	55	95%	201	53%	265%
18	1,038	70%	1,943	61%	87.2%
19	40	95%	132	63%	230%
Total	11,942		13,851		16%

□ Shaded rows are low to moderate income census tracts

* Census Tract 6 was combined with Census tract 6 in the 2000 Census

Source: 1990 and 2000 U.S. Census

The total number of owner-occupied units in Oshkosh increased 16 percent from 11,942 to 13,851 between 1990 and 2000. While ownership did not increase at the same rate in established, older areas, there was some growth, which is good news for the viability of certain older neighborhoods. Unfortunately, there was a significant drop in the rate of owner occupancy in three of four of the LMI Census Tracts between 1990 and 2000.

The table below compares number of housing units by type in 1990 and 2000. The majority of housing units in the city are single-family structures. The "One-Unit, Attached" structures are those classified as houses attached to non-residential uses. The "Other" category in the Census included boats, recreational vehicles, and vans. The number of these units is small enough that the percentage for this category is rounded to zero.

Between 1990 and 2000, there was a decrease in the percentage of “1-Unit, Detached” structures and “2-Unit” structures. While the number of “1-Unit, Detached” structures increased from 1990 to 2000, these structures now comprise a smaller portion of the overall housing supply.

HOUSING UNITS BY TYPE						
Units in Structure	1990		2000		Numerical Change 1990-2000	Percent Change 1990-2000
	Units	Percent	Units	Percent		
1-unit, detached	12,720	58.3%	14,615	57.6%	1,895	14.9%
1-unit, attached	392	1.8%	685	2.7%	293	74.7%
2 units	3,568	16.3%	3,522	13.9%	-46	-1.3%
3 or 4 units	1,352	6.2%	1,426	5.6%	74	5.5%
5 to 9 units	1,113	5.1%	1,920	7.6%	807	72.5%
10 to 19 units	869	4.0%	1,275	5.0%	406	46.7%
20 or more units	1,419	6.5%	1,699	6.7%	280	19.7%
Mobile Home	156	0.7%	217	0.9%	61	39.1%
Other	238	1.1%	0	0%	-238	-100%
Total	21,827		25,359			

Source: 1990 and 2000 U.S. Census

HOUSING DEMAND

According to the East Central Wisconsin Regional Planning Commission (ECWRPC), the number of persons per household is expected to continually decline over the next 15 to 20 years due to an increase of single elderly households and “empty-nester” households. Based on the increase in population and the decrease in household size, ECWRPC has estimated that Oshkosh will need 2,381 additional dwelling units by the year 2015. This increase in dwelling units includes a combination of all types of housing units, except for group facilities such as nursing homes, institutions, and dormitories. This estimate is based on ECWRPC’s population projections and household size estimates.

According to the 2000 Census, the overall vacancy rate for Oshkosh was 5.3 percent. Owner-occupied units had a vacancy rate of 1.3 percent, while renter units had a vacancy rate of 6.5 percent. The recent housing crisis has had a significant impact on the Oshkosh’s housing market. Earlier in the decade, lower rates made it possible for many renters to move to home ownership at the same time creating incentives for developers to build additional rental units on speculation. However, when the housing market crashed, many of those who purchased homes for the first time are now facing foreclosure. The number of foreclosures on homes has increased significantly since 2002. Because of this, the need for rental homes has increased along with an additional burden on agencies that work to meet the needs of people in financial trouble such as homeless shelters, Department of Human Services, church groups and tax supported agencies. This cost is then sent down to the taxpayer.

OSHKOSH POPULATION PROJECTIONS					
Number of Households	1990 Census	2000 Census	2006-2008 American Community Survey Estimate	2010 ECWRPC Projection	2015 ECWRPC Projection
Population	55,006	62,916	64,635	67,996	70,080
Population Increase		7,916	1,719	3,361	2,084
Housing Units	21,827	25,420	27,316		
Number of Occupied Housing Units	20,957	24,082	24,528	26,171	27,075
Average Household Size	2.39	2.31	2.23	2.29	2.28
Estimated New Dwelling Unit Need				1467	914

Source: 1990 and 2000 U.S. Census, 2006-2008 American Community Survey, East Central Wisconsin Regional Planning Commission

OSHKOSH HOUSING CONSTRUCTION						
Unit Type Constructed	1990	2000	2006	2007	2008	2009
Single Family	107	109	51	58	47	14
Two Family	50	20	12	0	4	4
Multi-Family	419	148	162	72	8	56
Total Units	576	277	225	130	59	74

Prior to 2007 and the housing crisis, Oshkosh's pace of residential construction exceeded the average annual need based on projected population. Now, there continues to be a need for additional units, but the housing crisis has significantly driven down the construction of new units.

Another factor that must be taken into consideration is the continual annexation plans of the City of Oshkosh. In 2013 and 2018, large portions of the Town of Algoma will be annexed into the city. Some of this land is vacant and some is already developed and populated. In addition, the City is also working on future agreements with the towns of Black Wolf, Nekimi, Omro and Oshkosh to annex portions of those areas as well.

HOUSING CONDITION

According to the 2000 Census, 51.4 percent of the housing units in the Oshkosh were built prior to 1960. More significantly, a total of 8,020 housing units, or 31.6 percent of all Oshkosh

housing units were built prior to 1939. 2000 Census data shows a high correlation between LMI Census Tracts and older housing stock. While older homes are less expensive to purchase, the costs of maintenance and utilities, especially gas for heating can create a significant financial challenge for LMI home owners. The result is deferred maintenance, which can have a negative impact on individual properties as well as neighborhoods.

A similar problem exists with older rental units. Older rental units are more affordable, and there is a high correlation between older rental units and low to moderate income neighborhoods. However, rents in older units may not be sufficient to permit the higher level of maintenance required by these units. Further, historically high vacancy rates, especially among older, less well maintained units, further impacts cash flow, making it even more difficult to maintain these older rental units. This situation can result in disinvestment and further deterioration of older units and the neighborhoods in which they are located.

