

State of Oklahoma 2025 Action Plan Update



Included in this Annual Action Plan Update:

2025 Community Development Block Grant (CDBG)

- 2022 Disaster Recovery Unmet Needs Attachment A
- 2019 Disaster Recovery Unmet Needs Attachment B

2025 Emergency Solutions Grant (ESG)

2025 HOME Investments Partnership (HOME)

2025 Housing Trust Fund (HTF)

2025 Housing Opportunities for People with Aids (HOPWA)

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INTRODUCTION

The Community Development Block Grant (CDBG) Program is authorized under Title I of the Housing and Community Development Act of 1974, as amended. The small cities portion of the program appropriates monies to the Department of Housing and Urban Development (HUD) for allocation to the states. The Oklahoma Department of Commerce / Community Development (ODOC/CD), formerly the Department of Economic and Community Affairs, was assigned the administrative responsibility for the program in Oklahoma in 1982.

The primary National Objective of the State's CDBG program is:

"THE DEVELOPMENT OF VIABLE URBAN COMMUNITIES, BY PROVIDING DECENT HOUSING AND A SUITABLE LIVING ENVIRONMENT, AND EXPANDING ECONOMIC OPPORTUNITIES, **PRINCIPALLY FOR PERSONS OF LOW INCOME**."

The use of the "benefit to low and moderate income-persons" CDBG National Objective is considered a funding PRIORITY under the State's CDBG Program and is treated as such under the State's individual CDBG set-asides. All project proposals submitted for funding through the State's CDBG Program must document the achievement of the low and moderate-income National Objective as delineated in 24 CFR §570.483 (Criteria for National Objectives).

✓ Provide benefit to low and moderate-income persons.

It is estimated that, at a minimum, 95% of funds will be utilized on projects that meet the primary national objective of benefit to low- and moderate-income persons. Each state administering the CDBG program is allowed the flexibility of determining its priorities from the range of eligible activities under Section 105(a) of the Housing and Community Development Act. To formulate the State's CDBG program, views on priorities are requested and received from the public, municipalities, and counties through written surveys, public hearings and written comments on proposed plans.

Distribution and management of the Community Development Block Grant funds allocated to Oklahoma will rely on a process that permits local communities to request assistance through the submittal of a formal application. Applicants are required to complete and submit their respective application and applicable attachments online at the following OKGrants web address: https://grants.ok.gov. No paper applications will be accepted. ODOC/CD shall conduct an evaluation of applications to ensure compliance with the National Objectives, all thresholds and program requirements. Application guidelines with specific application requirements can be found at the ODOC/CD website: https://www.okcommerce.gov/community-development/. Prospective applicants should review the application guidelines or properly submit required application documentation may result in a FAILED or DENIED application rating.

ELIGIBLE APPLICANT

Eligible applicants are units of local government (incorporated towns, cities, and counties) that are **not** participants in the CDBG Entitlement Program. Oklahoma's entitlement cities are Edmond, Enid, Lawton, Midwest City, Moore, Norman, Oklahoma City, Shawnee, and Tulsa as well as the units of local government participating in the CDBG Urban County Designation for Tulsa County which consists of the following:

City of Bixby City of Jenks City of Skiatook
City of Broken Arrow City of Owasso Town of Sperry

City of Collinsville City of Sand Springs Unincorporated Tulsa County

City of Glenpool City of Sapulpa

GRANT ALLOCATION

Funding for the Fiscal Year 2025 CDBG Program:

HUD Allocation:	\$13,963.452
Less State administrative allowance:	\$379.269
Less State technical assistance:	\$139,635

Total available for distribution: \$13,444,548

CDBG Set-Aside Funding Distribution:

Public Facility and Improvements \$13,444,548

\$3,000,000
\$4,634,548
\$1,500,000
\$1,500,000
\$1,370,000

Planning

Capital Improvement Planning (CIP) \$440,000

Economic Development

Economic Development Infrastructure Financing (EDIF) \$1,000,000

Please note: The total allocation amount is subject to change based on the HUD budget appropriation when released.

Program Income from the State's Economic Development Revolving Loan Fund shall be used to fund CDBG activities as described in this Plan. The **estimated** amount of program income made available during the program year will be \$500,000.

The Oklahoma Department of Commerce reserves the right to adjust set-aside and category allocations to ensure maximum utilization of funds. This includes the use of any CDBG funds recovered from cancelled or de-obligated CDBG projects. Such adjustments shall be the minimum amount necessary to fund projects efficiently and best facilitate the State's CDBG Program obligation and expenditure requirements established by HUD.

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GUIDELINES FOR SET-ASIDES

Audit Requirements

To be eligible to apply for funds in any category, units of general local government must demonstrate the ability to manage federal funds utilizing generally accepted principles of accounting. TOWNS AND CITIES (COUNTIES ARE EXEMPT) MUST SUBMIT A COPY OF THEIR AUDIT OR THE AGREED UPON PROCEDURES BY THE APPLICATION DEADLINE. ALL TOWNS AND CITIES THAT HAVE A JUNE 30, FISCAL YEAR END DATE ARE REQUIRED TO SUBMIT A COPY OF THEIR FY 2024 AUDIT AND TOWNS AND CITIES THAT HAVE A DECEMBER 31, FISCAL YEAR END DATE ARE REQUIRED, AS A MINIMUM, TO SUBMIT A COPY OF THEIR FY 2023 AUDIT. NO APPLICATION WILL BE CONSIDERED FOR REVIEW OR FUNDING THAT DOES NOT MEET THE REQUIREMENTS STATED ABOVE.

If the city or town receives less than \$50,000 in annual revenues from its normal business and does not have an audit or agreed upon procedure, the city or town cannot apply directly to ODOC/CD. The city or town can apply only by having the local County apply on their behalf if the County chooses to do so. Nothing contained herein mandates a county to act as an accommodating party.

Application Submission Requirements

- 1. City/Town and County (Direct Jurisdiction) Applicants: City/Towns and Counties receiving a direct jurisdictional benefit may submit only one (1) grant application per CDBG Program Year selecting from CDBG Water/Wastewater Engineering, Water/Wastewater Construction, Community Revitalization, or Rural Economic Action Plan (REAP). A City/Town and County (Direct Jurisdiction) cannot submit a CDBG application if it currently has an open CDBG grant. Exclusions: Economic Development Infrastructure Financing (EDIF), Capital Improvement Planning (CIP). Typical County direct jurisdiction CDBG application projects are roads, bridges, County hospital, etc. In the case of fire truck funding requests, the County would have to own and operate the fire trucks to qualify under direct jurisdictional benefit.
- 2. County Sponsored Applicants: Counties acting in a "sponsorship" capacity may submit a maximum of one sponsored CDBG grant application per CDBG Program Year selecting from Water/Wastewater Engineering, Water/Wastewater Construction, Community Revitalization, or Rural Economic Action Plan (REAP). Limitation: Counties may ONLY have one (1) open sponsored CDBG grant and still make another sponsored CDBG application. Counties cannot exceed a maximum number of two open sponsored CDBG grants open at any given time. Exclusions: Economic Development Infrastructure Financing (EDIF), Capital Improvement Planning (CIP). Counties may sponsor applications where they do not have direct jurisdiction over certain public functions. Generally, these are communities with less than \$50,000 in revenue, Rural Water Districts, and Rural Fire Districts. Counties CANNOT submit a single application containing multiple Units of General Local Governments or jurisdictions such as Rural Fire Districts under a single county sponsored application.

Leverage

The State's CDBG Program requires that all leveraged CDBG project funding be in place at the time of the application submission. There are several reasons for this. First, the HUD based CDBG Program imposes program specific obligation and expenditure requirements. Most importantly, an applicant may simply not receive the leveraged funding as intended. Second, applicants

without secured leverage funding at the time of the application submission would require additional time for securing the funds adding time to the overall project completion timeline. Third, there is no foreseeable way to impose an additional timeframe for the allowance to secure leveraged funding that would be fair to all applicants given the varied types of outside funding available.

CDBG Project Eligibility Policy

Prospective CDBG Program applicants are strongly encouraged to review (24 CFR 570 Subparts A, C, I, K, and O) of the Electronic Code of Federal Regulations (https://ecfr.io/Title-24/) for additional regulatory CDBG Program guidance as related to State CDBG Programs. The Housing and Community Development Act Section 105(a) and 24 CFR 570.482 defines eligible activities under the State CDBG Program. While some regulatory language is direct, there are instances where more clarity is needed.

It is the policy of ODOC/CD that should a prospective CDBG Program applicant request a CDBG project/activity that does NOT appear directly eligible and cannot be immediately determined as ineligible as interpreted from CDBG regulatory guidance and ODOC/CD staff that the applicant can formally request ODOC/CD to seek a final determination from HUD officials.

- a. The prospective applicant will be required to submit a project/activity narrative regarding the requested activity. This will be required by HUD to conduct their review and make a determination. It is the responsibility of the prospective applicant to provide the narrative. The submission of the narrative to ODOC/CD will be seen by as the formal request to seek a final determination from HUD.
- b. Once a detailed project narrative is received by ODOC/CD, it will be submitted to the Oklahoma City HUD office for a final eligibility determination.

Prospective applicants are advised to seek project/activity guidance as soon as possible from ODOC/CD if they have eligibility concerns. Prospective applicants should be aware that final CDBG regulatory and program guidance can take several months to receive from HUD. ODOC/CD understands that prospective applicants are subject to CDBG application deadlines; however, in absence of a final project/activity determination from HUD, ODOC/CD cannot allow an award for any requested CDBG project/activity that cannot be determined to be directly CDBG eligible. If the project/activity eligibility determination has not been received from HUD by the CDBG application deadline, the application will receive a FAIL threshold rating. Applicants are advised to consider that a determination may not be received by the CDBG application submission date.

Definition of Standard Vs. Substandard for Rehabilitation

The State defines a standard condition as those units, that at a minimum, meet applicable federal standards and local building codes.

Furthermore, the State defines a "substandard condition but suitable for rehabilitation" as units that may be structurally sound, but they do not provide adequate and safe shelter, and in their present condition may endanger the health and safety of occupants.

WATER & WASTEWATER ENGINEERING

The purpose of this Application Guide is to provide guidance in preparing a Community Development Block Grant (CDBG) Water/Wastewater Engineering application for the Oklahoma Department of Commerce / Community Development (ODOC/CD). The primary goals of the CDBG Water/Wastewater Engineering Program are to (1) ensure the most proper technical solutions to the applicant's water and wastewater problems within the budget that is available; and (2) improve coordination among other state agencies (both permitting and financing). It is important to note that given the design and intent of the State's CDBG Water/Wastewater Engineering Program, an eligible application must contain an engineering component regardless of whether CDBG or leveraged funds are paying for this cost.

NOTE: STARTING WITH THE FY 2019 CDBG APPLICATIONS, the former CDBG Water/Wastewater Engineering Phase I and CDBG Water/Wastewater Phase II Programs have been merged into one single program. This new program is now known as "CDBG Water/Wastewater Engineering" and will use a single application to allow for both engineering and construction.

Applicants submitting under the CDBG Water/Wastewater Engineering Program may elect to either have (1) CDBG funds pay for the engineering, construction, administration, permitting, and other costs associated with water/wastewater project; or (2) provide a combination of CDBG funds and other funds to pay for these costs.

Applicants who successfully compete under the CDBG Water/Wastewater Engineering Program and receive an award will be subject to the following project timeline. Prospective applicants should note that this timeline will be strictly enforced by ODOC/CD in order to ensure the timeliness of CDBG expenditures as required by the U.S. Department of Housing and Urban Development (HUD). CDBG Water/Wastewater awardees will receive a three (3) year contract structured as follows:

- 1. Year One The sub-recipient will be required to successfully complete project engineering and achieve Release of Funds within one (1) year. ODOC/CD will carefully monitor project activity and subsequent progress. Allowable engineering costs will be based on the U.S. Department of Agriculture Rural Development (USDA-RD) sliding scale. Once the Oklahoma Department of Environmental Quality (ODEQ) permit and Oklahoma Department of Commerce/Community Development (ODOC/CD) Release of Funds requirements are complete (regardless of the source of funds), the sub-recipient will be able to proceed with project construction.
- (a) If the above deliverables are not met, the contract will be subject to de-obligation by ODOC/CD.
- (b) As part of ODOC/CD's monitoring and evaluation of the project's engineering progress, the sub-recipient must submit all required documentation to the ODOC/CD monitor in a timely manner. Failure to submit any or all required documentation will result in contract deobligation.
- (c) Should the contract be de-obligated, any expended CDBG funds will be required to be reimbursed by the sub-recipient. The contract will remain open until repayment is made during which time the sub-recipient will not be eligible to apply for additional CDBG funding.

- (d) An ODOC/CD review committee will determine de-obligation of the CDBG funding if the project's engineering has NOT been satisfactorily completed and Release of Funds has NOT been obtained. This review committee will be composed of ODOC/CD staff to include: CDBG Planners, the Director of Programs (Planning & Monitoring), and Division Director.
- (e) If a sub-recipient is de-obligated "in good standing" without any CDBG funds expended or has made the proper CDBG repayment as deemed necessary, the sub-recipient could close the contract and reapply during the next year's application cycle.
- **2. Years' Two & Three** Project construction will be allowed for a period of two (2) years plus any time left available should the engineering and Release of Funds be accomplished before the one (1) year engineering limit is reached.

The grant maximum for the CDBG Water/Wastewater Engineering application is \$600,000. The maximum amount of CDBG Water/Wastewater Engineering funds that may be used for project administration is eight percent (8%) of the total CDBG Water/Wastewater Engineering funds awarded for total construction and professional/non-construction funds provided. All CDBG Water/Wastewater Engineering applications must be received no later than May 2, 2025. Applications received after this date will NOT be considered for funding.

Any funds not applied for in the CDBG Water & Wastewater set-aside will be transferred to another set-aside as determined by ODOC/CD.

Applicants are required to complete and submit their respective application and applicable attachments online at the following OKGrants web address: https://grants.ok.gov. NO PAPER APPLICATIONS WILL BE ACCEPTED. Application guidelines and specific program requirements be found at the **OKGrants** web address: can https://okcommerce.gov/community/cdbg/. Prospective applicants should review the application guidance BEFORE attempting to complete the online application. Failure to meet application guidelines or properly submit required application documentation may result in a FAILED or DENIED application rating.

THRESHOLD REQUIREMENTS FOR CDBG WATER & WASTEWATER ENGINEERING

- CDBG Water/Wastewater Engineering requests for funds must meet the principle CDBG National Objective of providing a direct benefit (fifty-one percent [51%] or more) to persons of low and moderate-income.
- 2. Cities, Towns and Counties with previous CDBG funding <u>must have close-out documents</u> submitted by January 31, 2025.
 - (a) City/Town and County (Direct Jurisdiction) Applicants: City/Towns and Counties receiving a direct jurisdictional benefit may submit only one (1) grant application per CDBG Program Year selecting from CDBG Water/Wastewater Engineering, CDBG Water/Wastewater Construction, CDBG Community Revitalization, or CDBG Rural Economic Action Plan (REAP). A City/Town and County (Direct Jurisdiction) cannot submit a CDBG application if it currently has an open CDBG grant. Exclusions: Economic Development Infrastructure Financing (EDIF), Capital Improvement Planning (CIP). Typical County direct jurisdiction CDBG application projects are roads, bridges, County hospital, etc.

- (b) County Sponsored Applicants: Counties acting in a "sponsorship" capacity may submit a maximum of one sponsored CDBG grant application per CDBG Program Year selecting from Water/Wastewater Engineering, Water/Wastewater Construction, Community Revitalization, or Rural Economic Action Plan (REAP). Limitation: Counties may ONLY have one (1) open sponsored CDBG grant and still make another sponsored CDBG application. Counties cannot exceed a maximum number of two open sponsored CDBG grants open at any given time. Exclusions: Economic Development Infrastructure Financing (EDIF), Capital Improvement Planning (CIP). Counties may sponsor applications where they do not have direct jurisdiction over certain public functions. Generally, these are communities with less than \$50,000 in revenue, Rural Water Districts, and Rural Fire Districts.
- 3. Per the design and intent of the State's CDBG Water/Wastewater Engineering Program, the following application specific limitations or restrictions are in place.
 - (a) Applicants can apply for up to a \$600,000 grant maximum.
 - (b) Applicants may not apply for more than one (1) project activity per application under this CDBG Water/Wastewater Engineering set-aside.
 - (c) A CDBG Water/Wastewater Engineering application must contain an engineering component regardless of whether CDBG or leveraged funds are being committed as payment. This is documented through the submission of the required Preliminary Engineering Report at the time of application submission.
 - (d) The CDBG Water/Wastewater Engineering application pursuant with 24 CFR §570.207 will not fund equipment only requests. The purchase of equipment under CDBG is generally ineligible except under very limited conditions as outlined in 24 CFR §570.207. Requests such as water meters must be encompassed by a broader type of water/wastewater project. Applicants are encouraged to review the entire regulation and should immediately consult ODOC should there questions as to the eligibility of their prospective project funding request.
- 4. A proper sponsor for CDBG Water/Wastewater Engineering projects is defined as a Unit of Local government with direct jurisdiction over the majority (60%) of the proposed project beneficiaries.
- 5. Proof that citizen participation requirements have been met, as evidenced by an application phase public hearing and written Citizen Participation Plan.
- 6. All cost estimates shall be obtained from professional sources and submitted with the application. These estimates must be certified (signed, sealed, and dated) from professional engineers, architects, construction companies, vendors, or appropriate personnel with experience to make such estimates.
- 7. The CDBG Water/Wastewater Engineering grant request cannot exceed \$2,000 per beneficiary.
- 8. TOWNS AND CITIES (COUNTIES ARE EXEMPT) MUST SUBMIT A COPY OF THEIR AUDIT OR THE AGREED UPON PROCEDURES BY THE APPLICATION DEADLINE. ALL TOWNS AND CITIES THAT HAVE A JUNE 30, FISCAL YEAR END DATE ARE REQUIRED TO SUBMIT A COPY OF THEIR FY 2024 AUDIT AND TOWNS AND CITIES THAT HAVE A

DECEMBER 31, FISCAL YEAR END DATE ARE REQUIRED, AS A MINIMUM, TO SUBMIT A COPY OF THEIR FY 2023 AUDIT. NO APPLICATION WILL BE CONSIDERED FOR REVIEW OR FUNDING THAT DOES NOT MEET THE REQUIREMENTS STATED ABOVE.

If a city or town receives less than \$50,000 in annual revenues from its normal business and does not have an audit or agreed upon procedures, the city or town cannot apply directly to ODOC/CD. The city or town can apply only by having the local County apply on their behalf if the County chooses to do so. Nothing contained herein mandates a County to act as an accommodating party.

- 9. Applicants are responsible for accomplishing online application corrections/revisions along with any applicable application upload corrections/revisions as directed by ODOC/CD staff within the pre-determined deadline. In fairness to other applicants and in order to maintain HUD required ODOC/CD's CDBG funding expenditure rates; ODOC/CD can NOT indefinitely hold applications until the respective application corrections/revisions are accomplished. Applications will be considered INCOMPLETE if the prescribed corrections/revisions are not made to the application within the pre-determined deadline established by ODOC/CD. This will result in a FAILED threshold application rating.
- 10. The Application Guidelines associated with this CDBG Water/Wastewater Engineering set-aside contains an APPLICATION FORMS CHECKLIST outlining all application related documentation required to be uploaded into the online OKGrants application. It is the applicant's responsibility to follow this checklist and seek additional guidance from ODOC/CD staff as required. Applicants will be responsible for following and providing each item listed on the checklist. Failure to provide any of the required application documentation listed on the checklist will result in a FAILED application rating. Additionally, applicants must provide a response to all application questions and satisfy all documentation requirements delineated in the CDBG Water/Wastewater Engineering Application Guidelines and online OKGrants Application System including, but not limited to: Resolution, income survey results, resolution requesting assistance, survey maps, certifications, HUD Form 2880 Applicant Recipient Disclosure Update Report, project budget, etc.
- 11. The application must sufficiently demonstrate an applicant's need for the requested CDBG activity. For any requested CDBG project, there is an underlying "need" for such a project. It is the responsibility of the applicant to communicate to ODOC/CD why the CDBG activity is being requested in the application. Failure to adequately demonstrate a project need will result in a FAILED threshold application rating. The project need is communicated in the "Project Description" section of the "CDBG Application Summary" page of the online OKGrants application. Additional narratives and supporting documentation can be uploaded in the "Uploads" page of the OKGrants application if required.

RATING CRITERIA FOR WATER & WASTEWATER ENGINEERING

Water and Wastewater applications, which meet threshold criteria, will be ranked for funding utilizing the following criteria:

1. Project Benefit to Low- and Moderate-Income Persons (2 - 15 points).

LMI %	Points	# LMI Persons	Points
51 - 55	1	0 - 250	1

56 - 60	2
61 - 65	3
66 - 70	4
71 - 75	5
76 - 80	6
81 - 85	7
86 - 90	8
91 - 95	9
96 - 100	10

251 - 500	2
501 - 750	3
751 - 1,000	4
Over 1,000	5

2. Severity of Need Water and Wastewater Projects (0 - 10 points).

Projects will be rated on water and wastewater associated documented health, safety, and welfare hazards. Water and wastewater health, safety, and welfare deficiencies may be documented in one of two ways: (1) through the presence of a legal enforceable order issued by Oklahoma Department of Environmental Quality (ODEQ) or the U.S. Environmental Protection Agency (EPA), or (2) by written confirmation of a "hazard" from ODEQ that specifically states the cause and extent of the water or wastewater, health, safety, and welfare deficiency. ODOC/CD will only accept "documented hazard" Water and Wastewater related health, safety, and welfare hazard documentation from ODEQ and EPA sources. Claims using "Legal Enforceable Orders" and "Documented Hazards" will be verified by ODOC/CD through the applicant's submitted supporting documentation.

Water and Wastewater projects that document health, safety, and welfare hazards involving legal enforceable orders will be rated on a separate scale of severity than written documentation of hazards. The two separate severity of need categories are as follows:

Legal Enforceable Orders 10.0 Points

Documented Hazards 5.0 Points

No Documentation 0.0 Points

Severity of Need (0 - 5 points) Water and Wastewater Projects for New Housing Construction: Projects for Water and Wastewater system expansions serving new housing developments shall be rated on their verification of the extent of the local jurisdictions housing shortage as documented by an official housing market analysis that clearly concludes a projected 3-5 year demand for a specific number of single family ownership units and/or rental units. Points will be determined by the level of impact based on the following criteria:

- √ Vacancy rates
- ✓ Population growth
- ✓ Projected job growth
- ✓ Number of units + Total units

3. Residential Water Rate Structure (-3 to +3 points)

Project proposals will earn points based on the first 5,000 gallons of their most current associated water rate structure. Water rate structures that favor both strong fiscal

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management and conservation awareness will be analyzed and awarded points by using portions of the Oklahoma "Water Resources Board's Grant Priority Point Evaluation Policy". Points will be awarded based on the following table:

<u>Flat Water Rate</u>: Unmetered charges on unmetered systems that charge a fee without regard to the amount of water used, unless the proposed project involves metering of all taps on the system. **-3 points**

<u>Decreasing Block Water Rate</u>: Price per unit of water becomes lower as the quantity of water use increases. **-3 points**

<u>Fixed/Uniform Water Rate</u>: Price per unit of water, in excess of any base or minimum charge, remains constant. **0 points**

<u>Increasing Block Water Rate</u>: Price per unit of water increases as the quantity of water use increases. **+3 points**

4. Residential Water and Wastewater Rates (0 - 7 points)

All water and wastewater category projects will also receive points based on the revenue generating capacity of their rate structures. Water and Wastewater rates will be analyzed and awarded points by using portions of the Oklahoma "Water Resources Board's Grant Priority Point Evaluation Policy". The appropriate table of points is determined based on the type of services provided by the system operator. If the system operator provides water service only, then Table #1 is used; if the system operator provides wastewater service only, then Table #2 is used; and if the system operator provides both water and wastewater service, then Table #3 is used.

Table #1 - Systems Providing Water Service Only		
Cost Per 5,000 Gallons	Points	
\$35.00 or Greater	7	
\$30.00 - \$34.99	6	
\$25.00 - \$29.99	5	
\$23.00 - \$24.99	4	
\$21.00 - \$22.99	3	
\$19.00 - \$20.99	2	
\$18.00 - \$18.99	1	
Less than \$18.00	0	

Table #2 - Systems Providing Wastewater Service Only		
Cost Per 5,000 Gallons	Points	
\$28.00 or Greater	7	
\$26.00 - \$27.99	6	
\$24.00 - \$25.99	5	
\$22.00 - \$23.99	4	
\$20.00 - \$21.99	3	
\$18.00 - \$19.99	2	
\$16.00 - \$17.99	1	
Less than \$16.00	0	
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Table #3 - Systems Providing Water & Wastewater Service		
Cost Per 5,000 Gallons	Points	
\$45.00 or Greater	7	
\$41.00 - \$44.99	6	
\$37.00 - \$40.99	5	
\$34.00 - \$36.99	4	
\$32.00 - \$33.99	3	
\$31.00 - \$31.99	2	
\$30.00 - \$30.99	1	
Less than \$30.00	0	

5. Ability to Finance Project (0 - 10 pts)

Applicants ranked by giving a standardized account of the amount of the existing water/sewer rates would have to be raised in order for the applicant to finance the project through a loan. The formula is as follows:

FP=AR(0.0710) (12) (c) FP = Estimate of amount of rates to be raised to finance project through a loan

AR = Amount Requested

0.0710 = Annual rate factor for a 25-year loan at 5%

12 = Number of months per year

c = Number of Customers

Ability to Finance Project Through Loan	Points	
\$12.00 or Greater	10	
\$10.00 - \$11.99	9	
\$9.00 - \$9.99	8	
\$8.00 - \$8.99	7	
\$7.00 - \$7.99	6	
\$6.00 - \$6.99	5	
\$5.00 - \$5.99	4	
\$4.00 - \$4.99	3	
\$3.00 - \$3.99	2	
\$2.00 - \$2.99	1	
Less than \$2.00	0	

6. Grant Request Amount (0 - 3 points)

Grant Request Amount	Points	
\$200,000 or Less	0	
\$200,001 to \$299,999	1	
\$300,000 to \$399,999	2	
\$400,000 to \$600,000	3	

7. Corrective Action Point Reduction (As Applicable) (Minus 2 points)

Applications requiring minor corrections will receive a maximum two (2) point scoring reduction. These applications require ODOC/CD to formally initiate the application to a "changes required" status in OKGrants and the applicant is then required to formally "submit" the application once again through the OKGrants system. The point reduction is applicable if the application needs a correction that does NOT immediately warrant a FAILED threshold rating but has an identifiable minor requirement or procedure that was not followed and can be easily corrected. Example: required documentation is submitted unsigned; incorrect budget numbers; incorrect LMI numbers, etc. The corrective action timeframe is four (4) workdays. Corrections that remain incomplete will result in a FAILED threshold rating. NOTE: Applicants will NOT be penalized for ODOC/CD requests for clarifying information or documentation required beyond that specified in the CDBG Application Guidelines or CDBG Application Guidelines errors/omissions which result in needed corrections.

Under extenuating circumstances, ODOC/CD will carefully consider correction related extensions provided legitimate reasons can be given for such time extensions. ODOC/CD will make the final determination if an extension is warranted. Corrective action time extensions will NOT be automatic and requests for time extensions will be carefully considered by

ODOC/CD. It will be the responsibility of the prospective applicant to make ODOC/CD aware of any issues that may affect the ability to meet the four (4) working day corrective action deadline.

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WATER & WASTEWATER CONSTRUCTION

The purpose of this program is to fund projects that are ready to begin construction. Eligible entities that provide documentation of final plans and specifications or a construction permit secured through the ODEQ may apply under this category. This information will be verified with the ODEQ. The documentation must show that the final plans and specifications have been submitted to ODEQ or the construction permit has been issued prior to the CDBG application deadline. Absolutely no engineering costs will be allowed or reimbursed using CDBG funds in this category.

CDBG funds may only be utilized for construction, inspection, and administration. The grant maximum for single applicants is \$600,000. All projects shall be single purpose, either water or wastewater that will focus on some of the most serious problems in the state. The deadline for application submission is May 2, 2025.

Any funds not applied for in the CDBG Water & Wastewater Construction set-aside will be transferred to another set-aside as determined by ODOC/CD.

For a basic water and wastewater project the maximum amount of CDBG funds that may be used for project administration is 8% of the total CDBG Water/Wastewater Construction funds awarded for the total Construction and Professional / Non-Construction funds.

THRESHOLD REQUIREMENTS FOR WATER & WASTEWATER CONSTRUCTION

- CDBG Water & Wastewater Construction requests for funds must meet the principle CDBG National Objective of providing a direct benefit (fifty-one percent [51%] or more) to persons of low and moderate-income.
- 2. Cities, Towns and Counties with previous CDBG funding <u>must have close-out documents</u> submitted by January 31, 2025.
 - (a) City/Town and County (Direct Jurisdiction) Applicants: City/Towns and Counties receiving a direct jurisdictional benefit may submit only one (1) grant application per CDBG Program Year selecting from CDBG Water/Wastewater Engineering, CDBG Water/Wastewater Construction, CDBG Community Revitalization, or CDBG Rural Economic Action Plan (REAP). A City/Town and County (Direct Jurisdiction) cannot submit a CDBG application if it currently has an open CDBG grant. Exclusions: Economic Development Infrastructure Financing (EDIF), Capital Improvement Planning (CIP). Typical County direct jurisdiction CDBG application projects are roads, bridges, County hospital, etc.
 - (b) County Sponsored Applicants: Counties acting in a "sponsorship" capacity may submit a maximum of one sponsored CDBG grant application per CDBG Program Year selecting from Water/Wastewater Engineering, Water/Wastewater Construction, Community Revitalization, or Rural Economic Action Plan (REAP). Limitation: Counties may ONLY have one (1) open sponsored CDBG grant and still make another sponsored CDBG application. Counties cannot exceed a maximum number of two open sponsored CDBG grants open at any given time. Exclusions: Economic Development Infrastructure Financing (EDIF), Capital Improvement Planning (CIP). Counties may sponsor applications where they do not have

direct jurisdiction over certain public functions. Generally, these are communities with less than \$50,000 in revenue, Rural Water Districts, and Rural Fire Districts.

- 3. Applicants can apply for up to a \$600,000 grant maximum. Applicants may not apply for more than one (1) project activity per application under CDBG Water/Wastewater Construction set-aside.
- 4. A proper sponsor of CDBG water and wastewater projects is defined as a unit of local government with direct jurisdiction over the majority (60%) of the proposed project beneficiaries.
- 5. Proof that citizen participation requirements have been met, as evidenced by an application phase public hearing and written Citizen Participation Plan.
- All cost estimates must be derived from professional sources and submitted with the application. CDBG Water or wastewater projects must have a signed, dated and sealed certified cost estimate from a professional engineer licensed to do business in the State of Oklahoma.
- 7. Grant request cannot exceed \$2,000 per beneficiary for all projects, except in the case of new housing development.
- 8. Applicant must provide a response to all application questions and satisfy all documentation requirements delineated in the CDBG Water and Wastewater Construction Guidelines and application package including but not limited to: Resolution, Income Survey Results, Survey Maps, Certifications, HUD Form 2880 Applicant Recipient Disclosure Update Report, Project Budget, etc.
- 9. TOWNS AND CITIES (COUNTIES ARE EXEMPT) MUST SUBMIT A COPY OF THEIR AUDIT OR THE AGREED UPON PROCEDURES BY THE APPLICATION DEADLINE. ALL TOWNS AND CITIES THAT HAVE A JUNE 30, FISCAL YEAR END DATE ARE REQUIRED TO SUBMIT A COPY OF THEIR FY 2024 AUDIT AND TOWNS AND CITIES THAT HAVE A DECEMBER 31, FISCAL YEAR END DATE ARE REQUIRED, AS A MINIMUM, TO SUBMIT A COPY OF THEIR FY 2023 AUDIT. NO APPLICATION WILL BE CONSIDERED FOR REVIEW OR FUNDING THAT DOES NOT MEET THE REQUIREMENTS STATED ABOVE.

If a city or town receives less than \$50,000 in annual revenues from its normal business and does not have an audit or agreed upon procedures, the city or town cannot apply directly to ODOC/CD. The city or town can apply only by having the local County apply on their behalf if the County chooses to do so. Nothing contained herein mandates a County to act as an accommodating party.

10. Applicants must provide documentation that Final Plans and Specifications have been provided to Oklahoma Department of Environmental Quality (ODEQ) or a Construction Permit has been issued by ODEQ, prior to the Application deadline. If an ODEQ Permit is not required, Applicants must provide documentation from ODEQ stating an ODEQ Permit is Not Required. If applicant has been issued a Construction Permit and that Construction Permit is greater than one year old, a Construction Permit Extension from ODEQ is required and must be Uploaded to OKGrants with the application submittal before the permit will be accepted.

- 11. Applicants are responsible for accomplishing online application correction/revisions along with any applicable application upload corrections/revisions as directed by ODOC staff within the pre-determined deadline. In fairness to other applicants and in order to maintain HUD required CDBG funding expenditure rates; ODOC can NOT indefinitely hold applications until the respective application corrections/revisions are accomplished. Applications will be considered INCOMPLETE if the prescribed corrections/revisions are not made to the application within the pre-determined deadline established by ODOC. This will result in a FAILED threshold application rating.
- 12. The Application Guidelines associated with the CDBG W-WW Construction set-aside contains an APPLICATION FORMS CHECKLIST outlining all application related documentation required to be uploaded into the online OKGrants application. It is the Applicant's responsibility to follow this checklist and seek additional guidance from ODOC staff as required. Applicants will be responsible for following and providing each item listed on the checklist. Failure to provide any of the required application documentation listed on the checklist will result in a FAILED application rating. Additionally, Applicants must provide a response to all application questions and satisfy all documentation requirements delineated in the Application Guidelines and online OKGrants Application System including, but not limited to: Resolution, Income Survey Results; Survey Maps; Certifications; HUD Form 2880 Applicant Recipient Disclosure Update Report; Project Budget; etc.

RATING CRITERIA FOR WATER & WASTEWATER CONSTRUCTION

Water and Wastewater applications, which meet threshold criteria, will be ranked for funding utilizing the following criteria:

1. Project Benefit to Low- and Moderate-Income Persons (2 - 10 points).

Projects awarded under these criteria will be awarded 1-5 points for percentage of LMI, and 1-5 points for total number of LMI.

LMI %	Points
51 - 60	1
61 - 70	2
71 - 80	3
81 - 90	4
91 - 100	5

# LMI Persons	Points
0 - 250	1
251 - 500	2
501 - 750	3
751 - 1,000	4
Over 1,000	5

2. Severity of Need Water and Wastewater Projects (0 - 10 points).

Projects will be rated on water and wastewater associated documented health, safety, and welfare hazards. Water and wastewater health, safety, and welfare deficiencies may be documented in one of two ways: (1) through the presence of a legal enforceable order issued by Oklahoma Department of Environmental Quality (ODEQ) or the U.S. Environmental Protection Agency (EPA), or (2) by written confirmation of a "hazard" from ODEQ that specifically states the cause and extent of the water or wastewater, health, safety, and welfare deficiency. ODOC/CD will only accept "documented hazard" Water and Wastewater related health, safety, and welfare hazard documentation from ODEQ and EPA sources. Claims using

"Legal Enforceable Orders" and "Documented Hazards" will be verified by ODOC/CD through the applicant's submitted supporting documentation.

Water and Wastewater projects that document health, safety, and welfare hazards involving legal enforceable orders will be rated on a separate scale of severity than written documentation of hazards. The two-separate severity of need categories are as follows:

Legal Enforceable Orders 10.0 Points

Documented Hazards 5.0 Points

No Documentation 0.0 Points

Severity of Need (0-5 points) Water and Wastewater Projects for New Housing Construction

Projects for Water and Wastewater system expansions serving new housing developments shall be rated on their verification of the extent of the local jurisdictions housing shortage as documented by an official housing market analysis that clearly concludes a projected 3-5 year demand for a specific number of single family ownership units and/or rental units. Points will be determined by the level of impact based on the following criteria:

Vacancy rates
Population growth
Projected job growth
Number of Units + Total units

3. Residential Water and Wastewater Rates and Water Rate Structures (-3 to +3 points)
Water project proposals will earn points based on the first 5,000 gallons of the most current water rate structure and the subsequent revenue generating capacities where wastewater service is provided in conjunction with water service. Water rate structures that favor both strong fiscal management and conservation awareness will be analyzed and awarded points by using portions of the Oklahoma "Water Resources Boards' Emergency Grant Priority Point System."

Only proposals for water related system improvements will receive points for the residential water rate structure based on the following table:

<u>Flat Water Rate</u>: Unmetered charges on unmetered systems that charge a fee without regard to the amount of water used, unless the proposed project involves metering of all taps on the system. **-3 points**

<u>Decreasing Block Water Rates</u>: Price per unit of water becomes lower as the quantity of water use increases. *-3 points*

<u>Fixed/Uniform Water Rates</u>: Price per unit of water, in excess of any base or minimum charge, remains constant. *0 points*

<u>Increasing Block Water Rates</u>: Price per unit of water increases as the quantity of water use increases. **+3 points**

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4. Residential Water and Wastewater Rates (0 – 7 points)

All Water and Wastewater category projects will also receive points based on the revenue generating capacity of their rate structures. The appropriate table of points is determined based on the type of services provided by the system operator. If the system operator provides water service only, then Table #1 is used; if the system operator provides water and wastewater service, then Table #2 is used; and if the system operator provides wastewater service only, then Table #3 is used.

Table #1 - Systems Providing Water Service Only		
Cost Per 5,000 Gallons	Points	
\$35.00 or Greater	7	
\$30.00 - \$34.99	6	
\$25.00 - \$29.99	5	
\$23.00 - \$24.99	4	
\$21.00 - \$22.99	3	
\$19.00 - \$20.99	2	
\$18.00 - \$18.99	1	
Less than \$18.00	0	

Table #2 - Systems Providing Wastewater Service Only		
Cost Per 5,000 Gallons	Points	
\$28.00 or Greater	7	
\$26.00 - \$27.99	6	
\$24.00 - \$25.99	5	
\$22.00 - \$23.99	4	
\$20.00 - \$21.99	3	
\$18.00 - \$19.99	2	
\$16.00 - \$17.99	1	
Less than \$16.00	0	

Table #3 - Systems Providing Water & Wastewater Service		
Cost Per 5,000 Gallons	Points	
\$45.00 or Greater	7	
\$41.00 - \$44.99	6	
\$37.00 - \$40.99	5	
\$34.00 - \$36.99	4	
\$32.00 - \$33.99	3	
\$31.00 - \$31.99	2	
\$30.00 - \$30.99	1	
Less than \$30.00	0	

5. Ability to Finance Project (0 - 10 points)

Applicants ranked by giving a standardized account of the amount of the existing water/sewer rates would have to be raised in order for the applicant to finance the project through a loan. The formula is as follows:

FP=AR(0.0710)

(12) (c)

FP = Estimate of amount of rates to be raised to finance project through a loan

AR = Amount Requested

0.0710 = Annual rate factor for a 25-year loan at 5%

12 = Number of months per year

c = Number of Customers

Ability to Finance Project Through Loan	Points	
\$12.00 or Greater	10	
\$10.00 - \$11.99	9	
\$9.00 - \$9.99	8	
\$8.00 - \$8.99	7	
\$7.00 - \$7.99	6	
\$6.00 - \$6.99	5	
\$5.00 - \$5.99	4	
\$4.00 - \$4.99	3	
\$3.00 - \$3.99	2	
\$2.00 - \$2.99	1	
Less than \$2.00	0	

6. Grant Request Amount (0 - 3 points)

Grant Request Amount	Points	
\$200,000 or Less	0	
\$200,001 to \$299,999	1	
\$300,000 to \$399,999	2	
\$400,000 to \$600,000	3	

7. Leverage (0 - 10 points)

Projects will be rated on their ability to integrate the use of funds other than CDBG to carry out the proposed CDBG project. Leverage will be valued using full value for cash leverage and no point value will be given for in-kind leverage. The leverage score will be calculated as follows:

Formula:						
Cash Lever	age:	\$				
	Cash Le CDBG R	_	-	ount	Х	10 = Leverage Points
EXAMPLE:						
Cash Lever	age:			\$50	,000	
CDBG Req	uest Amo	ount:		\$10	0,000	
<u>\$50,000</u> \$100,000	X	10	=	5	Levera	ge Points

8. Oklahoma Department of Environmental Quality (ODEQ) Permitting (0 - 10 Points)

Permitting Status

Points

•	ODEQ Permit <u>not</u> required	0
•	Final Plans and Specifications submitted to ODEQ for approval	5
•	Permit to Construct Issued by ODEQ	10

9. Corrective Action Point Reduction (As Applicable) (Minus 2 points)

Applications requiring minor corrections will receive a maximum two (2) point scoring reduction. These applications require ODOC/CD to formally initiate the application to a "changes required" status in OKGrants and the applicant is then required to formally "submit" the application once again through the OKGrants system. The point reduction is applicable if the application needs a correction that does NOT immediately warrant a FAILED threshold rating but has an identifiable minor requirement or procedure that was not followed and can be easily corrected. Example: required documentation is submitted unsigned; incorrect budget numbers; incorrect LMI numbers, etc. The corrective action timeframe is four (4) work days. Corrections that remain incomplete will result in a FAILED threshold rating. NOTE: Applicants will NOT be penalized for ODOC/CD requests for clarifying information or documentation required beyond that specified in the CDBG Application Guidelines or CDBG Application Guidelines errors/omissions which result in needed corrections.