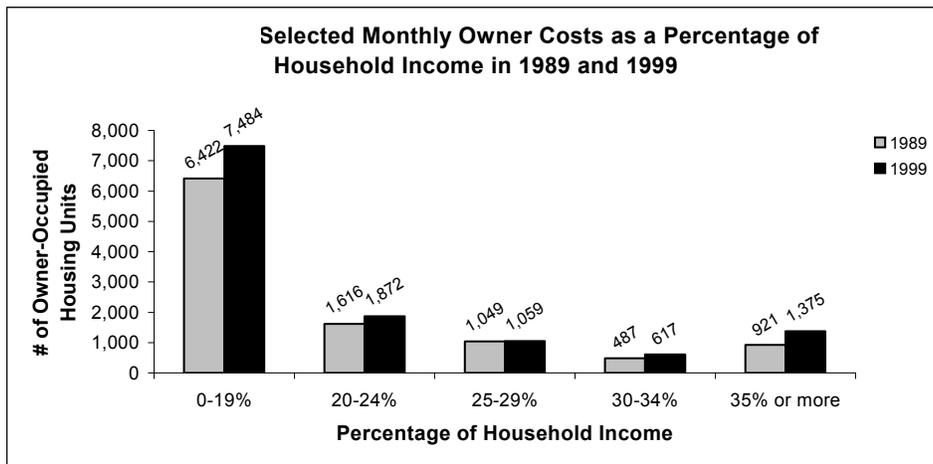
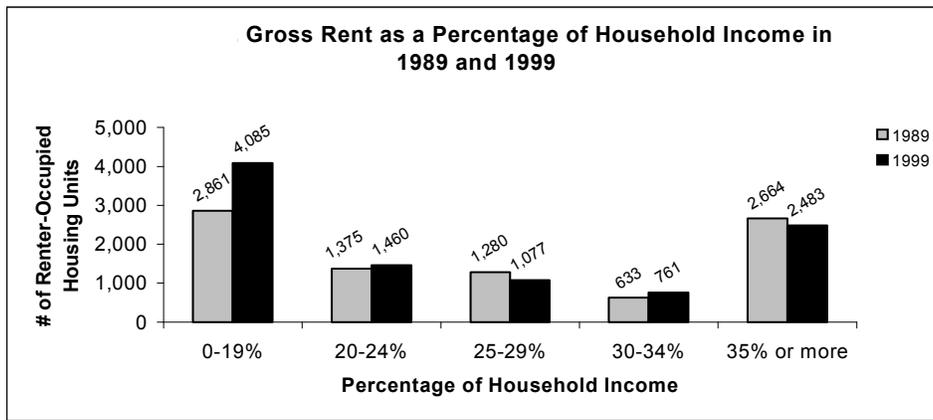
YEAR STRUCTURE BUILT		
YEAR	NUMBER	PERCENT
1999 to March 2000	402	1.6
1995 to 1998	1,724	6.8
1990 to 1994	1,843	7.3
1980 to 1989	2,592	10.2
1970 to 1979	3,029	11.9
1960 to 1969	2,720	10.7
1949 to 1959	5,029	19.8
1939 or earlier	8,020	31.6
TOTALS	25,359	99.9

Source: 2000 U.S. Census

HOUSING COST

The commonly accepted definition of affordable housing relates housing costs and household income. If housing costs do not exceed 30 percent of the income of the household, housing is considered affordable. Housing costs include rent and utilities for renter households or principal, interest, taxes, insurance and utilities for owner households. This definition is problematic in that it does not provide a distinction between households that are forced to pay more than 30 percent of their income for housing related costs and those who choose to have that level of housing expense.

The figures below show a relatively stable relationship between wages and housing costs between 1990 and 2000 for the majority of Oshkosh residents. In general, housing costs for owner occupants appear increasingly quite affordable, while the rental situation appears similarly affordable, with the exception of the increase in those paying in excess of 35 percent of income for rent.



Source: City of Oshkosh 2005-2025 Comprehensive Plan

For the purposes of this Plan, the following circumstances are those of primary concern from a housing affordability perspective:

- Low to moderate income households who are forced to pay more than 30 percent of their income for housing, leaving insufficient income to cover the costs of food, clothing, transportation and medical care.
- Median income households who must spend more than 30 percent of income to own a median priced home.

2000 Census information shows that the most significant problem with affordability in Oshkosh is a lack of affordable housing for low income renters, the majority of whom are family households with two to four members.

HOUSING SERVING PERSONS WITH DISABILITIES

OSHKOSH LICENSED COMMUNITY-BASED RESIDENTIAL FACILITIES

Name	Type	Beds
Arborview Manor	Aged, Dementia, Alzheimer's, Brain Damage	39
Bella Vista Manor	Aged, Dementia, Alzheimer's	36
Centennial Inn	Aged, Dementia, Alzheimer's	18
Clarity Care Jefferson	Developmentally Disabled	6
Clarity Care Bowen Street	Developmentally Disabled	7
Clarity Care Maricopa	Developmentally Disabled	8
Clarity Care WI Heights	Developmentally Disabled	8
Clarity Care Packer Heights	Developmentally Disabled	7
Clarity Care South Park	Developmentally, Physically Disabled	6
Coral House	Developmentally Disabled, Mental Illness	8
Eastbrooke Manor	Aged, Dementia, Alzheimer's	25
Elijah's Place	Dementia, Alzheimer's	12
Evergreen Sharehaven	Dementia, Alzheimer's	20
Evergreen Terrace	Aged	40
Harbor House	Aged, Dementia, Alzheimer's	18
Lakeshore Manor	Dementia, Alzheimer's	57
LSS Pinel House	Developmentally Disabled, Emotionally Disturbed	8
LSS Toward Tomorrow	Emotionally Disturbed, Mental Illness	12
Nexus House	AODA Correctional Clients	14
Nova Counseling	AODA	50
Oakwood Manor	Aged, Dementia, Alzheimer's	20
Respite House	Physically Disabled	8
Serenity Place I	AODA, Mental Illness	7
Serenity Place II	AODA, Mental Illness	5
Sterling House	Aged, Dementia, Alzheimer's	20
Summit House	AODA, Mental Illness	8

HOUSING SERVING PERSONS WITH HIV/AIDS AND THEIR FAMILIES

There is no housing specifically developed for persons with HIV/AIDS and their families in Oshkosh. However, as mentioned previously, Winnebago County is served by the AIDS Resource Center of Wisconsin (ARCW) which provides safe and affordable housing for people with HIV disease. ARCW's comprehensive housing program provides residential housing, intensive housing counseling and financial assistance in the form of rent, utility and security deposit payments to people with HIV and their families to help them secure safe and affordable homes.

2. Describe the number and targeting (income level and type of household served) of units currently assisted by local, state, or federally funded programs, and an assessment of whether any such units are expected to be lost from the assisted housing inventory for any reason, (i.e. expiration of Section 8 contracts).

The following tables provide information on all federally assisted units in Oshkosh by type of owner. The City has no information that there is a risk of losing any of these units from the inventory during the period covered by this Plan.

FEDERALLY ASSISTED UNITS IN OSHKOSH

Owned by the Oshkosh Housing Authority or the Cumberland Court Housing Commission

Name	Elderly	Disabled	Family
Court Tower Apartments	157		
Cumberland Court			72
Mainview Apartments	111		
Marian Manor	121		
Scattered Site			70
Owned by the Winnebago County Housing Authority			
Scattered Site			24
Privately Owned			
Camelot Court			40
Clarity Care		24	2
Dominium Management		1	21
Gilead Apartments		15	
Simeanna I,II,III	220		
Willow Apartments		12	
Whispering Pines	66		
Total Federally Assisted Units	675	52	229

Source: May 2010 Oshkosh/Winnebago County Housing Authority Data

STATE OF WISCONSIN AFFORDABLE HOUSING TAX CREDIT UNITS

Name	Type	Affordable Units
618 E. Parkway	Single family	1
219 Oxford	Single family	1
619 9th	Single family	1
123 Mill	Single family	1
Division Street Apartments	Multifamily mixed income (23units)	11
Irving Place Apartments	Multifamily mixed income (23units)	16
Jackson Farm Apartments	Multifamily (60 units)	60
The Rivers	Multifamily (60 units)	60
Lakefront Manor	Multifamily mixed income (66 units)	58
Summerfield Place Apartments	Multifamily (120 units)	120
Total State Tax Credit Units		329

Source: May 2010 Oshkosh/Winnebago County Housing Authority Data

3. Indicate how the characteristics of the housing market will influence the use of funds made available for rental assistance, production of new units, rehabilitation of old units, or acquisition of existing units.

Overall, there are currently a sufficient number of units to house all households in Oshkosh. The problem is the condition and cost of some units which makes them unsuitable for extremely low and moderate income households. For this reason, the City will give priority to rehabilitation projects that will improve the condition of housing and provision of rehabilitation financing in a manner that preserves affordability.

While the City recognizes the efficiency and elasticity of providing rent assistance versus bricks and mortar to meet affordable housing needs, it is limited in using CDBG funds to meet a significant portion of this need due to regulations (rent assistance falls under the Public Service cap) and demand for other uses of this money.

Probably the most significant challenge posed by current market conditions is the situation that many moderate income family owner households find themselves in. The City is receiving an increasing level of inquiries for owner-occupied housing rehabilitation funding from these households who purchased as recently as a month before requesting funding. The lack of equity, type of financing and lack of sufficient funds to address maintenance needs creates significant issues in developing local loan processing standards, particularly since the majority of these households are living in low to moderate income areas. The City will continue to give priority to owner-occupied housing rehabilitation projects, especially ones that will improve the appearance of the exterior of properties. However, increasing scrutiny will be given to terms and rates of first mortgages and financial literacy training will be integrated into financing approval conditions where needed.

The City will continue to support the Oshkosh/ Winnebago County Housing Authority Homeownership Assistance Program for LMI first time homebuyers. The training, favorable financing and City rehabilitation support significantly reduces the probability of foreclosures in this population of buyers.

Specific Housing Objectives (91.215(b))

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve over a specified time period.

Geographic priorities are identified on page 8 and priority populations are identified in the following table.

HOUSING PRIORITIES AND GOALS FOR THIS PLAN

RENTERS

		Goal # Households	Type of Assistance	Source
Elderly	<30% MFI	1	Rental Rehabilitation Program	CDBG
	30 – 50% MFI	1	Rental Rehabilitation Program	CDBG
	50 – 80% MFI	0	Rental Rehabilitation Program	CDBG
Small Related	<30% MFI	2	Rental Rehabilitation Program	CDBG
	30 – 50% MFI	1	Rental Rehabilitation Program	CDBG
	50 – 80% MFI	0	Rental Rehabilitation Program	CDBG
Large Related	<30% MFI	0	Rental Rehabilitation Program	CDBG
	30 – 50% MFI	0	Rental Rehabilitation Program	CDBG
	50 – 80% MFI	0	Rental Rehabilitation Program	CDBG
All Other	<30% MFI	0	Rental Rehabilitation Program	CDBG
	30 – 50% MFI	0	Rental Rehabilitation Program	CDBG
	50 – 80% MFI	0	Rental Rehabilitation Program	CDBG
TOTAL ANNUAL RENTERS		5		

OWNERS

Elderly	<30% MFI	3	Owner-occupied Rehabilitation	CDBG
	30 – 50% MFI	3	Owner-occupied Rehabilitation	CDBG
	50 – 80% MFI	2	Owner-occupied Rehabilitation	CDBG
Small Related	<30% MFI	3	Owner-occupied Rehabilitation and Purchase Assistance Program	CDBG
	30 – 50% MFI	3	Owner-occupied Rehabilitation and Purchase Assistance Program	CDBG
	50 – 80% MFI	3	Owner-occupied Rehabilitation and Purchase Assistance Program	CDBG
Large Related	<30% MFI	1	Owner-occupied Rehabilitation and Purchase Assistance Program	CDBG
	30 – 50% MFI	1	Owner-occupied Rehabilitation and Purchase Assistance Program	CDBG
	50 – 80% MFI	1	Owner-occupied Rehabilitation and Purchase Assistance Program	CDBG
All Other	<30% MFI	0	Owner-occupied Rehabilitation	CDBG
	30 – 50% MFI	0	Owner-occupied Rehabilitation	CDBG
	50 – 80% MFI	0	Owner-occupied Rehabilitation	CDBG
TOTAL ANNUAL OWNERS		20		

2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

Over the five years covered by this Plan, sources of funds that can be expected to be available to meet the housing needs in Oshkosh include the federal CDBG formula program funds. Other sources of funding include programs through Winnebago County, the Oshkosh Area United Way and Oshkosh Area Community Foundation.

Needs of Public Housing (91.210(b))

In cooperation with the public housing agency or agencies located within its boundaries, describe the needs of public housing, including the number of public housing units in the jurisdiction, the physical condition of such units, the restoration and revitalization needs of public housing projects within the jurisdiction, and other factors, including the number of families on public housing and tenant-based waiting lists and results from the Section 504 needs assessment of public housing projects located within its boundaries (i.e. assessment of needs of tenants and applicants on waiting list for accessible units as required by 24 CFR 8.25).