Under extenuating circumstances, ODOC/CD will carefully consider correction related extensions provided legitimate reasons can be given for such time extensions. ODOC/CD will make the final determination if an extension is warranted. Corrective action time extensions will NOT be automatic and requests for time extensions will be carefully considered by ODOC/CD. It will be the responsibility of the prospective applicant to make ODOC/CD aware of any issues that may affect the ability to meet the four (4) working day corrective action deadline.

COMMUNITY REVITALIZATION

Under this broad category, an Applicant may submit a project proposal for any eligible activity listed under Section 105(a) of the Federal Housing and Community Development Act of 1974, as amended, other than water or wastewater projects. Such projects could include fire protection, storm water drainage, street improvements, community centers, and property acquisition. Additional information on property acquisition is found on page 47.

Applications received under this set-aside will be scored competitively against one another regardless of project type.

The grant maximum for the CDBG Community Revitalization application is \$300,000. The deadline for application submission is March 28, 2025. The maximum amount of CDBG Community Revitalization funds that may be used for project administration is eight percent (8%) of the total CDBG Revitalization funds awarded. Applications received after this date will NOT be considered for funding. Additionally, CDBG Community Revitalization projects not meeting all the threshold requirements will NOT be considered for funding.

Any funds not applied for in the CDBG Community Revitalization set-aside will be transferred to another set-aside as determined by ODOC/CD.

THRESHOLD REQUIREMENTS FOR COMMUNITY REVITALIZATION

- 1. CDBG Community Revitalization requests for funds must meet the principle CDBG National Objective of providing a direct benefit (fifty-one percent [51%] or more) to persons of low and moderate-income.
- 2. A proper sponsor for CDBG Community Revitalization projects is defined as a Unit of Local government with direct jurisdiction over the majority (60%) of the proposed project beneficiaries.
- 3. Applicants can apply for up to \$300,000 grant maximum. Applicants may not apply for more than one (1) project activity per application under this CDBG Community Revitalization set-aside.
- 4. Proof that citizen participation requirements have been met, as evidenced by an application phase public hearing and written Citizen Participation Plan.
- 5. All cost estimates shall be obtained from professional sources, as applicable, and submitted with the application. These estimates must be signed, dated and sealed/certified from professional engineers, architects, construction companies, vendors or appropriate personnel with experience to make such estimates.
- 6. Cities, Towns and Counties with previous CDBG funding <u>must have close-out documents</u> submitted by January 31, 2025.
 - (a) City/Town and County (Direct Jurisdiction) Applicants: City/Towns and Counties receiving a direct jurisdictional benefit may submit only one (1) grant application per CDBG Program Year selecting from CDBG Water/Wastewater Engineering, CDBG Water/Wastewater

Construction, CDBG Community Revitalization, or CDBG Rural Economic Action Plan (REAP). A City/Town and County (Direct Jurisdiction) cannot submit a CDBG application if it currently has an open CDBG grant. Exclusions: Economic Development Infrastructure Financing (EDIF), Capital Improvement Planning (CIP). Typical County direct jurisdiction CDBG application projects are roads, bridges, County hospital, etc.

- (b) County Sponsored Applicants: Counties acting in a "sponsorship" capacity may submit a maximum of one sponsored CDBG grant application per CDBG Program Year selecting from Water/Wastewater Engineering, Water/Wastewater Construction, Community Revitalization, or Rural Economic Action Plan (REAP). Limitation: Counties may ONLY have one (1) open sponsored CDBG grant and still make another sponsored CDBG application. Counties cannot exceed a maximum number of two open sponsored CDBG grants open at any given time. Exclusions: Economic Development Infrastructure Financing (EDIF), Capital Improvement Planning (CIP). Counties may sponsor applications where they do not have direct jurisdiction over certain public functions. Generally, these are communities with less than \$50,000 in revenue, Rural Water Districts, and Rural Fire Districts. Counties CANNOT submit a single application containing multiple Units of General Local Governments or jurisdictions such as Rural Fire Districts under a single county sponsored application.
- 7. The CDBG Community Revitalization grant request cannot exceed \$2,000 per beneficiary.
- 8. TOWNS AND CITIES (COUNTIES ARE EXEMPT) MUST SUBMIT A COPY OF THEIR AUDIT OR THE AGREED UPON PROCEDURES BY THE APPLICATION DEADLINE. ALL TOWNS AND CITIES THAT HAVE A JUNE 30, FISCAL YEAR END DATE ARE REQUIRED TO SUBMIT A COPY OF THEIR FY 2024 AUDIT AND TOWNS AND CITIES THAT HAVE A DECEMBER 31, FISCAL YEAR END DATE ARE REQUIRED, AS A MINIMUM, TO SUBMIT A COPY OF THEIR FY 2023 AUDIT. NO APPLICATION WILL BE CONSIDERED FOR REVIEW OR FUNDING THAT DOES NOT MEET THE REQUIREMENTS STATED ABOVE.

If the city or town receives less than \$50,000 in annual revenues from its normal business and does not have an audit or agreed upon procedure, the city or town cannot apply directly to ODOC. The city or town can apply only by having the local County apply on their behalf if the County chooses to do so. Nothing contained herein mandates a County to act as an accommodating party.

- 9. Applicants must certify that if the proposed project is funded by CDBG Community Revitalization dollars it will be properly insured for the life of the asset (as applicable). Proper insurance for buildings includes property and liability insurance coverage. When the project includes vehicles, proper insurance will include liability, comprehensive and collision coverage.
- 10. Applicants are responsible for accomplishing online application corrections/revisions along with any applicable application upload corrections/revisions as directed by ODOC/CD staff within the pre-determined deadline. In fairness to other applicants and to maintain HUD required CDBG funding expenditure rates; ODOC/CD can NOT indefinitely hold applications until the respective application corrections/revisions are accomplished. Applications will be considered INCOMPLETE if the prescribed corrections/revisions are not made to the application within the pre-determined deadline established by ODOC/CD. This will result in a FAILED threshold application rating.

- 11. The Application Guidelines associated with the CDBG Community Revitalization set-aside contains an APPLICATION FORMS CHECKLIST outlining all application related documentation required to be uploaded into the online OKGrants application. It is the Applicant's responsibility to follow this checklist and seek additional guidance from ODOC/CD staff as required. Applicants will be responsible for following and providing each item listed on the checklist. Failure to provide any of the required application documentation listed on the checklist will result in a FAILED application rating. Additionally, Applicants must provide a response to all application questions and satisfy all documentation requirements delineated in the CDBG Community Revitalization Application Guidelines and online OKGrants Application System including, but not limited to: Resolution, income survey results, resolution requesting assistance, survey maps, certifications, HUD Form 2880 Applicant Recipient Disclosure Update Report, project budget, etc.
- 12. The application must sufficiently demonstrate an applicant's need for the requested CDBG activity. For any requested CDBG project, there is an underlying "need" for such a project. It is the responsibility of the applicant to communicate to ODOC/CD why the particular CDBG activity is being requested in the application. Failure to adequately demonstrate a project need will result in a FAILED threshold application rating. The project need is communicated in the "Project Description" section of the "CDBG Application Summary" page of the online OKGrants application. Additional narratives and supporting documentation can be uploaded in the "Uploads" page of the OKGrants application if required.

RATING CRITERIA FOR COMMUNITY REVITALIZATION

Applications which meet threshold requirements will be ranked for funding utilizing the following criterion:

1. Project Benefit to Low- and Moderate-Income Percentage (2 - 15 points)

LMI %	Points
51 - 55	1
56 - 60	2
61 - 65	3
66 - 70	4
71 - 75	5
76 - 80	6
81 - 85	7
86 - 90	8
91 - 95	9
96 - 100	10

# LMI Persons	Points
0 - 250	1
251 - 500	2
501 - 750	3
751 - 1,000	4
Over 1,000	5

2. Grant Request Amount (0 – 10 points)

Grant Request Amount	Points	
\$50,000 or Less	0	
\$50,001 - \$74,999	1	
\$75,000 - \$99,999	2	

\$100,000 - \$124,999	3	
\$125,000 - \$149,999	4	
\$150,000 - \$174,999	5	
\$175,000 - \$199,999	6	
\$200,000 - \$224,999	7	
\$225,000 - \$249,999	8	
\$250,000 - \$274,999	9	
\$275,000 - \$300,000	10	

3. **Leverage (0 – 15 points)**

Projects will be rated on their ability to integrate the use of funds other than CDBG Community Revitalization to carry out the proposed CDBG Community Revitalization project. Leverage will be valued using full value for cash leverage and **no point value will be given for in-kind leverage**. A maximum of 15 points is available for leverage.

In an attempt to level the playing field faced by smaller communities, a variable will be applied to the previously used ratio (total leverage to grant request amount ratio); based on the population figures found in the Appendix 'D' of this guide. These figures are compiled by the U.S Census Bureau and provided by the U.S. Department of Housing and Urban Development (HUD) and are reported in conjunction with HUD's LMI qualification related documentation. Moreover, if the applicant is a county submitting on behalf of an unincorporated area, the maximum variable allowed (1.5) will automatically be applied.

Applicants with a population of 1,500 or less will receive a variable of one and a half (1.5). Those with a population of 1,501 to 3,500 will receive a variable of one and a quarter (1.25). Finally, applicants with a population of 3,501 and greater will receive a variable of one (1).

The leverage score will be calculated as follows:

Formula: Cash Leverage: Cash Leverage CDBG Request Amount X 15 = Leverage Points EXAMPLE A: Cash Leverage: \$50,000 \$150,000 X 15 = 5 Leverage Points

Example B: Based on the point award in Example 'A' above, The applicant has a population of 2,750 people. 5 x 1.25 = 6.25 points awarded.

Example C: Based on the point award in Example 'A' above, the applicant has a population of 1,200 people. $5 \times 1.5 = 7.5$ points awarded.

4. Previous Grant (0 - 10 points)

An applicant will be awarded points based on the CALENDAR YEAR & MONTH of closeout of the last (CDBG REAP, CDBG Community Revitalization, CDBG Water/Wastewater Engineering, CDBG Water/Wastewater Construction) award and the current CDBG Community Revitalization application submission deadline. **Exclusions:** Economic Development Infrastructure Financing (EDIF) and Capital Improvement Planning (CIP). The applicant will receive points based on the following scale:

A. Less than one year after grant closeout –	0 Points
B. Greater than one year less than two years after grant closeout –	1 Point
C. Greater than two years less than three years after grant closeout –	2 Points
D. Greater than three years less than four years after grant closeout –	4 Points
E. Greater than four years less than five years after grant closeout –	6 Points
F. Greater than five years less than six years after grant closeout –	8 Points
G. More than six years after grant closeout –	10 Points

EXAMPLE A: If an applicant successfully closed out a CDBG application in January of 2022. If the applicant applies for a CDBG Community Revitalization application in March of 2025, the applicant would receive four points on a 2025 CDBG Community Revitalization application.

EXAMPLE B: If an applicant successfully closed out a CDBG application in April of 2022. If the applicant applies for a CDBG Community Revitalization application in March of 2025, the applicant would receive two points on a 2025 CDBG Community Revitalization application.

5. Corrective Action Point Reduction (As Applicable) (Minus 2 points)

Applications requiring minor corrections will receive a maximum two (2) point scoring reduction. These applications require ODOC/CD to formally initiate the application to a "changes required" status in OKGrants and the applicant is then required to formally "submit" the application once again through the OKGrants system. The point reduction is applicable if the application needs a correction that does NOT immediately warrant a FAILED threshold rating but has an identifiable minor requirement or procedure that was not followed and can be easily corrected. Example: required documentation is submitted unsigned; incorrect budget numbers; incorrect LMI numbers, etc. The corrective action timeframe is four (4) workdays. Corrections that remain incomplete will result in a FAILED threshold rating. NOTE: Applicants will NOT be penalized for ODOC/CD requests for clarifying information or documentation required beyond that specified in the CDBG Application Guidelines or CDBG Application Guidelines errors/omissions which result in needed corrections.

Under extenuating circumstances, ODOC/CD will carefully consider correction related extensions provided legitimate reasons can be given for such time extensions. ODOC/CD will make the final determination if an extension is warranted. Corrective action time extensions will NOT be automatic and request for time extensions will be carefully considered by ODOC/CD. It will be the responsibility of the prospective applicant to make ODOC/CD aware of any issues that may affect the ability to meet the four (4) working day corrective action deadline.

CDBG/RURAL ECONOMIC ACTION PLAN (REAP)

The total funding amount for the CDBG REAP set-aside is **\$1,500,000**. The allocation formula for each Substate Planning District Area (SSPD) is based on low to moderate-income population. ODOC/CD reserves the right to adjust set-aside and category allocations to ensure maximum utilization of funds. Such adjustments shall be the minimum amount necessary to fund projects efficiently. An applicant may submit a project proposal for any eligible activity listed under Section 105 (a) of the Federal Housing and Community Development Act of 1974, as amended. Any funds not applied for in the Substate Planning District Area will be transferred to another set-aside as determined by ODOC/CD. ODOC/CD allows applicants to compete in the CDBG REAP and any other CDBG program in accordance with each set-aside restrictions.

The maximum amount of funds that may be used for CDBG REAP project administration is eight percent (8%) of the total award. **The deadline for application submission is February 28, 2025.**

The SSPD Allocations are listed below:

1.	ACOG	\$136,363.63
2.	ASCOG	\$136,363.63
3.	COEDD	\$136,363.63
4.	EODD	\$136,363.63
5.	GGEDA	\$136,363.63
6.	INCOG	\$136,363.63
7.	KEDDO	\$136,363.63
8.	NODA	\$136,363.63
9.	OEDA	\$136,363.63
10.	SODA	\$136,363.63
11.	SWODA	\$136,363.63

THRESHOLD CRITERIA FOR CDBG REAP

- 1. Eligible applicants for the CDBG REAP Program are units of general local governments (counties and incorporated towns and cities) that are State appropriated REAP funding eligible as identified by the Sub-state Planning District and in accordance with 62 O.S. § 2001 et al as amended.
- CDBG REAP funds must be matched dollar for dollar by State appropriated REAP funds. For example, if a project is \$80,000 it must be \$40,000 CDBG REAP and \$40,000 State appropriated REAP funds. Applicants may not apply for more than one (1) project activity per application under this set-aside.
- 3. CDBG REAP requests for funds must meet the principle CDBG National Objective of providing a direct benefit (fifty-one percent [51%] or more) to persons of low and moderate-income.
- 4. Cities, Towns, and Counties with previous CDBG funding <u>must have close-out documents</u> submitted by January 31, 2025.

- (a) City/Town and County (Direct Jurisdiction) Applicants: City/Towns and Counties receiving a direct jurisdictional benefit may submit only one (1) grant application per CDBG Program Year selecting from CDBG Water/Wastewater Engineering, CDBG Water/Wastewater Construction, CDBG Community Revitalization, or CDBG Rural Economic Action Plan (REAP). A City/Town and County (Direct Jurisdiction) cannot submit a CDBG application if it currently has an open CDBG grant. Exclusions: Economic Development Infrastructure Financing (EDIF), Capital Improvement Planning (CIP). Typical County direct jurisdiction CDBG application projects are roads, bridges, County hospital, etc.
- (b) County Sponsored Applicants: Counties acting in a "sponsorship" capacity may submit a maximum of one sponsored CDBG grant application per CDBG Program Year selecting from Water/Wastewater Engineering, Water/Wastewater Construction, Community Revitalization, or Rural Economic Action Plan (REAP). Limitation: Counties may ONLY have one (1) open sponsored CDBG grant and still make another sponsored CDBG application. Counties cannot exceed a maximum number of two open sponsored CDBG grants open at any given time. Exclusions: Economic Development Infrastructure Financing (EDIF), Capital Improvement Planning (CIP). Counties may sponsor applications where they do not have direct jurisdiction over certain public functions. Generally, these are communities with less than \$50,000 in revenue, Rural Water Districts, and Rural Fire Districts. Counties CANNOT submit a single application containing multiple Units of General Local Governments or jurisdictions such as Rural Fire Districts under a single county sponsored application.
- 5. A proper sponsor for CDBG REAP projects is defined as a Unit of Local government with direct jurisdiction over the majority (60%) of the proposed project beneficiaries.
- 6. Proof that citizen participation requirements have been met, as evidenced by an application phase public hearing and written Citizen Participation Plan.
- 7. All cost estimates shall be obtained from professional sources, as applicable, and submitted with the application. These estimates must be signed, dated, and certified from professional engineers, architects, construction companies, vendors, or appropriate personnel with experience to make such estimates.
- 8. The CDBG REAP grant request cannot exceed \$2,000 per beneficiary.
- 9. TOWNS AND CITIES (COUNTIES ARE EXEMPT) MUST SUBMIT A COPY OF THEIR AUDIT OR THE AGREED UPON PROCEDURES BY THE APPLICATION DEADLINE. ALL TOWNS AND CITIES THAT HAVE A JUNE 30, FISCAL YEAR END DATE ARE REQUIRED TO SUBMIT A COPY OF THEIR FY 2024 AUDIT AND TOWNS AND CITIES THAT HAVE A DECEMBER 31, FISCAL YEAR END DATE ARE REQUIRED, AS A MINIMUM, TO SUBMIT A COPY OF THEIR FY 2023 AUDIT. NO APPLICATION WILL BE CONSIDERED FOR REVIEW OR FUNDING THAT DOES NOT MEET THE REQUIREMENTS STATED ABOVE.

If the city or town receives less than \$50,000 in annual revenues from its normal business and does not have an audit or agreed upon procedure, the city or town cannot apply directly to ODOC. The city or town can apply only by having the local County apply on their behalf if the County chooses to do so. Nothing contained herein mandates a County to act as an accommodating party.

10. Applicants must certify that if the proposed project is funded by CDBG REAP dollars it will be properly insured for the life of the asset. Proper insurance for buildings includes property and

liability insurance coverage. When the project includes vehicles, proper insurance will include liability, comprehensive and collision coverage.

- 11. Applicants are responsible for accomplishing online application corrections/revisions along with any applicable application upload corrections/revisions as directed by ODOC/CD staff within the pre-determined deadline. In fairness to other applicants and in order to maintain HUD required ODOC/CD's CDBG funding expenditure rates; ODOC/CD can NOT indefinitely hold applications until the respective application corrections/revisions are accomplished. Applications will be considered INCOMPLETE if the prescribed corrections/revisions are not made to the application within the pre-determined deadline established by ODOC/CD. This will result in a FAILED threshold application rating.
- 12. The Application Guidelines associated with this CDBG REAP set-aside contain an APPLICATION FORMS CHECKLIST outlining all application related documentation required to be uploaded into the online OKGrants application. It is the Applicant's responsibility to follow this checklist and seek additional guidance from ODOC/CD staff as required. Applicants will be responsible for following and providing each item listed on the checklist. Failure to provide any of the required application documentation listed on the checklist will result in a FAILED application rating. Additionally, Applicants must provide a response to all application questions and satisfy all documentation requirements delineated in the CDBG REAP Application Guidelines and online OKGrants Application System including, but not limited to: Resolution, income survey results, resolution requesting assistance, survey maps, certifications, HUD Form 2880 Applicant Recipient Disclosure Update Report, project budget, etc.
- 13. The application must sufficiently demonstrate an applicant's need for the requested CDBG activity. For any requested CDBG project, there is an underlying "need" for such a project. It is the responsibility of the applicant to communicate to ODOC/CD why the particular CDBG activity is being requested in the application. Failure to adequately demonstrate a project need will result in a FAILED threshold application rating. The project need is communicated in the "Project Description" section of the "CDBG Application Summary" page of the online OKGrants application. Additional narratives and supporting documentation can be uploaded in the "Uploads" page of the OKGrants application if required.

SMALL CITIES

Communities with a 2010 U.S. Census Bureau population estimate of 15,000 to 50,000 that are currently **not** HUD designated entitlement communities are eligible to participate in the Small Cities category. Oklahoma's entitlement cities are Edmond, Enid, Lawton, Midwest City, Moore, Norman, Oklahoma City, Shawnee, and Tulsa as well as the units of local government participating in the CDBG Urban County Designation for Tulsa County which consists of the following:

City of Bixby	City of Jenks	City of Skiatook
City of Broken Arrow	City of Owasso	Town of Sperry
City of Collinsville	City of Sand Springs	Unincorporated Tulsa County

City of Glenpool City of Sapulpa

Application Submission Requirements

Based on population criteria previously stated, there are currently eighteen (18) units of local governments eligible for the CDBG Small Cities program.

CDBG-Small Cities Communities

Ada	Altus	Ardmore	Bartlesville	Bethany	Chickasha
Claremore	Del City	Duncan	Durant	El Reno	McAlester
Muskogee	Mustang	Ponca City	Stillwater	Tahlequah	Yukon

The eighteen (18) eligible units of local governments continue to be divided into two groups of nine (9) for purposes of funding. Those communities that elected to participate in the 2023 Small Cities program through a Letter of Interest and their application status from the 2023 Small Cities Program Review is as follows:

2024	Small Cities	Awards
1.	Ada	Funded
2.	Altus	Funded
3.	Ardmore	Declined Participation
4.	Bethany	Funded
5.	Chickasha	Declined Participation
6.	Durant	Funded
7.	Mustang	Declined Participation
8.	Ponca City	Funded
9.	Tahlequah	Funded

The total amount of funding available for the 2025 Small Cities program is \$1,370,000. The funds will be allocated evenly between the proposed nine (9) eligible communities listed in the table below.

2025 Eligible Small Cities

- 1. Bartlesville
- 2. Claremore
- 3. Del City
- 4. Duncan
- 5. El Reno
- 6. McAlester
- 7. Muskogee
- 8. Stillwater
- 9. Yukon

Participation in the 2025 Small Cities Program is determined by submission of a Letter of Intent due by 5:00 p.m. on or before December 6, 2024. Additionally, the 2025 CDBG Small Cities Application Submission Due Date is June 20, 2025.

Note: For those communities that choose not to participate in the Small Cities Program, Oklahoma Department of Commerce/Community Development (ODOC/CD) will recalculate and distribute the allocation based on **participants only**.

Each eligible CDBG Small Cities unit of local governments has the option to not participate in the 2025 CDBG Small Cities Program and choose to compete in the appropriate CDBG set asides.

THRESHOLD REQUIREMENTS FOR SMALL CITIES

Due to the U.S. Department of Housing and Urban Development (HUD) desire for all states to dramatically increase their expenditure rates, the following new expenditure criteria has been established.

- The CDBG Small Cities project must include leverage at least 1:1. Proposed leverage must be directly related to the proposed CDBG Small Cities project. For example, local funds being utilized in one section of town would not be considered as leveraging the CDBG Small Cities funds if the CDBG Small Cities funds were being utilized in a different section of town. <u>In-kind</u> <u>is not an eligible source of leverage</u>.
- 2. As referenced in 24 CFR 570.201-204) and 24 CFR 570.206, costs incurred as a direct result of implementing and executing eligible CDBG activities are known as "Activity Delivery Costs". These costs are directly attributable to an eligible CDBG project activity. Project activity delivery costs are not eligible from CDBG Small Cities funds; however, cash leverage can include reasonable project activity delivery costs.
- 3. If an eligible community is applying in the CDBG Small Cities set-aside that community cannot apply for any other CDBG set-aside during the FY 2025 program year.

- 4. The project must achieve a National Objective. CDBG Small Cities applicants must qualify their project activities under the low and moderate-income National Objective. This is accomplished by conducting a random sample income survey in the project target area. However, the use of any Census Data to document the percentage of low and moderateincome beneficiaries for any CDBG funded activity should receive prior ODOC review and approval.
- 5. Each community must have an updated Citizen Participation Plan and conduct one public hearing before the application is submitted. Acceptable documentation of the public hearing consists of the Affidavit of Publication.
- 6. Communities participating in the CDBG Small Cities set-aside must have a Letter of Intent submitted to the Oklahoma Department of Commerce/Community Development (ODOC/CD) by 5:00 p.m., December 6, 2024.
- 7. Specific projects identified in the application must have cost estimates derived from professional sources. Water and wastewater projects must have certified cost estimates from a professional engineer licensed to work in Oklahoma with the engineer's signature, date and seal. For other types of projects professional cost estimates may be derived from architects (must include signature, date and seal), engineers (must include signature, date and seal), vendors, construction companies, or appropriate personnel to make such estimates. All estimates must be signed and dated.
- 8. Applications must include a Resolution passed by the current governing body requesting the particular assistance.
- 9. Grant request cannot exceed \$2,000 per beneficiary for all projects.
- 10. Cities must submit a copy of their Audit by the application deadline. All Cities that have a June 30, Fiscal Year End date are required to submit a copy of their FY 2024 Audit. Cities that have a December 31, Fiscal Year End date are required, as a minimum, to submit a copy of their FY 2023 Audit. NO APPLICATION WILL BE CONSIDERED FOR REVIEW OR FUNDING THAT DOES NOT MEET THE REQUIREMENTS STATED ABOVE.
- 11. The application must sufficiently demonstrate an applicant's need for the requested CDBG activity. For any requested CDBG project, there is an underlying "need" for such a project. It is the responsibility of the applicant to communicate to ODOC/CD why the particular CDBG activity is being requested in the application. Failure to adequately demonstrate a project need will result in a FAILED application. The project need is communicated in the "Project Description" section of the "CDBG Application Summary" page of the online OKGrants application. Additional narratives and supporting documentation can be uploaded in the "Uploads" page of the OKGrants application if required.
- 12. The Application Guidelines associated with this CDBG Small Cities set-aside contain an APPLICATION FORMS CHECKLIST outlining all application related documentation required to be uploaded into the online OKGrants application. It is the Applicant's responsibility to follow this checklist and seek additional guidance from ODOC/CD staff as required. Applicants will be responsible for following and providing each item listed on the checklist. Failure to provide any of the required application documentation listed on the checklist will result in a FAILED application rating. Additionally, Applicants must provide a response to all application questions and satisfy all documentation requirements delineated in the CDBG Small Cities Application

Guidelines and online OKGrants Application System including, but not limited to: Resolution, income survey results, resolution requesting assistance, survey maps, certifications, HUD Form 2880 Applicant Recipient Disclosure Update Report, project budget, etc.

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ECONOMIC DEVELOPMENT

The objective of the Economic Development (ED) set-aside is the development of communities and counties by expanding economic opportunities, primarily for low and moderate-income persons. The State's activities shall achieve the national objective by funding projects that stimulate the creation of jobs primarily for low and moderate-income persons.

ELIGIBLE APPLICANT

Eligible applicants are units of local government (incorporated towns, cities, and counties) that are **not** participants in the CDBG Entitlement Program. Oklahoma's entitlement cities are Edmond, Enid, Lawton, Midwest City, Moore, Norman, Oklahoma City, Shawnee, and Tulsa as well as the units of local government participating in the CDBG Urban County Designation for Tulsa County which consists of the following:

City of Bixby	City of Jenks	City of Skiatook
City of Broken Arrow	City of Owasso	Town of Sperry

City of Collinsville City of Sand Springs Unincorporated Tulsa County

City of Glenpool City of Sapulpa

Applicants seeking funding under other FY 2025 CDBG set asides may concurrently apply for funding under the Economic Development set-aside.

Economic Development Infrastructure Financing (EDIF) Program

The EDIF program shall be utilized for public infrastructure and other improvements necessary for a business to create new jobs primarily for low and moderate-income persons in Oklahoma. Public improvements eligible to be financed by this program are publicly owned or public easement improvements that will provide basic infrastructure services to a new or expanding business. Such improvements may include, but are not limited to, water, wastewater, transportation improvements, and rehabilitation and new construction of publicly owned industrial buildings.

The State shall review for funding purposes only, individual economic development projects between an eligible applicant and a specific employment generating business.

In order to provide prospective applicants with clear objectives of the Oklahoma Department of Commerce/Community Development (ODOC/CD) EDIF program the following general guidance is provided.

- 1. New Jobs for low- and moderate-income persons are the primary purpose of this program;
- 2. Funding is for publicly owned infrastructure;
- 3. The infrastructure improvement activity must be directly related to the industry being assisted and have a clear link to the creation of jobs;
- 4. Funding is not for the benefit of retail, private prisons, educational institutions or the retention of jobs.
- 5. ODOC/CD will examine the business(es) involved and its reasonable potential to create the projected jobs;

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- 6. Start-up businesses will not be considered unless the company has cash capitalization of at least 25% of the company's project costs;
- 7. EDIF funds may not be used for speculation; a specific business creating new jobs is required;
- 8. Reasonable cost of administration up to a maximum of \$15,000;
- 9. The charge for professional engineering services will be based upon the USDA-Rural Development fee guidelines.
- 10. The application packet shall contain all information necessary to apply for funding, and it must be complete to be considered for funding;
- 11. A company can be the beneficiary of only one CDBG-EDIF project at a time. All projected jobs must be created, and the project must be closed out before a company can benefit from another CDBG-EDIF project.

FINANCING OPTION:

Business Expansions or Targeted Industries

- Targeted towards assisting Oklahoma existing companies' expansion efforts and new companies or industries to the state.
- Targeted industry group (i.e. alternative energy, agribusiness, aerospace, defense or other advanced manufacturing), with the new jobs being Quality Job eligible in terms of health insurance (as long as the company has a plan to meet the National Objective of benefit to low and moderate income persons).
- Maximum grant amount is \$1,000,000 based upon jobs and leverage.

PROJECT SELECTION PROCEDURES - EDIF PROJECTS

CDBG-EDIF PROGRAM - THRESHOLD REQUIREMENTS

- 1. At least 51% of the projected jobs to be created shall be held by, or made available to, persons who qualified as low to moderate-income persons.
- 2. At least one permanent job shall be created for every \$35,000 of CDBG-EDIF funds.
- 3. All projects shall require one new dollar committed as financial leverage to the project for each CDBG-EDIF dollar requested.
- 4. Proof that citizen participation requirements have been met, as evidenced by an application phase public hearing and written Citizen Participation Plan.
- 5. If the city or town receives less than \$50,000 in annual revenues from its normal business the city or town cannot apply directly to ODOC. The city or town can apply only by having the local County apply on their behalf if the County chooses to do so. Nothing contained herein mandates a County to act as an accommodating party. Any applications by a County to act as an accommodation for a city or town that does not have \$50,000 in annual revenues from its normal business, will not count against the County's open contract maximum.

- 6. 100% of the average county wage for all new jobs. If the project does not meet the 100% ACW, the following two criteria may be considered:
 - Established Company in business for at least 10 years.
 - County unemployment is higher than the state average.
- 7. The proposed use of the CDBG-EDIF funds is "allowable, reasonable, and appropriate."

EVALUATION CRITERION FOR EDIF PROGRAM

General: There are no specific application deadlines. ODOC/CD reserves the right to suspend the taking of applications based upon availability of funding. Projects will be evaluated, and a funding decision reached as expeditiously as possible. However, project evaluation will depend on the applicant satisfactorily completing the application and all information requested by ODOC/CD. Applications from one program year will not be kept for Review past three (3) months into another program year. If the application has not been completed three (3) months into the next program year, the application will need to be resubmitted using the current year application guidelines.

Economic development projects may be approved where a community development project is in existence. Funds cannot be used to relocate economic activity from one Oklahoma community to another when CDBG funds are the primary motivation factor. Applicant will be asked to justify request when relocation is an issue. Eligible entities are strongly encouraged to apply only for the minimum financing necessary to make the project a reality. Projects must have other new leverage dollars in place or currently applied for.

Applications meeting the requirements shall be evaluated based upon the following criterion. The state will review and underwrite applications to determine if, and to what extent, the criterion is met. Each application will stand on its own, and the strengths or weaknesses of the applicant's claim will be evaluated. A determination will be made by ODOC/CD as to the likelihood or reasonableness of the claims made by the applicant becoming reality. The criteria are prioritized according to relative importance to the State.

If funding levels reach 75 percent (75%) of all CDBG-EDIF funds awarded, the Evaluation Criteria point system will be utilized to determine the CDBG-EDIF request. All projects (currently under review and any new applications received) at this point which meet Eligibility, Threshold, and Completeness review will be funded based on the highest points achieved on the Evaluation Criteria point system until the CDBG-EDIF funds are exhausted. Once funds are exhausted, all applications not funded will be returned to the applicant.

EVALUATION CRITERIA FOR CDBG-ED – BUSINESS EXPANSION

Business Expansions (60 Points Maximum) Leverage

1:1 0 points 2:1 1 points 3:1 2 points

Each whole number increase is worth one point to a maximum of 10 points. Leverage does not include in-kind contributions, and ratios are rounded down.

New job benefits: Does the company provide Quality Job minimum level of health insurance for all full time positions? Yes 5 points No 0 points Average wages of the new jobs compared to average county wage (ACW): County name: Average County Wage Average wages 100% of ACW 0 points Average wages _____ of ACW Average wages ____ of ACW 5 points 10 points Each 5% increase is worth one point to a maximum of 10 points. Percentages are rounded down. Job threshold: Small community population <5,000 people; greater than 5 jobs 5 points Community of 5,000 – 10,000 people; greater than 10 jobs 5 points Medium community population 10,000 – 40,000 people: greater than 25 jobs 5 points Large community >40,000 people: greater than 50 jobs 5 points Company information: Is the company a manufacturing company? Yes 5 points 0 points No How long has the company been in existence in Oklahoma? 0 points 2 - 0 years 5 - 3 years 1 points 8 - 6 years 2 points 12 – 9 years 3 points 15 – 13 years 4 points 18 – 16 years 5 points Greater than 18 years 10 points Project location: Is the project located in an enterprise zone? Yes 5 points No 0 points Regional project: How many units of local government involvement does the project include? One unit 0 points Two units 5 points

EVALUATION CRITERIA FOR CDBG-ED - TARGETED INDUSTRIES

10 points

Three units

Targeted Industries (55) Point <i>Leverage</i>	s Maximum)	
1:1	0 points	
2:1	1 points	
3:1	2 points	
	ease is worth one point to	a maximum of 10 points
		nd ratios are rounded down.
New job benefits:		
Does the company provi	de Quality Job minimum le	evel of health insurance for all full time
positions?	•	
Yes	5 points	
No	0 points	
Average wages of the new jok	os compared to average o	county wage (ACW):
County name:		
Average County Wage _		
A	5 A O A A	
Average wages 100% of	f ACW 0 poi	nts
Average wages	of ACW 5 poi	NIS
Average wages	of ACW 10 po	DINIS
rounded down.	nn one point to a maximum	n of 10 points. Percentages are
Job threshold:		
 Small community population 		•
 Community of 5,000 – 10,00 	00 people; greater than 10	jobs 5 points
 Medium community populati 	on 10,000 – 40,000 people	e
greater than 25 jobs:		5 points
 Large community >40,000 p 	eople: greater than 50 jobs	5 points
Company information:		
Is the company a manuf	acturing company?	
Yes	5 points	
No	0 points	
Is the company within ar	n industry targeted by ODC	OC?
Yes	5 points	
No	0 points	
Project location:		
Is the project located in a	an enterprise zone?	
Yes	5 points	
No	0 points	
Regional project:		
	government involvement of	loes the project include?
One unit [*]	0 points	. ,
Two units	5 points	
Three units	10 points	

CAPITAL IMPROVEMENT PLANNING (CIP)

Beginning in 1993, the Oklahoma Department of Commerce/Community Development (ODOC/CD) has funded grants to local governments to assist in developing Capital Improvement Plans (CIP).

To guide participating entities through this process, ODOC/CD created GeoCIP®, a standardized method for creating a Geographic Information System (GIS) based, comprehensive mapping and inventory of local government assets. This information is used in evaluating asset conditions, identifying infrastructure needs, setting improvement priorities and updating the local government's capital budget. The process also includes the development of a Total Capital Needs Summary/5-year strategic plan that prioritizes needs and identifies potential funding sources.

The local Council of Government (COG) will review and recommend CDBG CIP projects in their area. All CIP applications should be coordinated with the local COG. The applicant should contact their local COG to verify the application deadline. After each COG reviews the potential CDBG CIP projects in their area, they will submit the applications that they recommend to be awarded to ODOC/CD for contract consideration.

The total allocation for the CIP Program will be **\$440,000**. The deadline for application submission is **July 11, 2025**. The amount of CDBG funds that may be used for a CIP project varies depending on the project. Grant amounts will be based on the criteria set forth in the CDBG application packet. Each COG should determine their priority list of projects. Each local government must update compliance with meeting the National Objective of benefiting at least 51% of persons who are low to moderate income.

CDBG CIP COG Allocations:

1.	ACOG	\$40,000
2.	ASCOG	\$40,000
3.	COEDD	\$40,000
4.	EODD	\$40,000
5.	GGEDA	\$40,000
6.	INCOG	\$40,000
7.	KEDDO	\$40,000
8.	NODA	\$40,000
9.	OEDA	\$40,000
10.	SODA	\$40,000
11.	SWODA	\$40,000

After the **July 11**, **2025**, application deadline has passed, if any CDBG CIP funds remain in the set-aside that have not been applied for, additional time will be provided for COGs to submit an additional CDBG CIP application for those funds. To be eligible to submit an additional CDBG CIP application, a COG must have submitted a successful CDBG CIP application during the original application period **and** applied for all of their original allotted funds. Eligible COGs will be notified by email of the opportunity to submit an additional CDBG CIP application. The deadline

for the additional CDBG CIP applications is **September 12, 2025**. After the second deadline has passed, any funds not applied for in the CDBG CIP set-aside will be transferred to another set-aside as determined by ODOC/CD.

THRESHOLD REQUIREMENTS FOR CIP

- 1. COGs will evaluate CDBG CIP needs in their regions and recommend potential projects for eligible applicants to Commerce.
- 2. Eligible applicants for the CDBG CIP Program are units of general local governments (counties and incorporated towns and cities) that are CDBG eligible as identified by the Substate Planning District and in accordance with 62 O.S. § 2001 et al as amended.
- 3. Eligible applicants are required to work with their local COG to discuss doing a project.
- 4. Requests for funds must address at least one or more of the Primary National Objectives of the CDBG program:
 - (a) Provide a direct benefit (fifty-one percent [51%] or more) principally for persons of low income;
 - (b) Aid in the prevention or elimination of slums or blight; and
 - (c) Address a particular urgent need posing a serious and immediate threat to the health or welfare of a community.
- 5. Cities, Towns and Counties with previous CDBG funding <u>must have close-out documents</u> <u>submitted by January 31, 2025</u>.
 - (a) City/Town and County (Direct Jurisdiction) Applicants: City/Towns and Counties receiving a direct jurisdictional benefit may submit only one (1) grant application per CDBG Program Year selecting from CDBG Water/Wastewater Engineering, CDBG Water/Wastewater Construction, CDBG Community Revitalization, or CDBG Rural Economic Action Plan (REAP). A City/Town and County (Direct Jurisdiction) cannot submit a CDBG application if it currently has an open CDBG grant. Exclusions: Economic Development Infrastructure Financing (EDIF), Capital Improvement Planning (CIP). Typical County direct jurisdiction CDBG application projects are roads, bridges, County hospital, etc.
 - (b) County Sponsored Applicants: Counties acting in a "sponsorship" capacity may submit a maximum of one sponsored CDBG grant application per CDBG Program Year selecting from Water/Wastewater Engineering, Water/Wastewater Construction, Community Revitalization, or Rural Economic Action Plan (REAP). Limitation: Counties may ONLY have one (1) open sponsored CDBG grant and still make another sponsored CDBG application. Counties cannot exceed a maximum number of two open sponsored CDBG grants open at any given time. Exclusions: Economic Development Infrastructure Financing (EDIF), Capital Improvement Planning (CIP). Counties may sponsor applications where they do not have direct jurisdiction over certain public functions. Generally, these are communities with less than \$50,000 in revenue, Rural Water Districts, and Rural Fire Districts. Counties CANNOT submit a single application

containing multiple Units of General Local Governments or jurisdictions such as Rural Fire Districts under a single county sponsored application.