HOUSING AUTHORITY INVENTORY IN OSHKOSH								
	Public Housing			Multi-Family Housing		Other		
	Court Tower	Mainview	Scattered Sites	Cumberland Court	Marian Manor	Group Homes	Housing Vouchers	
Building Description	14-Story	10-Story		(8) 2-story	6-story			
Year Built	1973	1981	Various	1973	1978	Various		
Bedroom Size								TOTAL
Efficiency		8				16		24
One	156	101			120		89	466
Two	1	1	26	48	1		94	171
Three			34	24			34	92
Four			22				3	25
Five			10				2	12
Six			1					1
TOTAL	157	110	93	72	121	16	222	791

Source: May 2010 Oshkosh/Winnebago County Housing Authority Data

All dwelling units are on-line and routinely occupied. Daily occupancy rates for May 2009 to April 2010 ranged from a high of 100 percent to a low of 96.6 percent.

Each of the properties is physically sound, and needed repairs are addressed daily. Each development has a list of capital needs identified by management and the residents. Current priorities to restore and revitalize developments, including needs identified to comply with Section 504 accessibility survey, are as follows:

Court Tower Apartments

- Acquire property for parking upgrades including isolate visitor parking, secure resident parking area and supplement parking for disabled persons close to the building.
- Upgrade hot water systems
- Tuckpoint and seal exterior brick and mortar
- Add visitor’s entrance to separate residents and secure building. This can include intercom, access security and camera systems
- Replace and modernize roof structure
- Remodel first floor public areas and create public areas on some residential floors to allow for a personal care salon, exercise rooms, computer lab, chapel, game/media lounges

Mainview Apartments

- Supplement parking, upgrade paving and secure resident parking area and designate more parking for disabled persons close to the building
- Expand efficiency apartments
- Finish remodeling of East Tower apartments including HVAC improvements
- Renovation of public areas with furnishings for personal care salon, exercise rooms, computer lab, chapel, game/media lounges.
- Address deficiencies with the laundry and vending equipment.
- Replace unit appliances.

Scattered-site Apartments

- Replace driveways and add garages where lot size can accommodate better storage facility
- Replace furnaces, hot water heating and HVAC where inefficiencies warrant
- Replace or update kitchens
- Replace roofs

PUBLIC HOUSING WAITING LISTS IN OSHKOSH								
	Public Housing			Multi-Family Housing		Other		
Bedroom Size	Court Tower	Mainview	Scattered Sites	Cumberland Court	Marian Manor	Group Homes	Housing Vouchers	TOTAL
Efficiency								
One	24	7		2	13	N/A	187	233
Two			304	235			429	968
Three			134	94			223	451
Four			18				35	53
Five			4				6	10
Six								
TOTAL	24	7	460	331	13	N/A	880	1715

Source: May 2010 Oshkosh/Winnebago County Housing Authority Data

The Authority administers site-based waiting which allows applicants to be listed on multiple lists. The multiple family structures typically see about 80 move-outs annually and many applicants are determined ineligible, new eligible applicants can promptly lease.

Applicants for the scattered-site family units face a longer waiting list as only 35 vacancies are anticipated annually. Eligible families can expect a wait of more than a year. The Section 8 and Housing Choice Voucher Program have a waiting list of 639 families with annual turnover projected to yield 120 vacancies.

Public Housing Strategy (91.210)

- 1. Describe the public housing agency's strategy to serve the needs of extremely low-income, low-income, and moderate-income families residing in the jurisdiction served by the public housing agency (including families on the public housing and section 8 tenant-based waiting list), the public housing agency's strategy for addressing the revitalization and restoration needs of public housing projects within the jurisdiction and improving the management and operation of such public housing, and the public housing agency's strategy for improving the living environment of extremely low-income, low-income, and moderate families residing in public housing.**

The Oshkosh/Winnebago County Housing Authority strategy to meet affordable housing needs in the city is to tirelessly pursue its mission. The Authority embraces a vibrant private sector and supports developments that create a range of new residential opportunities across all market segments. Where the private market doesn't provide adequate options for low-income households, the Authority will pursue programs and resources to supplement the market.

Scarce public resources require the targeting of assistance to the neediest populations in the community. Consequently, the subsidized rental opportunities available from the Authority will benefit primarily extremely low-income households (ELI). ELI households are those with an annual income below 30% of Median Family Income (MFI) for the area. Clearly, the Authority will exceed the regulatory thresholds for enrollment of ELI households and expects an excess of 80% of the new placements, in all programs, will be high-priority ELI households. ELI households currently constitute more than 80 percent of the waiting lists. Very low-income (VLI) households will also be a high priority for Section 8 Rental Assistance, Public Housing and Homeownership Assistance. Low-Income (Moderate) applicants are most likely to benefit from the Homeownership Assistance Program, but policy does permit placement of some households in public housing that would contribute to the goal of including a broad range of incomes.

Revitalization and restoration needs detailed above represent intended obligation of current and future Capital Funds grants. Additional capital needs exist that will require future HUD grants or other resources. Among these would be continued bathroom and kitchen remodeling of the dwelling units, roof replacements, parking and resident amenities.

The Authority has repeatedly achieved High-Performer Status on the HUD assessment protocols. Management and operational goals are focused on customer service, as little opportunity exists to enhance performance where market conditions have more impact than administrative fine-tuning. Management's best opportunity to improve living environments is to thoroughly screen eligible applicants, vigorously enforce the lease and deliver services and amenities that add value to their leasing experience.

2. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake to encourage public housing residents to become more involved in management and participate in homeownership. (NAHA Sec. 105 (b)(11) and (91.215 (k))

The Authority has never been able to generate any interest in resident management as family housing is widely scattered with no common identity and families rarely take advantage of opportunities to gather and provide input. At the high-rise buildings, there is a long history of resident meetings where resident activities are planned, process and policy matters are discussed and customer input is solicited. Again, the residents have consistently communicated, but refused to take an active role in management.

A Homeownership Assistance Program has been in place for 10 years and has successfully moved several households from the Section 8 Voucher and Public Housing programs into homeownership. While the Authority hasn't used HUD's 5h or Voucher homeownership programs, it has utilized City of Oshkosh CDBG First-Time Homebuyer funding and funds from the Federal Home Loan Bank, local banks, the Wisconsin Housing and Economic Development Authority and the Wisconsin Housing Partnership. The Authority remains open to using both the 5h and Voucher options, if the need arises, but prefers to work with the City on homeownership assistance as it is felt to have more favorable results.

3. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation. (NAHA Sec. 105 (g))

The public housing agency is not designated as "troubled" by HUD.

Barriers to Affordable Housing (91.210(e) and 91.215(f))

1. Explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction. Such policies include tax policy affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment.