- 6. A proper sponsor for CDBG CIP projects is defined as a Unit of Local government with direct jurisdiction over the majority (60%) of the proposed project beneficiaries.
- 7. Proof that citizen participation requirements have been met, as evidenced by an application phase public hearing and written Citizen Participation Plan.
- 8. The Project Assessment is a detailed explanation of the scope of the project. It should include all work to be done and the tasks to be accomplished. Details on methodology and workflow used in the field as well as in the office should be provided. It should also include a description of the deliverables that are expected to be submitted at the end of the project.
- 9. The CDBG CIP grant request cannot exceed \$2,000 per beneficiary.
- 10. Applicants must provide a response to all application questions and satisfy all documentation requirements delineated in the Guideline and Application package including, but not limited to: Resolution, income survey results, survey maps, certifications, HUD Form 2880 Applicant Recipient Disclosure Update Report, project budget; etc.
- 11. TOWNS AND CITIES (COUNTIES ARE EXEMPT) MUST SUBMIT A COPY OF THEIR AUDIT OR THE AGREED UPON PROCEDURES BY THE APPLICATION DEADLINE. ALL TOWNS AND CITIES THAT HAVE A JUNE 30, FISCAL YEAR END DATE ARE REQUIRED TO SUBMIT A COPY OF THEIR FY 2024 AUDIT AND TOWNS AND CITIES THAT HAVE A DECEMBER 31, FISCAL YEAR END DATE ARE REQUIRED, AS A MINIMUM, TO SUBMIT A COPY OF THEIR FY 2023 AUDIT. NO APPLICATION WILL BE CONSIDERED FOR REVIEW OR FUNDING THAT DOES NOT MEET THE REQUIREMENTS STATED ABOVE.

If the city or town receives less than \$50,000 in annual revenues from its normal business and does not have an audit or agreed upon procedure, the city or town cannot apply directly to ODOC. The city or town can apply only by having the local County apply on their behalf, if the County chooses to do so. Nothing contained herein mandates a County to act as an accommodating party.

- 12. Applicants are responsible for accomplishing online application corrections/revisions along with any applicable application upload corrections/revisions as directed by ODOC staff within the pre-determined deadline. In fairness to other applicants and in order to maintain HUD required CDBG funding expenditure rates, ODOC can NOT indefinitely hold applications until the respective application corrections/revisions are accomplished. Applications will be considered INCOMPLETE if the prescribed corrections/revisions are not made to the application within the pre-determined deadline established by ODOC. This will result in a FAILED threshold application rating.
- 13. The Application Guidelines associated with this CDBG CIP Set-Aside contains an APPLICATION FORMS CHECKLIST outlining all application related documentation required to be uploaded into the online OKGrants application. It is the Applicant's responsibility to follow this checklist and seek additional guidance from ODOC staff as required. Applicants will be responsible for following and providing each item listed on the checklist. Failure to provide any of the required application documentation listed on the checklist will result in a FAILED application rating. Additionally, Applicants must provide a response to all

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application questions and satisfy all documentation requirements delineated in the Application Guidelines and online OKGrants Application System including, but not limited to: Resolution, income survey results, resolution requesting assistance, survey maps, certifications, HUD Form 2880 Applicant Recipient Disclosure Update Report, project budget, etc.

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STATE CDBG PROGRAM PRIMARY NATIONAL OBJECTIVE

As addressed earlier, the primary National Objective of the State's CDBG program is:

"THE DEVELOPMENT OF VIABLE URBAN COMMUNITIES, BY PROVIDING DECENT HOUSING AND A SUITABLE LIVING ENVIRONMENT, AND EXPANDING ECONOMIC OPPORTUNITIES, **PRINCIPALLY FOR PERSONS OF LOW INCOME**."

By regulation, all community activities funded by CDBG must meet one of the broad, federally mandated national objectives. These are:

- 1. Benefit to low and moderate income persons;
- 2. Aid in the prevention or elimination of slums or blight; or
- 3. Community Development needs having a particular urgency, posing a serious and immediate threat to the health or welfare of a community.

It is estimated that, at a minimum, 95% of funds will be utilized on projects that meet the primary national objective of benefit to low- and moderate-income persons.

The use of the "benefit to low- and moderate-income persons" CDBG National Objective is considered as a funding PRIORITY under the State's CDBG Program and is treated as such under the State's individual CDBG set-asides. All project proposals submitted for funding through the CDBG Program must document the achievement of at least one of the National Objectives delineated under 24 CFR §570.483 (Criteria for National Objectives).

Under CDBG regulations, the State must demonstrate that at least 70% of expenditures benefitting low and moderate-income person. The State has an effective limit of 30% of the grant (adjusted for administration and program income) for slum and blight (and urgent need) activities. Because of this, potential applicants are REQUIRED to contact ODOC/CD before the submission of any CDBG application if intending to use a National Objective OTHER than "Providing benefit to low- and moderate-income persons".

NATIONAL OBJECTIVE: ELIMINATION OF SLUM AND BLIGHT

HUD guidance clarifies that states can be more restrictive than the statutory and regulatory national objective requirements, so long as the state requirements do not contradict federal requirements. For example, although three separate national objectives are eligible (Low and Moderate Income, Elimination of Slum and Blight, Urgent Need) under CDBG, a state may choose to fund only low and moderate income (LMI) benefit activities. The State of Oklahoma CDBG program prioritizes funding for CDBG activities qualifying under the low- and moderate-income national objective. The State's CDBG program is built on serving the low- and moderate-income national objective. Given this, the State's CDBG program funding is formally allocated for such low- and moderate-income qualifying activities as demonstrated in the annual CDBG Action Plan. Slum and Blight projects may be considered for available CDBG program re-use funds if the activity meets the specific guidelines addressed below. In order for consideration under this national objective, the respective Unit of General Local Government (UGLG) must first submit a formal letter of request to the ODOC Community Development Director thirty (30) days prior to the respective CDBG application deadline.

The focus of activities under this national objective is a change in the physical environment of a deteriorating area. This contrasts with the LMI benefit national objective where the goal is to ensure that funded activities benefit LMI persons.

In developing the criteria for qualifying under this national objective, HUD has taken considerable care to ensure that activities that qualify under the objective are either clearly eliminating objectively determinable signs of slums or blight in a defined slum or blighted area or are strictly limited to eliminating specific instances of blight outside such an area ("spot blight"). Accordingly, the subcategories under this national objective are:

- Addressing slums/blight on an area basis (24 CFR 570.483(c)(1)); and
- Addressing slums/blight on a spot basis (24 CFR 570.483(c)(2)).

Addressing Slums or Blight on an Area Basis

To qualify under the national objective of slums/blight on an area basis, an activity must meet all of the following criteria:

- 1. The area must be officially designated by the grant recipient and must meet a definition of a slum, blighted, deteriorated, or deteriorating area under State or local law. (For these purposes, it is not necessary to formally designate/declare the area to be blighted, but the area must meet the definitions for designation.)
- 2. The area must exhibit signs of economic disinvestment as indicated by at least one of the following physical signs of blight or decay:
 - A. There must be a substantial number of deteriorated or deteriorating buildings throughout the area. As a "safe harbor," HUD will consider this test to have been met if *either:*
 - (1) The proportion of buildings in the area that are in such condition is at least equal to that specified in the applicable State law for this purpose; **or** (2) In the case where the applicable State law does not specify the percentage of deteriorated or deteriorating buildings required to qualify the area, then at least one quarter of all the buildings in the area must meet the grant recipient's definition of:
 - a) deteriorated or deteriorating;
 - b) abandoned;
 - c) experiencing chronic high occupancy turnover rates or chronic vacancy rates in commercial or industrial buildings;
 - d) experiencing significant declines in property values or abnormally low property values relative to other areas in the community; or
 - e) known or suspected of environmental contamination
 - B. The public improvements throughout the area must be in a general state of deterioration. (For this purpose, it would be insufficient for only one type of public improvement, such as a sewer system, to be in a state of deterioration; rather, the public improvements taken as a whole must clearly exhibit signs of deterioration.)

3. Documentation must be maintained by the grant recipient on the boundaries of the area and the conditions that qualified the area at the time of its designation. The recipient must establish definitions of the conditions (listed above) and maintain records to substantiate how the area met the slums or blighted criteria.

Note: The area must be re-designated every 10 years for continued qualification and documentation must be retained.

4. Activities to be assisted with CDBG funds must be limited to those that address one or more of the conditions that contributed to the deterioration of the area. (Note that this does not limit the activities to those that address the blight or decay itself, but it allows an activity to qualify if it can be shown to address a condition that is deemed to have contributed to the decline of the area.)

Where the assisted activity is rehabilitation of residential structures, two additional criteria must be met:

- A. Each such building must be considered substandard under local definition. (States are to ensure that state grant recipients have developed minimum building quality standards for this purpose. Local conditions may be taken into consideration; states are also free to set standards regarding building quality.)
- B. All deficiencies making the building substandard must be corrected before less critical work on the building may be undertaken.

Note: These two criteria do not apply to nonresidential rehabilitation (rehabilitation of commercial or industrial buildings). Reference: 24 CFR 570.483(c)(1)

When the assistance is designed to address one or more of the specific conditions that originally qualified the area, typical activities designed to address blight on an area basis include:

- Acquisition and clearance of blighted properties,
- Rehabilitation of substandard housing,
- Infrastructure improvements,
- Renovation and reuse of abandoned, historic buildings,
- Commercial revitalization through facade improvements, and
- Removal of environmental contamination on property to enable it to be redeveloped for a specific use.
- 5. The records to be maintained must include:
 - The boundaries of the area;
 - A description of the conditions that qualified the area at the time of its designation in sufficient detail to demonstrate how the area met the criteria for designation.
 - Recipients must define and document their definition of the criteria used to qualify areas.
 - Grant recipients must adopt local definitions related to deteriorating or deteriorated buildings/improvements, abandonment of properties, chronic

- high turnover rates, chronic high vacancy rates, significant declines in property values, abnormally low property values, and environmental contamination); and
- Designations must be re-determined every 10 years for continued qualification.
- A description of the activity showing how it addressed a condition that led to the
 decline of the area. Each residential rehabilitation activity must also be supported
 by documentation that shows:
 - How the building qualifies under the state grant recipient's definition of "sub-standard" and
 - o As applicable, information showing that any deficiencies making the building substandard were eliminated prior to less critical work being done.

Addressing Slums or Blight on a Spot Basis

The elimination of specific conditions of blight or deterioration on a spot basis is designed to comply with the statutory objective for CDBG funds to be used for the prevention of blight, on the premise that such action(s) serves to prevent the spread to adjacent properties or areas.

To comply with the national objective of Elimination or Prevention of Slums or Blight on a Spot Basis, i.e., outside a slum or blighted area, an activity must meet the following criteria:

- The activity must be designed to eliminate specific conditions of blight, physical decay or environmental contamination not located in a designated slum or blighted area and
- The activity must be limited to one of the following:
 - o Acquisition;
 - o Clearance;
 - o Remediation of environmentally contaminated properties;
 - Relocation;
 - o Historic Preservation; or
 - o Rehabilitation of buildings, but only to the extent necessary to eliminate specific conditions detrimental to public health and safety.

Where the assisted activity is acquisition or relocation, it must be a precursor to another eligible activity (funded with CDBG or other resources) that directly eliminates the specific conditions of blight or physical decay, or environmental contamination. This requirement is not intended to discourage acquisition and relocation as pre-development activities and does not mandate that a proposed plan be in place before CDBG funds can be spent. For example, a grantee could clean up a contaminated site without acquiring the site; however, if the grantee acquired the site first, the project would be considered to meet the slum/blight national objective criteria only after clean-up occurred. Reference: 24 CFR 570.483(c)(2)

The records maintained must include:

- A description of the specific condition of blight or physical decay treated and,
- A description of the assisted activity showing that it falls under one of the activity types
 that are eligible to be carried out under this subcategory. Where rehabilitation of a building
 is carried out under this category, information showing how the activity eliminates
 conditions detrimental to public health and safety must be included.

To be considered detrimental to public health and safety, a condition must pose a threat to the public in general. A specific condition of a housing unit may be treated under this subcategory only if it poses a threat to any occupant. Thus, if a housing unit is occupied by a disabled person and a specific condition of the housing unit poses a threat to the health and safety only for the disabled occupant, it would not qualify (i.e., it would have to post a threat to non-disabled occupants as well).

Public improvements cannot qualify under this standard except for rehabilitation of public buildings (other than buildings for the general conduct of government) and historic preservation of public property that is blighted.

As a general rule, national objective compliance for the acquisition of real property must be based on the use of the property after the acquisition takes place. The initial determination is based on the planned use of the property, but the final determination is to be based on the actual use. However, when property is acquired for the purpose of clearance to remove specific conditions of blight or physical decay, the clearance is considered to be the actual use of the property, but any subsequent use made of the property following clearance must be considered to be a "change of use" under 24 CFR 570.489(j).

NATIONAL OBJECTIVE: URGENT NEED

HUD guidance clarifies that states can be more restrictive than the statutory and regulatory national objective requirements, so long as the state requirements do not contradict federal requirements. For example, although three separate national objectives are eligible (Low and Moderate Income, Elimination of Slum and Blight, Urgent Need) under CDBG, a state may choose to fund only low and moderate income (LMI) benefit activities. The State of Oklahoma CDBG program prioritizes funding for CDBG activities qualifying under the low- and moderate-income national objective. The State's CDBG program is built on serving the low- and moderate-income national objective. Given this, the State's CDBG program funding is formally allocated for such low- and moderate-income qualifying activities as demonstrated in the annual CDBG Action Plan. For an activity to be qualified under the national objective of Urgent Need there would have to be sufficient CDBG program re-use funds available, and the activity would have to meet the specific guidelines addressed below. For consideration under this national objective, the respective Unit of General Local Government (UGLG) must first submit a formal letter of request to the ODOC Community Development Director.

To comply with the national objective of meeting community development needs having a particular urgency, an activity must be designed to alleviate existing conditions which the local government certifies, and state determines:

- The specific infrastructure or public facility related activity is located within a Presidential declared disaster boundary.
- Pose a serious and immediate threat to the health or welfare of the community,
- Is of recent origin or recently became urgent. A condition will be considered to be of recent origin if it is developed or became critical within two months (60 days) of the Presidential disaster declaration date.
- A specific infrastructure or public facility related activity that has a past history of similar recurrent issues unrelated to the current disaster would not qualify for Urgent Need. For

example, a street that has a history of flooding annually due to a significant rainfall event would not qualify as an Urgent Need.

- The Unit of General Local Government (UGLG) is unable to finance the activity on its own.
- Other sources of funding are not available to carry out the activity, as certified by other state / federal agencies and the grant recipient. This would include Oklahoma Emergency Management and federal sources such as the Federal Emergency Management Agency (FEMA) and Small Business Administration (SBA) as applicable.
- The requested Infrastructure or public facility related activities must be publicly owned.

The records maintained must include:

- A description of the nature and degree of seriousness of the conditions requiring assistance;
- Evidence that the state grant recipient certified that the CDBG activity was designed to address the urgent need;
- Information on the timing of the development of the serious condition; and
- Evidence confirming that other financial resources to alleviate the need were not available
 as certified by other state / federal agencies and the grant recipient. This would include
 Oklahoma Emergency Management and federal sources such as the Federal Emergency
 Management Agency (FEMA) and Small Business Administration (SBA) as applicable.

HUD has said that states are free to establish criteria for what constitutes a "serious and immediate" threat. States are free to establish criteria or documentation requirements regarding the lack of other funding resources and local governments' inability to finance activities on their own. Activities designated solely to prevent a serious health or welfare threat from developing in the future will not qualify under this criterion. Despite the flexibility available to states in establishing criteria related to qualifying activities under the urgent need national objective, local communities should be made aware that this is a difficult standard to meet. Generally, activities that may not have met the standard for another national objective are unlikely to qualify under Urgent Need. Planning only grants are not allowed under Urgent Needs.

SPECIAL FUNDING AND ALLOCATION CONSIDERATIONS

New Funding Allocations from HUD

If any additional CDBG funds are allocated to the State, in addition to the regular CDBG allocation, by the U.S. Department of Housing and Urban Development, the funding will be allocated per the respective Federal Register Notice or regulatory guidance written expressly for the funding, after allowable State administration and technical assistance have been subtracted.

Program Income Statement

All program income:

- 1) Will revert to the State and will be used for CDBG eligible activities.
- 2) Must comply with applicable State and Federal rules and regulations.
- 3) Must be reported to the Oklahoma Department of Commerce.

Program income from FY'87-08 Economic Development projects deposited in the State's revolving fund will be used for CDBG eligible activities. These funds will be utilized in accordance with the re-use policy.

Re-use Statement

The definition of re-use is the funds available from cancellation of projects; from projects completed under budget; from funds designated but not expended as the State cannot predict in advance the source, amount, or timing of available re-use funds, the State reserves the right to determine, based upon need, timing and amount of funds available for re-use, the most appropriate utilization of these funds. This includes but is not limited to other set-asides. All re-use funds must be used for CDBG eligible activities and must comply with applicable State and Federal rules and regulations.

The Oklahoma Department of Commerce reserves the right to adjust set-aside and category allocations to ensure maximum utilization of funds. Such adjustments shall be the minimum amount necessary to fund projects efficiently and best facilitate the State's CDBG Program obligation and expenditure requirements established by HUD.

Based upon the above re-use statement, any funds utilized for any of the set-asides will be utilized in conformance with the guidelines established in this CDBG Action Plan for the individual set-aside.

GENERAL DEFINITIONS

Blighted Area

An area in which there are properties, buildings or improvements, whether occupied or vacant, whether residential or nonresidential, which by reason of dilapidation, deterioration, age, or obsolescence; inadequate provision for ventilation, light, air, sanitation or open spaces; population overcrowding, inadequate parcel size; arrested economic development; improper street layout; faulty lot layout in relation to size adequacy, accessibility or usefulness, unsanitary or unsafe conditions, deterioration of site or other improvements; diversity of ownership, tax or special assessment delinquency; any one or combination of such conditions which substantially impair or arrest the sound growth of municipalities or constitutes an economic or social liability which endangers life or property, or is conducive to ill health, transmission of disease, mortality, juvenile delinquency or crime, and by reason thereof is detrimental to public health, safety, morals, or welfare.

Benefit to Low- and Moderate-Income persons

To meet the National Objective of benefit to low- and moderate-income groups, an activity must at a minimum benefit households whose income is 80% of the median income for that county or Metropolitan Statistical Area (MSA) where the project is located as established by HUD. An activity undertaken in an area where 51% of the residents are low and moderate income does not necessarily benefit such persons. Each proposed activity must be analyzed on its own merits. Benefit is determined by the nature of the proposed activity and how it serves the residents of the target area.

Financial Leverage/Project Definition/EDIF

One (1) new dollar from other sources must be committed as financial leverage for every CDBG-EDIF dollar requested. Financial, leverage is defined as new money recently contributed to the project for the express purpose of implementing the proposed project.

<u>Financial leverage must be committed and in place with supporting documentation at the time of application submittal.</u>

The source of new money may be cash or other valuable consideration, e.g., land, bank loans, proceeds from the sale of stocks or bonds or loans from other public agencies.

Private and public investments that do not qualify as financial leverage are existing net worth, existing debt, future operating expenses, and inventory. Additionally, In-Kind leverage is ineligible.

Proper Sponsors

A proper sponsor under the Community Development set-aside is defined as the unit of government with direct jurisdiction over the majority (60%) of the proposed project's beneficiaries. If no unit of local government has sixty percent (60%) of the proposed beneficiaries, then the unit of local government with the majority of the proposed beneficiaries must sponsor the application.

Program Income

Gross income earned by a grantee from grant supported activities includes, but is not limited to, sale of real or personal property, service fees, sale of commodities, usage or rental fees, royalties, and loan and interest repayments on economic development projects.

CDBG Project Definition

Under the State's CDBG program, a project is defined as ONE eligible or sponsored unit of local government (UGLG) applying for ONE CDBG activity in which there is a benefit to only ONE geographically TARGETED AREA or an entire COMMUNITY-WIDE AREA. These areas allow for a CDBG activity in which only ONE LMI survey (as applicable) is required. Per CDBG application thresholds, the following CDBG applications; CDBG REAP, CDBG Community Revitalization, CDBG W/W Engineering, and CDBG W/W Construction only allow for ONE activity/project to be submitted per application. If the project doesn't meet the above definition, it will be disqualified resulting in a FAILED application rating.

Leverage

Leverage may consist of the following: Cash from other Federal/State grants and loans, local funds, and capital improvement funds earmarked (as a release of funds requirement) in municipal and/or county budget. Fair market value is given to land, building, or materials portion of infrastructure improvements. In-kind contributions are eligible for the leverage requirement if properly valued and documented.

The value of in-kind contributions must be reasonable and verifiable. Additionally, the claiming of leverage must be fair and consistent among all communities who are competing for CDBG project funds. The Department reserves the right to require additional documentation of the extent and value of in-kind contributions and to reject the proposed valuation of the contributions if found to be unreasonable or lack appropriate documentation. In-kind includes value of force account labor, voluntary labor (at \$10.00 per hour) and services and supplies provided by another entity. Guidelines for documentation are included in the application manual.

Proposed leverage must be directly related to the proposed CDBG project proposal. Penalties may be accessed for in-kind leverage not materializing.

Target Area

That portion of a town, city or county within which the governing body of such town, city, or county determines that by reason of special need or special condition the area is designated for specific analysis and project development.

GENERAL APPLICATION PROCEDURES

All applications for assistance must be submitted using the appropriate online application forms through the State's online application system formally known as *OKGrants*. Applications must include a resolution passed by the current governing body requesting that assistance and must comply with all required certifications. As a part of ODOC/CD's administrative responsibility, the Department guarantees that all applicants under the CDBG program will be protected against any form of unlawful discrimination.

The Oklahoma Department of Commerce will review only one application per entity per set-aside. The restriction of submitting only one application does not apply to economic development or CIP projects. No facsimile or paper applications will be accepted in any set-aside. All specific application procedures are included in the set-aside descriptions in this plan.

Disallowance of Supplemental Funding:

Once a unit of local government is awarded CDBG funds for a specific project/activity, that unit of local government will not be allowed to apply for additional/supplemental CDBG funds for that specific project/activity.

Audit Requirement:

All audits of prior awards from ODOC/CD must be in accordance with ODOC/CD Audit Policies and Procedures Manual. An audit is required if \$50,000 or more was received from ODOC/CD. The audit should be completed, and the report submitted no later than twelve (12) months after the end of the contractor's fiscal year.

If the audit has not been submitted or the audit is not closed prior to the release of funds, the contract may be unable to draw funds unless a good cause is shown and approved by ODOC/CD.

The General Rules of Practice and Procedure established by ODOC/CD include a formal appeals process pursuant to the Oklahoma Administrative Procedures Act (OAPA). In addition, ODOC/CD has promulgated CDBG Rules in accordance with OAPA.

All individuals who wish to administer a Community Development Block Grant (CDBG) project for a fee, regardless of the source of the fee, except for full-time employees of local units of government, will have to be certified by the Oklahoma Department of Commerce/Community Development. This requirement went into effect at the beginning of the 1998 CDBG Fiscal Year on April 1, 1998.

SAM.Gov Debarred / Exclusion Check Requirement:

The System for Award Management (SAM) is an official website of the U.S. government. You must have an active registration in SAM to do business with the Federal Government. There is no cost to use SAM. The General Services Administration (GSA) is required by the Federal Acquisition Regulation (FAR) to compile and maintain a list of parties debarred, suspended, or disqualified by federal agencies in SAM.gov. Units of General Local Government (UGLG's), contractors as well as recipients of federal financial assistance must be registered at SAM.gov. Active registration in SAM is required to apply for an award and for HUD to make a payment. ODOC is required by HUD to check UGLG grantees' debarment/exclusion status in the federal SAM database and place a record on file. You can use this site for FREE to:

- Register to do business with the U.S. government
- Update or renew your entity registration

- Check status of an entity registration
- Search for entity registration and exclusion records

Per the SAM User Guide, the No Active Exclusions field on the SAM Entity summary indicates whether the entity has a current debarment. SAM.gov will check the exclusions list for the DUNS number of your entity and indicate whether any exclusion records exist. If an active exclusion record exists for your entity, this question will default to "Yes," meaning that the contractor is debarred. No Record Found means that the entity is not registered or has let its registration lapse. The entity should ensure that the email address is current in SAM.gov so that when automated reminders are sent to renew registration each year that this reminder does not go into spam due to an obsolete email address.

Get started with a SAM.gov registration and the Unique Entity Identifier Number: If you have not yet started your registration, please create an individual user account and log into SAM.gov to register your entity. To register in SAM.gov, at a minimum, you will need the following information:

U.S. REGISTRANTS:

- 1. Legal Business Name, and Physical Address (A post office box may not be used as your physical address).).
- 2. Your Taxpayer Identification Number (TIN) and Taxpayer Name associated with your TIN. Review your tax documents from the IRS (such as a 1099 or W-2 form) to find your Taxpayer Name.
- 3. Your bank's routing number, your bank account number, and your bank account type, i.e. checking or savings, to set up Electronic Funds Transfer (EFT).

Refer to the following website <u>SAM.gov</u> | <u>Home</u> for the applicable options provided for your entity. If you have already registered, check your status by clicking on "Check Registration Status" and logging in with your username and password; then provide your UEI Number or CAGE Code. You will need to download the information provided by the site by clicking on the Download heading toward the top of the page which creates an electronic pdf copy of the document that will need to be saved for your records. That pdf will be required to be uploaded into OKGrants with the status that shows that the UGLG has an Active status and has NO ACTIVE EXCLUSIONS.

You must renew your registration every 365 days to keep it active. You can make updates to your registration anytime or during renewal.

The Build America Buy America Act (BABAA)

The Build America Buy America Act (BABAA), enacted as part of the Infrastructure Investment and Jobs Act on November 15, 2021, established a domestic content procurement preference for all Federal financial assistance obligated for infrastructure projects. The domestic content procurement preference requires that all iron, steel, manufactured products, and construction materials used in covered infrastructure projects are produced in the United States. BABAA will apply to all 2024 CDBG projects where the total amount of Federal financial assistance exceeds \$250,000. For more information regarding BABAA, please visit here.

PERFORMANCE MEASUREMENT SYSTEM

The proposed Outcome Performance Measurement System was published in the Federal Register on June 10, 2005 (70 FR 34044). The final outcome performance measurement system includes objectives, outcome measures, and indicators that describe outputs. For a full discussion of the objectives, outcomes and indicators see Oklahoma's Consolidated Plan. The objectives are Creating Suitable Living Environments, Providing Decent Affordable Housing, and Creating Economic Opportunities. The Outcome categories are Accessibility/Availability, Affordability, and Sustainability. There is a standardized list of output indicators that Oklahoma will report on as appropriate for our chosen objectives and outcomes.

The State of Oklahoma's estimated performance measures can be found in the State's Consolidated Plan. These performance measures are listed in tables that provide performance measurement data which span the five-year lifecycle of the State's Consolidated Plan. These measures are categorized as Public Facility and Improvements (which includes CDBG Water and Wastewater, CDBG Community Revitalization, CDBG Small Cities, and CDBG/REAP), CDBG Economic Development and Planning set-asides. Within each of these categories "common indicators", new specific HUD designated indicators and ODOC internal indicators are set forth.

RISK ASSESSMENT

ODOC/CD performs monitoring of the CDBG projects. Not every project will be monitored on-site. Desk monitoring may be utilized for projects that are low risk or when the Grantee has an exemplary management history.

ODOC/CD has developed a monitoring strategy that targets a sampling of projects or activities. This sampling is based on risk factors associated with various types of projects and/or Grant Recipients. While every project receives some level of monitoring, priority for in-depth evaluation and review is given to projects that are:

- 1. Multi-jurisdictional, i.e., involving more than one unit of local government;
- 2. Involve some level of risk, as evidenced by:
 - a. Lack of recent history in administering a CDBG project;
 - b. Evidence of numerous accounting or financial tracking errors on current or previous projects;
 - c. A record of serious findings or sanctions in previous monitoring sessions;

- d. High turnover of administrative staff;
- e. Delays in submitting required reports;
- f. Prior violations;
- g. Failure to attend and participate in implementation workshops;
- h. Excessive tardiness in responding to prior monitoring findings.
- 3. By definition, economic development projects are considered high risk.

In addition, CDBG subrecipients must meet certain threshold requirements listed in the CDBG application guidance for each CDBG set-aside. These threshold requirements assist ODOC/CD to assess risk and to award funds to those potential subrecipients with the best administrative and financial capacity to manage grants.

2022 Disaster Recovery Unmet Needs - Attachment A

2019 Disaster Recover Unmet Needs - Attachment B)



Attachment A

2022 Disaster Recover Unmet Needs
Assessment

1 Unmet Needs Assessment

1.1 Overview

HUD allocated \$7.43 million to the State of Oklahoma to address unmet needs from the May 2022 severe storms, tornadoes, and flooding. HUD has identified the Muscogee (Creek) Nation and the 74447 ZIP code of Okmulgee County as the most impacted and distressed (MID) areas. Oklahoma has decided to expand the HUD-identified MID area in ZIP code 74447 to include the entirety of Okmulgee County. The state of Oklahoma is required to spend 80% of funds in HUD-identified MIDs. The State is designating Adair, Cherokee, Muskogee, Pottawatomie, Seminole, and Tulsa Counties as state-identified most impacted and distressed areas. These counties still have approximately \$6.3 million in remaining unmet housing needs because of the disaster and would be well-served by the remaining funds for recovery.

Much of the damage from the disaster to homes was because of tornadoes and flooding. One representative working on disaster case management in an impacted area stated, "Everyone needed a roof," because of tornadoes in Seminole and Pottawatomie Counties. The initial FEMA preliminary damage report estimated that 599 residences were impacted by DR-4657, with most residences experiencing minor or major damage. Disaster damage data confirmed that the disaster was primarily a housing disaster, with some impact on businesses and nonprofits.

Infrastructure within the Muscogee (Creek) Nation was also greatly impacted, resulting in a disaster declaration that authorized FEMA public assistance funds for the tribe. Representatives of the Nation report multiple flooded, collapsed, and damaged roads, impacting access to medical facilities.

The analysis below and the limited amount of funding available for recovery from this disaster are the primary drivers of the program design identified in Section 4 of the Action Plan. Due to limited funding, the state will still have over \$3 million in identified unmet needs from the disaster. The largest driver of community recovery from the impacts of the disaster will be rebuilding residential housing - which will catalyze economic recovery through the return and expansion of a local tax and customer base - and repairing damaged infrastructure. The investments in housing and infrastructure will promote rebuilding and recovery while increasing resilience to future disasters.

1.2 Housing Unmet Need

1.2.1 Disaster Damage and Impacts

Pre-disaster housing conditions:

In 2015, an Oklahoma Housing Needs Assessment was conducted to evaluate current housing conditions in the state at a county level and to project future housing needs into 2020. This comprehensive housing study found that Oklahoma would need 66,821 new housing units through 2020 to accommodate the state's growing population.¹ Oklahoma's population has grown by 6% from 2010 to 2020.² An additional study conducted in 2021 by the Oklahoma Housing Finance Agency and the University of Oklahoma found that over 26% of Oklahomans are paying more than 30% of their income

¹ Integra Realty Resources, "Statewide Housing Needs Assessment Executive Summary," *Oklahoma Housing Needs Assessment*, 2015, https://oklahomahousingneeds.org/wp-content/uploads/2015/12/Executive-Summary.pdf.

² "Our Changing Population: Oklahoma," USAFacts, July 2022, https://usafacts.org/data/topics/people-society/population-and-demographics/our-changing-population/state/oklahoma/.

toward housing costs.³ This represents a significant portion of the state's population who are overburdened by high housing costs. Figure 1 shows the proportion of individuals in the disaster-impacted areas who spend more than 30% of their income on housing costs. The data is divided by income bracket and shows that the most impoverished Oklahomans are the most likely to spend more than 30% of their income on housing costs.

The disaster struck a predominately rural area, which was projected to need between 1 and 250 new housing units by 2020.⁴ Due to nationwide housing market trends post-pandemic, it is expected that these areas meet or exceed the projected need for new housing. With production of new homes largely stalled or stopped entirely throughout the pandemic due to lockdowns and supply chain delays, Oklahoma's need for new housing units has only grown. HUD has labeled 36 of Oklahoma's 77 counties as "priority geographies" for the new Pathways to Removing Obstacles to Housing (PRO Housing) grant program.⁵

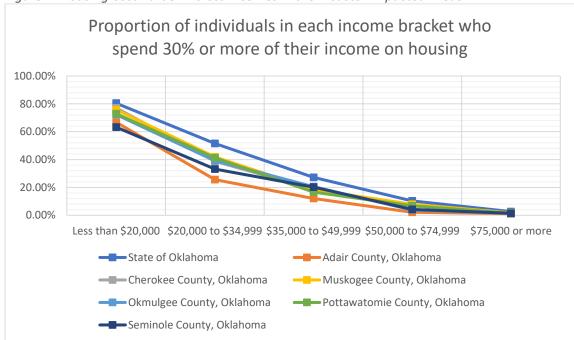


Figure 1: Housing Cost Burden Across Incomes in the Disaster Impacted Areas.

Source: U.S. Census Bureau. American Community Survey S2503, 5-Year Estimates, 2021. data.census.gov.

As seen in Table 1, the disaster-impacted areas have high rates of owner-occupied housing. The 2022 disaster struck a primarily rural and suburban area of Oklahoma. Only Tulsa County falls within an urbanized area, according to census data. In a 2021 report, the perception of rural communities in

³ Oklahoma Housing Finance Agency, "HOME + Shelter: Pathways to Housing Security in Oklahoma," *HOME-ARP: The Institute for Quality Communities*, 2023, https://iqc.ou.edu/housing/home-arp/#:~:text=Oklahoma%20HOME%2DARP%20Allocation%20Plan,providers%20and%20agencies%20across%20Oklahoma...

⁴ Integra Realty Resources, "Statewide Maps – Oklahoma Housing Needs Assessment," Oklahoma Housing Needs Assessment, 2015, https://oklahomahousingneeds.org/statewide-graphs/.

⁵ U.S. Department of Housing and Urban Development, *PRO Housing Priority Geography*, July 26, 2023, July 26, 2023, https://hudgis-hud.opendata.arcgis.com/apps/HUD::pro-housing-priority-geography-search/explore.

Oklahoma was that there was a lack of housing, a lack of housing up to code, and available housing was unaffordable.⁶

Table 1: Owner vs. Renter-Occupied

Geography	Owner- Occupied (%)	Renter Occupied (%)
Oklahoma	66.06%	33.94%
Adair County	68.04%	31.96%
Cherokee County	67.53%	32.47%
Muskogee County	66.49%	33.51%
Okmulgee County	70.76%	29.24%
Pottawatomie County	70.44%	29.56%
Seminole County	68.44%	31.56%
Tulsa County	59.86%	40.14%
Creek OTSA	64.29%	35.71%

Source: U.S. Census Bureau. American Community Survey S2503, 5-Year Estimates, 2021. data.census.gov.

In 2021, the Oklahoma Department of Commerce provided grants to communities for COVID recovery using CARES Act funds. These CDBG-CV dollars have primarily gone to help pay rent, mortgage, and utility bills for Oklahomans in rural areas who were impacted by the pandemic and could no longer afford to pay for their housing. This demonstrates a need for housing support in Oklahoma, even in rural areas, where housing costs are typically lower.

Vacancy rates in the disaster-impacted areas are similar to the statewide and national vacancy rates, with homeowner vacancies being much lower than rental vacancy rates. Cherokee County has some of the highest vacancy rates. Pottawatomie County, containing the City of Shawnee, a suburb of Oklahoma City, has very low vacancy rates.

Table 2: Vacancy Rates

	Homeowner Vacancy Rate	Rental Vacancy Rate
Adair County	0.7	9.8
Cherokee County	2.3	10.6
Muskogee County	1.8	8.7
Okmulgee County	2.1	7.8
Pottawatomie County	0.9	4
Seminole County	1.6	5.1
Tulsa County	1.5	7.9
Creek OTSA	1.7	8.3

Source: U.S. Census Bureau. American Community Survey DP04, 5-Year Estimates, 2021. data.census.gov.

Table 3 shows the median home value, median monthly rent, and the number of building permits issued in the impacted areas, and the State of Oklahoma as a whole. Only Tulsa County and the

⁶ Oklahoma Housing Finance Agency, "HOME + Shelter: Pathways to Housing Security in Oklahoma," HOME-ARP: The Institute for Quality Communities, 2023, https://iqc.ou.edu/housing/home-arp/#:~:text=Oklahoma%20HOME%2DARP%20Allocation%20Plan,providers%20and%20agencies%20across%20Oklahoma...

Muscogee (Creek) Nation (Creek OTSA in the table) have median home values that exceed the State's median home value. Seminole County has a median home value that is nearly half of the statewide median.

Table 3: Evidence of Cost Burden

Geographic Area Name	Median Home Value	Median Monthly Rent	Building Permits (2022)
State of Oklahoma	\$150,800.00	\$862.00	13735
Adair County	\$94,200.00	\$563.00	6
Cherokee County	\$132,100.00	\$723.00	23
Muskogee County	\$113,100.00	\$717.00	42
Okmulgee County	\$96,400.00	\$700.00	9
Pottawatomie County	\$129,800.00	\$776.00	92
Seminole County	\$77,200.00	\$669.00	7
Tulsa County	\$168,800.00	\$929.00	2483
Muscogee Creek OTSA, OK	\$163,300.00	\$898.00	no data

Source: U.S. Census Bureau. American Community Survey DP04, 5-Year Estimates, 2021. data.census.gov. U.S. Census Bureau. Building Permits Survey, 2022. data.census.gov.

Before the 2022 disaster, residents of the impacted areas suffered from pandemic and disaster-related increased housing costs. The impacted area for the 2022 disaster overlaps significantly with the impacted area for Oklahoma's 2019 disaster. In addition, in 2023, severe storms, straight-line winds, and tornadoes (DR-4721 and DR-4706) impacted some of the same counties that were affected by the 2022 disaster. Pottawatomie County was part of the designated area for DR-4706, and Tulsa and Muskogee Counties were impacted by DR-4721.

Data provided to ODOC from the City of Seminole indicates at least 46 homes in the city and surrounding areas still have unmet needs from the 2022 disaster. These residents continue to live in disaster-damaged homes. The city continues to work with the disaster recovery teams to determine estimates for the cost of repairing these homes. In addition, some members of the community are struggling with mental health after the disaster, impacting their ability to access resources and recover.

Disasters and nationwide trends in home construction have resulted in a shortage of available affordable housing, especially for those households with the lowest incomes. The best resolution to the shortage of housing is the construction of new housing and the rehabilitation of existing housing. For full recovery, housing must be built to be stronger and more resilient to future disasters.

1.2.2 Single Family v. Multi-Family Needs; Owner Occupied v. Tenant.

The average number of owner-occupied units in the disaster-impacted areas is 66.98% (Table 1), and 33.02% are rented units. Most of the housing in the impacted areas is either 1 or 2-family homes, or mobile homes (Table 4). A trend of note is that the percentage of mobile homes in rural areas is much higher than in Tulsa County, a predominately urban county. Tulsa County and the Creek Nation have many more 10+ unit structures than the more rural counties. Thus, the types of housing in the disaster-impacted areas largely follow national trends: the predominant type of housing is owner-occupied single-family housing. In rural areas, there are more mobile home units, and in urban areas, there are more large multi-family complexes.

As Table 4 and Table 5 demonstrate, the vast majority of disaster impacts (82.15%) occurred in single-family homes or duplexes. 74% of the applicants impacted by the disaster living in a house or duplex were owner-occupants, whereas 25.68% were renters. The large number of single-family or

duplex homes impacted by the disaster means that any housing recovery program should be targeted towards single-family homes or duplexes for the most effective and community-oriented program.

Mobile Homes account for the second highest type of impacted housing. 7.3% of all applicants for assistance lived in mobile home units. 77.25% of those applicants owned and occupied a mobile home. 22.75% of impacted households living in mobile home units were tenants.