After reviewing the local zoning ordinance and building codes, the City does not believe there are local policies or regulations that create significant barriers to developing affordable housing.

In terms of maintaining affordable housing, the City's application of the Uniform Dwelling Code (UDC) to all housing units, not just those constructed after 1980, does increase the cost of renovation and repair by requiring a higher level of code compliance for new work than what existed at the time of construction.

2. Describe the strategy to remove or ameliorate negative effects of public policies that serve as barriers to affordable housing, except that, if a State requires a unit of general local government to submit a regulatory barrier assessment that is substantially equivalent to the information required under this part, as determined by HUD, the unit of general local government may submit that assessment to HUD and it shall be considered to have complied with this requirement.

As the City does not believe that any local regulations or policies exist to create significant barriers to affordable housing, there is no need to develop a strategy to address these.

It should be noted that the City's 2005-2025 Comprehensive Plan calls for the following actions to ensure affordable housing availability:

- Work with public and private housing providers to plan for the development of additional housing units affordable to low and moderate income owners and renters as needed and to secure additional subsidies for rental of existing privately owned units.
- Promote opportunities and programs to provide owner and rental options for low and moderate income residents.

The City's 2005-2025 Comprehensive Plan also calls for the following action to maintain and rehabilitate the City's existing housing stock and the surrounding areas containing this housing:

- Continue housing rehabilitation programming which provides assistance to low and moderate-income persons in upgrading their housing and in purchasing and improving properties in older neighborhoods.
- Encourage Downtown/Central City residential development through rehabilitation or new construction.
- Implement "Neighborhood Improvement Strategies" in specific geographic areas for neighborhood and housing issues.
- Develop program and encourage owners to convert non-competitive rental property back to owner-occupied structures.
- Create a rehabilitation code for pre-existing conditions on historic properties.

HOMELESS

PLEASE ALSO REFER TO THE CONTINUUM OF CARE HOMELESS POPULATION AND SUBPOPULATIONS CHART, CONTINUUM OF CARE HOUSING INVENTORY AND HOMELESS SERVICE ACTIVITIES LIST IN APPENDIX

Homeless Needs (91.205(b) and 91.215(c))

Homeless Needs— The jurisdiction must provide a concise summary of the nature and extent of homelessness in the jurisdiction, (including rural homelessness and chronic homelessness where applicable), addressing separately the need for facilities and services for homeless persons and homeless families with children, both sheltered and unsheltered, and homeless subpopulations, in accordance with Table 1A. The summary must include the characteristics and needs of low-income individuals and children,

(especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered. In addition, to the extent information is available; the plan must include a description of the nature and extent of homelessness by racial and ethnic group. A quantitative analysis is not required. If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates.

The information contained in the Continuum of Care Homeless Population and Subpopulations Chart is based on a point in time survey conducted by ADVOCAP, a local non-profit administering a HUD funded homeless program.

In addition to the information contained in the Continuum of Care Homeless Population and Subpopulations Chart, ADVOCAP provided the following information regarding the homeless population they served during the period from July 2008 through June 2009.

HOMELESS PERSONS SERVED 2008-2009 PROGRAM YEAR				
Persons Served	Singles (not in families)	Adults (in families)	Children	Number of Families
First day of operating year	9	12	24	11
Entered during program year	20	13	20	11
Left during program year	18	16	28	13
In program last day of program year	11	9	16	9

Source: ADVOCAP

The information in the tables below is also from ADVOCAP and shows the following:

- Number of homeless adults entering the program by race
- Number of homeless adults with special needs entering the program
- Prior living situation
- Destination of adults exiting the program
- Reason for exiting the program

NUMBER OF HOMELESS ADULTS ENTERING THE PROGRAM BY RACE	
American Indian or Alaskan Native	2
Asian	0
Black or African American	9
Native Hawaiian or Other Pacific Islander	0
Hispanic/Latino	3
White	20
Other Multi-Racial	1
Other/Unknown	1

NUMBER OF HOMELESS ADULTS WITH SPECIAL NEEDS ENTERING THE PROGRAM

Mental Illness	11
Alcohol Abuse	1
Drug Abuse	2
Physical Disability	9
Domestic Violence	8
Other	3

PRIOR LIVING SITUATION

Emergency Shelter (primarily Christine Ann Shelter for victims of domestic abuse)	30
Non-Housing (Park, Car, Bus Station, Etc.)	1
Other	1

DESTINATION OF ADULTS EXITING PROGRAM

Permanent Housing	Rental house or apartment (unsubsidized)	20
	Other subsidized house or apartment	1
Transitional	Transitional housing for homeless persons	3
Other	Moved in with family or friends	1
	Unknown	9

REASON FOR EXITING THE PROGRAM

Left for a housing opportunity before completing the program	3
Non-compliance with program requirements	10
Death	1
Other	1

Source: ADVOCAP

Priority Homeless Needs

- Using the results of the Continuum of Care planning process, identify the jurisdiction's homeless and homeless prevention priorities specified in Table 1A, the Homeless and Special Needs Populations Chart. The description of the jurisdiction's choice of priority needs and allocation priorities must be based on reliable data meeting HUD standards and should reflect the required consultation with homeless assistance providers, homeless persons, and other concerned citizens regarding the needs of homeless families with children and individuals. The jurisdiction must provide an analysis of how the needs of each category of residents provided the basis for determining the relative priority of each priority homeless need category. A separate brief narrative should be directed to addressing gaps in services and housing for the sheltered and unsheltered chronic homeless.
- A community should give a high priority to chronically homeless persons, where the jurisdiction identifies sheltered and unsheltered chronic homeless persons in its Homeless Needs Table - Homeless Populations and Subpopulations.

The Winnebagoland Housing Coalition is the name of the Continuum of Care (CoC) in this area. The process used by the CoC to identify and prioritize homeless needs included a multi-format process. These needs included those services being provided which were identified as essential to meet the needs of future homeless individuals and families. The planning process included reviewing results from the previous year's CoC needs assessment and prioritization process, a point-in-time survey of homelessness, a review of homeless client input and case notes by homeless service providers, and prioritization by both the Winnebagoland Housing Coalition. From this data and input by CoC members, consensus was reached on the following priorities in rank order:

1. Service gap in short term assistance
2. Case management with supportive services
3. Accessible emergency shelter along with motel vouchers
4. Medical and health related services
5. Transportation help
6. Transitional housing
7. Housing and supportive services for chronic homeless
8. Essential personal needs such as food, clothing and personal care items
9. Subsidized permanent housing
10. Foreclosure help
11. Daycare support
12. Fair housing assistance

Homeless Inventory (91.210(c))

The jurisdiction shall provide a concise summary of the existing facilities and services (including a brief inventory) that assist homeless persons and families with children and subpopulations identified in Table 1A. These include outreach and assessment, emergency shelters and services, transitional housing, permanent supportive housing, access to permanent housing, and activities to prevent low-income individuals and families with children (especially extremely low-income) from becoming homeless. The jurisdiction can use the optional Continuum of Care Housing Activity Chart and Service Activity Chart to meet this requirement.

See Appendix D for the Continuum of Care (CoC) Housing Inventory Chart and Homeless Service Activities, which are part of the CoC application submitted to the Department of Housing and Urban Development (HUD).

Oshkosh's homeless housing inventory consists primarily of emergency shelters operated by Christine Ann Domestic Abuse Services, Salvation Army (vouchers) and Father Carr's Place 2B. More specifically, the 35-bed unit is the women and children's shelter (Christine Ann) and the 40-bed "Bethlehem Inn" and the 40-bed "Holy Family Village" are the men's shelters.

Besides housing general victims of homelessness, Christine Ann's also serves as a domestic violence shelter. Emergency motel vouchers are also available from the Salvation Army during periods when the shelters are full. Transitional housing is provided primarily through the 15 Christine Ann Sienna Apartments and the three units of ADVOCAP's 16th Street Home.

Homeless Strategic Plan (91.215(c))

- 1. Homelessness— Describe the jurisdiction's strategy for developing a system to address homelessness and the priority needs of homeless persons and families (including the subpopulations identified in the needs section). The jurisdiction's strategy must consider the housing and supportive services needed in each stage of the process which includes preventing homelessness, outreach/assessment, emergency shelters and services, transitional housing, and helping homeless persons (especially any persons that are chronically homeless) make the transition to permanent housing and independent living. The jurisdiction must also describe its strategy for helping extremely low- and low-income individuals and families who are at imminent risk of becoming homeless.**
- 2. Chronic homelessness—Describe the jurisdiction's strategy for eliminating chronic homelessness by 2012. This should include the strategy for helping homeless persons make the transition to permanent housing and independent living. This strategy should, to the maximum extent feasible, be coordinated with the strategy presented Exhibit 1 of the Continuum of Care (CoC) application and any other strategy or plan to eliminate chronic homelessness. Also describe, in a narrative, relationships and efforts to coordinate the Con Plan, CoC, and any other strategy or plan to address chronic homelessness.**
- 3. Homelessness Prevention—Describe the jurisdiction's strategy to help prevent homelessness for individuals and families with children who are at imminent risk of becoming homeless.**
- 4. Institutional Structure—Briefly describe the institutional structure, including private industry, non-profit organizations, and public institutions, through which the jurisdiction will carry out its homelessness strategy.**
- 5. Discharge Coordination Policy—Every jurisdiction receiving McKinney-Vento Homeless Assistance Act Emergency Shelter Grant (ESG), Supportive Housing, Shelter Plus Care, or Section 8 SRO Program funds must develop and implement a Discharge Coordination Policy, to the maximum extent practicable. Such a policy should include “policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons.” The jurisdiction should describe its planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how the community will move toward such a policy.**

The City of Oshkosh Department of Community Development and the Oshkosh/Winnebago County Housing Authority are members of the Winnebagoland Housing Coalition Continuum of Care. ADVOCAP is the local non-profit agency taking the leadership role in actively pursuing, obtaining and administering federal funding to address local homeless needs and is very effective in that role. For that reason, the City sees no need to develop a separate Homeless Strategic Plan.

The Winnebagoland Housing Coalition plans to address the issue of chronic homelessness during the next year, especially those turned away from shelters. Taking an active role will be Father Carr's, Salvation Army and the ESTHER Interfaith Project, which is interested researching a warming shelter.

The City does not receive funds from sources that would require the development of a discharge coordination policy.

Emergency Shelter Grants (ESG)

The City of Oshkosh does not receive or utilize any emergency shelter grants within its jurisdiction. However, ADVOCAP, as the lead agency in a consolidated application involving Christine Ann Domestic Abuse Services, the American Red Cross and Legal Action of Wisconsin, will be receiving approximately \$134,000 in state funds for the Oshkosh area through HUD ESG/State Transitional Housing Grants.

COMMUNITY DEVELOPMENT

PLEASE ALSO REFER TO THE HOUSING AND COMMUNITY DEVELOPMENT ACTIVITIES TABLE IN APPENDIX

Community Development (91.215(e))

- 1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), – i.e., public facilities, public improvements, public services and economic development.**
- 2. Describe the basis for assigning the priority given to each category of priority needs.**

Oshkosh's non-housing community development needs eligible for assistance with CDBG funding relate generally to two categories. They are Neighborhood Improvement Strategic Areas and Public Services.

NEIGHBORHOOD IMPROVEMENT STRATEGIC AREAS

As discussed in the General Questions section of this Plan, the City of Oshkosh has designated three types of priority areas. These priority areas were identified using data from the 2000 U.S. Census (tract and block group level), including the value and age of the housing stock, the tenure of the residents (owner versus renter), and the low-moderate income levels.

The City will use CDBG funds in the priority areas for housing related activities such as single and multi-unit rehabilitation and homeownership assistance programs, but can also use CDBG funds for non-housing community development needs such as street and general utility improvements, neighborhood facilities, parks/recreational/public facilities and improvements. The City will also use funds for the purchase, demolition, and disposition of deteriorating or blighting structures. The City coordinates its use of CDBG funds with the implementation of the

City's Capital Improvement Program (CIP). Activities funded through the CIP plan include the upgrade of streets, sidewalks, and sewer/water/storm sewer service lines.

Activities funded with CDBG funds in this project category will meet the national objectives of benefiting low-moderate income persons, low-moderate income areas and/or preventing or eliminating slum or blighting conditions.

PUBLIC SERVICES

As an eligible activity, the support of Public Services will continue to be a high priority for Oshkosh. Using CDBG funds for Public Services plays a significant role in achieving the minimum 70 percent requirement for the expenditure of CDBG funds benefiting low-moderate income persons. The City has worked closely with the Oshkosh Area United Way and the Oshkosh Area Community Foundation to create the Public Services Consortium to implement a streamlined application and review process. The City will continue to allocate approximately \$100,000 for Public Service activities (the 15% cap is not exceeded) by those serving on the Consortium. The continuing need demonstrated year after year during the public service application process serves as the basis for assigning priority to funding Public Service activities.