ODOC will use HOME program rents to determine affordable rents where applicable.

Table 4: Percent Housing Type in Disaster Impacted Areas

Geographic Area	Single-	Structure with 3-9	Structure with 10+	Mobile	Boat, RV, van,
Name	Family/Duplex	units	units	Homes	etc.
Oklahoma	77.00%	6.40%	7.60%	8.80%	0.20%
Adair County	73.10%	3.90%	1.00%	21.90%	0.10%
Cherokee County	68.20%	6.10%	4.80%	20.90%	0.00%
Muskogee County	77.40%	4.20%	7.00%	11.20%	0.20%
Okmulgee County	78.90%	3.60%	2.30%	14.70%	0.30%
Pottawatomie	79.80%	4.90%	2.80%	12.40%	0.20%
County					
Seminole County	78.20%	3.10%	1.90%	16.40%	0.30%
Tulsa County	73.30%	9.00%	15.40%	2.30%	0.10%
Creek OTSA	73.50%	7.60%	12.70%	6.10%	0.20%

Source: U.S. Census Bureau. American Community Survey DP04, 5-Year Estimates, 2021. data.census.gov.

Table 5: Application for FEMA Assistance by Housing Type

Residence Type	Applicants	Owner- Occupied	% Owner- Occupied	Tenants	% Tenants	Unknown	% Applicants Living in Type
Apartment	117	0	0.00%	117	100.00%	0	4.52%
Assisted Living Facility	2	0	0.00%	2	100.00%	0	0.08%
Boat	3	1	33.33%	2	66.67%	0	0.12%
College Dorm	1	0	0.00%	1	100.00%	0	0.04%
Condo	12	6	50.00%	6	50.00%	0	0.46%
House/Duplex	2126	1580	74.32%	546	25.68%	0	82.15%
Military Housing	1	1	100.00%	0	0.00%	0	0.04%
Mobile Home	189	146	77.25%	43	22.75%	0	7.30%
Other	92	60	65.22%	31	33.70%	1	3.55%
Townhouse	22	8	36.36%	14	63.64%	0	0.85%
Travel Trailer	23	17	73.91%	6	26.09%	0	0.89%
Grand Total	2588	1819	70.29%	768	29.68%	1	

Source: FEMA, DR-4657 Individual Assistance Data, 2022.

1.2.2.1 FEMA Individual Assistance (IA) Owner-Occupied Units

The following tables provide information related to FEMA Individual Assistance (IA) for owner-occupied units and tenant-occupied housing units for the DR-4657 disaster-eligible areas. The Creek Nation is not included, as the DR-4670 disaster was for public assistance only, therefore there is no IA data related to that disaster. The number of applications and unit inspections including those with

damage is included. The number of households receiving assistance and the amount of FEMA-verified loss is also outlined in the tables.

Table 6: Owner-Occupied Unit Applications, DR-4657

County	Applicants	Inspections	Inspected With Damage	Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
Adair	115	80	52	43	\$172,731.32	\$1,502.01
Cherokee	76	49	23	23	\$106,278.36	\$1,398.40
Muskogee	354	299	190	182	\$971,647.24	\$2,744.77
Okmulgee	391	324	238	221	\$1,454,281.57	\$3,719.39
Pottawatomie	74	54	22	21	\$43,837.08	\$592.39
Seminole	410	287	204	190	\$1,229,039.34	\$2,997.66
Tulsa	399	305	40	32	\$183,766.93	\$460.57

Source: FEMA, DR-4657 Individual Assistance Data, 2022.

Table 6 shows the number of owner-occupied unit applications and the total FEMA-verified loss. Seminole County has the highest number of applicants, and the second-highest total and average FEMA verified loss. This is especially concerning given the low median value of housing in Seminole County, as seen in Table 3. Okmulgee County has the highest number of properties inspected with damage.

Table 7: Owner-Occupied Units Real Property Damage, DR-4657

		Minor-	Major-			
County	Minor-Low	High	Low	Major-High	Severe	Total
Adair County	97	5	12	1	0	115
Cherokee County	64	5	6	1	0	76
Muskogee County	253	27	63	11	0	354
Okmulgee County	252	67	50	20	2	391
Pottawatomie County	70	3	1	0	0	74
Seminole County	307	60	25	14	4	410
Tulsa County	378	5	16	0	0	399

Source: FEMA, DR-4657 Individual Assistance Data, 2022.

Owner-Occupied Units Real Property Damage, DR-4657 Tulsa 378 Seminole 307 Pottawatomie Severe (ct.) County Okmulgee Major (ct.) 252 ■ Major-Low (ct.) Muskogee ■ Minor-High (ct.) ■ Minor-Low (ct.) Cherokee Adair 0 100 150 200 400 50 250 300 350 Count of damaged owner-occupied units Source: FEMA, DR-4657 Individual Assistance Data, 2022.

Figure 2: Owner-Occupied Units Real Property Damage, DR-4657

Okmulgee County, a HUD-designated MID, contains the most properties with "major-high" real property damage (Table 7). Seminole County and Tulsa County have the most properties with "minorlow" damage. Seminole County has the highest number of properties with "severe" damage, at 4, and the greatest number of applicants, 410. 204 of Seminole's 410 applicants were inspected with damage (Table 6).

1.2.2.2 FEMA IA Tenant Applications

FEMA does not inspect rental units for real property damage so personal property damage from the Individuals and Households Program (IHP) reports is used as a proxy for unit damage. The monetary thresholds are defined in Appendix D and are set by HUD. Table 8 and Table 9 provide information on damage to personal property (furniture, belongings, etc.) in tenant-occupied homes, as reported by FEMA.

Table 8: Tenant Applications, DR-4657

County	Applicants	Inspections	Inspected with Damage	Total FEMA Verified Loss	Average FEMA Verified Loss
Adair	20	15	2	\$2,786.26	\$139.31
Cherokee	28	25	6	\$11,433.54	\$408.34
Muskogee	103	86	20	\$81,843.63	\$794.60
Okmulgee	93	79	27	\$76,022.24	\$817.44
Pottawatomie	42	29	4	\$4,358.98	\$103.79

Seminole	154	131	47	\$55,488.11	\$360.31
Tulsa	328	253	8	\$38,822.46	\$118.36

Source: FEMA, DR-4657 Individual Assistance Data, 2022.

Muskogee, Okmulgee, and Seminole County have the highest FEMA Verified Loss for rental units. Seminole County has the highest number of units inspected with damage.

Table 9: Tenant Personal Property Damage, DR-4657

	Minor	Minor	Major	major		
County	Low	High	Low	High	Severe	Total
Adair County	19	1	0	0	0	20
Cherokee County	24	2	2	1	0	29
Muskogee County	83	6	3	9	2	103
Okmulgee County	75	6	4	6	2	93
Pottawatomie County	40	2	0	0	0	42
Seminole County	132	15	4	3	0	154
Tulsa County	321	3	1	2	1	328
Grand Total	694	35	14	21	5	769

Source: FEMA, DR-4657 Individual Assistance Data, 2022.

Muskogee, Okmulgee, and Tulsa County appear to have experienced significant impacts on tenants from the disaster. All three counties are the only counties with severe damage to personal property experienced by tenants (Table 9).

1.2.3 Public Housing and Affordable Housing

The following sections provide tables for documenting damages to HUD-assisted multi-family housing and public housing. ODOC reached out to local governments and twelve local public housing authorities (PHAs) on July 13, 2023, and August 24, 2023, and received no reports of damage from the disaster to date. ODOC will update the tables if new data becomes available.

1.2.3.1 Multifamily Assisted Housing

There are approximately 62 HUD-assisted multi-family properties in the disaster-impacted areas. To date, there have been no reports of damage to these properties because of the disaster.

Table 10: Multifamily Assisted Housing

	# Of	# Of # Of Units # Of Units Waiting		Remaining Unmet	
Type Of Damage	Properties	Units	Assisted	Assistance	Need
No damage	N/A	N/A	N/A	N/A	N/A
reported					

Source: ODOC Outreach

1.2.3.2 Public Housing Authorities Damaged

There are 12 Public Housing Authorities within the disaster-impacted areas. In addition, the Muscogee Creek Nation has a Department of Housing that operates and constructs affordable housing. All 12 PHAs were contacted on August 24th, 2023. If additional data becomes available, ODOC will update the table.

Table 11: Public Housing Authorities Damaged

County/Municipality	Total # PHAs	Total PHAs Damaged	# Of Units Damaged	Remaining Unmet Need
Adair	N/A	N/A	N/A	N/A

Cherokee	N/A	N/A	N/A	N/A
Muskogee	3	N/A	N/A	N/A
Okmulgee	2	N/A	N/A	N/A
Pottawatomie	2	N/A	N/A	N/A
Seminole	4	N/A	N/A	N/A
Tulsa	1	N/A	N/A	N/A
Muscogee (Creek) Nation	1	N/A	N/A	N/A

Source: Oklahoma Public Housing Authorities

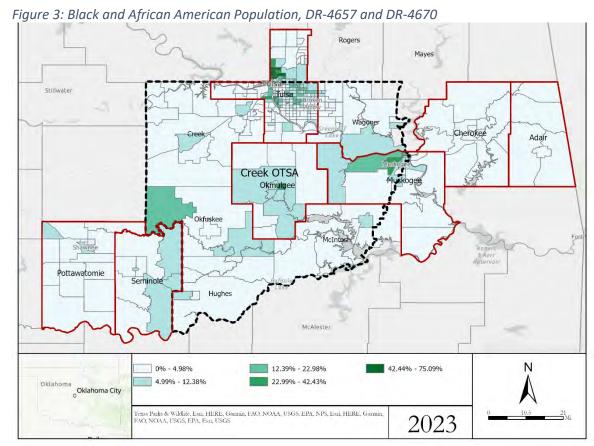
1.2.4 Fair Housing, Civil Rights Data, and Advancing Equity

Oklahoma is committed to using data, performance metrics, and quantitative data to ensure programs advance equity and reduce barriers. This section describes the policies and regulations Oklahoma will follow relating to fair housing, civil rights, and equity, and describes how programs will impact traditionally underserved communities and advance equity. The section includes relevant data and analysis surrounding race, disability, social vulnerability, and limited English proficiency.

Oklahoma's planned use of CDBG-DR funds will advance equity and benefit households in areas of concentrated poverty. Low-income residents impacted by the disaster will have the ability to completely repair damaged homes and will build homes back to a higher standard than before. The repaired homes will be more resilient to future disasters and will be more valuable, thereby increasing wealth for members of the community. In addition, the State will spend 80% of funds in the HUD MIDs, which includes the Muscogee (Creek) Nation, a population typically underserved by disaster recovery funds.⁷

ODOC understands disaster survivors are frequently fatigued from navigating multiple complex disaster recovery bureaucracies. ODOC is committed to maintaining transparency and working actively with survivors to guide them through programs. ODOC plans to work with Disaster Case Managers to help subrecipients design programs that meet survivors where they are. Often, the most vulnerable populations are the most heavily impacted by a disaster, and the least able to easily access resources. Regulatory and funding challenges associated with CDBG-DR limit the state's ability to eliminate all barriers to access and to fully fund the needs of all impacted survivors. However, ODOC is committed to designing programs that are accessible, effective, and meet the statutory requirements of CDBG-DR.

⁷ Allison Herrera, "Trying to Get Disaster Aid? It's Harder for Indigenous People," Center for Public Integrity, November 6, 2019, https://publicintegrity.org/environment/one-disaster-away/when-disaster-strikes-indigenous-communities-receive-unequal-recovery-aid/.



Source: U.S. Census Bureau, 2020 Decennial Census. data.census.gov.

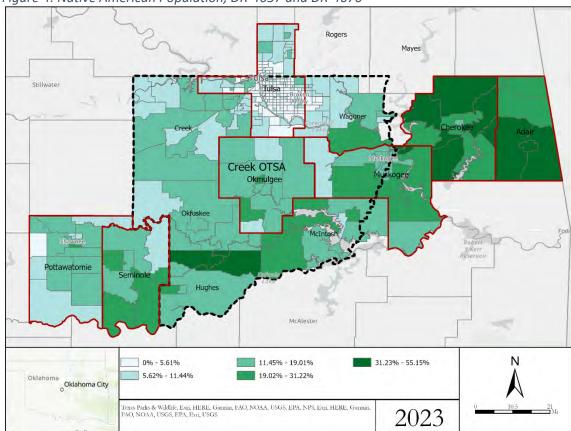


Figure 4: Native American Population, DR-4657 and DR-4670

Source: U.S. Census Bureau, 2020 Decennial Census. data.census.gov.

Creek OTSA
Okinistee

Oklahoma City

Oklahoma City

Frans Pulis & Wäldige, Eins HERE, Garman, FAQ, NOAA, USGS, EIPA, NPS, Eist, HERE, Carmin, EAQ, NPS, Eist, EAQ, NPS

Figure 5: Asian Population, DR-4657 and DR-4670

Source: U.S. Census Bureau, 2020 Decennial Census. data.census.gov.

Rogers

Rogers

Mayes

Creek OTSA
Okmitigee

Oklahoma City

Oklahoma City

Oklahoma City

Items Pack & Wildliff, Eus. HEREL: Garman, FXO, NOAA, USGS, EPA, NPS, Eus. HEREL: Garman, EXO, NOAA, USGS, EPA, Eus, USGS

Oklahoma City

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Oklahoma City

Items Pack & Wildliff, Eus. HEREL: Garman, EXO, NOAA, USGS, EPA, NPS, Eus. HEREL: Garman, EXO, NOAA, USGS, EPA, Eus. USGS

Figure 6: Hispanic Population, DR-4657 and DR-4670

Source: U.S. Census Bureau, 2020 Decennial Census. data.census.gov.

Table 12: Population with a Disability in Impacted Areas

Geographic Area	Total Population	Population with a Disability	Percent with a Disability
Oklahoma	3,869,212	631,051	16.3%
Adair County	19,723	4,114	20.9%
Cherokee County	46,947	9,375	20.0%
Muskogee County	64,226	13,570	21.1%
Okmulgee County	36,413	7,939	21.8%
Pottawatomie County	70,516	12,848	18.2%
Seminole County	23,422	5,611	24.0%
Tulsa County	659,288	88,597	13.4%
Creek OTSA, OK	798,829	115,805	14.5%

Source: U.S. Census Bureau, American Community Survey S1810, 5-Year Estimates, 2021, data.census.gov.

Maps of racially or ethnically concentrated areas of poverty focus on Tulsa, Muskogee, and Adair Counties, as these are the only counties in the disaster-impacted areas with any identified racially and ethnically concentrated areas of poverty. The City of Muskogee is included in the HUD MID area of the Muscogee (Creek) Nation, but Adair County is not within the Nation. The southern portion of Tulsa County is part of the Creek Nation. The boundary roughly follows Interstate 244 through the city of Tulsa, and two of the ten census tracts that are considered racially or ethnically concentrated areas of poverty in Tulsa County are a part of the Nation, and therefore the HUD MID.



Figure 7: Racially or Ethnically Concentrated Areas of Poverty: Muskogee and Adair Counties

Source: U.S. Department of Housing and Urban Development, "Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)," hudgis-hud.opendata.arcgis.com, August 21, 2023, https://hudgis-hud.opendata.arcgis.com/datasets/56de4edea8264fe5a344da9811ef5d6e 15/about.

O sage Reservation Legend Hominy Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) Skiatook Collinsville Claremore 1092 ft Owasso 953 ft Catoosa Shel Inola Sand Springs Tulsa Mannford Broken Arrow Jenk Wagoner Coweta Bixby Bristow

Figure 8: Racially or Ethnically Concentrated Areas of Poverty: Tulsa County

Source: U.S. Department of Housing and Urban Development, "Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)," hudgis-hud.opendata.arcgis.com, August 21, 2023, https://hudgis-hud.opendata.arcgis.com/datasets/56de4edea8264fe5a344da9811ef5d6e 15/about.

Oklahoma does not have data on sexual orientation and gender identity down to the county and tribal nation level. At the state level, the Williams Institute estimates that 138,000 Oklahoma residents over the age of 13 identify as LGBT+. ODOC does not anticipate the program having negative impacts on LGBT+ individuals and households.

1.2.5 Oklahoma Demographics and Disaster-Impacted Populations

Table 13: Demographics and Disaster-Impacted Populations

			Disaster	Disaster		
	State	State	Declaration	Declaration	MID	MID
Demographic	Estimates	Percentage	Estimates	Percent	Estimates	Percent
Total Population	3,948,136	100%	1,740,733	100.00%	846,493	100.00%
White	2,752,553	69.72%	1,172,007	67.33%	588,918	69.57%
Black	284,536	7.21%	135,652	7.79%	59,298	7.01%
Native American	303,792	7.69%	154,903	8.90%	67,624	7.99%
Asian	88,601	2.24%	49,619	2.85%	24,379	2.88%
Other Race	118,507	3.00%	45,965	2.64%	18,214	2.15%
Two or more Races	393,387	9.96%	181,090	10.40%	87,488	10.34%

Hispanic	443,914	11.24%	188,884	10.85%	85,012	10.04%
Not Hispanic	3,504,222	88.76%	1,551,849	89.15%	761,481	89.96%

Data source: U.S. Census Bureau, American Community Survey B02001, B03001, 5-Year Estimates, 2021, data.census.gov.

There do not appear to be major differences in demographics between the state population and disaster declaration and HUD MID areas. The impacted disaster areas are generally within +/-1% of the state percentages for each demographic group. The only exception to this is a higher concentration of Native Americans in the disaster declaration area (8.9% in the declaration area versus 7.69% statewide). This is not unexpected, as there is a higher concentration of Native American citizens and Native American tribal nations in the eastern half of Oklahoma.

1.2.6 Income Demographics

Table 14: Income Demographics: Statewide and Disaster-Impacted Areas

Income Demographic	Statewide	Counties Impacted by Disaster (Average)	HUD MID Areas (average)
Median Household Income	\$56,956	\$49,271	\$54,587
Per Capita Income	\$30,976	\$26,385	\$29,998

Data source: U.S. Census Bureau, American Community Survey DP03, 5-Year Estimates, 2021, data.census.gov.

Table 15: Income Demographics by Disaster-Impacted County

	Median Household	80% below	50% below
Area	Income	Median	Median
Statewide	\$52,538	\$42,030.40	\$26,269.00
Adair	\$37,940	\$30,352.00	\$18,970.00
Cherokee	\$47,421	\$37,936.80	\$23,710.50
Muskogee	\$44,166	\$35,332.80	\$22,083.00
Okmulgee	\$48,689	\$38,951.20	\$24,344.50
Pottawatomie	\$54,896	\$43,916.80	\$27,448.00
Seminole	\$40,190	\$32,152.00	\$20,095.00
Tulsa	\$60,382	\$48,305.60	\$30,191.00

Data source: U.S. Census Bureau, American Community Survey DP03, 5-Year Estimates, 2021, data.census.gov.

1.2.7 Income Demographics - Low Income

Table 16: Income Demographics - Poverty Level

	Statewide	Areas Impacted by Disaster	HUD MIDs
Income in the past 12 months below poverty level	583,853	248,204	113,132

Source: U.S. Census Bureau, American Community Survey S1702, 5-Year Estimates, 2021, data.census.gov.

1.2.8 LMI Analysis - Overall

Table 17: Low-Income Population in Disaster-Impacted Areas

Geographic Area	Total LMI Persons	Total Population	Percent LMI
Adair County	11,668	22,120	52.75%
Cherokee County	20,859	45,805	45.54%
Muskogee County	30,765	66,560	46.22%
Okmulgee County	17,500	38,025	46.02%
Pottawatomie County	26,470	67,800	39.04%
Seminole County	11,865	24,835	47.78%
Tulsa County	260,900	615,010	42.42%
Muscogee Creek Nation	335,851	775,638	43.30%

Source: U.S. Department of Housing and Urban Development, "FY 2023 ACS 5-Year 2011-2015 Low- and Moderate-Income Summary Data," 2023, https://www.hudexchange.info/programs/acs-low-mod-summary-data/. and U.S. Department of Housing and Urban Development, "FY2022 Data Update for Low- and Moderate-Income (LMI) Area Benefit Designation for HUD's Indian Community Development Block Grant (ICDBG) | HUD USER," n.d., https://www.huduser.gov/portal/icdbq2022/home.html.

1.2.9 LMI Analysis - Federally Declared Disaster Areas

Table 18: LMI Analysis - Federally Declared Disaster Areas

County/Municipality	Non-MID- Total LMI Persons	Non-MID- Total Population	Non-MID- Percentage LMI	MID-Total LMI Persons	MID-Total Population	MID- Percentage LMI
Okmulgee County	-	-	-	17,500	38,025	46.02%
Muscogee Creek Nation	-	-	-	335,851	775,638	43.30%
Seminole County	11,865	24,835	47.78%	-	-	-
Adair County	11,668	22,120	52.75%	-	-	-
Cherokee County	20,859	45,805	45.54%	-	-	-
Muskogee County	30,765	66,560	46.22%	-	-	-
Pottawatomie	26,470	67,800	39.04%	-	-	-
Tulsa	260,900	615,010	42.42%	-	-	-

Source: U.S. Department of Housing and Urban Development, "FY 2023 ACS 5-Year 2011-2015 Low- and Moderate-Income Summary Data," 2023, https://www.hudexchange.info/programs/acs-low-mod-summary-data/. and U.S. Department of Housing and Urban Development, "FY2022 Data Update for Low- and Moderate-Income (LMI) Area Benefit Designation for HUD's Indian Community Development Block Grant (ICDBG) | HUD USER," n.d., https://www.huduser.gov/portal/icdbg2022/home.html

1.2.10 Manufactured Housing Units Impacted by Disaster

Table 19: Manufactured Housina Units Impacted by Disaster

County/Municipality	Number of Units	% Of Total Units in County/Municipality	Remaining Unmet Need	Number of units impacted by disaster
Adair	1,796	21.87%	\$7,659.97	20
Cherokee	4,591	20.88%	\$7,796.63	11

3,317	11.24%	\$6,918.05	40
2,468	14.71%	-\$6,635.39	41
3,721	12.42%	\$5,089.07	16
1,781	16.45%	\$114,901.14	46
6,661	2.29%	\$181.00	15
21,613	6.08%	no data	no data
	2,468 3,721 1,781 6,661	2,468 14.71% 3,721 12.42% 1,781 16.45% 6,661 2.29%	2,468 14.71% -\$6,635.39 3,721 12.42% \$5,089.07 1,781 16.45% \$114,901.14 6,661 2.29% \$181.00

Source: FEMA, DR-4657 Individual Assistance Data, 2022. And U.S. Census Bureau, American Community Survey, DP04, 5-Year Estimates, 2021, data.census.gov.

1.2.11 Limited English Proficiency Population of Disaster-Related Areas

ODOC is committed to providing access to all its programs for Limited English proficient speakers. ODOC and its subrecipients will translate vital documents into Spanish for CDBG-DR programs that occur in market areas that exceed 1,000 LEP individuals (to include the upper band of the margin of error) or 5% LEP in that language group. The cost incurred by the State or its subrecipients to translate vital documents into Spanish is both reasonable and necessary. For the 2022 CDBG-DR program, activities occurring in Tulsa County will require the translation of vital documents into Spanish.

Upon request, ODOC and its subrecipients will translate vital documents into Vietnamese. The cost incurred by the State or its subrecipients to translate vital documents larger than 2 pages into Vietnamese is neither reasonable nor necessary. Therefore, ODOC and its subrecipients will utilize oral translation and interpretation services, provided through Language Associates, to assist LEP Vietnamese speakers. For the 2022 CDBG-DR program, no activities will require the translation of vital documents into Vietnamese. To encourage participation in the program, activities occurring in Tulsa County should consider some outreach in the Vietnamese language.

Upon request, ODOC and its subrecipients will translate vital documents into Chinese. The cost incurred by the State or its subrecipients to translate vital documents larger than 2 pages into Chinese is neither reasonable nor necessary. Therefore, ODOC and its subrecipients will utilize oral translation and interpretation services, provided through Language Associates, to assist LEP Chinese speakers. For the 2022 CDBG-DR program, no activities will require the translation of vital documents into Chinese. To encourage participation in the program, activities occurring in Tulsa County should consider some outreach in the Chinese language.

For more details about vital documents and the level of language assistance that ODOC and its subrecipients provide to beneficiaries, please refer to the Language Access Plan available on ODOC's disaster recovery website.

Table 20: Spanish LEP Speakers in Impacted Counties

County Adair	Total Number of Speakers (Estimate)	Total Number of Spanish Speakers (Estimate)	Total number of Spanish LEP Speakers (Estimate) 108 ± 78	Percent LEP of Total Speaker Population (Estimate) 1.01%
Cherokee	44576	1846 ± 325	611 ± 175	1.76%
Muskogee	62537	2407 ± 307	635 ± 190	1.32%
Okmulgee	34860	542 ± 148	151 ± 79	0.66%
Pottawatomie	67983	1522 ± 230	383 ± 105	0.72%

Seminole	22284	452 ± 125	165 ± 92	1.15%
Tulsa	618086	64156 ± 1151	24919 ± 885	4.17%

Source: U.S. Census Bureau, American Community Survey, C16001, 5-Year Estimates, 2021, data.census.gov Note: LEP data is not available at the tribal level.

Note: Percentages are calculated using the upper estimate of the margin of error.

Table 21: Vietnamese LEP Speakers in Impacted Counties

County	Total Number of Speakers (Estimate)	Total Number of Vietnamese Speakers (Estimate)	Total number of Vietnamese LEP Speakers (Estimate)	Percent LEP of Total Speaker Population (Estimate)
Adair	18396	57 ± 65	57 ± 65	0.66%
Cherokee	44576	9 ± 13	1 ± 5	0.01%
Muskogee	62537	125 ± 44	116 ± 43	0.25%
Okmulgee	34860	0 ± 21	0 ± 21	0.06%
Pottawatomie	67983	94 ± 106	20 ± 21	0.06%
Seminole	22284	8 ± 18	0 ± 18	0.08%
Tulsa	618086	3251 ± 457	1832 ± 339	0.35%

Source: U.S. Census Bureau, American Community Survey, C16001, 5-Year Estimates, 2021, data.census.gov Note: LEP data is not available at the tribal level.

Note: Percentages are calculated using the upper estimate of the margin of error.

Table 22: Chinese LEP Speakers in Impacted Counties

County	Total Number of Speakers (Estimate)	Total Number of Chinese Speakers (Estimate)	Total number of Chinese LEP Speakers (Estimate)	Percent LEP of Total Speaker Population (Estimate)
Adair	18396	2 ± 7	2 ± 7	0.05%
Cherokee	44576	46 ± 49	15 ± 19	0.08%
Muskogee	62537	36 ± 56	7 ±15	0.04%
Okmulgee	34860	12 ± 21	12 ± 21	0.09%
Pottawatomie	67983	46 ± 44	30 ± 36	0.10%
Seminole	22284	5 ± 7	5 ± 7	0.05%
Tulsa	618086	1928 ± 348	782 ± 200	0.16%

Source: U.S. Census Bureau, American Community Survey, C16001, 5-Year Estimates, 2021, data.census.gov Note: LEP data is not available at the tribal level.

 ${\it Note: Percentages \ are \ calculated \ using \ the \ upper \ estimate \ of \ the \ margin \ of \ error.}$

1.2.12 Point-in-Time Count - Type of Shelter

Table 23: Point in Time Count - Type of Shelter

Geography	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
No data available				

The U.S. Department of Housing and Urban Development (HUD) requires an annual count of individuals and families experiencing homelessness. This count, known as the Point-in-Time Count, is completed during the last ten days in January.

The 2022 Point-in-Time count does not capture data during the period of the severe storms, flooding, and tornadoes (May 2-8, 2022) that impacted Oklahoma. Additionally, HUD calls for PIT data at the CoC level by aggregating the data from all relevant providers within the CoC. The State of Oklahoma's CoC network does not have data from the PIT count available at the county level. In addition, the count does not ask about disaster impacts, and the CoC network has not added this question to the PIT count. ODOC will update the PIT data tables if new data becomes available.

1.2.13 Point-in-Time Count - Impacted by Disaster

Table 24: Point in Time Count: Impacted by Disaster

Geography	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
No data available				

1.2.14 Assisted Housing Impacted by the Disaster

No damages to assisted housing units were reported by communities and stakeholders. ODOC will update this table with new data as it becomes available.

Table 25: Assisted Housing Units Impacted by Disaster

County/Municipality	Total Housing Choice Vouchers	Total Impacted Housing Choice Voucher Units	Total LIHTC Units	Total Impacted LIHTC units	Total Public Housing Dwelling Units	Total Impacted Public Housing Dwelling Units	Remaining Unmet Need
Adair	NA	0	8	0	80	0	0
Cherokee	NA	0	8	0	0	0	0
Muskogee	1053	0	14	0	426	0	0
Okmulgee	118	0	3	0	80	0	0
Pottawatomie	536	0	20	0	501	0	0

Seminole	346	0	9	0	238	0	0
Tulsa	6991	0	47	0	492	0	0

Source: U.S. Department of Housing and Urban Development.

1.3 Infrastructure Unmet Need

1.3.1 Disaster Damage and Impacts - Infrastructure.

The infrastructure conditions in the impacted counties before the disaster consisted of many state and local roads and highways crossing predominately rural areas. The primary damage from the event is due to roads and bridges impacted by high flooding. Many areas also saw an impact on energy infrastructure due to high winds and tornadoes. Most residents of Seminole County had no power service for more than seven days after the disaster. The Muscogee (Creek) Nation saw extensive road damage because of flooding. Muskogee County had multiple closed highways due to flooding.

Public assistance includes a wide range of work, from extensive debris removal across the area to impacts on community water systems, public utilities, public buildings, open space infrastructure, irrigation ditches, fire suppression, and emergency operations. Public assistance was made available by FEMA to the Muscogee (Creek) Nation for DR-4670. Preliminary damage estimates from FEMA put the cost of damage at \$253,519.00. The Muscogee (Creek) Nation has estimated over \$4 million in infrastructure projects and a minimum of \$2,078,600 million in unmet infrastructure needs. The Nation is currently working with FEMA to release public assistance funds, and no FEMA public assistance funds have been awarded. The data included below is based on preliminary communication with the Muscogee (Creek) Nation and will be updated if more data becomes available.

1.3.2 Total Cost and Need by PA Category

Table 26: Total Cost and Need by PA Category

PA Category	Estimated PA Cost	Local Match	Resiliency	Total Need (Match + Resiliency)
Category A: Debris removal	\$15,000	\$3,750.00	\$2,250.00	\$6,000.00
Category B: Emergency protective measures	\$75,000	\$18,750.00	\$11,250.00	\$30,000.00
Category C: Roads and bridges	\$4,606,500	\$1,151,625.00	\$690,975.00	\$1,842,600.00
Category D: Water control facilities	\$0	\$0.00	\$0.00	\$0.00
Category E: Public buildings and contents	\$500,000	\$125,000.00	\$75,000.00	\$200,000.00
Category F: Public Utilities	\$0	\$0.00	\$0.00	\$0.00
Category G: Parks, recreational, and other facilities	\$0	\$0.00	\$0.00	\$0.00

Source: The Muscogee Nation. Data will be updated if more information becomes available.



Figure 9: Damage within the Muscogee (Creek) Nation from the May 2022 Storm event

Source: Muscogee (Creek) Nation.

Impacts on roads and bridges were greatest in the Muscogee Nation. The flooding caused many roads to wash out, buckle, or collapse entirely. The Nation continues to work to repair damaged infrastructure, despite multiple subsequent disasters impacting infrastructure in the area.

1.3.3 Hazard Mitigation Needs per County or Known Project

Table 27: Hazard Mitigation Needs per County or Known Project

Project	Cost	Funding Source	Unmet Need
No data available			

Source: Preliminary conversations with the Muscogee Nation. Data will be updated if more accurate data is provided.

The Muscogee Nation is responsible for administering the Hazard Mitigation Grants associated with DR 4670 and the May 2022 storms. The Nation is working with FEMA to release the funds. As of plan publication, no hazard mitigation projects have been funded or requested. ODOC will update the available hazard mitigation data if more information becomes available.

Infrastructure projects funded with CDBG-DR funds will incorporate mitigation and preparedness wherever possible so that reconstructed or repaired infrastructure will be more resilient to future disasters. An essential aspect of recovery is mitigating the impacts of future disasters. ODOC will prioritize projects with mitigation and preparedness aspects. ODOC will work with subrecipients to align investments with capital improvement plans and prevent duplication of benefits.

1.4 Economic Revitalization Unmet Need

1.4.1 Disaster Damage and Impacts - Economic Revitalization.

The communities impacted by the disaster frequently have small hubs of economic activity in their main street areas. Downtown Seminole's Main Street was the most heavily impacted economic hub, as an EF2 tornado tore through the area, damaging business facades and nonprofit buildings.

Other businesses across the state were impacted by flooding. Muskogee County was heavily impacted by flooding throughout the county, resulting in the closure of at least one employer in the county. Superior Linen Service closed its Muskogee facilities after more than 6 feet of water entered the building. The company cited challenges in obtaining flood insurance as a reason for not rebuilding at the site.

County	Total Verified loss	Total loan amount	Unmet need		
Adair	\$170,002.27	\$3,000.00	\$167,002.27		
Cherokee	\$30,167.56	\$0.00	\$30,167.56		
Muskogee	\$1,022,319.65	\$381,400.00	\$640,919.65		
Okmulgee	\$280,278.21	\$0.00	\$280,278.21		
Pottawatomie	\$238,386.16	\$0.00	\$238,386.16		
Seminole	\$1,793,383.79	\$998,260.00	\$795,123.79		
Tulsa	\$100,563.26	\$0.00	\$100,563.26		
Total	\$3,635,100.90	\$1,382,660.00	\$2,252,440.90		

Source: SBA, Disaster Loan Data, DR-4657 and DR-4670, 2022.

The Small Business Administration allocated a significant amount of disaster recovery loans to businesses in Muskogee and Seminole County. Other impacted areas did not receive funds. The data includes loans from both DR-4657 and DR-4670. The only loan associated with DR-4670 was in Muskogee County.

1.5 Mitigation-Only Activities

Mitigation needs throughout the state of Oklahoma relate to threats from multiple types of natural disasters, as outlined in the state's hazard mitigation plan. ODOC is not currently pursuing mitigation-only activities. Instead, disaster mitigation will be built into each activity the state will fund with CDBG-DR dollars.

1.5.1 Oklahoma's State Hazard Mitigation Plan

The following eleven natural disasters and hazards were identified in the state's hazard mitigation plan:

- Dam failure
- Drought
- Earthquake

- Extreme heat
- Flood
- Severe storms (Hail, Lightning)
- High Winds
- Soil Hazards
- Tornado
- Wildfire
- Winter Storms (Ice, Freezing Rain, Snow)
- Landslides

These hazards listed are in no particular order, and not prioritized in order of risk and vulnerability. As seen in Table 29, flooding is the highest risk hazard in Oklahoma. Flooding risk has increased for all 77 counties in the state, according to the State's Hazard Mitigation Plan. The Oklahoma Water Resources Board is currently using CDBG-DR funding to produce more detailed floodplain maps throughout the state, to help mitigate risk and guide development decisions.

Table 29: Natural Hazards and Probability in Oklahoma

Hazard	CPRI	Probability Assessment
Dam failure	2.5	Unlikely
Drought	3.1	No data
Earthquake	1.9	Possible
Extreme heat	2.95	No data
Flood	3.75	Highly Likely
Severe storms (Hail, Lightning)	3.1	No data
High Winds	2.95	No data
Soil Hazards	1.3	Unlikely
Tornado	2.95	No data
Wildfire	2.95	No data
Winter Storms (Ice, Freezing Rain, Snow)	1.65	No data
Landslides	1.3	No data

Source: Oklahoma's State Hazard Mitigation Plan. 2019. https://oklahoma.gov/content/dam/ok/en/oem/documents/2019-oklahoma-state-hm-plan.pdf

Note: The Calculated Risk Priority Index (CPRI) is calculated using probability, severity, warning time, and duration data. A higher number means the hazard is a greater risk to the State. The probability assessments come from the language in the State Hazard Mitigation Plan. Not all hazards provided a probability assessment.

Other likely hazards in the state are drought, extreme heat, high winds, tornados, and wildfires. All these hazards are likely to impact the entire state and are not concentrated in particular areas. High winds, tornados, and severe storms are often associated with one another, frequently occurring simultaneously, and impacting the same areas. In addition, Oklahoma's historical tornadic patterns increase the risk to life and property because of their frequency near the two population centers of the state: Tulsa and Oklahoma City (Figure 10).

Tornado Paths 2013-2018

EF Scale

— # 0
— # 1
— # 1
— # 2
— # 1
— # 2
— # 3
— # 3
— # 4
— # 5
— **Character**

Following a trend line of tornado paths from the southwest corner to the northeast corner, are the areas of the state that have a higher risk of effects from a tornadic event.

This risk is amplified due to the location of the (2) metropolitan areas of Oklahoma City and Tulsa, of which both lie in the central portion of this trend line.

Figure 10: Jurisdiction Affected by Tornadic Hazards

Source: Oklahoma's State Hazard Mitigation Plan. (2019). $\underline{ https://oklahoma.aov/content/dam/ok/en/oem/documents/2019-oklahoma-state-hm-plan.pdf}$

In addition, Oklahoma frequently has more severe thunderstorm watches than anywhere else in the nation (Figure 11). Severe thunderstorms are defined as follows: 1) Winds of 58 mph or higher and/or 2) Hail 1 inch in diameter or larger. Climate models project an increase in the frequency and intensity of severe thunderstorms over the Southern Great Plains, especially during the peak storm season (March, April, and May).

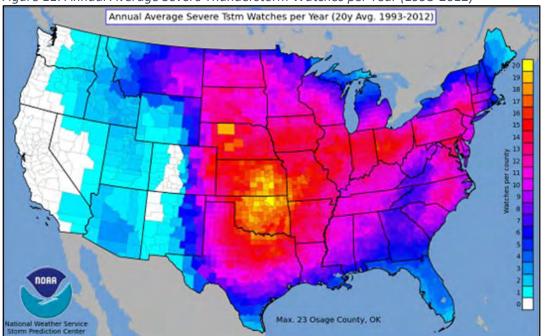


Figure 11: Annual Average Severe Thunderstorm Watches per Year (1993-2012)

 $Source: Oklahoma's \ State \ Hazard \ Mitigation \ Plan. \ 2019. \ \underline{https://oklahoma.qov/content/dam/ok/en/oem/documents/2019-oklahoma-state-hm-plan.pdf}$

Mitigation needs in the state revolve around reducing flooding and high wind risk, which will help mitigate the impacts of flooding, tornadoes, severe storms, and high winds. Increasing Oklahoma's resiliency to drought and extreme heat is also essential to preventing loss of life and property.



Attachment B

2019 Disaster Recover Unmet Needs Assessment

Nowata County, OK	\$53,900	Very-Low Income	20,800	23,750	26,700	29,650	32,050	34,400	36,800	39,150
•		Low Income	33,250	38,000	42,750	47,450	51,250	55,050	58,850	62,650
		Extremely Low- Income	12,880	17,420	21,960	26,500	31,040	34,400	36,800	39,150
Okmulgee County, OK	\$54,900	Very-Low Income	20,800	23,750	26,700	29,650	32,050	34,400	36,800	39,150
		Low Income	33,250	38,000	42,750	47,450	51,250	55,050	58,850	62,650
_		Extremely Low- Income	15,150	17,420	21,960	26,500	31,040	35,580	40,120	44,660
Tulsa Metro Area (Creek County, OK)	\$74,200	Very-Low Income	25,200	28,800	32,400	36,000	38,900	41,800	44,650	47,550
		Low Income	40,350	46,100	51,850	57,600	62,250	66,850	71,450	76,050
		Extremely Low- Income	12,880	17,420	21,960	26,500	31,040	34,400	36,800	39,150
Ottawa County, OK	\$49,900	Very-Low Income	20,800	23,750	26,700	29,650	32,050	34,400	36,800	39,150
		Low Income	33,250	38,000	42,750	47,450	51,250	55,050	58,850	62,650
		Extremely Low- Income	12,880	17,420	21,960	26,500	31,040	34,400	36,800	39,150
Pawnee County, OK	\$57,300	Very-Low Income	20,800	23,750	26,700	29,650	32,050	34,400	36,800	39,150
		Low Income	33,250	38,000	42,750	47,450	51,250	55,050	58,850	62,650
		Extremely Low- Income	13,750	17,420	21,960	26,500	31,040	35,580	40,120	43,100
Payne County, OK	\$71,100	Very-Low Income	22,900	26,150	29,400	32,650	35,300	37,900	40,500	43,100
		Low Income	36,550	41,800	47,000	52,200	56,400	60,600	64,750	68,950

	_									
		Extremely Low- Income	12,950	17,420	21,960	26,500	31,040	35,580	38,150	40,600
Pottawatomie County, OK	\$61,500	Very-Low Income	21,550	24,600	27,700	30,750	33,250	35,700	38,150	40,600
		Low Income	34,450	39,400	44,300	49,200	53,150	57,100	61,050	64,950
		Extremely Low- Income	15,150	17,420	21,960	26,500	31,040	35,580	40,120	44,660
Tulsa Metro Area (Rogers County, OK)	\$74,200	Very-Low Income	25,200	28,800	32,400	36,000	38,900	41,800	44,650	47,550
,		Low Income	40,350	46,100	51,850	57,600	62,250	66,850	71,450	76,050
		Extremely Low- Income	12,880	17,420	21,960	26,500	29,350	31,500	33,700	35,850
Fort Smith, AK -OK Metro Area (Sequoyah County, OK)	\$54,300	Very-Low Income	19,050	21,750	24,450	27,150	29,350	31,500	33,700	35,850
County, Oit,		Low Income	30,450	34,800	39,150	43,450	46,950	50,450	53,900	57,400
		Extremely Low- Income	15,150	17,420	21,960	26,500	31,040	35,580	40,120	44,660
Tulsa Metro Area (Tulsa County, OK)	\$74,200	Very-Low Income	25,200	28,800	32,400	36,000	38,900	41,800	44,650	47,550
		Low Income	40,350	46,100	51,850	57,600	62,250	66,850	71,450	76,050
		Extremely Low- Income	15,150	17,420	21,960	26,500	31,040	35,580	40,120	44,660
Tulsa Metro Area	\$74,200	Very-Low Income	25,200	28,800	32,400	36,000	38,900	41,800	44,650	47,550

(Wagoner County, OK)										
		Low Income	40,350	46,100	51,850	57,600	62,250	66,850	71,450	76,050
		Extremely Low- Income	14,000	17,420	21,960	26,500	31,040	35,580	40,120	44,050
Washington County, OK	\$66,700	Very-Low Income	23,350	26,700	30,050	33,350	36,050	38,700	41,400	44,050
		Low Income	37,350	42,700	48,050	53,350	57,650	61,900	66,200	70,450
		Extremely Low- Income	16,850	19,250	21,960	26,500	31,040	35,580	40,120	44,660
Woods County, OK	\$78,500	Very-Low Income	28,050	32,050	36,050	40,050	43,300	46,500	49,700	52,900
		Low Income	44,900	51,300	57,700	64,100	69,250	74,400	79,500	84,650

Table 9: County Level Income Limits for 2019 CDBG-DR

Data Source: HUD Income Limit Documentation System²

Note: The FY 2014 Consolidated Appropriations Act changed the definition of extremely low-income to be the greater of 30/50ths (60 percent) of the Section 8 very low-income limit or the poverty guideline as <u>established by the Department of Health and Human Services</u> (HHS), provided that this amount is not greater than the Section 8 50% very low-income limit. Consequently, the extremely low-income limits may equal the very low (50%) income limits. Income Limit areas are based on FY 2020 Fair Market Rent (FMR) areas. For information on FMRs, please see our associated FY 2020 Fair Market Rent documentation system.

² https://www.huduser.gov/portal/datasets/il.html

SOCIAL VULNERABILITY INDEX

For more detailed information on population characteristics, please refer to Appendix F: Population Characteristics of the 27 eligible counties.

An additional component to consider when looking at unmet needs for impacted counties in Oklahoma is what level of social vulnerability to natural hazards they are experiencing. The Social Vulnerability Index (SoVI®) measures the social vulnerability of counties across the United States to their vulnerability to environmental hazards. This index, developed by the University of South Carolina's Hazards & Vulnerability Research Institute. utilizes twenty-nine (29) socioeconomic variables which contribute to reduction in a community's ability to prepare for, respond to, and recover from hazards. SoVI is a comparative metric that facilitates the examination of the differences in vulnerability among counties. It is a valuable tool because it graphically illustrates the geographic variation in social vulnerability, which in turn contributes greatly to response and recovery capabilities. SoVI shows where there is uneven capacity for disaster preparedness and response, and where resources might be used most effectively to reduce preexisting vulnerability. The data sources for the development of SoVI come primarily from the United States Census Bureau. The SoVI data combines the best available data from both the 2010 U.S. Decennial Census and five-year estimates from the American Community Survey (ACS). Additionally, the SoVI scores at the Census Tract level provides a more granular assessment of vulnerability within each county.

The SoVI details above are further explained by some of the characteristics at the individual level that affect vulnerability. One of these characteristics is that of Socioeconomic Status which affects the ability of a community to absorb losses and be resilient to hazard impacts. For example, of the 27 eligible counties, 24 of them can be considered mostly rural. Rural areas lack access to certain business types that can accelerate the recovery from disasters. This is due to the idea that wealth enables communities to absorb and recover from losses using insurance, social safety nets, and entitlement programs. Other factors used in SoVI relate to gender as well as race and ethnicity being that these factors impose language and cultural barriers and affect access to post-disaster funding. Additional factors used in SoVI are special-needs populations, social dependence (i.e., people who are totally dependent on social services for survival), education, family structure,

occupation, and other demographic characteristics that help to define social vulnerability for communities and individuals. The following table illustrates the twenty-nine (29) used in the calculation of the Social Vulnerability index.

VARIABLE	DESCRIPTION
QASIAN	Percent Asian
QBLACK	Percent Black
QSPANISH	Percent Hispanic
QINDIAN	Percent Native American
QAGEDEP	Percent Population under 5 years or 65 and over
QFAM	Percent Children Living in Married Couple Families
MEDAGE	Median Age
QSSBEN	Percent Households Receiving Social Security Benefits
QPOVTY	Percent Poverty
QRICH	Percent Households Earning over \$200,000 annually
PERCAP	Per Capita Income
QESL	Percent Speaking English as a Second Language with Limited
	English Proficiency
QFEMALE	Percent Female
QFHH	Percent Female Headed Households
QNRRES	Nursing Home Residents Per Capita
HOSPTPC	Hospitals Per Capita (County Level ONLY)
QNOHLTH	Percent of population without health insurance (County Level ONLY)
QED12LES	Percent with Less than 12th Grade Education
QCVLUN	Percent Civilian Unemployment
PPUNIT	People per Unit
QRENTER	Percent Renters
MDHSEVAL	Median Housing Value
MDGRENT	Median Gross Rent
QМОНО	Percent Mobile Homes
QEXTRCT	Percent Employment in Extractive Industries
QSERV	Percent Employment in Service Industry
QFEMLBR	Percent Female Participation in Labor Force
QNOAUTO	Percent of Housing Units with No Car
QUNOCCHU	Percent Unoccupied Housing Units

Table 10: Social Vulnerability Index

What Population Characteristics Affect Vulnerability?

- Socioeconomic Status (Income, Political Power, Prestige): Socioeconomic status affects the ability of a community to absorb losses and cope with hazard impacts. Wealth enables communities to better prepare for disasters through mitigation and absorb and recover from losses more quickly using insurance, social safety nets, and entitlement programs. Low status communities have little ability to absorb losses due to poverty and disadvantaged populations.
- Gender: Women often have a more difficult time during recovery than men because of sector-specific employment (e.g., personal services), lower wages, and family care responsibilities.
- Race and ethnicity: These factors impose language and cultural barriers and affect access to post-disaster funding and occupation of highhazard areas.
- Age: Extremes of age affect movement out of harm's way and require outside supervision and care. Parents lose time and money caring for children when day care facilities are affected; the elderly may have mobility constraints or medical and cognitive concerns increasing the burden of care before, during, and after the emergency.
- Employment loss: The potential loss of employment following a disaster increases the existing number of unemployed workers in a community. Such losses compound the impact of the hazard and leads to a slower recovery from the disaster. At an individual level, employment loss equates to a lower ability to pay for necessary goods and services, effectively lowering the ability to prepare and recovery from disasters.
- Residential property: Home value is an indicator of financial capacity. The value and quality of residential construction affect potential losses and recovery. Expensive homes are costly to replace, mobile homes are easily destroyed by water and winds. The viability of neighborhoods based on the number of unoccupied housing units also contributes to slower long-term recovery.
- Renters: People rent because they are transients, do not have the financial resources for home ownership, or do not want the responsibility of home ownership. They often lack access to information about financial aid during recovery and are not covered by current federal disaster recovery programs. In extreme cases, renters lack sufficient shelter options when lodging becomes uninhabitable or too costly to afford.
- Occupation: Some occupations, especially those characterized as primary extractive industries, may be severely affected by a hazard event. Primary sector jobs are impacted first during major disasters.

For example, self-employed fishermen suffer when their means of production is lost (boats), and they may not have the requisite capital to resume work in a timely fashion; therefore, they may seek alternative employment. The same is true of migrant workers engaged in agriculture. Low-skilled service jobs (housekeeping, childcare, and gardening) may suffer similarly as disposable income fades and the need for services declines.

- Family structure: Families with large numbers of dependents and/or single-parent households often have limited resources to outsource care for dependents and thus must juggle work responsibilities with care for family members. All these factors affect coping with and recovering from hazards.
- Education: Education is linked to socioeconomic status in that higher educational attainment affects lifetime earnings, and limited education constrains the ability to understand warning information and access recovery information.
- Medical Services and Access: Health care providers, including physicians and hospitals, are important post-event sources of relief. The lack of proximate medical services lengthens the time needed to obtain short-term relief and achieve longer-term recovery from disasters. Nursing homes represent an increase in socially vulnerable people as the resident populations are less able to independently cope with disasters. The availability of health insurance is another factor influencing social vulnerability.
- Social dependence: People who are totally dependent on social services (social security, food assistance) for survival are already economically and socially marginalized and require additional support in the postdisaster period.
- Special-needs population: Special needs populations (infirm. institutionalized, transient, homeless) are difficult to identify, let alone measure and monitor. Yet it is this segment of society that invariably is left out of recovery efforts, largely because of this invisibility in communities.

Effectively addressing social vulnerability decreases both human suffering and the economic loss related to providing social services and public assistance after a disaster. While a stand-alone component when compared to total unmet need and other factors like per capita unmet need, the SoVI contributes to the ultimate funding decision process by adding a layer that looks at the components involved closely with an individual's or community's effort to recover from a disaster event. SoVI is classified using standard

deviations. Social vulnerability scores that are greater than 1.5 standard deviations above the mean are considered the most socially vulnerable places, while scores below 1.5 standard deviations less than the mean are the least vulnerable places.

SoVI Categorical ratings range from: High (Top 20%), Medium High, Medium, Medium Low, and Low (Bottom 20%). The following counties were specifically identified under DR 4438.

Alfalfa	LOW
Canadian	LOW
Cherokee	MEDIUM HIGH
Craig	MEDIUM HIGH
Creek	MEDIUM LOW
Delaware	MEDIUM HIGH
Garfield	MEDIUM
Kay	MEDIUM HIGH
Kingfisher	MEDIUM LOW
Le Flore	MEDIUM
Logan	LOW
Mayes	MEDIUM
Muskogee	MEDIUM HIGH
Noble	MEDIUM LOW
Nowata	MEDIUM
Okmulgee	MEDIUM
Osage	MEDIUM
Ottawa	MEDIUM HIGH
Pawnee	MEDIUM
Payne	MEDIUM LOW
Pottawatomie	MEDIUM
Rogers	MEDIUM LOW
Sequoyah	MEDIUM HIGH
Tulsa	MEDIUM
Wagoner	MEDIUM LOW
Washington	MEDIUM
Woods	MEDIUM LOW

Table 11: SoVI Scores

The HUD-identified most impacted and distressed counties of Muskogee, Tulsa, and Sequoyah do share a moderate to moderately high social

vulnerability (SoVI) relationship. Eighty-eight percent of these counties rate at the "Medium" or higher category rating suggesting there is a strong social vulnerability correlation present.

The connection between physical hazards and populations that may have factors that reduce their ability to plan, cope during an event and recover after an event is directly related with housing. It is important to plan for housing in locations away from repeated risk factors such as flooding and aid during natural events like tornadoes. Assistance that may be needed includes transportation during an event to a shelter or safe place. Public shelters are often needed for those in apartments, mobile homes, or housing without private shelters. The elderly may have general mobility or cognitive issues that can mean additional assistance is needed for transportation or even design of facilities. Those that may be unemployed or underemployed, renters, minorities, persons in poverty and many other factors may lead to a great need for temporary housing if their housing or employment has been destroyed in an event. Many of these socially vulnerable people may not have insurance or family or other resources to assist them if they experience losses from an event. This analysis helps to raise awareness that while hazards exist for all the population within a county, some may need additional attention and focus to ensure their safety, health, and recovery.

Vulnerable Population Analysis of the 27 Eligible Counties

DISABILITY CHARACTERISTICS

Having a disability poses unique challenges for survivors of natural disasters. According to the 2019 ACS 5-Year S1810, the percentage of people reporting a disability in the 27 eligible counties ranges from 12.1% to as high as 23.5%. Persons with disabilities are considered a vulnerable population and ODOC is committed to ensuring such persons are adequately served during disaster recovery. During Survey I and II, ODOC did not identify specific unmet needs of persons with disabilities. To ensure vulnerable populations are still adequately served in the recovery process, ODOC will add additional points to an applicant's score if they identify projects that support the recovery efforts of persons with disabilities. Below shows percentage of civilian noninstitutionalized persons with a disability for each affected county:

Geographic Area Name	Total civilian noninstitutionalized population	Total civilian noninstitutionalized population with a disability	Total civilian noninstitutionalized population percent with a disability	Margin of Error (MOE), total civilian noninstitutionalized population percent with a disability
Alfalfa County, Oklahoma	4745	865	18.2	2.1
Canadian County, Oklahoma	138461	18391	13.3	0.7
Cherokee County, Oklahoma	48254	8824	18.3	1.1
Craig County, Oklahoma	13593	3062	22.5	1.6
Creek County, Oklahoma	70625	9599	13.6	0.7
Delaware County, Oklahoma	42058	9888	23.5	1.2
Garfield County, Oklahoma	59739	9069	15.2	0.9
Kay County, Oklahoma	43691	9095	20.8	1.1

Kingfisher County, Oklahoma	15525	2202	14.2	1.7
Le Flore County, Oklahoma	48819	10856	22.2	0.9
Logan County, Oklahoma	46284	6902	14.9	1.2
Mayes County, Oklahoma	40611	9384	23.1	1.1
Muskogee County, Oklahoma	65760	11812	18	0.8
Noble County, Oklahoma	11247	2018	17.9	2
Nowata County, Oklahoma	10156	1684	16.6	1.7
Okmulgee County, Oklahoma	38077	8130	21.4	0.9
Osage County, Oklahoma	45806	8299	18.1	0.9
Ottawa County, Oklahoma	30996	6330	20.4	0.7
Pawnee County, Oklahoma	16246	2600	16	1
Payne County, Oklahoma	80350	9748	12.1	0.7
Pottawatomie County, Oklahoma	70235	12363	17.6	0.7
Rogers County, Oklahoma	90246	13484	14.9	0.5
Sequoyah County, Oklahoma	41268	9187	22.3	0.9
Tulsa County, Oklahoma	641435	86840	13.5	0.3
Wagoner County, Oklahoma	78663	13342	17	0.7
Washington County, Oklahoma	51473	7932	15.4	0.7
Woods County, Oklahoma	8464	1430	16.9	2.5

Table 12: Disability Characteristics by County

Note: This condensed table does not break down the number of people experiencing specific disabilities for ease of reading purposes. The 2019 ACS 5-Year S1810 complete table <u>does</u> describe the numbers and percentages by disability type (visual, hearing, physical, mental, etc.). For more information, please refer to Census.gov or contact ODOC for the complete dataset.

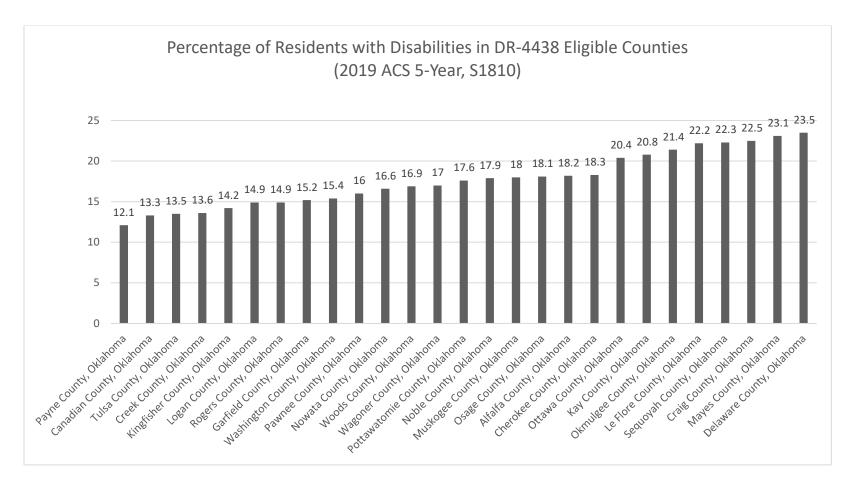


Figure 2: Percentage of Residents with Disabilities

HIV STATUS

Those with HIV are considered vulnerable for disasters. Activities for transitional housing to support those with disabilities, HIV/AIDS status, or homeless will receive additional points when CDBG-DR applications are scored. These populations are a priority for ODOC. The following data comes from 2019 CDC Atlas³.

³ https://gis.cdc.gov/grasp/nchhstpatlas/tables.html

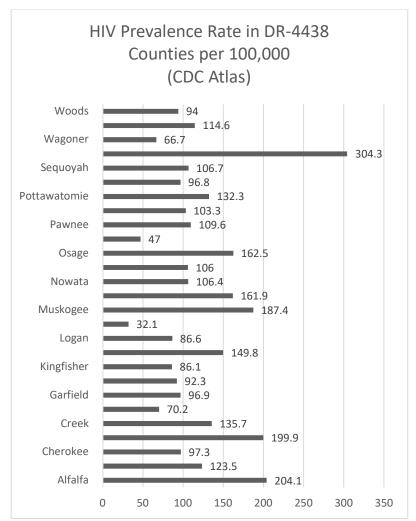


Figure 3: HIV Rates by County

Housing Needs Assessment

The State analyzed FEMA-IA data for the Most Impacted and Distressed Areas (MID) to determine unmet housing needs. Unmet housing needs are those needs that are not covered by other sources of funding and can be covered by CDBG-DR funds (No interim housing needs were noted). A total of 5,407 dwelling structures in 27 counties were damaged from the storms that occurred from May 1, 2019, to June 9, 2019. This data was obtained from FEMA-IA in February of 2021.

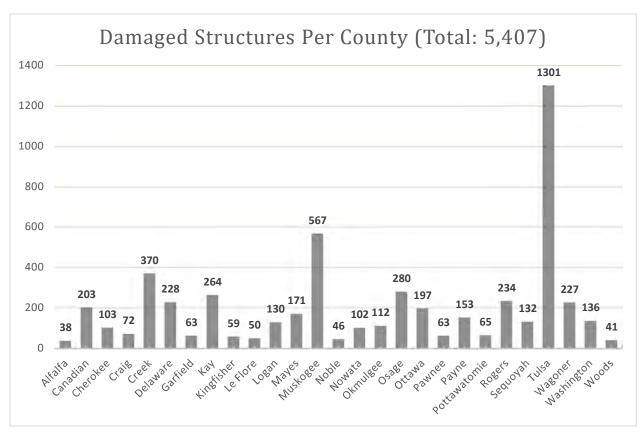


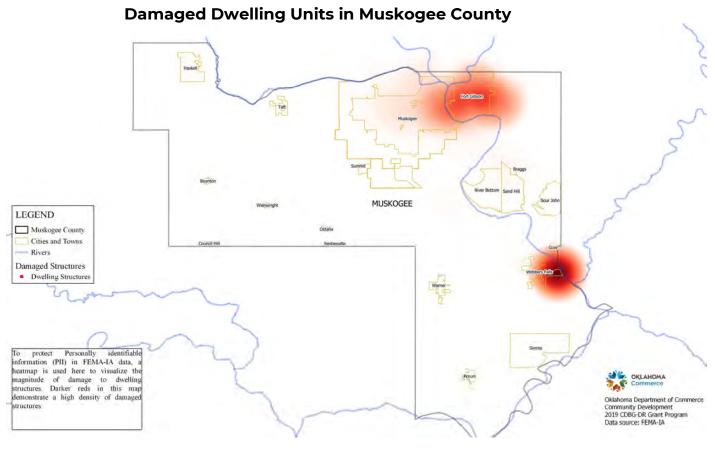
Figure 4: Damaged structures by County

The type of damage varied across these dwelling structures. Documented damage types include foundation, roof, and flooding. It should be noted that flood damage can, and often does, cause damage to foundations. Flooded dwelling structures comprised the largest damage type (45%) at 2,435 structures with an average water depth at 18 inches (1.5 feet). Of all the structures that flooded, 82% of households did not have flood insurance.

Based upon the review of available data, HUD concluded that the counties Muskogee, Sequoyah (Zip code 74946), and Tulsa are the Most Impacted and Distressed Areas (MID). The remaining 24 counties and the remainder of Sequoyah County will be considered the State's Most Impacted and Distressed Areas (MID). The other 24 counties and the remainder of Sequoyah County had considerable damage due to the disasters that occurred. Many cities and towns have reported homes that were severely flooded and have since been abandoned. Other communities reported serious infrastructure damage due to the disasters and was reported within the FEMA Public Assistance (PA) data. Data shows several needs including debris removal and public utility and roads/bridge repair for all 24 counties. All data and evidence showed that the remaining counties were all eligible to receive assistance and therefore should be considered part of the State's MID.

MUSKOGEE COUNTY

Muskogee County is part of HUD's Most Impacted and Distressed Areas. A total of 567 dwelling structures were damaged. The red areas represent clusters of damaged structures. The darker the red, the more damaged structures were present.



Map 5: Damaged Residential Structures in Muskogee County

Of these 567 structures, 57% (327 structures) flooded with an average water depth of 34 inches (2.8 feet). Only 19% (62) of households had flood insurance.

Owner occupied housing comprised 70% of the damaged housing. Renter occupied housing comprised 30% of the damaged housing. Note: Apartments show "0" under the Owned column because none of the property owners lived in the apartment at the time of the disaster. This table is also available for the State identified Most Impacted and Distressed Areas (MID), please refer to the appendix to find this table.

Structure Type	Damaged Structure Count	Owned	Rented
Apartment	30	0	30
House/Duplex	293	232	52
Mobile Home	159	103	54
Other	76	47	28

Travel Trailer	9	8	1
Totals	567	390	165
Percentage	100%	69 %	29%

Table 13: Muskogee County - Structure damage, owner and rental

The unmet needs for Muskogee County are significant. ODOC analyzed the most recent FEMA-IA dataset and summarized the data in the following table. In total, there are \$2,787,929.71 in unmet needs spread across the different dwelling types.

SUBSTANTIAL AMENDMENT 2 UPDATE TO THIS SECTION

The initial CDBG-DR Action Plan evaluated unmet housing needs by analyzing the FEMA-IA dataset obtained through an FSA agreement between ODOC and FEMA. According to the State's analysis, 29% of the dwelling structures in Muskogee County were renter-occupied during the May-June 2019 disaster. ODOC attempted to augment the unmet housing needs analysis in the Action Plan by surveying impacted communities for additional data. Unfortunately, during the development of the initial Action Plan through Substantial Amendment 2, ODOC was unable to obtain data beyond the initial FEMA-IA dataset.

ODOC has proposed deleting the Multifamily Housing Rehabilitation activity for the following reasons:

- 1. No eligible community has informed ODOC that there is an unmet need for MFH housing.
- 2. No eligible applicant has applied for the Multifamily Housing Rehabilitation program.
- 3. It is reasonable to assume that landlords have fixed their rental properties by this point either through insurance or some other means.

Individual Assistance Data for Muskogee County

County/Residence Type	Count of Residence Type	Real Property FEMA Verified Loss	Sum of Insurance Settlement	Sum of Repair Assistance Amount	Sum of Replacement Assistance Amount	Sum of Unmet Need
Muskogee						
[A]Apartment	30	\$0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$0.00*
[B]House/Duplex	293	\$4,585,400.44	\$968,522.49	\$1,895,085.51	\$139,600.00	\$2,257,143.47
[C]Mobile Home	159	\$1,388,016.88	\$65,067.98	\$1,019,725.29	\$135,360.00	\$232,809.88
[D]Other	76	\$180.20	\$ 0.00	\$ 0.00	\$ 0.00	\$180.20
[E]Travel Trailer	9	\$23,341.60	\$ 0.00	\$19,238.61	\$ 0.00	\$4,102.99
Muskogee Total	567	\$5,996,939.12	\$1,033,590.47	\$2,934,049.41	\$274,960.00	\$2,494,236.54*

Table 14: Muskogee County - Individual Assistance

It is important to note that row [A] for Apartment is \$0.00 because renters do not own the property and therefore received no financial assistance for repairs. Though it can be assumed that the property owner of an apartment complex had insurance to recover from storm damages, ODOC has no data to confirm or deny this at this time. A better understanding of unmet need for Apartments will occur at the application phase of the disaster recovery program.

^{*} Rental Assistance (which includes mortgage assistance) is not calculated when determining unmet need according to FEMA-IA data because <u>it does not address property damage</u>. The Rental Assistance amount does not go towards rehabilitation expenses of damaged structures and is not noted in FEMA-IA data. Therefore, funds beyond the "Sum of Unmet Need" are necessary to ensure all residents affected in Muskogee County receive adequate disaster recovery assistance.

The damage to rental stock is concerning since 30% of all damage in Muskogee County occurred for rental properties. ODOC has determined the best way to address the lack of rental stock in the county is to allow for rehabilitation or reconstruction.

DAMAGED DWELLING STRUCTURES WITHIN THE 100-YEAR (1%) FLOODPLAIN IN MUSKOGEE COUNTY

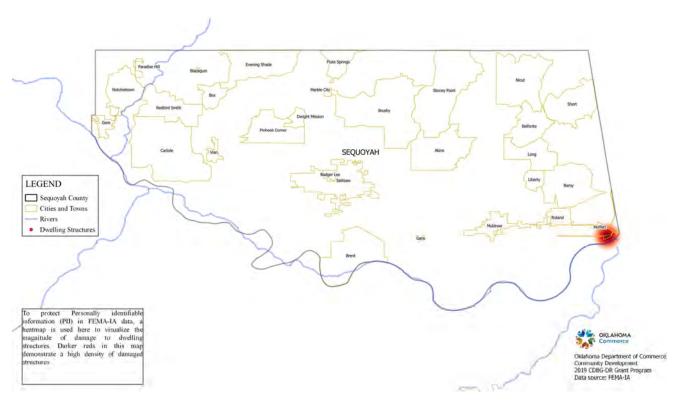
ODOC analyzed FEMA-IA damaged structures against FEMA NFHL (floodplain) to determine the number of damaged structures in the 1% floodplain. A 1% floodplain refers to those areas with a 1% annual chance of flooding and a 26% chance of flooding over the life of a 30-year mortgage. For Muskogee County, 250 damaged structures are in the 1% floodplain.

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SEQUOYAH COUNTY

Sequoyah County is part of HUD's Most Impacted and Distressed Areas. A total of 132 dwelling structures were damaged. The red areas represent clusters of damaged structures. The darker the red, the more damaged structures were present.

DAMAGED DWELLING UNITS IN SEQUOYAH COUNTY



Map 6: Sequoyah County - Damaged residential structures

Of these 132 structures, 57% (76 structures) flooded with an average water depth of 53 inches (4.4 feet). Of all the structures that flooded, only one had flood insurance. Owner occupied housing comprised 59% of the damaged housing. Renter occupied housing comprised 39% of the damaged housing. Note: Apartments show "0" under the Owned column because none of the property owners lived in the apartment at the time of the disaster. This table is also available for the State identified Most Impacted and Distressed Areas (MID), please refer to the appendix to find this table.

	Damaged		
Structure	Structure		
Type	Count	Owned	Rented

Apartment	24	0	24
House/Duplex	62	48	12
Mobile Home	22	10	11
Other	22	19	3
Travel Trailer	2	1	1
Totals	132	78	51
Percentage	100%	59%	39%

Table 15: Sequoyah County - Residential damage, owner and rentals

The unmet needs for Sequoyah County are less than Muskogee County. ODOC analyzed the most recent FEMA-IA dataset and summarized the data in the following table. In total, there are \$134,233.85 in unmet needs spread across the different dwelling types.

SUBSTANTIAL AMENDMENT 2 UPDATE TO THIS SECTION

The initial CDBG-DR Action Plan evaluated unmet housing needs by analyzing the FEMA-IA dataset obtained through an FSA agreement between ODOC and FEMA. According to the State's analysis, 39% of the dwelling structures in Sequoyah County were renter-occupied during the May-June 2019 disaster. ODOC attempted to augment the unmet housing needs analysis in the Action Plan by surveying impacted communities for additional data. Unfortunately, during the development of the initial Action Plan through Substantial Amendment 2, ODOC was unable to obtain data beyond the initial FFMA-IA dataset.

ODOC has proposed deleting the Multifamily Housing Rehabilitation activity for the following reasons:

- 1. No eligible community has informed ODOC that there is an unmet need for MFH housing.
- 2. No eligible applicant has applied for the Multifamily Housing Rehabilitation program.
- It is reasonable to assume that landlords have fixed their rental properties by this point either through insurance or some other means.

FEMA INDIVIDUAL ASSISTANCE DATA – SEQUOYAH COUNTY

County/Residence Type	Count of Residence Type	Real Property FEMA Verified Loss	Sum of Insurance Settlement	Sum of Repair Assistance Amount	Sum of Replacement Assistance Amount	Sum of Unmet Need
Sequoyah						
[A]Apartment	24	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00*
[B]House/Duplex	62	\$545,623.85	\$0.00	\$492,759.77	\$0.00	\$54,018.16
[C]Mobile Home	22	\$123,922.62	\$0.00	\$42,616.81	\$0.00	\$81,305.81
[D]Other	22	\$9,667.50	\$0.00	\$9,667.50	\$0.00	\$0.00
[E]Travel Trailer	2	\$63.96	\$0.00	\$0.00	\$0.00	\$63.96
Sequoyah Total	132	\$679,277.93	\$0.00	\$545,044.08	\$0.00	\$135,387.93*

Table 16: Sequoyah County - Individual Assistance

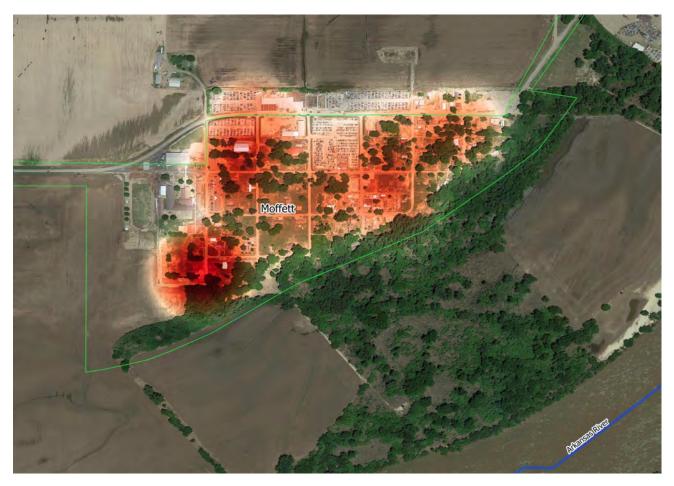
It is important to note that row [A] for Apartment is blank because renters do not own the property and therefore received no financial assistance. Though it can be assumed that the property owner of an apartment complex had insurance to recover from storm damages, ODOC has no data to confirm or deny this at this time. Additionally, since apartments are a larger proportion of the damage type, ODOC anticipates the actual Unmet Need to be higher.

^{*} Rental Assistance (which includes mortgage assistance) is not calculated when determining unmet need according to FEMA-IA data because <u>it does not address property damage</u>. The Rental Assistance amount does not go towards rehabilitation expenses of damaged structures and is not noted in FEMA-IA data. Therefore, funds beyond the "Sum of Unmet Need" are necessary to ensure all residents affected in Sequoyah County receive adequate disaster recovery assistance.

The damage to rental stock is concerning since 39% of all damage in Sequoyah County occurred for rental properties. ODOC has determined the best way to address the lack of rental stock in the county is to allow for rehab (or reconstruction for those structures completely destroyed) on a one-to-one replacement basis.

The Town of Moffett, Oklahoma, represented the majority of damaged dwelling structures (Total of 83) in Sequoyah County. The image below details where the damaged structures are located within the Town of Moffett.

DAMAGED DWELLING UNITS IN SEQUOYAH COUNTY



Map 7: Damaged residential structures in Moffett, OK

The red areas represent clusters of damaged structures. The darker the red, the more damaged structures that were present.

Many of these structures have been demolished and are now empty lots. There are some households that continue to live in damaged structures which pose significant health concerns. As mentioned elsewhere in this Action Plan, the State is proposing a <u>voluntary</u> buyout program for residential units in the 100-year (1%) floodplain and the Disaster Risk Reduction Area (DRRA).

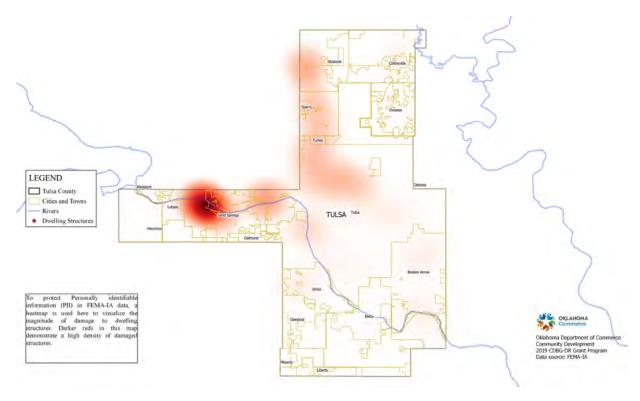
DAMAGED DWELLING STRUCTURES WITHIN THE 100-YEAR (1%) FLOODPLAIN IN SEQUOYAH COUNTY

ODOC analyzed FEMA-IA damaged structures against FEMA NFHL (floodplain) to determine the number of damaged structures in the 1% floodplain. A 1% floodplain refers to those areas with a 1% annual chance of flooding and a 26% chance of flooding over the life of a 30-year mortgage. For Sequoyah County, 90 damaged structures (or 68% of all damaged structures in the county) are in the 1% floodplain.

TULSA COUNTY

Tulsa County is part of HUD's Most Impacted and Distressed Areas. A total of 1,301 dwelling structures were damaged. The red areas represent clusters of damaged structures. The darker the red, the more damaged structures were present.

DAMAGED DWELLING UNITS IN TULSA COUNTY



Map 8: Tulsa County - Damaged residential structures

Of these 1,301 structures, 48% (Total of 634) flooded with an average water depth of 18.6 inches (1.5 feet). Of all the structures that flooded, 69% did not have flood insurance.

Owner occupied housing comprised 71% of the damaged housing. Renter occupied housing comprised 28% of the damaged housing. Note: Apartments show "0" under the Owned column because none of the property owners lived in the apartment at the time of the disaster. This table is also available for the State identified Most Impacted and Distressed Areas (MID), please refer to the appendix to find this table.

Structure Type	Damaged Structure Count	Owned	Rented
Apartment	59	0	59
House/Duplex	968	743	211
Mobile Home	146	106	38
Other	111	55	55
Travel Trailer	17	15	2
Totals	1301	919	365
Percentage	100%	71%	28%

Table 17: Tulsa County - Damaged structures, owner and renter

The unmet needs for Tulsa County are significant. ODOC analyzed the most recent FEMA-IA dataset and summarized the data in the following table. In total, there are \$2,997,260.80 in unmet needs spread across the different dwelling types.

SUBSTANTIAL AMENDMENT 2 UPDATE TO THIS SECTION

The initial CDBG-DR Action Plan evaluated unmet housing needs by analyzing the FEMA-IA dataset obtained through an FSA agreement between ODOC and FEMA. According to the State's analysis, 28% of the dwelling structures in Tulsa County were renter-occupied during the May-June 2019 disaster. ODOC attempted to augment the unmet housing needs analysis in the Action Plan by surveying impacted communities for additional data. Unfortunately, during the development of the initial Action Plan through Substantial Amendment 2, ODOC was unable to obtain data beyond the initial FFMA-IA dataset.

ODOC has proposed deleting the Multifamily Housing Rehabilitation activity for the following reasons:

- 1. No eligible community has informed ODOC that there is an unmet need for MFH housing.
- 2. No eligible applicant has applied for the Multifamily Housing Rehabilitation program.
- 3. It is reasonable to assume that landlords have fixed their rental properties by this point either through insurance or some other means.

FEMA Individual Assistance Data – Tulsa County

County/Residence Type	Count of Residence Type	Real Property FEMA Verified Loss	Sum of Insurance Settlement	Sum of Repair Assistance Amount	Sum of Replacement Assistance Amount	Sum of Unmet Need
Tulsa						
[A]Apartment	59	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00*
[B]Condo	3	\$983.10	\$0.00	\$0.00	\$0.00	\$983.10
[C]House/Duplex	968	\$5,364,792.31	\$3,442,260.43	\$2,711,416.96	\$0.00	\$2,113,338.84
[D]Mobile Home	146	\$755,828.69	\$120,612.89	\$420,901.11	\$0.00	\$287,641.43
[E]Other	103	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
[F]Townhouse	5	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
[G]Travel Trailer	17	\$27,464.74	\$0.00	\$19,489.97	\$0.00	\$7,974.77
Tulsa Total	1301	\$6,149,068.84	\$3,562,873.32	\$3,151,808.04	\$0.00	\$2,409,938.14*

Table 18: Tulsa County - Individual Assistance

It is important to note that row [A] for Apartment is blank because renters do not own the property and therefore received no financial assistance. Though it can be assumed that the property owner of an apartment complex had insurance to recover from storm damages, ODOC has no data to confirm or deny this at this time.

^{*} Rental Assistance (which includes mortgage assistance) is not calculated when determining unmet need according to FEMA-IA data because <u>it does not address property damage</u>. The Rental Assistance amount does not go towards rehabilitation expenses of damaged structures and is noted in FEMA-IA data. Therefore, funds beyond the "Sum of Unmet Need" are necessary to ensure all residents affected in Tulsa County receive adequate disaster recovery assistance.

The damage to rental stock is concerning since 28% of all damage in Tulsa County occurred for rental properties. ODOC has determined the best way to address the lack of rental stock in the county is to allow for rehab (or reconstruction for those structures destroyed) on a one-to-one replacement basis.

DAMAGED DWELLING STRUCTURES WITHIN THE 100-YEAR (1%) FLOODPLAIN IN TULSA COUNTY

ODOC analyzed FEMA-IA damaged structures against FEMA NFHL (floodplain) to determine the number of damaged structures in the 1% floodplain. A 1% floodplain refers to those areas with a 1% annual chance of flooding and a 26% chance of flooding over the life of a 30-year mortgage. For Tulsa County, 385 damaged structures are in the 1% floodplain.

FEMA Individual Assistance Data for all 27 Eligible Counties

The following chart summarizes property damage in the 27 eligible counties. This chart was created from FEMA-IA data obtained through an FSA between ODOC and FEMA. The definitions for the terms used in the table are noted below:

- (A) **County:** Only the 27 eligible counties are included in this table. Those counties include Alfalfa, Canadian, Cherokee, Craig, Creek, Delaware, Garfield, Kay, Kingfisher, Le Flore, Logan, Mayes, Muskogee, Noble, Nowata, Okmulgee, Osage, Ottawa, Pawnee, Payne, Pottawatomie, Rogers, Sequoyah, Tulsa, Wagoner, Washington, and Woods.
- (B) **Residence Type:** Structures with the primary purpose of being a place for dwelling. <u>Note: Not every eligible county has every possible residence type. Counties that do not have residences, such as condos, will not be listed.</u>
- (C) **County of Residence Type:** The occurrence of damaged residential structures within each eligible county.