3. Identify any obstacles to meeting underserved needs.

Due to funding limitations both through HUD programs and at the local level, the City will have to use its funding strategically. For redevelopment or neighborhood projects, funds will be concentrated in high priority and redevelopment areas versus scattering the funds throughout the city on a plethora of projects.

The State of Wisconsin continues to have issues with budget deficits, which has a direct effect on the amount of shared revenue coming back to the local level. The reduction of shared revenues is expected to continue or increase. This loss of funding will directly affect the amount of funds that can be budgeted in the annual Capital Improvements Program for upgrades to areas in need of assistance.

4. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

NOTE: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

Both the short term and long term goals of the City are to provide decent housing and a suitable living environment to low-moderate income (LMI) persons and the elimination of blighting conditions within the community.

Short term goals are to annually assist in the rehabilitation of five rental units, the rehabilitation of 15 LMI owner-occupied housing units and to assist in the purchase of five homes by LMI persons through our down payment assistance program administered by the Housing Authority.

Over the course of this strategic planning period, these numbers are expected to be the rehabilitation of 25 rental units, the rehabilitation of 75 owner-occupied housing units and to assist in the purchase of 25 homes. Additional short term goals include identifying and eliminating conditions of slum and blight, especially within our Central City LMI areas and more specifically our designated priority areas. The continued support of Public Service organizations through our Public Service expenditures to the fullest extent permitted by the CDBG program will help to assist those of LMI and of presumed benefit such as victims of domestic violence, the elderly, and handicapped.

Long term goals coincide with the short term goals but are much broader in nature to include a substantial increase in suitable housing stock within the city's geographical areas for the LMI population and as well as creating a "pride in place" situation where areas are predominately LMI because of the physical condition of private and public areas become areas that are attractive to investment from the general public and where residents take hold of the area and work in a private manner to improve and stabilize their communities. Ideally, the City would like to see the priority areas, as identified in this Plan, increase owner occupancy rates of LMI persons, improve housing conditions that affect values and create "pockets" of poverty and not be in need of public improvements that negatively affect the neighborhoods. Additional long term goals are to remove many blighting influences within our community, especially within the Central City and promote reinvestment that may inadvertently create jobs for nearby residents. The long term goals of the Public Service facet of the program are to provide services necessary to LMI persons of presumed benefit in a consistent and coordinated manner and to remove duplication of services that may be in abundance while other essential needs are left underserved or not provided.

Antipoverty Strategy (91.215(h))

- 1. Describe the jurisdiction's goals, programs, and policies for reducing the number of poverty level families (as defined by the Office of Management and Budget and revised annually). In consultation with other appropriate public and private agencies, (i.e. TANF agency) state how the jurisdiction's goals, programs, and policies for producing and preserving affordable housing set forth in the housing component of the consolidated plan will be coordinated with other programs and services for which the jurisdiction is responsible.**

The City does not use its CDBG funds to provide direct services to reduce the number of families with income below the poverty line. In considering the factors affecting poverty that may be impacted by the existing housing programs of the City, it appears that coordination of production and preservation of affordable housing as well as the Public Service programs and services targeted to special needs populations including victims of domestic violence, the physically and mentally handicapped, and elderly benefit and help to reduce the numbers of families below the poverty level.

- 2. Identify the extent to which this strategy will reduce (or assist in reducing) the number of poverty level families, taking into consideration factors over which the jurisdiction has control.**

The City will be reducing the housing cost burden on these households to some extent in completing rehabilitation projects on properties owned by households below the poverty level limits. The reduction in housing cost burden will result from actions that reduce energy costs

and reduce the cost of repairs needed to keep the home in habitable condition. The City recognizes that while this in itself will not increase the level of income of these households, it will make more domestic funds available to cover other expenses.

Additionally, the City requires owner occupants applying for CDBG housing rehabilitation programs who have a large volume of debt to participate in free budget counseling as a condition of housing rehabilitation loan approval. This policy is based on the position that the rehabilitation loan is a partnership effort with the City and bringing the house into livable condition while attempting to ensure that the owner is in a financial position to keep up the home would reduce the possibility of the house falling into future disrepair.

Low-Income Housing Tax Credit (LIHTC) Coordination (91.315(k))

Not applicable to the City of Oshkosh.

NON-HOMELESS SPECIAL NEEDS

PLEASE ALSO REFER TO THE NON-HOMELESS SPECIAL NEEDS TABLE IN APPENDIX

Specific Special Needs Objectives (91.215)

- 1. Describe the priorities and specific objectives the jurisdiction hopes to achieve over a specified time period.**

CDBG funds will be used for identified priorities addressing the needs of non-homeless persons who require housing and supportive services (e.g. elderly, frail elderly, persons with mental/physical/developmental disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, and Public Housing residents). Of these subpopulations, priority will be given to the elderly, frail elderly, and persons with disabilities as they are identified as the largest group of underserved individuals in the community.

For the aging population of Oshkosh, the table below shows the distribution on five age categories for the 1980, 1990, and 2000 U.S. Census. Based on this information, the total number of people age 55 and older increased from 9,476 people in 1980 to 11,933 people in 1990 to 12,538 in 2000.

POPULATION BY AGE AND SEX						
	1980 Census		1990 Census		2000 Census	
	Number	Percent	Number	Percent	Number	Percent
Total Population	49,620	100.0%	55,006	100.0%	62,916	100.0%
55 to 59 years	2,324	4.7%	2,087	3.8%	2,316	3.7%
60 to 64 years	2,180	4.4%	2,116	3.8%	1,985	3.2%
65 to 74 years	3,901	7.9%	3,909	7.1%	3,748	6.0%
75 to 84 years	2,971	6.0%	2,933	5.3%	3,045	4.8%
85 years and over			888	1.6%	1,444	2.3%
Median Age (years)	29.6		30.4		32.4	

Source: 1980, 1990, 2000 U.S. Census

2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

Other than CDBG funding and funds associated with the Winnebagoland Housing Coalition, it is not expected that any federal, state or local funding will be allocated to directly address identified needs for the subpopulations listed above. However, a major source of private funding to address identified needs is the Oshkosh Area United Way and Oshkosh Area Community Foundation with funds varying from year to year. Supportive services funded by the United Way relate to counseling, special needs, and health. Other sources of funding that will address the identified needs for these subpopulations will predominantly come from fundraising by other local non-profit organizations.