- (D) **Real Property FEMA Verified Loss:** When someone registers for FEMA assistance after a disaster, FEMA is required to verify losses to determine eligibility for disaster assistance. FEMA's standard method to verify a loss due to disaster damage and to determine initial eligibility is an onsite inspection by a FEMA inspector. Home damage must be disaster related.
- (E) **Sum of Insurance Settlement:** The sum of all insurance payouts in a particular county.
- (F) **Sum of Repair Assistance Amount:** The sum of FEMA repair assistance in a particular county.
- (G) **Sum of Replacement Assistance Amount:** The sum of FEMA replacement assistance in a particular county.
- (H)**Sum of Unmet Need:** Is the value minus "Sum of Total FEMA Verified Loss", minus "Sum of Insurance Settlement", minus "Sum of Repair Assistance Amount", minus "Sum of Replacement Assistance Amount", and minus "Sum of SBA Received Amount"

Note 1: The source of this data is from FEMA-IA.

Note 2: Not every county reported damage to every possible housing type.

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Martia 38 \$ 2,265.39 \$ 46,950.00 \$ 31,839.47 \$ - \$ \$ 16,399.46	County/Residence Type	Count of Damaged Residence Type	Sum of Total FEMA Verified Loss	Sum of Insurance Settlement	Sum of Repair Assistance Amount	Sum of Replacement Assistance Amount	Sum of SBA Received Amount	Sum of Unmet Need
House/Duclet		1						\$ 16,399.44
Mobile Home	House/Duplex	29	·		\$ 31,588.77		\$ -	\$ 14,887.24
Townhouse	Mobile Home		\$ 16,489.38		\$ 14,977.18		\$ -	\$ 1,512.20
Canadian 203 \$819,986.22 \$171,222.86 \$184,322.83 \$202,800.00 \$ - \$302,498.70 \$ - \$124.481 \$ - \$124.481 \$ - \$124.481 \$ - \$134,507.87 \$ - \$134,507.87 \$ - \$134,507.87 \$ - \$134,507.87 \$ - \$134,507.87 \$ - \$134,507.87 \$ - \$134,507.87 \$ - \$134,507.87 \$ - \$134,507.87 \$ - \$134,507.87 \$ - \$134,507.87 \$ - \$134,507.87 \$ - \$134,507.87 \$ - \$144,507.87	Other	4	\$ -				\$ -	\$ -
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Apartment	Canadian	203	\$ 819,986.22	\$ 171,222.86	\$ 184,322.83	\$ 202,800.00	\$ -	\$ 382,498.71
Mobile Home	Apartment	3	\$ 1,424.61				\$ -	\$ 1,424.61
Other	House/Duplex	122	\$ 291,058.72	\$ 89,722.86	\$ 156,865.44		\$ -	\$ 134,507.87
Townhouse 1 \$ \$ \$ \$ \$ \$ \$ \$ \$	Mobile Home	59	\$ 527,325.41	\$ 81,500.00	\$ 27,457.39	\$ 202,800.00		\$ 246,388.75
Travel Trailer 1 \$177.48 Cherokee 103 \$152,311.32 \$307,221.90 \$56,409.61 \$- \$9,0635.52 \$- \$9,0675.73 \$18,5221.75 \$- \$- \$7,088.93 Mobile Home 28 \$111,070.73 \$37,887.86 \$- \$73,182.86 \$- \$73,182.86 \$- \$- \$73,182.86 \$- \$- \$- \$- \$- \$- \$- \$- \$- \$- \$- \$- \$-	Other	17	\$ -					\$ -
Cherokee 103 \$152,311.32 \$307,221.90 \$56,409.61 \$ \$ \$90,875.71 House/Duplex 60 \$30,633.62 \$307.221.90 \$18,521.75 \$ \$ \$7,085.91 Mobile Home 28 \$111,070.73 \$ \$37,887.86 \$ \$ \$7,085.91 Cher 11	Townhouse	1	\$ -					\$ -
House/Duplex 60 \$30,633.62 \$307,221.90 \$18,52175 \$ \$ \$7,085.91	Travel Trailer	1	\$ 177.48					\$ 177.48
Mobile Home 28 \$111,070.73 \$37,887.86 \$-\$ \$73,182.87 Other 11 \$-\$ \$-\$ \$-\$ Travel Trailer 4 \$10,606.97 Craig 72 \$146,885.95 \$127,733.70 \$20,408.21 S \$-\$ \$95,419.51 Apartment 1 \$-\$ \$-\$ House/Duplex 56 \$133,810.38 \$124,443.10 \$19,207.56 Mobile Home 9 \$13,054.13 \$3,290.60 \$1,200.65 S \$-\$ \$-\$ Travel Trailer 1 \$2,21.44 Creek 370 \$192,973.32 \$174,960.71 \$93,015.43 Apartment 2 \$-\$ House/Duplex 306 \$109,242.19 \$174,960.71 \$51,428.31 Mobile Home 31 \$2,278.26 S \$113.91 Townhouse 1 \$-\$ Travel Trailer 5 \$88.96 House/Duplex 124 \$412,050.93 \$5,134.92 Mobile Home 77 \$247,883.05 \$80,302.54 \$45,058.29 \$90,460.00 S \$360,732.55 Townhouse 1 \$ \$ \$ \$36,755 Townhouse 1 \$ \$ \$ \$1,273.16 Townhouse 1 \$ \$ \$ \$1,200.93 S \$360,732.55 Mobile Home 77 \$247,883.05 \$80,302.54 \$45,058.29 S \$90,460.00 S \$62,269.26 Townhouse 1 \$ \$ \$ \$ \$1,273.27 Townhouse 1 \$ \$ \$ \$ \$1,273.27 Townhouse 1 \$ \$ \$ \$ \$ \$1,273.27 Townhouse 1 \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	Cherokee	103	\$ 152,311.32	\$ 307,221.90	\$ 56,409.61		\$ -	\$ 90,875.79
Other 11 \$ - \$ \$ \$ \$ \$ \$ \$ 10,606.97 \$ \$ \$ 10,606.97 \$ \$ \$ 10,606.97 \$ 10,606.97 \$ 10,60	House/Duplex	60	\$ 30,633.62	\$ 307,221.90	\$ 18,521.75		\$ -	\$ 7,085.95
Travel Trailer	Mobile Home	28	\$ 111,070.73		\$ 37,887.86		\$ -	\$ 73,182.87
Craig 72 \$ 146,885.95 \$ 127,733.70 \$ 20,408.21 \$ - \$ 95,419.93 Apartment 1 - - \$ -	Other	11	\$ -				\$ -	\$ -
Apartment 1	Travel Trailer	4	\$ 10,606.97				\$ -	\$ 10,606.97
Apartment	Craig	72	\$ 146,885.95	\$ 127,733.70	\$ 20,408.21		\$ -	\$ 95,419.92
House/Duplex 56		_	\$				\$ -	
Mobile Home 9 \$13,054.13 \$3,290.60 \$1,200.65 \$-\$0,178.34 \$-\$10,178.34	· ·		- + 177 010 70	# 10 / / / 7 10	¢ 10 007 56		¢	\$ -
Other 5 \$- \$ \$- \$ Travel Trailer 1 \$21.44 \$- \$21.44 Creek 370 \$192,973.32 \$174,960.71 \$93,015.43 \$- \$98,624.36 Apartment 2 \$- \$- \$- \$- \$- \$98,624.36 House/Duplex 306 \$109,242.19 \$174,960.71 \$51,428.31 \$- \$- \$56,480.33 Mobile Home 31 \$82,798.26 \$174,960.71 \$51,428.31 \$- \$56,480.32 Other 25 \$113.91 \$- \$13.9 \$- \$13.9 Townhouse 1 \$- \$- \$113.9 \$- \$113.9 Townhouse 1 \$- \$- \$13.9 \$- \$188.96 Delaware 28 \$683,941.30 \$85,437.46 \$76,321.16 \$110,048.57 \$- \$446,262.56 House/Duplex 124 \$412,050.93 \$5,134.92 \$29,864.23 \$- \$380,973.2*								
Travel Trailer 1 \$21.44 \$- \$21.44 Creek 370 \$192,973.32 \$174,960.71 \$93,015.43 \$- \$98,624.34 Apartment 2 \$- \$- \$- \$ \$- \$98,624.34 House/Duplex 306 \$109,242.19 \$174,960.71 \$51,428.31 \$- \$56,480.35 Mobile Home 31 \$82,798.26 \$174,960.71 \$51,428.31 \$- \$56,480.35 Other 25 \$13.91 \$- \$41,287.12 \$- \$41,217.14 Other 25 \$13.91 \$- \$41,287.12 \$- \$41,217.14 Other 25 \$13.91 \$- \$41,287.12 \$- \$41,217.14 Other 25 \$13.91 \$- \$41,287.12 \$- \$13.99 Townhouse 1 \$- \$- \$- \$13.99 \$- \$13.99 Delaware 28 \$683,941.30 \$85,437.46 \$76,321.16 \$10,048.57 \$-		 		\$ 3,290.60	\$ 1,200.65			
Creek 370 \$192,973.32 \$174,960.71 \$93,015.43 \$- \$98,624.36 Apartment 2 \$-		5	· · ·					· ·
Apartment 2 \$ - \$ \$ - \$ \$ \$ - \$ \$ \$ \$		770	· ·	¢ 17 / 000 71	# 07 07F (7			
House/Duplex 306 \$109,242.19 \$174,960.71 \$51,428.31 \$- \$56,480.31 Mobile Home 31				\$ 174,960.71	\$ 93,015.43			\$ 98,624.36
Mobile Home 31 \$82,798.26 \$41,587.12 \$- \$41,211.14 Other 25 \$113.91 \$- \$13.91 \$- \$13.91 \$- \$13.91 \$- \$13.91 \$- \$13.91 \$- \$13.92 \$- \$13.92 \$- \$13.92 \$- \$13.92 \$- \$13.92 \$- \$13.92 \$- \$- \$13.92 \$-	· ·	+	· · ·	¢ 15 / 000 51	ф E1 / 20 71			\$ -
Other 25 \$113.91 \$- \$113.92 Townhouse 1 \$- <td>· ·</td> <td></td> <td></td> <td>\$ 1/4,960./1</td> <td></td> <td></td> <td>· ·</td> <td></td>	· ·			\$ 1/4,960./1			· ·	
Townhouse 1 \$ - \$ Travel Trailer 5 \$818.96 \$ - \$ 818.96 Delaware 228 \$ 683,941.30 \$ 85,437.46 \$ 76,321.16 \$ 110,048.57 \$ - \$ 446,262.56 House/Duplex 124 \$ 412,050.93 \$ 5,134.92 \$ 29,864.23 \$ - \$ 380,973.2° Mobile Home 77 \$ 247,883.05 \$ 80,302.54 \$ 45,058.29 \$ 90,460.00 \$ - \$ 62,269.20 Other 20 \$ 87.53 \$ - \$ 87.55 Townhouse 1 \$ - \$ - \$ -		<u> </u>			\$ 41,567.12		1	
Travel Trailer 5 \$818.96 \$- \$818.96 Delaware 228 \$683,941.30 \$85,437.46 \$76,321.16 \$110,048.57 \$- \$446,262.58 House/Duplex 124 \$412,050.93 \$5,134.92 \$29,864.23 \$- \$380,973.2° Mobile Home 77 \$247,883.05 \$80,302.54 \$45,058.29 \$90,460.00 \$- \$62,269.20 Other 20 \$87.53 \$- \$87.55 Townhouse 1 \$- \$ \$- \$		25						
Delaware 228 \$ 683,941.30 \$ 85,437.46 \$ 76,321.16 \$ 110,048.57 \$ - \$ 446,262.58 House/Duplex 124 \$ 412,050.93 \$ 5,134.92 \$ 29,864.23 \$ - \$ 380,973.27 Mobile Home 77 \$ 247,883.05 \$ 80,302.54 \$ 45,058.29 \$ 90,460.00 \$ - \$ 62,269.20 Other 20 \$ 87.53 \$ - \$ 87.53 Townhouse 1 \$ - \$ - \$ -		I	· · ·					
House/Duplex 124 \$ 412,050.93 \$ 5,134.92 \$ 29,864.23 \$ - \$ 380,973.20 Mobile Home 77 \$ 247,883.05 \$ 80,302.54 \$ 45,058.29 \$ 90,460.00 \$ - \$ 62,269.20 Other 20 \$ 87.53 \$ - \$ 87.53 Townhouse 1 \$ - \$ - \$ -		+	·	¢ 05 /77 /6	¢ 76 721 16	¢ 110 049 E7		
Mobile Home 77 \$ 247,883.05 \$ 80,302.54 \$ 45,058.29 \$ 90,460.00 \$ - \$ 62,269.20 Other 20 \$ 87.53 \$ - \$ 87.53 Townhouse 1 \$ -					•	\$ 11U,U 4 8.5 <i>1</i>		
Other 20 \$87.53 \$- \$87.53 Townhouse 1 \$ - \$<	·		·			¢ 00 %60 00		
Townhouse 1 \$ - \$				φ OU,3UZ.3 4	\$ 43,036.25	φ 90,400.00		
		1	· ·					\$ 67.33
	Travel Trailer	6	\$ 23,919.79		\$ 1,398.64	\$ 19,588.57	\$ -	\$ 2,932.58

County/Residence Type	Count of Damaged Residence Type	Sum of Total FEMA Verified Loss	Sum of Insurance Settlement	Sum of Repair Assistance Amount	Sum of Replacement Assistance Amount	Sum of SBA Received Amount	Sum of Unmet Need
Kay	264	\$ 224,217.69	\$ 40,568.07	\$ 117,197.27		\$ -	\$ 110,158.28
Apartment	1	\$ -				\$ -	\$ -
Condo	1	\$ -				\$ -	\$ -
House/Duplex	216	\$ 200,890.13	\$ 40,568.07	\$ 107,498.99		\$ -	\$ 96,529.00
Mobile Home	14	\$ 22,364.28		\$ 9,698.28		\$ -	\$12,666.00
Other	30	\$ 963.28				\$ -	\$ 963.28
Townhouse	1	\$ -				\$ -	\$ -
Travel Trailer	1	\$ -				\$ -	\$ -
Kingfisher	59	\$ 174,870.68		\$ 53,480.27		\$ -	\$ 121,564.37
House/Duplex	49	\$ 162,169.20		\$ 50,494.66		\$ -	\$ 111,848.50
Mobile Home	9	\$ 12,701.48		\$ 2,985.61		\$ -	\$ 9,715.87
Other	1	\$ -				\$ -	\$ -
Le Flore	50	\$ 85,161.19		\$ 24,500.83		\$ -	\$ 60,660.36
House/Duplex	30	\$ 22,035.87		\$ 7,437.51		\$ -	\$ 14,598.36
Mobile Home	11	\$ 63,125.32		\$ 17,063.32		\$ -	\$ 46,062.00
Other	7	\$ -				\$ -	\$ -
Travel Trailer	2	\$ -				\$ -	\$ -
Logan	130	\$ 719,424.51	\$ -	\$ 94,221.94	\$ 104,600.00	\$ -	\$ 530,186.97
Apartment	1	\$ -				\$ -	\$ -
House/Duplex	90	\$ 668,567.89	\$ -	\$ 88,437.16	\$ 69,800.00	\$ -	\$ 519,915.13
Mobile Home	28	\$ 50,260.54		\$ 5,784.78	\$ 34,800.00	\$ -	\$ 9,675.76
Other	8	\$ -				\$ -	\$ -
Travel Trailer	3	\$ 596.08				\$ -	\$ 596.08
Mayes	171	\$ 544,651.51	\$ 139,324.85	\$ 264,996.01	\$ 33,640.00	\$ -	\$ 197,529.88
House/Duplex	96	\$ 244,382.53	\$ 19,339.88	\$ 122,022.89		\$ -	\$ 119,582.82
Mobile Home	53	\$ 299,227.66	\$ 119,984.97	\$ 142,294.04	\$ 33,640.00	\$ -	\$77,584.82
Other	11	\$ -				\$ -	\$ -
Travel Trailer	11	\$ 1,041.32		\$ 679.08		\$ -	\$ 362.24
Muskogee	567	\$ 7,245,119.08	\$ 1,033,590.47	\$ 2,934,049.41	\$ 274,960.00	\$ -	\$ 3,710,950.53
Apartment	30	\$ 96,386.10				\$ -	\$ 96,386.10
House/Duplex	293	\$ 5,344,026.81	\$ 968,522.49	\$ 1,895,085.51	\$ 139,600.00	\$ -	\$ 2,994,776.44
Mobile Home	159	\$ 1,772,651.65	\$ 65,067.98	\$ 1,019,725.29	\$ 135,360.00	\$ -	\$ 606,972.08
Other	76	\$ 1,432.00				\$ -	\$ 1,432.00
Travel Trailer	9	\$ 30,622.52		\$ 19,238.61		\$ -	\$ 11,383.91
Noble	46	\$ 226,795.91	\$ 2,468.77	\$ 29,371.22		\$ -	\$ 197,002.94
House/Duplex	33	\$ 219,010.04		\$ 27,837.14		\$ -	\$ 191,172.90

County/Residence Type	Count of Damaged Residence Type	Sum of Total FEMA Verified Loss	Sum of Insurance Settlement	Sum of Repair Assistance Amount	Sum of Replacement Assistance Amount	Sum of SBA Received Amount	Sum of Unmet Need
Mobile Home	7	\$ 7,785.87	\$ 2,468.77	\$ 1,534.08		\$ -	\$ 5,830.04
Other	6	\$ -				\$ -	\$ -
Nowata	102	\$ 218,246.15		\$ 112,483.60		\$ -	\$ 112,639.90
Condo	1	\$ 743.46				\$ -	\$ 743.46
House/Duplex	79	\$ 201,355.03		\$ 92,646.42		\$ -	\$ 108,708.61
Mobile Home	9	\$ 15,585.43		\$ 19,837.18		\$ -	\$ 2,625.60
Other	11	\$ -				\$ -	\$ -
Travel Trailer	2	\$ 562.23				\$ -	\$ 562.23
Okmulgee	112	\$ 75,243.25	\$ 7,867.81	\$ 43,231.73		\$ -	\$ 31,510.69
Apartment	1	\$ 437.55				\$ -	\$ 437.55
House/Duplex	88	\$ 58,731.21	\$ 3,917.81	\$ 31,988.83		\$ -	\$ 26,570.87
Mobile Home	20	\$ 16,074.49	\$ 3,950.00	\$ 11,242.90		\$ -	\$ 4,502.27
Other	3	\$ -				\$ -	\$ -
Osage	280	\$ 1,280,287.27	\$ 279,949.91	\$ 743,162.55		\$ -	\$ 431,313.11
Apartment	1	\$ 639.91				\$ -	\$ 639.91
House/Duplex	196	\$ 982,663.35	\$ 279,949.91	\$ 555,489.09		\$ -	\$ 321,362.65
Mobile Home	59	\$ 274,293.24		\$ 175,510.66		\$ -	\$ 98,782.58
Other	15	\$ -				\$ -	\$ -
Travel Trailer	9	\$ 22,690.77		\$ 12,162.80		\$ -	\$ 10,527.97
Ottawa	197	\$ 637,978.67	\$ 343,284.48	\$ 128,603.19		\$ -	\$ 448,060.26
Apartment	11	\$ 31,244.59				\$ -	\$ 31,244.59
House/Duplex	132	\$ 455,565.62	\$ 342,401.25	\$ 81,218.34		\$ -	\$ 313,426.93
Mobile Home	21	\$136,562.48	\$ 883.23	\$ 47,384.85		\$ -	\$ 88,782.76
Other	26	\$ -				\$ -	\$ -
Townhouse	1	\$ -				\$ -	\$ -
Travel Trailer	6	\$ 14,605.98				\$ -	\$14,605.98
Pawnee	63	\$ 168,633.05		\$ 75,715.46		\$ -	\$ 92,917.59
House/Duplex	36	\$ 83,578.26		\$ 39,721.11		\$ -	\$ 43,857.15
Mobile Home	21	\$ 85,054.79		\$ 35,994.35		\$ -	\$ 49,060.44
Other	4	\$ -				\$ -	\$ -
Travel Trailer	2	\$ -				\$ -	\$ -
Payne	153	\$ 203,801.84	\$ 139,164.83	\$ 83,069.87		\$ -	\$ 89,774.19
Apartment	6	\$ -	-			\$ -	\$ -
House/Duplex	118	\$ 188,556.97	\$ 139,164.83	\$ 81,106.49		\$ -	\$ 76,492.70
Mobile Home	14	\$ 15,244.87		\$ 1,963.38		\$ -	\$ 13,281.49
Other	14	\$ -				\$ -	\$ -
Travel Trailer	1	\$ -				\$ -	\$ -

County/Residence Type			Sum of Insurance Settlement	Sum of Repair Assistance Amount	Sum of Replacement Assistance Amount	Sum of SBA Received Amount	Sum of Unmet Need	
Pottawatomie	65	\$ 20,378.87	\$ 30,452.29	\$ 10,609.25		\$ -	\$ 12,167.62	
Apartment	1	\$ -				\$ -	\$ -	
House/Duplex	33	\$ 7,500.35	\$ 14,065.40	\$ 1,650.07		\$ -	\$ 4,997.28	
Mobile Home	24	\$ 12,878.52	\$ 16,386.89	\$ 8,959.18		\$ -	\$ 7,170.34	
Other	7	\$ -				\$ -	\$ -	
Rogers	234	\$ 1,187,924.60	\$ 154,949.49	\$ 471,171.51	\$ 34,900.00	\$ -	\$ 618,437.48	
House/Duplex	159	\$ 928,260.49	\$ 24,184.49	\$ 348,824.02	\$ 34,900.00	\$ -	\$ 523,521.90	
Mobile Home	51	\$ 252,316.10	\$ 130,765.00	\$ 122,347.49		\$ -	\$ 87,567.57	
Other	22	\$ -				\$ -	\$ -	
Travel Trailer	2	\$ 7,348.01				\$ -	\$ 7,348.01	
Sequoyah	132	\$ 996,457.99		\$ 545,044.08		\$ -	\$ 451,413.91	
Apartment	24	\$ 87,742.27				\$ -	\$ 87,742.27	
House/Duplex	62	\$ 721,208.32		\$ 492,759.77		\$ -	\$ 228,448.55	
Mobile Home	22	\$ 172,935.04		\$ 42,616.81		\$ -	\$ 130,318.23	
Other	22	\$ 14,508.40		\$ 9,667.50		\$ -	\$ 4,840.90	
Travel Trailer	2	\$ 63.96				\$ -	\$ 63.96	
Tulsa	1301	\$ 7,589,365.31	\$ 3,562,873.32	\$ 3,151,808.04		\$ -	\$ 3,741,107.88	
Apartment	59	\$ 4,509.96				\$ -	\$ 4,509.96	
Condo	3	\$ 2,541.63				\$ -	\$ 2,541.63	
House/Duplex	968	\$ 6,519,501.96	\$ 3,442,260.43	\$ 2,711,416.96		\$ -	\$ 3,162,594.36	
Mobile Home	146	\$ 1,023,136.71	\$ 120,612.89	\$ 420,901.11		\$ -	\$ 551,276.85	
Other	103	\$ 2,933.35				\$ -	\$ 2,933.35	
Townhouse	5	\$ -				\$ -	\$ -	
Travel Trailer	17	\$ 36,741.70		\$ 19,489.97		\$ -	\$ 17,251.73	
Wagoner	227	\$ 1,547,025.19	\$ 848,761.71	\$ 592,936.83	\$ 33,840.00	\$ -	\$ 792,499.22	
House/Duplex	156	\$ 1,111,213.94	\$ 674,885.71	\$ 413,454.43		\$ -	\$ 624,394.14	
Mobile Home	54	\$ 424,960.12	\$ 173,876.00	\$ 177,137.02	\$ 33,840.00	\$ -	\$ 159,599.33	
Other	10	\$ -				\$ -	\$ -	
Townhouse	1	\$ -				\$ -	\$ -	
Travel Trailer	6	\$ 10,851.13		\$ 2,345.38		\$ -	\$ 8,505.75	
Washington	136	\$ 703,957.23	\$ 419,732.09	\$ 118,163.26		\$ -	\$ 417,565.87	
Apartment	1	\$ 2,348.39				\$ -	\$ 2,348.39	
House/Duplex	102	\$ 639,469.83	\$ 408,259.09	\$ 99,731.79		\$ -	\$ 382,982.94	
Mobile Home	20	\$ 59,510.55	\$ 11,473.00	\$ 18,431.47		\$ -	\$ 29,606.08	
Other	9	\$ 894.08				\$ -	\$ 894.08	
Travel Trailer	4	\$ 1,734.38				\$ -	\$ 1,734.38	

County/Residence Type	Count of Damaged Residence Type	Sum of Total FEMA Verified Loss	Sum of Insurance Settlement	Sum of Repair Assistance Amount	Sum of Replacement Assistance Amount	Sum of SBA Received Amount	Sum of Unmet Need
Woods	41	\$ 44,009.09		\$ 31,404.40		\$ -	\$ 15,459.73
House/Duplex	39	\$ 44,009.09		\$ 31,404.40		\$ -	\$ 15,459.73
Other	2	\$ -				\$ -	\$ -
Apartment Count	142	\$ 142.00				\$ 142.00	\$ 142.00
Condo Count	5	\$ 5.00				\$ 5.00	\$ 5.00
House/Duplex Count	3672	\$ 3,672.00	\$ 127.00	\$ 844.00	\$ 7.00	\$ 3,672.00	\$ 3,672.00
Mobile Home Count	950	\$ 950.00	\$ 25.00	\$ 249.00	\$ 17.00	\$ 950.00	\$ 950.00
Other Count	469	\$ 469.00		\$ 1.00		\$ 469.00	\$ 469.00
Townhouse Count Travel Trailer	12	\$ 12.00				\$ 12.00	\$ 12.00
Count	94	\$ 94.00		\$ 14.00	\$ 1.00	\$ 94.00	\$ 94.00
Grand Total		\$ 25,952,612.58	\$ 7,869,564.72	\$ 10,102,263.91	\$ 794,788.57	\$ -	\$ 13,313,001.58

Table 19: County structure damage, Verified loss, and unmet needs

Note: FEMA does not report loss to apartments.

The Voluntary Buyout Program

The 100-year floodplain is a hostile place to live. Long periods between major flooding events lead many people to underestimate the risk of living in a flood- prone area. Some people incorrectly assume that nothing bad will happen there at all ("I have lived here thirty years and never once saw a flood; no reason to start worrying about one now"). And then quite suddenly, that can change when the flood waters rise and destroy residential and commercial structures, resulting in millions of dollars in damage and years of repairs. Public infrastructure is commonly damaged as well, from roads and bridges to potable water and sewer systems. Those who do not escape in time can find themselves homeless or swept away in the flood waters.

Due to the danger of the 100-year floodplain, the Oklahoma Department of Commerce Community Development division (ODOC/CD) set out to design a Voluntary Buyout Program (VBP) that could mitigate against future loss of life and property. The VBP offers eligible households the opportunity to relocate to a safer location. Owners of many types of real property are eligible to receive a buyout in the Voluntary Buyout Program. ODOC has also expanded the possible buyout target area with a newly created Disaster Risk Reduction Area (DRRA).

NATIONAL OBJECTIVE REQUIREMENTS

The primary focus of CDBG-DR funding is to help communities recover from disasters. For communities to be eligible for funding, the U.S. Department of Housing and Urban Development (HUD) requires that <u>every</u> CDBG-DR funded activity meet a national objective. Eligible Subrecipients are required to explain which National Objectives will be met in their Project Narrative. ODOC will only consider the following National Objectives for the VBP:

- 1. Low-to-Moderate Income (direct benefit): If the household to be assisted is Low-to-Moderate Income; or
- 2. Urgent Need (direct benefit): If the activity addresses the serious threat to community welfare following the disaster and the household assisted is above 80% AMI. Urgent Need should be used to inform the Disaster Risk Reduction Area (DRRA). Urgent need requires preapproval by ODOC.

Additional information about National Objectives in the Voluntary Buyout Program:

Low-to- Moderate	LMI Household receives buyout and participation incentive. It is not required that the sub-recipient confirms
Buyout (LMB)	that the household finds replacement housing.
Bayout (EMB)	Urgent Need Household receives buyout and participation
Urgent Need	incentive It is not required that the sub-recipient confirms
(UN)	that the household finds replacement housing.
	LMI Household may receive buyout, participation
Low-Moderate	incentive and housing incentive. Sub-recipient must
Housing	confirm that the household has acquired replacement
Incentive (LMHI)	housing.
	Buyouts result in a benefit to primarily residential areas
	that are 51% LMI after the buyouts are complete. Requires
	a clear post buyout service/benefit area that would remain
Low-Mod Area	LMI regardless of who participates in the buyout. Requires
(LMA)	enough participation to demonstrate a benefit.

Table 20: Voluntary Buyout, National Objectives

ELIGIBLE BENEFICIARIES

Potential beneficiaries are property owners who can apply to the VBP through a Subrecipient. Subrecipients need to have a plan to document the eligibility of all criteria for the property and the beneficiary.

All the following property and property owner conditions must be met to qualify for the VBP:

- 1. The property must be in one of the 27 eligible counties. The eligible counties are described in Federal Register Notice 85 FR 4681.
- 2. The property must be located within either the 100-year floodplain or floodway per the most current Federal Emergency Management Agency (FEMA) flood maps. The property can also be in the Disaster Risk Reduction Area (DRRA), as defined later in

this document and in the State's Voluntary Buyout Program Guidelines.

- 3. The beneficiary must either be:
 - i. Low-to-Moderate income household as defined in the State's 2019 CDBG-DR Action Plan; or
 - ii. A non-LMI property owner. Non-LMI property owners may participate but are only eligible to receive the participation incentive and Fair Market value of their home.
- 4. The property owner(s) must demonstrate a clear title of the housing structure and property. Failure to provide this information will result in VBP ineligibility.
 - i. Note: Subrecipients are responsible for establishing property and property eligibility, including confirming the title of the subject property is clear. Subrecipients may wish to procure these services from a local title company that can perform title searches and produce a title commitment letter after the property owner applies to the VBP. Subrecipients may also propose to assist in clearing titles as a part of the local program if a need has been established.

The following conditions are required depending on the type of property:

- 1) **Manufactured Homes:** Oklahoma law allows a manufactured home to be classified as real or personal property. If the MHU is located on land owned by someone else, it is classified as personal property [68 O.S. § 2105] [OAC 710:60-3-132].
 - i) MHUs are considered real property in the state of Oklahoma if the MHU owner owns the land on which the unit is located [68 O.S. § 2105] [OAC 710:60-3-132], the MHU meets the state standard for real property and is assessed as real property by the county.
 - ii) MHU owners must provide documented proof that the manufactured home has been included in the property assessment. The proof required is a deed listing the manufactured home by VIN, year, make, and model [68 O.S. § 2105] [OAC 710:60-3-132].

- iii) Manufactured Homes (MHU) are eligible to receive a buyout award and incentives under the buyout program if the MHU is classified as real property
- iv) If an individual owns a MHU but does not own the land beneath their MHU and the owner of the land does not want to participate in the program, the MHU owner cannot receive a buyout or incentives since CDBG-DR cannot be used to purchase personal property. However, the actual, reasonable costs associated with moving the MHU and its contents may be eligible to be paid under the Uniform Relocation Act.
- v) If the owner of a Manufactured Home Park (also known as a Mobile Home Park) chooses to participate in Voluntary Buyout Program, all MHU owners in the park will be eligible for relocation assistance under the URA, including the actual reasonable costs associated with moving the MHU and its contents.
- 2) Property that was used for housing at the time of the disaster, as indicated by a housing structure located on the property at the time of the disaster, is eligible. Homes that are uninhabitable or were demolished after the disaster but still legally owned by the beneficiary, will qualify.
- 3) Properties that were vacant land before the disaster are eligible for a participation incentive and buyout award based on FMV but will not be eligible for the housing incentives regardless of income.
- 4) Secondary homes in the 100-year floodplain or the Disaster Risk Reduction Area are eligible to participate in the Voluntary Buyout Program. However, property owners are only eligible to receive the Fair Market Value of the property and the participation incentive, but not the housing incentive.
- 5) Property owners of rentals are eligible to participate under the Urgent Need National Objective on a limited basis. Property owners are limited to the participation incentive and the FMV of the housing structure. Tenants will be provided relocation assistance through the Uniform Relocation Act (URA) and will meet with HUD-Certified Housing Counselors.

THE EVOLUTION OF THE VBP IN THE 2019 CDBG-DR ACTION PLAN

The VBP offers financial incentives (a "buyout award") that will assist participants to find safer housing outside of the 100-year floodplain and the Disaster Risk Reduction Area (DRRA). The key difference between the initial Action Plan and all subsequent Substantial Amendments is that the State has

made the decision to prohibit the use of CDBG-DR funds for rehabilitation or reconstruction in the 100-year floodplain. This means that rehabilitation, reconstruction, and new construction are prohibited activities in the 100-year floodplain through Oklahoma's 2019 CDBG-DR program. The following sections describe each iteration of the Action Plan, and eligible activities in the 100-year floodplain.

Initial Action Plan

This Plan permitted elevation in the 100-year floodplain. On page 73 of the Plan, the following is stated:

Nonresidential structures must be elevated, or floodproofed to two feet above the BFE. Critical Actions, as defined in 24 CFR Part 55.2(b)(3), within the 500-year floodplain must be elevated or floodproofed to the higher of the 500-year floodplain elevation or three feet above the 100-year floodplain elevation. If the 500-year floodplain or elevation is unavailable, and the Critical Action is in the 100-year floodplain, then the structure must be elevated, or floodproofed at least three feet above the 100-year floodplain elevation.

Action Plan Substantial Amendment 1

This Plan prohibited rehabilitation (including elevation) in the 100-year floodplain. On page 122 of the Plan, the following is stated:

All structures, as defined under 44 CFR 59.1, designed principally for residential use, and located in the 100-year (or 1 percent annual chance) floodplain, are ineligible for rehabilitation, elevation, or repair.

This decision by ODOC was reached after significant research into the implications of allowing continued residential land uses in the 100-year floodplain with CDBG-DR funds.

At the time of development of the Substantial Amendment 1, only the Town of Moffett, Oklahoma, was a potential applicant for the program. Many of the homes in Moffett are beyond repair and have been abandoned. There are approximately a dozen people who continue to live in Moffett. The following three photographs were taken by ODOC on April 1, 2021.



Figure 5: Moffett, Oklahoma - Abandoned home

A home in Moffett that was destroyed by flood waters.



Figure 6: Moffett, OK - Abandoned home

Many homes were abandoned.



Figure 7: Moffett, OK - aerial

Facing SE towards Arkansas. In the background, the Arkansas River.

The structure of the Voluntary Buyout Program in Substantial Amendment 1 allowed for a buyout award of up to \$110,000. This amount was based on the median home value in the Fort Smith, Arkansas, Moffett, Oklahoma statistical area at the time of publication (August 2021).

After engaging other communities that were impacted by the disaster, it became apparent that Tulsa County could apply for the VBP if the program were re-designed to make it more effective in that county. ODOC remains committed to helping the Town of Moffett, Oklahoma. Eligible applicants are encouraged to apply if there is funding available.

Action Plan Substantial Amendment 2

The State's Action Plan Substantial Amendment 2 retains the prohibition of rehabilitation in the 100-year floodplain. ODOC remains committed to ensuring that life and safety are prioritized in its programming.

Rehabilitation, reconstruction, or new construction in the floodplain is contrary to those goals.

The Voluntary Buyout Program in Substantial Amendment 2 changed significantly compared to Substantial Amendment 1. These changes occurred due to numerous discussions with Tulsa County and Meshek & Associates on what would make the program feasible in Tulsa County. Some of the more significant changes are described below:

1. Vacant Lots are Eligible

Homeowners who were impacted by flooding, and who have subsequently demolished their homes, are now eligible to participate in the VBP. Property that was used for housing at the time of the disaster, as indicated by a housing structure located on the property at the time of the disaster, is eligible. Homes that are uninhabitable or were demolished after the disaster but still legally owned by the beneficiary will qualify. Properties that were vacant land before the disaster are eligible for a participation incentive and buyout award based on FMV but will not be eligible for the housing incentives regardless of income.

2. Property Owners of Rentals are Eligible

Property owners of rentals are now eligible under the Urgent Need National Objective on a limited basis. Property owners are limited to the participation incentive and the FMV of the housing structure. Tenants will be provided relocation assistance through the Uniform Relocation Act (URA) and will meet with HUD-Certified Housing Counselors.

3. Manufactured or Mobile Home Units are Eligible

Manufactured or Mobile Home Units (MHU) are eligible. Owners of MHU are eligible to receive a buyout award and incentives under the VBP if the MHU is considered real property and is assessed as real property by the county. MHUs are considered real property in the state of Oklahoma if the MHU owner also owns the land on which the unit is located [68 O.S. § 2105] [OAC 710:60-3-132]. MHU owners must provide documented proof that the manufactured home has been included in the property assessment. The proof required is a deed listing the manufactured home by VIN, year, make, and model [68 O.S. § 2105] [OAC 710:60-3-132]. MHUs that meet the state standard for real property are eligible to be purchased at the FMV, and the owners will be eligible for additional incentives.

 If an individual that owns a MHU but does not own the land beneath their MHU, the MHU is considered personal property in accordance with State Law [68 O.S. § 2105] [OAC 710:60-3-132]. If the owner of the land does not want to participate in the program, the MHU owner cannot receive a buyout or incentives since CDBG-DR cannot be used to purchase personal property. If the manufactured home is considered personal property, the actual, reasonable costs associated with moving it and its contents are eligible to be paid.

4. Owners of Manufactured or Mobile Home Parks

Owners of Manufactured or Mobile Home Parks may participate in the buyout program in the same manner that property owners of rental units may apply. These individuals, who are unlikely to be Low-to-Moderate Income (LMI), will be eligible under the Urgent Need National Objective. MHU owners in the park (tenants) will be eligible for relocation assistance under the URA, including the actual reasonable costs associated with moving the MHU and its contents.

Action Plan Proposed Non-Substantial Amendment #3

Non-Substantial Amendment #3 reallocates \$2 million from Public Infrastructure to the Voluntary Buyout Program to address the continued unmet housing need.

Incentives and Awards by Property Type

Item	Notes
Single-family residential	Eligible for VBP and all incentives.
Multi-family residential	Eligible for VBP and all incentives.
	Eligible for VBP and all incentives if the MHU is considered real property and is assessed as real property by the county.
Mobile or Manufactured Housing Units	If the MHU owner does not own the land, the MHU owner would be treated as a tenant and would be eligible for relocation assistance if the landlord participates in the VBP.

Vacant land (pre-disaster)	Eligible for VBP; ineligible for incentives except for the incentive to participate.
Property with owed back taxes	Eligible for VBP and all incentives. Property taxes must be paid. A payment plan may be possible. Liens can be resolved at closing.
Tie back to DR-4438	Flooding disaster impact will be determined at the Voluntary Buyout Target Area (VBTA) and the Disaster Risk Reduction Area (DRRA). Individual housing structures do not need to have a direct impact of DR-4438 to qualify for the VBP.
Someone who purchased the property after DR-4438	Eligible for VBP and all incentives. Note: Incentives shall not exceed the purchase price of the vacant lot.
Second homes	Eligible for VBP; ineligible for incentives except for the incentive to participate.

Table 21: VBP Incentives

Incentives by Beneficiary Type

For specific details, please refer to the 2019 CDBG-DR Voluntary Buyout Program Guidelines published on the website: https://www.okcommerce.gov/reportingcompliance/cdbg-disaster-recovery-2019-2/

Property owners who opt to participate in the Voluntary Buyout Program may be eligible for a participation incentive, the Fair Market Value of their property, and the Housing Incentive. All beneficiaries who participate in the Voluntary Buyout Program are required to meet with a HUD-Certified Housing Counselor to receive program benefits, regardless of income level, property type, or incentive received. These agents or counselors will be obtained by the subrecipient and will help beneficiaries navigate the buyout program and relocation where applicable.

All property owners are eligible to receive the participation incentive and the Fair Market Value of the property. Only Low- and Moderate-Income persons who receive a buyout are eligible for Housing Incentives.

Incentive to Participate	All beneficiaries are eligible.
Fair Market Value (FMV) of Property	All beneficiaries are eligible.

Housing Incentives Homeownership Assistance Rental Assistance

Only available to LMI persons who also receive a buyout.

Table 22: VBP Beneficiary Incentives

Incentive to Participate:

A one-time incentive to participate is an allowable expense that subrecipients may offer to all participants and cannot exceed \$5,000 per parcel. This may be an allowable expense for all individuals that participate in the VBP regardless of income.

All beneficiaries participating in the VBP will meet with a HUD-Certified housing counselor who will assist beneficiaries with the buyout program.

Property Valuation and Purchase Price

The State will determine whether pre or post disaster Fair Market Value (FMV) will be used and will publish this information in Voluntary Buyout Program Guidelines.

The FMV is determined through a market appraisal or through a waiver valuation, in accordance with the process defined in the Voluntary Program Buyout guidelines posted on ODOC's website.

All beneficiaries participating in the VBP will meet with a HUD-Certified Housing Counselor who will assist beneficiaries with the buyout program.

Housing Incentives (if applicable)

VBP provides two options to support beneficiaries to establish housing in areas of reduced risk; one for beneficiaries who will purchase homes, and one for beneficiaries who will rent. In some very specific household situations, it may be appropriate that the property owner participating in the buyout cannot maintain the long-term cost of owning a home and for their personal situation, renting is the most viable option.

All beneficiaries participating in the VBP will meet with a HUD-Certified Housing Counselor who will assist beneficiaries with the buyout program. The HUD-Certified housing counselor will provide housing counseling that ensures beneficiaries understand available housing opportunities, current housing costs, and financial requirements to purchase and maintain a home. The HUD-Certified housing counselor will analyze the household's finances and help determine how much the beneficiary can afford to spend on a home based on the beneficiary's current income. HUD-Certified housing counselors will determine the beneficiary contribution to the cost of a new

home, whether to own or rent, for the purposes of the incentive calculation. Beneficiaries will decide if they would rather rent or own a new home.

Homeownership Incentive:

The Homeownership Incentive will fill the gap between what a beneficiary can sustainably finance for replacement comparable housing and the currently available housing on the open market. Beneficiaries will be required to either fund or finance the remaining cost of the purchase. In some cases, beneficiaries may be unable to finance or fund any amount, in which case the actual award would equal the actual purchase price of a new home. The beneficiary contribution will be determined by the housing counselor, based on the beneficiary's current income. The maximum incentive will be determined using the median value of homes in the location of the replacement home. Subrecipients should provide beneficiaries a letter of intent certifying that they will receive an "up to" award amount.

Maximum Incentive = Median Home Value of MSA or County – Beneficiary Contribution (which may be \$0)

Actual Incentive = Actual Purchase Price – Beneficiary Contribution (which may be \$0)

For example, a program participant is paid \$115,000 for their buyout. Based on an evaluation of their financial ability, their housing counselor determines their Beneficiary Contribution is \$150,000. The selected relocation property, which is outside of the floodplain or DRRA, and is in the Tulsa, Oklahoma MSA costs \$225,000. The median home value in the Tulsa MSA is \$325,000. Because the actual purchase price is lower than the median home value for the MSA, the beneficiary will be within the maximum allowable incentive. The following calculation is used for the housing incentive:

\$225,000 - \$150,000 = \$75,000 Actual Incentive

Assistance must be escrowed for the closing sale of the new home and shall not be a direct payment to the beneficiary.

Additional formulas to determine financial capacity are outlined in the State's Voluntary Buyout Program Guidelines.

Rental Assistance Incentive:

Note: Existing tenants displaced through a voluntary buyout are assisted under URA rules and requirements. The Rental Assistance incentive is for owners who receive a buyout and then become renters of a new residence.

If a VBP beneficiary is eligible to receive rental assistance, the beneficiary may receive rental payments, paid directly to the landlord, for up to 12 months in an affordable housing unit. Subrecipients should check with the current year HUD fair market rent values for the specified area when formalizing rental payments. All beneficiaries participating in the VBP will meet with a HUD-certified Housing Counselor who will assist beneficiaries with the buyout program.

Disaster Risk Reduction Area

The Disaster Risk Reduction Area is the area that the subrecipient has found is necessary for the health and safety of residents to be offered a buyout option but is currently outside the 100-year floodplain. A Disaster Risk Reduction Area (DRRA) must adhere to the following criteria to be used for buyout programs:

- 1. The hazard must have been caused or exacerbated by the presidentially declared disaster for which the grantee is receiving its CDBG-DR allocation.
- 2. The hazard must be a predictable environmental threat to the safety and wellbeing of program beneficiaries using the latest data and science such as FEMA repetitive flood loss data
- 3. The Disaster Risk Reduction Area must be delineated so that HUD and the public know exactly which properties are located within the designated area.

The eligible Disaster Risk Reduction Areas are described and identified in the State's Voluntary Buyout Program Guidelines. In their application to ODOC, eligible subrecipients must show due diligence with the three criteria and justify in their Project Narrative that it is prudent to include a Disaster Risk Reduction Area and offer buyouts to homes that are not in the 100-year floodplain. Justification may include:

If these homes were damaged during the DR-4438 disaster If their property was encroached during that disaster If adjacent properties were impacted and inclusion will minimize checkerboard buyout patterns To allows for greater citizen participation and supports overall risk reduction in targeted areas, consistent with prior impacts and projected risks

RATIONALE BEHIND THE PROHIBITION OF REHABILITATION AND RECONSTRUCTION IN THE 100-YEAR FLOODPLAIN

Reason Number 1: Communities in the 100-year floodplain will flood again. Floods may result in the loss of life and property. For ODOC, these are unacceptable risks. Homes will not be replaced one-for-one under the Section 104(d) waiver.

Reason Number 2: Prohibiting continued development in the 100-year floodplain leads to better land use over time. The 100-year floodplain should remain greenspace, flood management areas, parks, etc., into perpetuity.

Reason Number 3: Significant elevation is required in most cases.

Reason Number 4: Residents residing in the floodplain are required to maintain flood insurance or risk becoming ineligible for federal assistance (either from FEMA or CDBG-DR) in a future flood event. Flood insurance premiums are becoming more expensive over time and as more communities in the U.S. flood. The cost of flood insurance represents an unnecessary financial burden on households when homes outside of the floodplain are readily available.

Reason Number 5: Using taxpayer dollars for development in a floodplain is not a wise investment. Elevating structures two feet above the BFE is no quarantee that there will not be future property damage or loss of life.

BENEFICIARY PRIORITIZATION

Within the Voluntary Buyout Target Areas, as described in these guidelines, the following priorities should be used in scoring applications submitted by Eligible Beneficiaries. Once subrecipients receive funds to implement the VBP, beneficiaries should be prioritized in the following order:

1. Owner-occupied Low- to Moderate- Income households who own and occupy their home.

- Low-to-Moderate Income households who own unoccupied, uninhabitable, or demolished homes (post-disaster vacant land). Households residing in temporary or transitional housing or who are considered homeless can participate.
- 3. Owners of occupied rental units who qualify under the Urgent Need National Objective
- 4. Households who own and occupy their home and qualify under the Urgent Need National Objective
- 5. Households who own unoccupied, uninhabitable, or demolished homes (post-disaster vacant land) and qualify under the Urgent Need National Objective.
- 6. Pre-disaster vacant land.

BUYOUT AWARD AND INCENTIVES

Please refer to the 2019 CDBG-DR Voluntary Buyout Guidelines for more detailed information. The guidelines are available on the State's disaster recovery website.

THE EFFECT OF THE VOLUNTARY BUYOUT PROGRAM ON HOUSING AVAILABILITY

There are two factors tied directly to beneficiaries that determine whether the VBP is successful.

First, low-to-moderate income (LMI) beneficiaries must be encouraged to participate in the VBP with financial incentives that are attractive enough to relocate to safer areas. After all, if the award is too low then nobody would relocate out of harm's way because the financial incentives will not be sufficient to acquire safer housing. On the other hand, the financial incentives cannot be so great that they are considered a windfall.

Second, relocation success out of the 100-year floodplain can only be achieved if participants can secure housing after they receive their buyout award. It does no participant any good if they receive a buyout award but there is nowhere to move to. To be successful in the first factor (receiving an

appropriate buyout award) and unsuccessful in the second factor (not being able to find housing after the fact) is not the definition of a successful VBP.

ODOC/CD takes this concern seriously and therefore has carefully evaluated what effect housing availability has on the Voluntary Buyout Program. As shown in the housing availability analysis below, Tulsa County has adequate housing available for sale and rent. Although the VBP cannot guarantee that every person will immediately find housing outside the 100-year floodplain, ODOC has identified numerous resources available that will mitigate this concern.

Data Overview

ODOC/CD researched to determine if prior VBP conducted elsewhere in the United States created homelessness. This proved inconclusive since no information was found on HUD's website, in news stories, or academic journal databases.

Numerous community partners were engaged in discussion about housing availability and the VBP. ODOC/CD is thankful for the support and data from:

- Realtor.com
- Greater Tulsa Association of Realtors
- DeBruler, Inc.
- Housing Solutions Tulsa
- Oklahoma Housing Finance Agency
- Zillow.com

Current Housing Availability in Muskogee, Sequoyah, and Tulsa Counties Using Realtor.com data (https://www.realtor.com/research/data/), ODOC looked at housing inventory for all HUD-identified MID areas: Muskogee, Sequoyah, and Tulsa Counties. This data is presented on the following two pages. Metadata on field names, from the Realtor.com dataset, is provided below.

Median list price / Median days on market: This is the value right in the middle of the dataset.

Active listing count: The active listing count tracks the number of for-sale properties on the market, excluding pending listings where a pending status

is available. This is a snapshot measure of how many active listings can be expected on any given day of the specified month.

New listing count: The count of new listings added to the market within the specified geography. The new listing count represents a typical week's worth of new listings in each month. The new listing count can be multiplied by the number of weeks in a month to produce a monthly new listing count.

Monthly Housing Inventory (July 2016-May 2022) in Muskogee, Sequoyah, and Tulsa Counties

Data source: Realtor.com https://www.realtor.com/research/data/

MM-YR	Muskogee - Median list price	Sequoyah - Median list price	Tulsa - Median list price	Muskogee - Active listing count	Sequoyah - Active listing count	Tulsa - Active listing count	Muskogee - Median days on market	Sequoyah - Median days on market	Tulsa - Median days on market	Muskogee - New listing count	Sequoyah - New listing count	Tulsa - New listing count
5/1/2022	\$187,450.00	\$212,500.00	\$325,000.00	88	77	744	40	54	34	72	40	1044
4/1/2022	\$172,000.00	\$225,000.00	\$335,951.00	70	74	573	38	43	32	68	28	1136
3/1/2022	\$146,250.00	\$204,950.00	\$304,000.00	63	83	514	52	40	40	64	52	972
2/1/2022	\$132,450.00	\$228,500.00	\$304,266.00	66	70	547	67	73	43	56	32	812
1/1/2022	\$116,999.00	\$199,900.00	\$303,805.00	78	77	607	66	77	51	48	16	820
12/1/2021	\$119,900.00	\$207,000.00	\$279,950.00	93	89	753	59	76	50	52	28	696
11/1/2021	\$119,900.00	\$214,950.00	\$277,900.00	97	97	884	57	67	46	52	32	888
10/1/2021	\$122,400.00	\$199,500.00	\$289,000.00	114	98	1003	47	55	45	60	32	1036
9/1/2021	\$121,950.00	\$197,500.00	\$286,569.00	107	95	1039	43	54	40	68	40	1036
8/1/2021	\$131,500.00	\$189,000.00	\$289,700.00	81	96	1065	46	45	38	72	52	1216
7/1/2021	\$137,000.00	\$207,450.00	\$282,000.00	75	96	982	43	38	39	64	56	1248
6/1/2021	\$129,550.00	\$187,450.00	\$274,225.00	64	73	887	49	42	38	80	40	1184
5/1/2021	\$90,000.00	\$184,000.00	\$315,500.00	57	61	777	46	51	39	64	24	1244
4/1/2021	\$135,000.00	\$179,500.00	\$299,999.00	64	73	792	51	52	45	52	32	1096
3/1/2021	\$112,200.00	\$183,950.00	\$322,500.00	65	85	727	50	69	49	56	48	1052
2/1/2021	\$140,000.00	\$185,000.00	\$292,000.00	75	86	842	55	90	65	56	20	700
1/1/2021	\$145,000.00	\$174,500.00	\$302,500.00	88	100	982	68	74	64	48	20	856
12/1/2020	\$140,750.00	\$170,750.00	\$298,250.00	96	108	1194	53	65	59	36	32	728
11/1/2020	\$148,450.00	\$193,500.00	\$291,900.00	106	108	1393	40	72	50	48	28	904
10/1/2020	\$145,000.00	\$185,000.00	\$294,900.00	90	111	1430	42	65	50	72	40	1100
9/1/2020	\$144,950.00	\$182,400.00	\$302,298.00	81	114	1424	46	84	51	56	28	1112
8/1/2020	\$142,000.00	\$165,000.00	\$309,000.00	83	128	1517	45	97	51	64	32	1140
7/1/2020	\$156,700.00	\$167,000.00	\$320,750.00	92	148	1594	42	82	52	56	32	1176
6/1/2020	\$147,500.00	\$165,000.00	\$311,700.00	97	156	1679	52	79	51	80	32	1156
5/1/2020	\$145,000.00	\$178,500.00	\$300,000.00	95	157	1819	65	76	53	56	40	1196
4/1/2020	\$149,999.00	\$181,200.00	\$299,200.00	112	163	1877	54	73	53	44	24	968
3/1/2020	\$139,950.00	\$171,200.00	\$294,000.00	115	164	1904	45	97	50	60	48	1040
2/1/2020	\$135,000.00	\$159,900.00	\$285,893.00	140	168	1911	76	113	62	72	36	1016
1/1/2020	\$141,063.00	\$164,825.00	\$275,000.00	128	173	2029	83	121	71	36	36	916
12/1/2019	\$132,250.00	\$158,450.00	\$278,450.00	158	187	2123	72	105	64	32	28	784
11/1/2019	\$135,000.00	\$159,000.00	\$275,000.00	170	196	2317	61	91	58	60	16	872
10/1/2019	\$135,403.00	\$159,500.00	\$274,950.00	171	207	2384	60	69	60	56	44	1016

9/1/2019	\$131,557.00	\$159,250.00	\$269,943.00	172	204	2358	57	73	57	72	32	1052
8/1/2019	\$127,857.00	\$165,214.00	\$269,943.00	196	204	2488	58	95	57	108	32	1172
7/1/2019	\$122,500.00	\$169,500.00	\$274,950.00	190	204	2575	66	93	57	72	36	1184
6/1/2019	\$122,500.00	\$169,000.00	\$271,439.00	192	209	2533	60	86	53	56	32	1240
5/1/2019	\$122,000.00	\$167,000.00	\$274,900.00	196	215	2478	49	77	51	80	40	1272
4/1/2019	\$127,329.00	\$165,000.00	\$263,800.00	185	211	2494	55	83	52	104	52	1360
3/1/2019	\$123,329.00	\$165,000.00	\$255,800.00	195	209	2541	56	107	53	96	44	1236
2/1/2019	\$119,950.00	\$165,000.00	\$242,971.00	201	224	2618	66	106	56	72	40	1156
1/1/2019	\$116,950.00	\$164,500.00	\$235,000.00	199	230	2682	70	110	70	60	44	1076
12/1/2018	\$118,500.00	\$159,900.00	\$235,000.00	195	242	2874	78	96	67	52	28	872
11/1/2018	\$119,900.00	\$157,450.00	\$239,260.00	216	251	2980	71	88	64	52	44	924
10/1/2018	\$119,450.00	\$149,000.00	\$234,450.00	227	250	3184	65	86	64	72	48	1052
9/1/2018	\$120,000.00	\$149,900.00	\$234,620.00	217	251	3301	58	92	60	84	60	1016
8/1/2018	\$117,450.00	\$155,000.00	\$233,000.00	205	249	3342	57	89	59	64	52	1264
7/1/2018	\$117,950.00	\$144,450.00	\$234,350.00	205	255	3330	57	86	58	80	40	1288
6/1/2018	\$115,000.00	\$149,900.00	\$235,000.00	201	259	3232	52	82	50	80	52	1340
5/1/2018	\$115,000.00	\$156,000.00	\$239,900.00	194	247	3039	58	84	46	84	56	1268
4/1/2018	\$119,750.00	\$160,000.00	\$245,000.00	186	240	2908	53	87	47	60	40	1284
3/1/2018	\$114,900.00	\$157,900.00	\$239,900.00	188	235	2880	46	89	50	68	52	1188
2/1/2018	\$114,950.00	\$159,750.00	\$229,350.00	184	243	2837	55	88	66	80	44	1088
1/1/2018	\$116,450.00	\$157,450.00	\$225,450.00	196	239	2930	75	92	71	72	56	920
12/1/2017	\$115,900.00	\$154,900.00	\$225,000.00	205	247	3092	81	95	65	48	44	728
11/1/2017	\$114,500.00	\$148,000.00	\$226,218.00	220	245	3311	69	92	62	36	40	996
10/1/2017	\$114,700.00	\$149,900.00	\$229,600.00	253	251	3339	67	96	61	72	32	1064
9/1/2017	\$117,900.00	\$149,000.00	\$232,500.00	254	251	3361	66	97	60	72	48	1040
8/1/2017	\$119,700.00	\$145,000.00	\$239,700.00	255	255	3389	61	93	58	72	44	1084
7/1/2017	\$115,000.00	\$149,000.00	\$239,900.00	264	265	3426	62	94	53	88	44	1244
6/1/2017	\$110,250.00	\$150,000.00	\$243,500.00	263	256	3231	60	96	53	96	52	1372
5/1/2017	\$115,000.00	\$150,000.00	\$239,950.00	247	253	3058	59	96	52	88	44	1332
4/1/2017	\$114,900.00	\$149,900.00	\$239,500.00	242	255	3012	58	93	50	76	48	1420
3/1/2017	\$114,900.00	\$150,000.00	\$231,250.00	237	246	2873	60	98	52	100	52	1392
2/1/2017	\$112,500.00	\$155,000.00	\$226,900.00	229	238	2803	69	104	61	72	40	1232
1/1/2017	\$110,000.00	\$157,500.00	\$219,450.00	229	233	2827	65	97	68	68	36	1084
12/1/2016	\$109,000.00	\$156,900.00	\$212,750.00	230	234	2911	71	99	67	72	32	668
11/1/2016	\$109,000.00	\$155,000.00	\$217,000.00	236	237	3039	65	90	61	68	28	952
10/1/2016	\$97,000.00	\$149,900.00	\$219,000.00	238	235	3156	66	81	58	80	52	1088
9/1/2016	\$94,750.00	\$145,000.00	\$225,400.00	234	229	3140	64	71	59	68	52	1100
8/1/2016	\$95,500.00	\$137,250.00	\$230,950.00	237	225	3090	64	64	60	76	48	1160
7/1/2016	\$94,900.00	\$135,000.00	\$229,524.00	237	222	3159	69	75	56	72	52	1256

Table 23: Monthly Housing Inventory (July 2016-May 2022) in Muskogee, Sequoyah, and Tulsa Counties

Using the data from Realtor.com, the following charts were created:

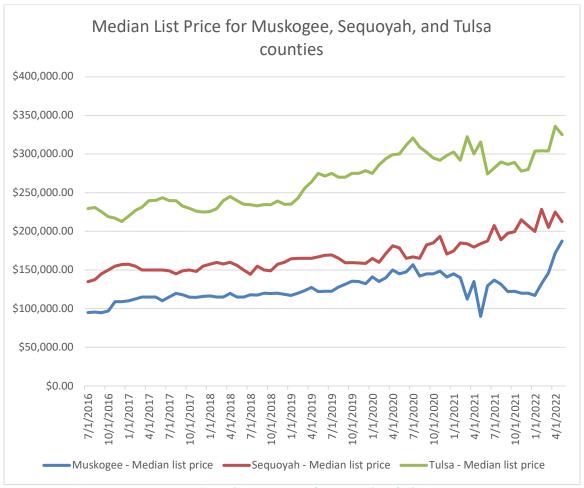


Figure 8: Median List Price for HUD Identified MID areas

As anticipated, more rural counties tend to have lower-cost housing.

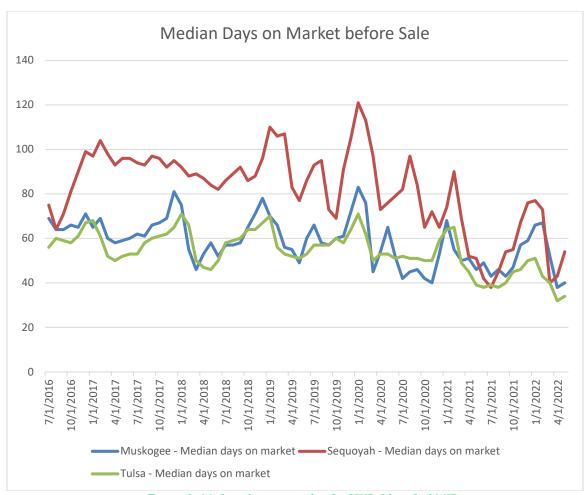


Figure 9: Median days on market for HUD Identified MID areas

For the past six years, the median number of days on market before a sale has exceeded twenty days for all three HUD-identified MID areas.

This is evidence to suggest that the housing market in Tulsa County is not as tight as in other areas of the country.

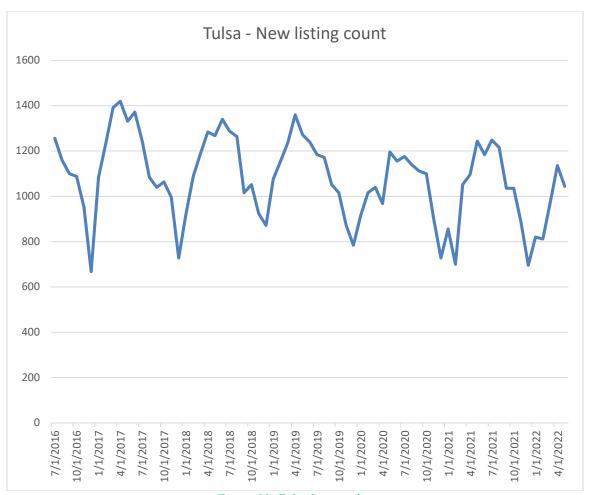


Figure 10: Tulsa housing listing count

As noted in the metadata from Realtor.com:

"The count of new listings added to the market within the specified geography. The new listing count represents a typical week's worth of new listings in each month. The new listing count can be multiplied by the number of weeks in a month to produce a monthly new listing count."

There are over 1,000 properties in any given period that are available for sale in Tulsa County. Since the 2019 CDBG-DR Voluntary Buyout Program is expected to help 30-60 households, there are plenty of homes within Tulsa County for sale (not to mention any other county in Oklahoma or a different state that someone could move to).

There does not exist a comprehensive database of rental listings. Where one listing could appear on Zillow it may not appear on any of the dozens of other apartment websites and phone apps that are available such as, but not limited to, the following:

- Apartment List (<u>website</u>)
- Apartments.com (<u>website</u>)
- Craigslist (<u>website</u>)
- Homesnap (<u>website</u>)
- HotPads (website)
- Padmapper (<u>website</u>)
- Rent.com (website)
- Trulia Rentals (<u>website</u>)
- Zumper (website)

ODOC did a cursory review of the rental properties available on just Zillow.com. As of June 23, 2022, there are over 300 rental properties in the City of Tulsa for under \$1500/month. There are 102 listings for under \$1000/month.

Affordable Housing under Construction

The Oklahoma Housing Finance Agency (OHFA) finances the construction and revitalization of affordable rental housing across the State of Oklahoma.

As of June 29, 2022, OHFA has several affordable housing developments under construction in Tulsa County totaling 390 units.

Under Construction	Number of Units	Estimated Completion
RIVER WEST PHASE I	74	August 2022
2100 S. Jackson Avenue		
Tulsa, OK 74107		
Tulsa County		
(918) 492-4833		
RIVER WEST PHASE II	72	December 2023
21st Nogales & Olympia Ave		
Tulsa, OK 74107		
Tulsa County		
(918) 492-4833		
RIVERBROOK	72	December 2022
APARTMENTS		
NW Of 5. Aspen And W.		

Shreveport Broken Arrow, OK 74011 Tulsa County		
THE VILLAGES -A PATH TO INDEPENDENCE 8535 N Memorial Dr Owosso, OK 74055 Tulsa County (918) 451-1491	62	Undetermined
TOWNSHIP21 SW Comer Of East 83rd St Owosso, OK 74055 Tulsa County	58	December 2023
Whitter Heights 68 North Lewis Tulsa, OK 74110 Tulsa County	52	December 2022

Table 24: Affordable housing under construction in Tulsa County

Resources for Homelessness

There are numerous resources available for the homeless in Tulsa County:

- The City of Tulsa <u>Website</u>
- Family Promise of Tulsa County Website
- Community Service Council Website
- Mental Health Association of Tulsa Website
- Oklahoma Department of Commerce ESG Website
- Housing Solutions Tulsa Website

CONCLUSION

The Oklahoma Department of Commerce has engaged 27 counties impacted by DR-4438 since January of 2020. ODOC staff has worked tirelessly with dozens of stakeholders as described in the State's Citizen Participation Plan.

Tulsa County is the only eligible applicant, with an extremely viable application, for the Voluntary Buyout Program. Despite over two years of trying to find other communities to participate in the VBP, no others have come forward. ODOC/CD has no reason to believe that any other community is interested in applying for the VBP at this time.

Tulsa County has identified 158 interested applicants for the VBP. The need for this program exceeds \$33,000,000. Since Oklahoma's 2019 CDBG-DR program restricts applicants to a maximum award amount of \$14,750,000 (Substantial Amendment 2) only 30-60 households will be able to participate in the program.

In any given month in Tulsa County, there are over 1000 homes for sale and over 300 available rentals.

No CDBG or CDBG-DR program is without risk. This includes Oklahoma's 2019 CDBG-DR Voluntary Buyout Program. Beneficiaries impacted by DR-4438 face a variety of different risks. Consider the following:

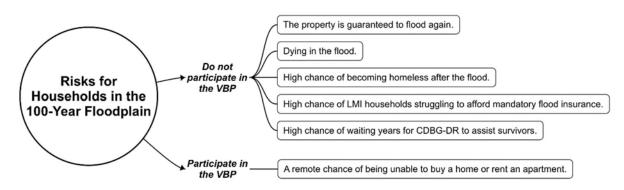


Figure 11: Risk for households in the 100-year floodplain

To continue living in the 100-year floodplain carries substantially more risk than voluntarily participating in the VBP.

There is no evidence ODOC found on the HUD website, in news stories, or in academic journals that demonstrated a Voluntary Buyout Program created homelessness. This does not mean it could never occur. But what it does suggest is that well-designed programs have successfully mitigated this risk. ODOC/CD will mitigate any potential risks associated with the program.

ODOC/CD has evaluated the housing availability in Tulsa County and has determined that there is no shortage of housing to buy or rent. ODOC remains committed to ensuring that all participants in the VBP find replacement housing. ODOC and Tulsa County will take the following steps to ensure program success:

All beneficiaries participating in the VBP will meet with a HUD-Certified Housing Counselor who will assist beneficiaries with the buyout program. HUD-Certified Housing Counselors will help participants of the VBP understand available housing opportunities, current housing costs, and the financial requirements to purchase and maintain a home. The Housing Counselors will analyze the household's finances and help determine the beneficiary's estimated contribution. In some cases, Housing Counselors may recommend that the beneficiary consider renting or may determine that the beneficiary's estimated contribution is \$0.

Housing and Bedroom Size

According to the 2014—2018 ACS 5-Year Data Profile, 24% of Oklahoma's population is under the age of 18 (Refer to Appendix for table data). This means that housing activities must consider family unit size when addressing unmet need.

HUD guidelines provide occupancy policies that allow for two persons per bedroom as reasonable. Exceptions to this standard are based on the following factors:

- A. No more than two persons are required to occupy a bedroom.
- B. Persons of different generations (i.e., grandparents, parents, children), persons of the opposite sex (other than spouses/couples), and unrelated adults are not required to share a bedroom (An adult is a person 18 years old or older).
- C. Couples living as spouses (whether or not legally married) must share the same bedroom for issuance size purposes.
- D. A live-in aide who is not a member of the family is not required to share a bedroom with another member of the household. Note: The need for a full-time live-in aide must be documented. A waiver may be approved as outlined in the section on Issuance Size Exceptions.
- E. Individual medical problems (e.g., chronic illness) sometimes require separate bedrooms for household members who would otherwise be required to share a bedroom. Documentation supporting the larger sized unit and related subsidy must be provided and verified as valid. A waiver may be approved as outlined in the section on Issuance Size Exceptions.

- F. In most instances, a bedroom is not provided for a family member who will be absent most of the time, such as a member who is away in the military. If individual circumstances warrant special consideration, a waiver may be approved as outlined in the section on Issuance Size Exceptions.
- G. When determining family issuance size, include all children expected to reside in the unit in the next year as members of the household. Examples include, but are not limited to, the following:
 - A. Adoption: Children who are in the process of being adopted are included as members of the household.
 - B. Pregnant women: Children expected to be born to pregnant women are included as members of the household.
 - C. Foster Children: Foster children residing in the unit along with families who are certified for foster care and are awaiting placement of children are included as members of the household. If children are anticipated to occupy the unit within a reasonable period of time, they must be considered when determining the issuance size.
 - D. Joint/Shared Custody Arrangements: In most instances children in joint/shared custody arrangements should occupy the unit at least 50% of the time. However, if individual circumstances merit special consideration, a waiver may be approved as outlined in the section on Issuance Size Exceptions. The custody arrangement may be verified by the divorce decree/legal documents or by self-certification.
- H. Custody of Children in Process: Children whose custody is in the process of being obtained by an adult household member may be included as members of the household. Evidence that there is a reasonable likelihood that the child will be awarded to the adult (i.e., within three months) must be provided for such child to be included.
- I. Children Temporarily Absent from Household:
 - A. Children temporarily absent from the home due to placement in foster care may be included as members of the household. Evidence that there is a reasonable likelihood that the child will return to the household (i.e., within three months) must be provided for such child to be included.
 - B. Children who are away at school but live with the family during school recesses are included as members of the household.

Conclusion of Housing Unmet Needs

Impacted Area	Data Source	Total Damage	Total Unmet Need
HUD MID	FEMA IA data	\$15,830,942.38	\$7,903,472.32
State MIDs	FEMA IA data	\$10,121,670.20	\$5,409,529.26
Total Unmet Housing Need		\$25,952,612.58	\$ 13,313,001.58

Table 25: Summary of HUD Identified MID housing needs

Homelessness, Transitional and Supportive Facilities, Units and Populations

To date, ODOC/CD has not received data supporting an unmet need for physical or structural homeless, transitional, and supportive facility repairs as a direct result of the FEMA DR 4438 identified disaster. No entity or Unit of General Local Government has identified a need for financial assistance to address an increase in homeless individuals or families or physical damage to homeless or transitional housing facilities for any of the events covered by the Federal Register Notice.

The State contacted 22 shelters in Survey I and Survey II. There were no responses received that indicated there are any unmet needs.

Should information relative to unmet need associated with alleviating the pressures of homelessness associated with the devastation caused by the storm become apparent, the State is committed to allocating any necessary resources from the next allocation of funding, consistent with all federal requirements and obligations. (The State of Oklahoma receives Emergency Shelter Grant Funding and Special Needs Grant funding to support homeless and transitional housing needs statewide.

For the State to be prepared for the unmet needs of the pre-disaster homeless and nearly homeless, the State has allocated higher scoring for projects that help this vulnerable population.

Public Facilities & Public Improvements Needs Assessment

Based on data compiled from the Oklahoma Emergency Management, State's needs assessment survey, public outreach, and FEMA reports, unmet infrastructure needs rank very high due to sustained significant damage to infrastructure because of the FEMA DR 4438 disaster.

The primary method by which unmet needs were assessed for infrastructure impacts from the disaster are through the FEMA PA data⁴. PA funds a portion of recovery work to public infrastructure, such as bridges, roads, and public buildings. PA applicants may be the State, a local municipality, or other entity. FEMA processes PA grant funding according to the type of work the applicant plans to undertake. Work must be required because of the declared disaster DR 4438, be in the designated area, be the legal responsibility of the applicant, and be undertaken at a reasonable cost.

Eligible work is classified into the following categories:

- Emergency Work:
 - Category A: Debris removal
 - o Category B: Emergency protective measures
- Permanent Work:
 - Category C: Roads and Bridges
 - Category D: Water control facilities
 - o Category E: Public Buildings and contents
 - Category F: Public Utilities
 - o Category G: Parks, recreational, and other facilities

The State suffered significant impacts which resulted in category A and B projects. However, due to the nature of such projects, funding already provided, and the time elapsed since the disaster, these no longer stand as an overlying priority. In total, 393 unique projects were identified across all impacted counties. The total approximate cost of the debris removal and emergency protective measures is \$12,231,671.12 across all DR 4438 eligible counties. The cost of FEMA PA projects is split between federal and nonfederal share, with the federal share contributing 75 percent of the cost and the non-federal share contributing 25 percent of the cost.

For assessing ongoing, long-term recovery needs, FEMA PA categories C – G are used as the foundation of the analysis. FEMA PA projects include a nonfederal cost share or a percentage of total costs which must be paid by the applicant to fully fund the necessary work. For Categories C – G, the nonfederal cost share is 25 percent. A total of \$116,559,253.33 in PA projects in categories C - G had been identified and submitted to FEMA for DR 4438. This includes an approximate federal share of \$87,419,540.81 and a non-federal share of \$29,139,712.52. The following data was collected on PA applicants for

⁴ https://www.fema.gov/openfema-data-page/public-assistance-funded-projects-details-v1

DR 4438 for FEMA PA categories C – G, the anticipated total costs of those projects, and the total amount of federal and non-federal share. It is important to note that FEMA's priority is to restore damage structures to service, while CDBG-DR funds work to develop a long-term recovery need, including implementing resiliency measures where appropriate to safeguard against future losses.

Category	Category Type	Number of Projects
А	Debris Removal	51
	Emergency Protective	
В	Measures	128
С	Roads and Bridges	508
D	Water Control Facilities	11
Е	Public Buildings	79
F	Public Utilities	98
G	Recreational or Other	60
Z	State Management	97
Total		1,032

Table 26: FEMA-PA

County	Estimated Cost	Federal Share (75%)	Local Share (25%) or Unmet Need
Alfalfa	\$1,479,029.26	\$1,109,725.63	\$369,757.32
Protective Measures	\$51,286.54	\$37,797.04	\$12,821.64
Public Utilities	\$110,669.32	\$83,002.00	\$27,667.33
Roads & Bridges	\$1,312,587.36	\$984,440.55	\$328,146.84
State Management	\$4,486.04	\$4,486.04	\$1,121.51
Canadian	\$3,457,622.27	\$2,634,378.91	\$864,405.57
Debris Removal	\$15,670.42	\$11,752.81	\$3,917.61

Protective Measures	\$173,386.50	86.50 \$130,039.89		
Public Buildings	\$194,188.09	\$145,641.08	\$48,547.02	
Public Utilities	\$514,478.22	\$385,858.67	\$128,619.56	
Roads & Bridges	\$2,277,421.99	\$1,708,066.50	\$569,355.50	
State Management	\$164,648.69	\$164,648.69	\$41,162.17	
Water Control	\$117,828.36	\$88,371.27	\$29,457.09	
Facilities				
Craig	\$919,411.18	\$696,791.66	\$229,852.80	
Debris Removal	\$38,965.80	\$29,224.35	\$9,741.45	
Public Buildings	\$5,000.00	\$3,750.00	\$1,250.00	
Public Utilities	\$23,705.53	\$17,779.15	\$5,926.38	
Roads & Bridges	\$822,806.87	\$617,105.18	\$205,701.72	
State Management	\$28,932.98	\$28,932.98	\$7,233.25	
Creek	\$1,158,208.59	\$871,727.56	\$289,552.15	
Debris Removal	\$456,480.93	\$342,360.70	\$114,120.23	
Protective Measures	\$65,212.83	\$48,909.63	\$16,303.21	
Public Buildings	\$124,023.81	\$93,017.86	\$31,005.95	
Recreational or Other	\$65,159.17	\$48,869.38	\$16,289.79	
Roads & Bridges	\$435,047.57	\$326,285.71	\$108,761.89	
State Management	\$12,284.28	\$12,284.28	\$3,071.07	
Delaware	\$441,971.17	\$331,749.72	\$110,492.79	
Debris Removal	\$25,963.64	\$19,472.73	\$6,490.91	
Public Buildings	\$59,391.21	\$44,543.41	\$14,847.80	
Public Utilities	\$21,706.87	\$16,280.15	\$5,426.72	
Roads & Bridges	\$333,824.10	\$250,368.08	\$83,456.03	
State Management	\$1,085.35	\$1,085.35	\$271.34	
Garfield	\$722,518.68	\$541,889.04	\$180,629.67	
Debris Removal	\$3,255.42	\$2,441.57	\$813.86	
Protective Measures	\$50,387.59	\$37,790.70	\$12,596.90	
Public Utilities	\$43,106.72	\$32,330.04	\$10,776.68	
Recreational or Other	\$5,096.35	\$3,822.26	\$1,274.09	
Roads & Bridges	\$620,672.60	\$465,504.47	\$155,168.15	
Kay	\$3,714,426.22	\$2,787,043.42	\$928,606.56	
Debris Removal	\$29,122.09	\$21,841.57	\$7,280.52	
Protective Measures	\$167,376.24	\$125,532.18	\$41,844.06	
Public Buildings	\$18,537.50	\$13,903.13	\$4,634.38	
	1 1	A	\$136,849.81	
Public Utilities	\$547,399.22	\$410,549.42		
Public Utilities Recreational or Other	\$547,399.22 \$145,842.85	\$410,549.42 \$109,382.14	\$36,460.71	
		·	<u> </u>	

State Management	\$4,894.78	\$4,894.78	\$1,223.70
Kingfisher	\$1,744,425.55	\$1,309,413.78	\$436,106.39
Debris Removal	\$4,546.77	\$3,410.08	\$1,136.69
Protective Measures	\$15,763.92	\$11,822.94	\$3,940.98
Public Buildings	\$50,000.00	\$37,500.00	\$12,500.00
Recreational or Other	\$21,280.89	\$15,960.67	\$5,320.22
Roads & Bridges	\$1,648,455.58	\$1,236,341.70	\$412,113.90
State Management	\$4,378.39	\$4,378.39	\$1,094.60
Le Flore	\$457,851.83	\$348,190.24	\$114,462.96
Protective Measures	\$42,174.09	\$31,630.58	\$10,543.52
Public Buildings	\$26,047.60	\$19,535.70	\$6,511.90
Public Utilities	\$170,921.66	\$128,191.25	\$42,730.42
Roads & Bridges	\$199,503.09	\$149,627.32	\$49,875.77
State Management	\$19,205.39	\$19,205.39	\$4,801.35
Logan	\$1,481,373.90	\$1,126,234.22	\$370,343.48
Debris Removal	\$67,118.92	\$50,339.19	\$16,779.73
Protective Measures	\$70,997.89	\$53,248.43	\$17,749.47
Public Buildings	\$72,513.70	\$54,385.28	\$18,128.43
Public Utilities	\$30,162.44	\$22,621.83	\$7,540.61
Recreational or Other	\$38,140.09	\$28,605.07	\$9,535.02
Roads & Bridges	\$1,130,658.38	\$847,993.82	\$282,664.60
State Management	\$60,814.96	\$60,814.96	\$15,203.74
Water Control	\$10,967.52	\$8,225.64	\$2,741.88
Facilities Mayes	\$879,312.27	\$663,159.25	\$219,828.07
Protective Measures	\$15,418.05	\$11,563.54	\$3,854.51
Public Buildings	\$10,000.00	\$7,500.00	\$2,500.00
Recreational or Other	\$141,816.87	\$106,362.65	\$35,454.22
Roads & Bridges	\$697,377.22	\$523,032.93	\$174,344.31
State Management	\$14,700.13	\$14,700.13	\$3,675.03
Muskogee	\$2,373,471.44	\$1,783,567.02	\$593,367.86
Debris Removal	\$262,251.31	\$196,688.49	\$65,562.83
Protective Measures	\$440,921.21	\$330,690.91	\$110,230.30
Public Buildings	\$190,726.25	\$143,044.69	\$47,681.56
Public Utilities	\$805,525.39	\$604,144.05	\$201,381.35
Recreational or Other	\$416,594.72	\$312,446.04	\$104,148.68
Roads & Bridges	\$243,598.95	\$182,699.23	\$60,899.74
State Management	\$13,853.61	\$13,853.61	\$3,463.40
Noble	\$235,466.97	\$177,247.11	\$58,866.74
Roads & Bridges	\$232,879.52	\$174,659.66	\$58,219.88