Non-Homeless Special Needs (91.205(d)) & Analysis (91.210 (d))
(including HOPWA)

1. Estimate, to the extent practicable, the number of persons in various subpopulations that are not homeless but may require housing or supportive services, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction, victims of domestic violence, and any other categories the jurisdiction may specify and describe their supportive housing needs. The jurisdiction can use the Non-Homeless Special Needs Table (formerly Table 1B) of their Consolidated Plan to help identify these needs.

Note: HOPWA recipients must identify the size and characteristics of the population with HIV/AIDS and their families that will be served in the metropolitan area.

2. Identify the priority housing and supportive service needs of persons who are not homeless but may or may not require supportive housing, i.e., elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS

and their families), persons with alcohol or other drug addiction by using the Non-homeless Special Needs Table.

The portions of the Oshkosh population who are not homeless, but have special needs, are listed below. As shown in the Non-Homeless Special Needs table, it is estimated that approximately 1,170 non-homeless people are in need of housing services and 1,500 non-homeless people are in need of supportive services.

The Mentally Ill – The mentally ill often have trouble getting or retaining employment and do not necessarily know where to look for assistance. This portion of the population needs several kinds of help including housing assistance. Coordination among agencies and private groups is needed.

People with Physical Disabilities – This population suffers from impairment of major life functions such as walking, caring for one's self, performing manual tasks, seeing, hearing, speaking, breathing, learning and working. A portion of the assisted housing units in Oshkosh are designed for this population but it is estimated that the need is greater than the supply. In addition, vacancies of such units sometimes do not coincide with a disabled person's needs, and so the units are sometimes occupied by non-disabled households.

Service providers for persons with disabilities include, but are not limited to:

- a. Integrated Counseling Center, LLC- outpatient psychotherapy and AODA services
- b. Mendota Mental Health Institute- specializes in serving patients with complex psychiatric conditions, often combined with certain problem behaviors.
- c. Winnebago Mental Health - specializes in serving children, adolescents and adults with complex psychiatric conditions that are often combined with challenging behaviors

The Frail or Low-Income Elderly – This category of persons is over age 65 and have a physical or mental disability that require them to have assistance in carrying out the essential activities of daily living. Such people usually have a variety of needs and require one or more supportive services in order to stay at home or in a community setting. With the trend toward longer lives, it can be expected that an increasing percentage of population will encounter the types of physical, social, psychological or economic conditions that make continued independence more difficult but for which institutional care is expensive and not appropriate. Consideration should be given to meeting the housing needs of the elderly through programs that keep them safely in their homes as long as possible.

Service providers for Frail or Low-Income Elderly include but are not limited to:

- Oshkosh Seniors Center-Exercise and fitness, support groups and counseling, education and activity programs
- Aging and Disability Resource Center of Winnebago County- Information and Assistance, Long Term Care Options Counseling, Protective Services, Access to Long Term Care Programs, Prevention/Early Intervention, and Benefits Counseling.
- Oshkosh Family, Inc-meals on wheels, guardianship

Persons with AODA - Persons with alcohol or other drug addiction have a disabling addictive disorder. It is characterized by compulsive and uncontrolled consumption of drugs and/or alcohol despite its negative effects on the drinker's health and social standing to the point that it affects the individual's ability to live independently or carry on a meaningful life.

Service providers for persons with alcohol or other drug addiction include but are not limited to:

- Nova Counseling Center- Substance Abuse Treatment, Halfway House/Sober Living
- Affinity Behavioral Health
- Theda Care Behavioral Health

People with AIDS – The difficulty of obtaining safe, affordable housing is compounded when someone has AIDS or HIV disease. It is assumed that there is much discrimination against this population when it comes to obtaining and keeping rental housing and the lack of adequate housing often prevents their timely discharge from acute care facilities. It may also force them into shelters for the homeless or to move into unstable or unsafe environments.

Victims of Domestic Violence – Domestic violence is also known as domestic abuse, spousal abuse or child abuse and can be broadly defined as a pattern of abusive behaviors by one or both partners in a relationship such as marriage, dating, family, friends or cohabitation. Domestic violence has many forms including physical aggression (hitting, kicking, biting, shoving, restraining, throwing objects), or threats thereof; sexual abuse; emotional abuse; controlling or domineering; intimidation; stalking; passive/covert abuse (e.g., neglect); and economic deprivation.

Service providers for persons who are victims of domestic violence include, but are not limited to:

- Christine Ann Domestic Abuse Services-emergency shelter, helpline, client advocacy, offender intervention, community education.

3. Describe the basis for assigning the priority given to each category of priority needs.

The Non-Homeless Special Needs table categorizes the highest need to include the supportive services for the elderly. Oshkosh will concentrate funding efforts on the supportive services for elderly. Estimates do not exist for frail elderly. The basis for concentrating efforts on supportive services versus housing services is that housing services for these populations is currently being met or can be met through the Oshkosh Housing Authority, the Winnebago County Housing Authority, and other private housing providers.

Supportive services may include activities that enable persons of this population category to remain in their homes for a longer period of time instead of going to assisted living or nursing home facilities. Supportive services may include meal programs, advocacy programs, or transportation programs.

4. Identify any obstacles to meeting underserved needs.

There is no coordinated effort to ensure that people returning to the community from mental and physical health institutions receive supportive housing. As a result, many of these people have difficulty finding or sustaining a suitable housing situation for themselves and either become homeless or is at risk of becoming so. Additionally, there is insufficient coordination of social service programs for non-homeless with special needs. Insufficient funding is also a major obstacle to meeting needs.

5. To the extent information is available, describe the facilities and services that assist persons who are not homeless but require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.

This item has been addressed in the answers to questions 1-2 above.

6. If the jurisdiction plans to use HOME or other tenant based rental assistance to assist one or more of these subpopulations, it must justify the need for such assistance in the plan.

The City of Oshkosh does not plan to use HOME or other tenant-based rental assistance to assist one or more of these subpopulations.

Housing Opportunities for People with AIDS (HOPWA)

The City of Oshkosh is not an Entitlement community for HOPWA.

Specific HOPWA Objectives

The City of Oshkosh is not an Entitlement community for HOPWA.

OTHER NARRATIVE

The City of Oshkosh, as well as a great deal of southern Winnebago County, was affected by a major flooding disaster in June, 2008. Many low to moderate income neighborhoods and businesses were adversely affected. The City has responded by participating in the FEMA programs and volunteer relief efforts as well. Homeowners have been encouraged to apply for the owner-occupied and rental rehabilitation programs and homes damaged by the flood event are considered priority projects within the CDBG funded housing rehabilitation programs.