State Management	\$2,587.45	\$2,587.45	\$646.86	
Nowata	\$2,254,354.17	\$1,690,765.65	\$563,588.54	
Protective Measures	\$13,260.49	\$9,945.37	\$3,315.12	
Roads & Bridges	\$2,241,093.68	\$1,680,820.28	\$560,273.42	
Okmulgee	\$757,414.39	\$575,362.89	\$189,353.60	
Debris Removal	\$10,341.82	\$7,756.37	\$2,585.46	
Protective Measures	\$41,517.83	\$31,138.37	\$10,379.46	
Public Buildings	\$20,000.00	\$15,000.00	\$5,000.00	
Public Utilities	\$542,649.11	\$406,986.83	\$135,662.28	
Roads & Bridges	\$113,697.28	\$85,272.97	\$28,424.32	
State Management	\$29,208.35	\$29,208.35	\$7,302.09	
Osage	\$1,724,444.62	\$1,311,166.38	\$431,111.16	
Debris Removal	\$83,288.49	\$62,466.37	\$20,822.12	
Protective Measures	\$62,375.71	\$46,781.80	\$15,593.93	
Public Buildings	\$680,372.13	\$510,279.10	\$170,093.03	
Public Utilities	\$52,791.69	\$39,593.77	\$13,197.92	
Recreational or Other	\$126,581.11	\$94,935.84	\$31,645.28	
Roads & Bridges	\$647,704.08	\$485,778.09	\$161,926.02	
State Management	\$71,331.41	\$71,331.41	\$17,832.85	
Ottawa	\$1,055,374.31	\$791,530.76	\$263,843.58	
Protective Measures	\$16,361.33	\$12,271.00	\$4,090.33	
Public Buildings	\$115,858.85	\$86,894.14	\$28,964.71	
Recreational or Other	\$245,947.81	\$184,460.86	\$61,486.95	
Roads & Bridges	\$677,206.32	\$507,904.76	\$169,301.58	
Pawnee	\$275,628.83	\$209,052.59	\$68,907.21	
Debris Removal	\$12,394.72	\$9,296.04	\$3,098.68	
Protective Measures	\$9,205.71	\$6,904.29	\$2,301.43	
Public Utilities	\$97,564.92	\$73,173.69	\$24,391.23	
Recreational or Other	\$44,345.33	\$33,259.00	\$11,086.33	
Roads & Bridges	\$102,794.39	\$77,095.81	\$25,698.60	
State Management	\$9,323.76	\$9,323.76	\$2,330.94	
Payne	\$1,583,965.36	\$1,204,560.26	\$395,991.34	
Protective Measures	\$150,512.27	\$112,884.21	\$37,628.07	
Public Buildings	\$29,131.99	\$21,849.00	\$7,283.00	
Recreational or Other	\$18,096.37	\$13,572.28	\$4,524.09	
Roads & Bridges	\$1,319,879.87	\$989,909.91	\$329,969.97	
State Management		\$66,344.86	\$16,586.22	
State Management	\$66,344.86	ΨΟΟ,5 1 1.00	• •	
Pottawatomie	\$66,344.86 \$225,248.32	\$171,617.78	\$56,312.08	
		· · · · ·	\$56,312.08 \$15,878.09	

State Management	\$10,726.12	\$10,726.12	\$2,681.53
Water Control	\$59,529.98	\$44,647.49	\$14,882.50
Facilities			
Rogers	\$1,888,092.92	\$1,424,452.64	\$472,023.23
Debris Removal	\$388,706.13	\$291,529.60	\$97,176.53
Protective Measures	\$95,682.65	\$71,761.99	\$23,920.66
Public Buildings	\$66,514.91	\$49,886.19	\$16,628.73
Public Utilities	\$1,103,509.42	\$827,632.06	\$275,877.36
Roads & Bridges	\$200,148.04	\$150,111.03	\$50,037.01
State Management	\$33,531.77	\$33,531.77	\$8,382.94
Sequoyah	\$852,963.13	\$640,741.20	\$213,240.78
Debris Removal	\$87,892.25	\$65,919.19	\$21,973.06
Protective Measures	\$5,468.88	\$4,101.66	\$1,367.22
Public Buildings	\$81,545.11	\$61,158.83	\$20,386.28
Public Utilities	\$37,787.79	\$28,340.84	\$9,446.95
Roads & Bridges	\$636,193.70	\$477,145.28	\$159,048.43
State Management	\$4,075.40	\$4,075.40	\$1,018.85
Tulsa	\$15,597,876.27	\$11,823,590.24	\$3,899,469.07
Debris Removal	\$1,337,431.92	\$1,016,383.50	\$334,357.98
Protective Measures	\$2,238,706.21	\$1,675,929.95	\$559,676.55
Public Buildings	\$84,153.16	\$63,114.87	\$21,038.29
Public Utilities	\$5,645,486.21	\$4,234,114.69	\$1,411,371.55
Recreational or Other	\$5,052,526.62	\$3,789,394.99	\$1,263,131.66
Roads & Bridges	\$426,707.93	\$320,030.96	\$106,676.98
State Management	\$459,892.44	\$459,892.44	\$114,973.11
Water Control Facilities	\$352,971.78	\$264,728.84	\$88,242.95
Wagoner	\$707,560.65	\$533,496.00	\$176,890.16
Debris Removal	\$19,942.70	\$14,957.03	\$4,985.68
Protective Measures	\$268,634.94	\$201,476.21	\$67,158.74
Public Buildings	\$25,000.00	\$18,750.00	\$6,250.00
Public Utilities	¢(00/700	\$36,035.90	\$12,011.97
Roads & Bridges	\$48,047.86	\$36,035.90	ψ1 <u>2</u> ,011.37
	\$48,047.86	\$250,974.93	\$83,658.31
State Management			
State Management Washington	\$334,633.22	\$250,974.93	\$83,658.31
	\$334,633.22 \$11,301.93	\$250,974.93 \$11,301.93	\$83,658.31 \$2,825.48
Washington	\$334,633.22 \$11,301.93 \$113,418.78	\$250,974.93 \$11,301.93 \$86,401.45	\$83,658.31 \$2,825.48 \$28,354.70
Washington Debris Removal	\$334,633.22 \$11,301.93 \$113,418.78 \$7,954.42	\$250,974.93 \$11,301.93 \$86,401.45 \$5,965.82	\$83,658.31 \$2,825.48 \$28,354.70 \$1,988.61
Washington Debris Removal Protective Measures	\$334,633.22 \$11,301.93 \$113,418.78 \$7,954.42 \$24,029.68	\$250,974.93 \$11,301.93 \$86,401.45 \$5,965.82 \$18,022.27	\$83,658.31 \$2,825.48 \$28,354.70 \$1,988.61 \$6,007.42

Debris Removal	\$5,835.69	\$4,376.77	\$1,458.92
Protective Measures	\$9,565.89	\$7,174.42	\$2,391.47
Roads & Bridges	\$596,438.13	\$447,328.61	\$149,109.53
Grand Total	\$46,713,270.79	\$35,302,735.20	\$11,678,317.70

Table 27: FEMA-PA local and federal share

Note: FEMA-PA does <u>n</u>ot explain which public infrastructure projects directly support housing. ODOC considers this satisfactory and will evaluate applications upon receipt; applicants of infrastructure projects are encouraged to describe how, if applicable, the infrastructure project directly supports housing.

Infrastructure projects represent a wide range of unmet need encompassing numerous types of infrastructure repair, including, for example, repairing or replacing roads and bridges damaged during the multiple disasters and in their subsequent clean-up.

The State's 2019 CDBG-DR program is phased. This means that during Phase I only housing projects can be submitted. Once it has been determined that there is no longer an unmet housing need in any of the 27 eligible counties, the State will open Phase II to infrastructure projects. The State recognizes, however, that in certain instances infrastructure projects that *directly relate to damaged housing* may be submitted and funded during Phase I. Infrastructure activities will include the construction or reconstruction of drainage systems that advance long-term resilience to natural hazards. The State's needs assessment indicates a large unmet need for infrastructure repairs related to damaged drainage systems. Road repairs can be noted as following as a close second in terms of unmet infrastructure needs. Anticipated uses of infrastructure funds are expected to include a focus on road and drainage improvements.

Unmet Public Facilities needs comprised a small percentage of the overall disaster unmet needs requests. The State has identified several public building projects as directly ineligible for CDBG-DR funding. This even further reduced the overall actual number of requests. These ineligible projects related to miscellaneous public building maintenance / repairs that could not be directly tied back to storm damage. Overall, public facilities projects represent a very small portion of the overall demonstrated unmet need.

The calculation of unmet needs in infrastructure and public facilities related activities is not intended to be final as much of the necessary data is currently not available.

Economic Revitalization Needs Assessment

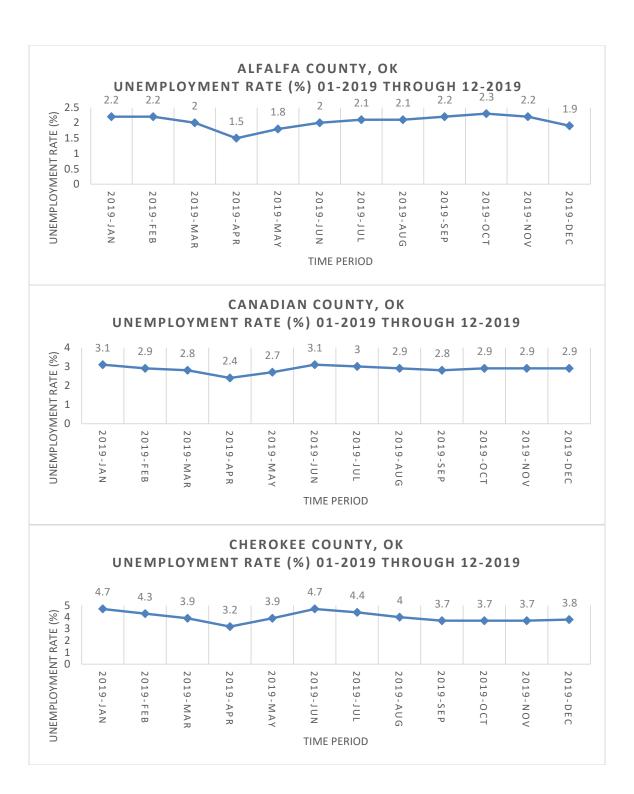
No CDBG-DR eligible Economic Revitalization related unmet needs survey responses were received. Multiple disasters impacted the State's economy either by temporarily or permanently impeding specific economic activity, including, for example, cancelled tourist visits, forgone business revenue due to shuttered offices, and wages not paid to workers who could not work during the storm and in its aftermath. Yet, ODOC chose to research further any unmet needs from the DR-4438 disaster in relation to Disaster Recovery.

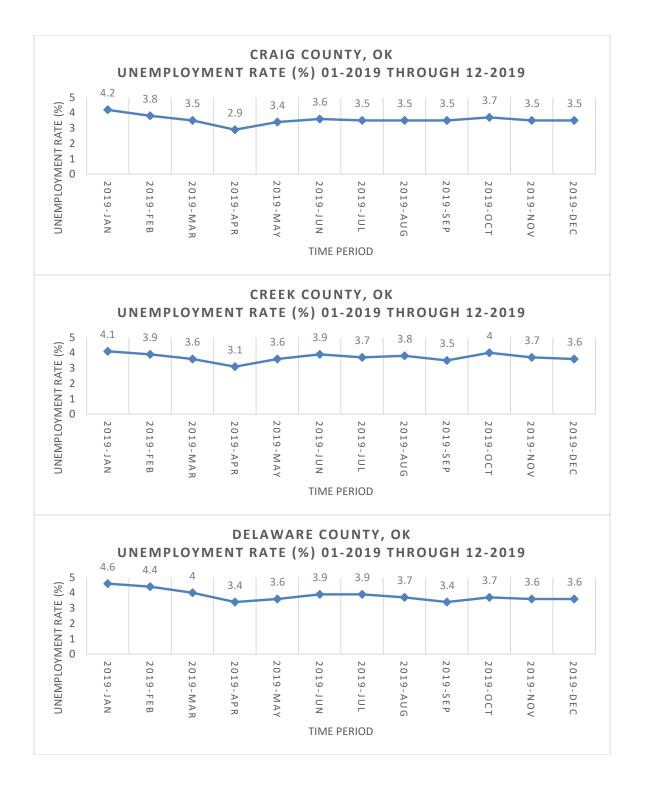
ODOC contacted the Oklahoma Employment Security Commission (OESC) to identify unemployment needs. The OESC only received 17 Disaster Unemployment Assistance (DUA) applications for DR-4438. 10 of these applications were approved for a total of \$58,878.74, whereas 7 were denied based on eligibility criteria or failing to meet the application deadline. No UGLG, tribal nation, PHA, or non-profit has reported a further need of assistance in relation to unemployment.

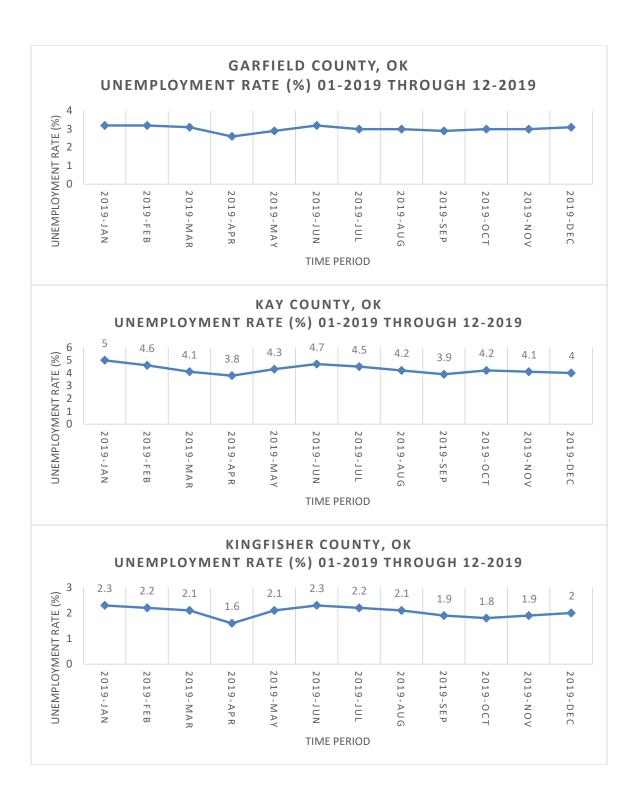
Data on the United States Department of Agriculture's (USDA) Emergency Conservation Program (ECP) provides further insight into possible crop or agricultural losses. 1,203 claims were made between the dates of May 7, 2019, and September 9, 2019 (3 months post the FEMA disaster declaration for DR-4438). A total of \$2,578,517.00 was approved to applicants in 27 eligible counties. The USDA could not disclose what specific disaster led applicants to apply for such funds but noted that these claims were made due to either a tornado, severe storm, or flood. No UGLG, tribal nation, PHA, or non-profit has reported a further need of assistance in relation to crop or agricultural losses tied to the DR-4438 disaster during either needs survey.

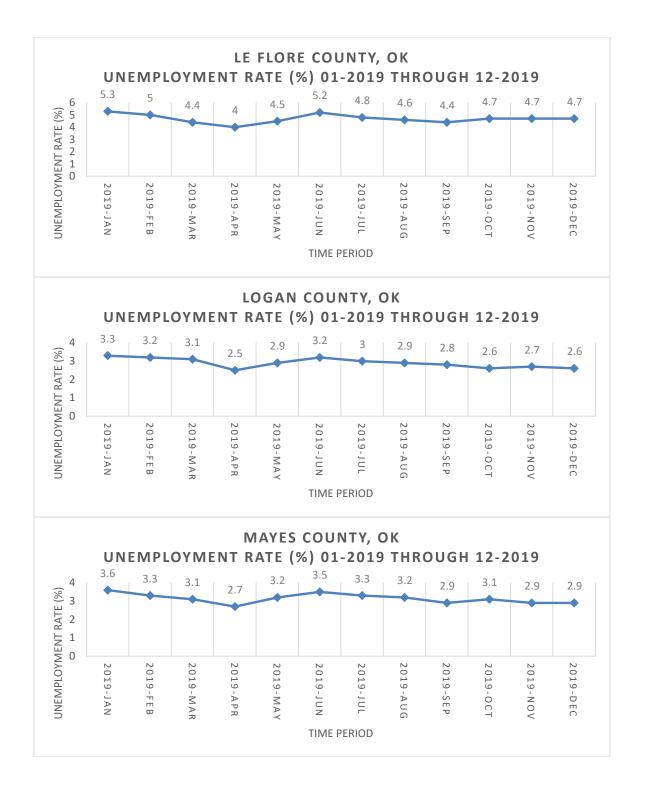
The State has analyzed unemployment rates for all 27 eligible counties using data from the U.S. Bureau of Labor Statistics (BLS). The BLS maintains the Local Area Unemployment Statistics (LAUS) program, which is a federal-state cooperative effort in which monthly estimates of total employment and unemployment are prepared for over 7,500 areas of the United States (Source: https://www.bls.gov/lau/lauov.htm). The unemployment analysis from January 2019 through December 2019 revealed that all 27 eligible counties had a slight increase in unemployment rates following the May 7 through June 1 incident period. Towards the end of the year, most counties experienced an unemployment rate similar to the unemployment rate prior to the disaster. While the State is committed to funding necessary projects for communities hit by the DR-4438 disaster, no UGLG, tribal nation, PHA, or

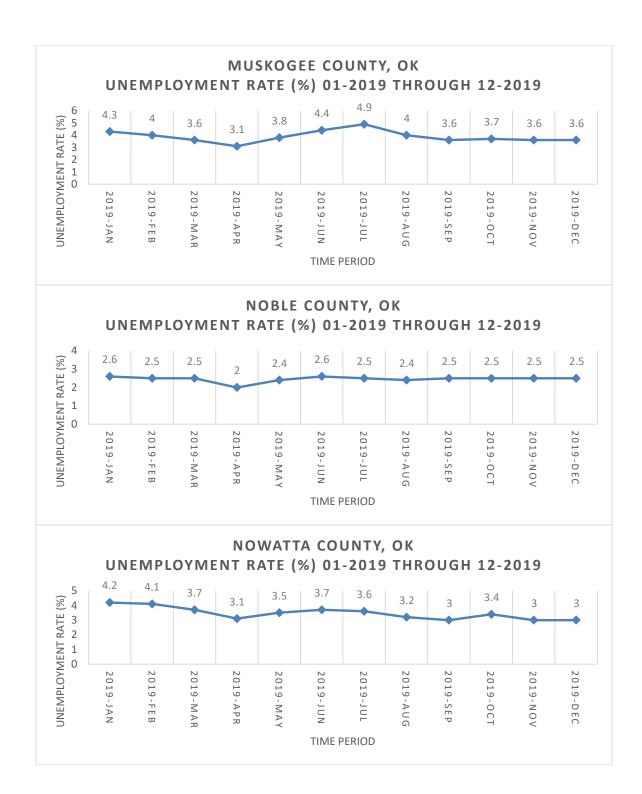


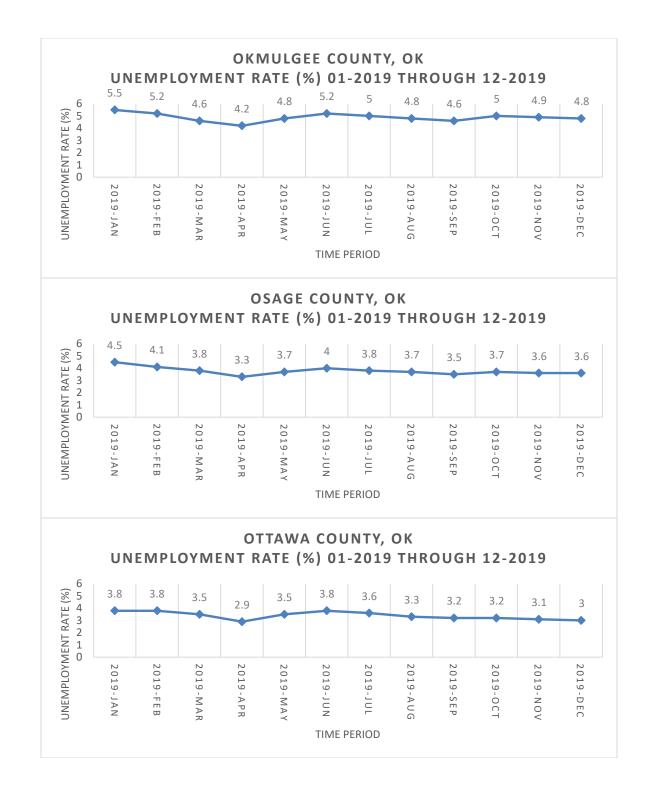


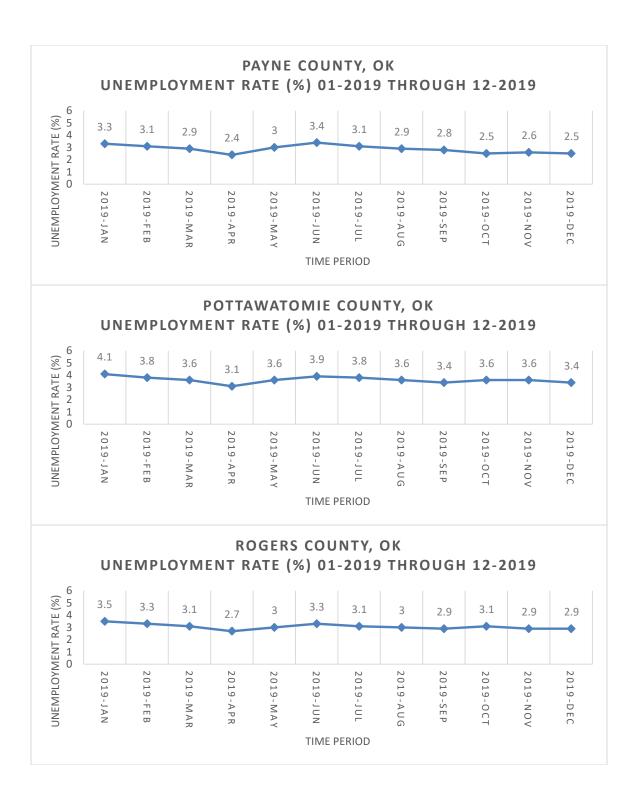


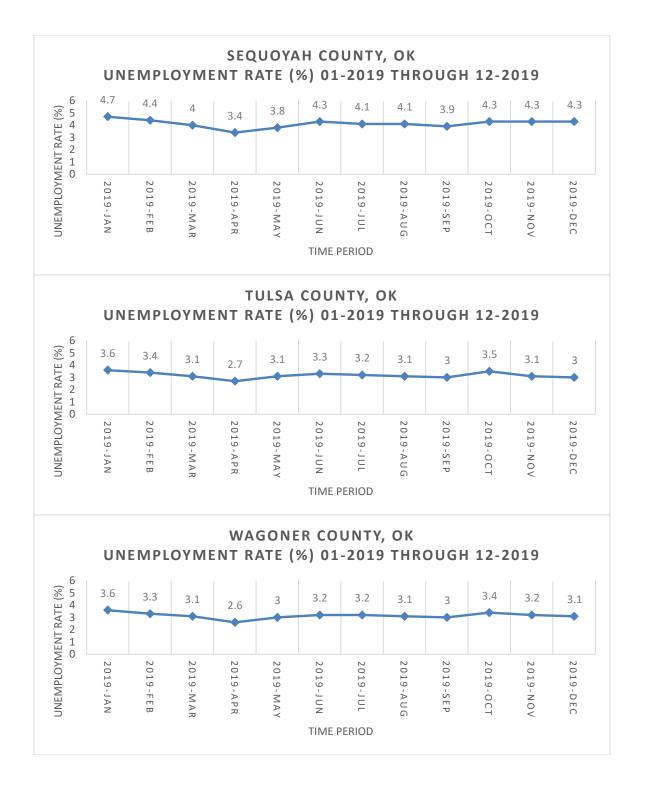












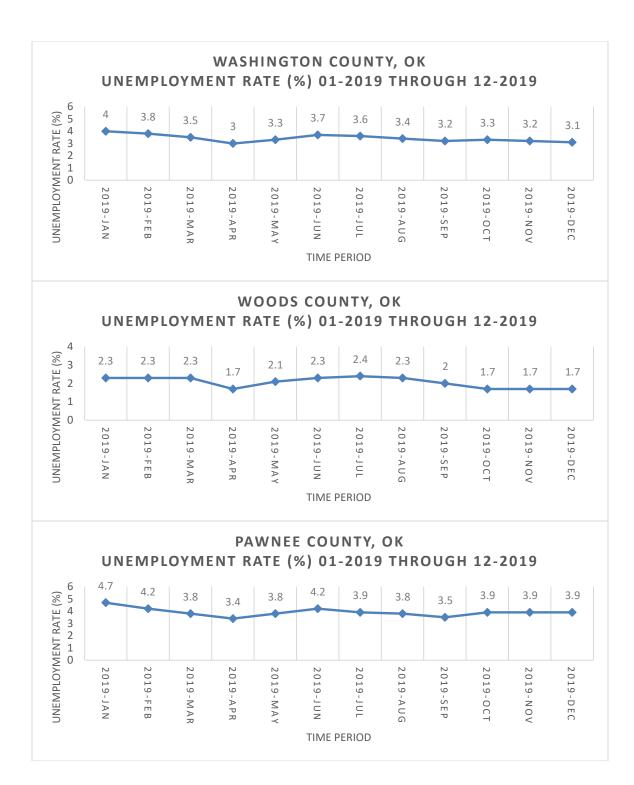


Figure 12: Unemployment rates in 27 counties affected by the 2019 disaster

While the unemployment trends above show minimal changes in unemployment due to the DR-4438 disaster and no entity has reported a need for economic recovery, the State is committed to supporting housing and infrastructural needs to indirectly support economic revitalization. The physical damage to residential housing, commercial buildings, public facilities, infrastructure, and business equipment affected communities and businesses. Many businesses likely required additional inventory due to unplanned expenditures during the disaster. Funds for other purposes were likely diverted to recovery relief rather than to other business needs such as savings and investment. Yet, while these issues could have affected businesses in the applicable counties, no unmet needs for economic revitalization were reported.

Overall, damages to public infrastructure such as roads, drainage systems, as well as compromised water and electrical utility systems caused significant interruption on the State's economy and have had a corresponding negative impact on businesses trying to recover after the storm. As indicated earlier, these issues will be addressed under the infrastructure category funding.

The calculation of unmet needs for economic revitalization is not intended to be final as the current data shows no need for economic revitalization. Should specific CDBG-DR categorical funding allocations need to be revised to meet any newly defined unmet needs, ODOC/CD has an established CDBG-DR amendment process in place to accomplish these necessary revisions, which is fully addressed within this CDBG-DR Action Plan. Based on the State's needs assessment and public outreach, demand exists for resiliency / mitigation investments, which could be specifically addressed via CDBG-DR Planning activities.

Planning: Needs Assessment

The disaster resiliency assessment conducted by the Oklahoma Housing Finance Agency (OHFA) as part of the Oklahoma Housing Needs Assessment found several notable recommendations as they relate to disaster resiliency that could be satisfied via CDBG-DR Planning related activities. Notably, recommendation number #1 and number #4 show particular merit in relation to tieback with this disaster event.

1. All jurisdictions should either continue to update, maintain, or create Hazard Mitigation Plans.

- 2. Particular attention should be paid to areas within the jurisdiction that, in addition to physical vulnerability, have compounding social vulnerability factors.
- 3. Efforts to strengthen building codes related to tornadoes and other natural disasters should be considered.
- 4. Continue to support regulations that prevent development in the floodplain and removing structures in the floodplain that experience repeated damages from floods.
- 5. Planning for shelters from disaster events for multifamily housing units (particularly including affordable housing), in addition to all housing in the community should be incorporated with any effort to increase housing.

As noted in the disaster resiliency assessment, there is an intimate relationship between droughts and flooding in Oklahoma. Soil that becomes parched from long-standing drought can act like impervious concrete when rains come. The penetration and saturation of the soil may take time resulting in flash floods before the soil can help to slow the flow of the water. Beyond issues of run-off from flash floods across parched land, we also have construction within the floodway or floodplain. Floodplain management is an important planning step in preventing risks to businesses and residences. Provisions within local codes should work to encourage open space near streams and rivers to allow for a healthy riparian area that can handle floodwaters and put fewer people at risk during storm events. Many counties and cities have learned from repeated floods that purchasing land and moving buildings (development) out of flood-prone areas is both for the health and safety as well as good economics for the community. Regulating buildings from being built in the floodplain from the beginning is essential as many communities find it difficult to purchase land or relocate individuals from land that experiences repetitive losses due to flooding.

Also, of relevance, Hazard Mitigation Plans (HMPs) at either the county or city level seek to document past events, past damages, and address proactive measures to improve the community's response to an event and efforts to have a more resilient community. Part of addressing hazards and risks in an area is understanding and planning as best as possible to be prepared to minimize damage and loss of life. Often one of the tools for communities to fully understand their risks and how they plan to address them when they occur is to prepare a Hazard Mitigation Plan or HMP. Those communities

that lack an HMP, have an outdated plan, or expired plan should consider the benefits of having both an HMP and Emergency Operation Plan (EOP) given natural events are a part of living in Oklahoma but how we respond and plan for these events can help minimize loss of life and property. Funding for working on HMPs can come from FEMA on an annual cycle basis. In many cases, counties and communities are eager to create or update their HMPs however lack funding for technical expertise in preparing the plan. Additionally, coordination with FEMA also can be a perceived or real barrier to final adoption of an HMP. Despite this, there are general principles that are covered in an HMP that are relevant for communities to employ related to creating safe, appropriate, and sustainable housing in the state.

Before many communities can create HMPs, they need adequate data to identify risks and opportunities within their communities. The State needs better comprehensive data sets and data sharing tools to allow communities across the state to have adequate information to create HMPs. During the needs assessment, the need for a floodplain study was identified to aggregate comprehensive data on Oklahoma floodplains including identifying buildings located in the floodplain and identifying communities that are the most vulnerable to disasters. The Oklahoma Water Resources Board (OWRB) identified this need for many communities across the state because of the lack of comprehensive data for Oklahoma. This comprehensive data would directly support planning efforts for affected communities and support resiliency for all of Oklahoma's cities and towns so they would be better prepared against disasters in the future.

In Substantial Amendment #2, the State has increased funding to the Planning Activity in the amount of \$500,000. OWRB will use the additional funds to conduct a second phase of the State Flood Plan that includes developing hazard mitigation projects and alternatives within the Arkansas River watershed, which encompasses all three HUD identified Most Impacted and Distressed areas (Tulsa County, Muskogee County, and the Moffett Zip code).

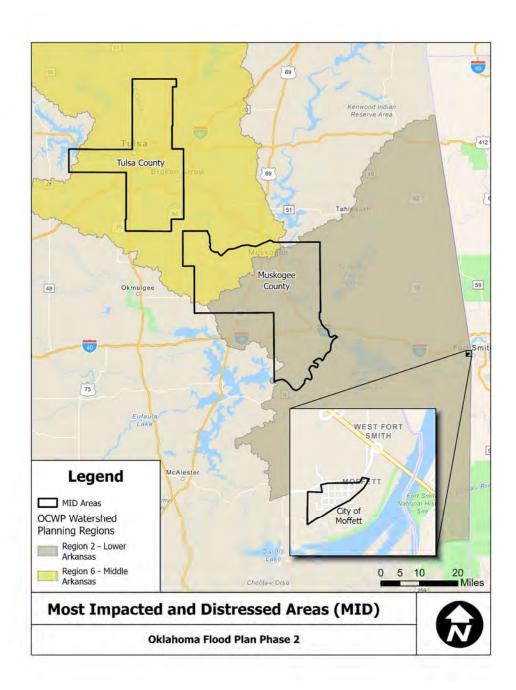
OWRB will prioritize projects for Phase 2 and include at least one project in each of the three MID areas. Depending on the projects prioritized for scoping in Phase 1, work in Phase 2 may include:

1. Scoping and developing hazard mitigation projects and alternatives, including engineering design and feasibility studies.

- 2. Conducting meetings, outreach, and coordination with potential subapplicants and community residents.
- 3. Incorporating environmental planning and historic preservation considerations into project planning activities.
- 4. Collecting data for Benefit-Cost Analyses, environmental compliance, and other program requirements.
- 5. Conducting hydrologic and hydraulic studies for unmapped flood zones or other areas where communities propose to submit hazard mitigation projects.
- Coordinating, scoping, and developing regional or multi-community hazard mitigation projects that require coordination to address resiliency and sustainability goals cohesively.
- 7. Utilizing third-party cost estimation services for project budgeting across sub-applications.

If additional funding becomes available through FEMA's Flood Mitigation Assistance (FMA) or Building Resilient Infrastructure and Communities (BRIC) Programs, OWRB will identify additional areas within the Arkansas River Watershed which encompasses all three HUD identified Most Impacted and Distressed areas.

OWRB plans to leverage CDBG-DR funds with FY22 FMA and BRIC project scoping money. A map showing the three MID areas of the 2019 flood event, and their location within the Arkansas River Watershed, is included below.



Map 9: OWRB Phase 2

(Map provided by the Oklahoma Water Resources Board)

As the map shows, all three HUD identified Most Impacted and Distressed areas are contained within the Arkansas River watershed.

Public Services: Needs Assessment

Based on current unmet need assessment priorities combined with the current post disaster time lapse, public services are not a CDBG-DR priority at this time. As identified earlier, the initial disaster response from federal, state, non-profit and volunteer organizations have firmly addressed these issues at that this time, and it is not identified as a priority need for the 2019 CDBG-DR Action Plan.

The primary focus of CDBG-DR funds is to address the unmet housing recovery need. However, CDBG-DR funds may be used to fund public services which complement the housing need. Public services include activities which provide a benefit to employment, health, drug abuse, education, fair housing counseling, energy conservation, and certain welfare activities. The Housing and Community Development Act of 1974, as amended (HCDA) permits the use of CDBG funds for the purpose of public services under HCDA 105(a)(8). In accordance with HCDA 105(a)(8), no more than 15 percent of the allocation will be directed to the provision of public service.

Resiliency: Needs Assessment

Resiliency is considered a key component under the State's CDBG-DR Action Plan. As noted, resiliency is not seen as a single independent CDBG-DR activity but rather a sub-component of the eligible CDBG-DR activities. Building back better and creating resilient housing and infrastructure is important part of any eligible CDBG-DR activity. Resiliency / mitigation can represent a wide range of unmet need encompassing numerous types of activities. For example, resiliency / mitigation activities can include the clearance / demolition of houses in identified floodplain areas. The State's needs assessment also indicates an unmet need for repairs related to damaged drainage systems for which resiliency / measures will also play a significant role. As applicable, resiliency is to be considered in conjunction with all CDBG-DR activities.

As addressed earlier, the disaster resiliency assessment conducted by the Oklahoma Housing Finance Agency (OHFA) as part of the Oklahoma Housing Needs Assessment found several notable recommendations as they relate to disaster resiliency:

- 1. All jurisdictions should either continue to update, maintain, or create Hazard Mitigation Plans.
- 2. Particular attention should be paid to areas within the jurisdiction that, in addition to physical vulnerability, have compounding social vulnerability factors.
- 3. Efforts to strengthen building codes related to tornadoes and other natural disasters should be considered.
- 4. Continue to support regulations that prevent development in the floodplain and removing structures in the floodplain that experience repeated damages from floods.
- 5. Planning for shelters from disaster events for multifamily housing units (particularly including affordable housing), in addition to all housing in the community, should be incorporated with any effort to increase housing.

(N). UNMET NEEDS SUMMARY

Data Type	Data Source	Total Damage	Total Unmet Need
Housing	FEMA IA data	\$25,952,612.58	\$13,313,001.58*
Infrastructure	FEMA Public		
	Assistance	\$46,713,271.00	\$11,678,317.00
Total Unmet			
Need		\$72,665,883.58	\$24,991,318.58 *

Table 28: FEMA-IA and FEMA-PA unmet needs

Note that the unmet need for housing is much greater than what is provided through FEMA Individual Assistance. This is due to drastic changes in raw materials and low assessed values for homes (Renter needs were also excluded from these numbers.) If applicants qualify and choose a voluntary buyout, applicants will need significantly more to purchase a home of equal value in a nearby town that is safe and affordable. As discussed in the Voluntary Buyout Program section in this Action Plan, ODOC has designed a more comprehensive recovery package for beneficiaries in the 100-year floodplain, floodway, and Disaster Risk Reduction Area (DRRA).

Consultation Efforts and Data Collection

As previously mentioned, the State has conducted extensive outreach efforts to develop the most accurate, up-to-date understanding about unmet needs in the 27 affected counties in Oklahoma. The first phase occurred from February 21, 2020, to March 13, 2020. The second phase occurred from October 8, 2020, to February 16, 2021. In both phases, ODOC sent out an unmet needs survey to a variety of stakeholders in Oklahoma. This section of the Action Plan details these efforts.

COUNTIES

In Survey I, all 27 counties were contacted, either directly by ODOC or through partner agencies, in the State. Only the HUD declared MIDs (Muskogee, Sequoyah, and Tulsa County) predictably identified unmet needs in housing and infrastructure. That information is contained in the existing Action Plan. Under Survey II, ODOC reached out to all 27 counties again by e-mail. Zero (0) responses were received from the 27 counties. Of the 27 counties, all county commissioners were mailed a letter during Survey II because of the low response rate received via email. Zero (0) responses from counties were received from Survey II mailed letters. These letters are described in further sections.

Since direct contact with counties was less than satisfactory, ODOC/CD directly contacted the Oklahoma Emergency Management (OEM) division. ODOC/CD received a dataset "DCM4438" for county and city level data. This data, in conjunction with other datasets, directly formed the unmet needs analysis in this Action Plan.

PUBLIC HOUSING AUTHORITY (PHA)

ODOC contacted 37 Public Housing Authorities in the 27 eligible counties. No responses were received that indicated any unmet housing or infrastructure need.

County	Public Housing Authority	Ö	Response to ODOC received? Unmet Housing Ne		Unmet Housing Ne	
		Yes	No	Yes	No	No Response
Alfalfa	No PHA located					
Canadian	No PHA located					
Cherokee	Cherokee Housing Authority		X			X

Craig	Vinita Housing Authority		X		X
Creek	Bristow Housing		Х		Х
	Authority				
Creek	Drumright Housing Authority		X		Х
Creek	Oilton Housing		Х		Х
D 1	Authority				\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
Delaware	Grove Housing		X		X
C	Authority				
Garfield	No PHA located		X		X
Kay	Newkirk Housing Authority		X		Х
	Ponca City Housing Authority	X		X	
	Tonkawa Tribal Housing		X		X
Kingfisher	No PHA located		X		
Le Flore	Heavener Housing		X		Х
	Authority				, ,
	Talihina Housing		X		Х
	Authority				, ,
	Wister Housing		X		Х
	Authority				, ,
Logan	Guthrie Housing		X		Х
	Authority				
Mayes	Locust Grove Housing		Х		Х
	Authority				
Muskogee	Ft Gibson Housing		X		Х
	Authority				
Noble	Missouri State Housing		Х		Х
	Authority				
Nowata	Nowata Housing		X		Х
	Authority				
Okmulgee	Beggs Housing		X		Х
	Authority				
	Henryetta Housing		X		Х
	Authority				
Osage	Osage County Housing		X		Х
	Authority				
Ottawa	Afton Housing	Х		X	
	Authority				
	Commerce Housing		X		Χ
	Authority				

	Wyandotte Housing Authority		X		×
Pawnee	Pawnee Housing Authority	Х		X	
Payne	Stillwater Housing Authority		X		X
	Yale Housing Authority		X		Χ
Pottawatomie	Earlsboro Housing Authority		Х		Х
	McLoud Housing Authority		X		Х
	Shawnee Housing Authority		Х		Х
	Tecumseh Housing Authority	X		X	
	Wanette Housing Authority		Х		Х
Rogers	Catoosa Housing Authority		Х		Х
	Chelsea Housing Authority		Х		Х
	Claremore Housing Authority		Х		Х
Sequoyah	Sallisaw Housing Authority		Х		Х
Tulsa	Collinsville Housing Authority		Х		Х
	Tulsa Housing Authority		Х		Х
Wagoner	No PHA located				
Washington	No PHA located				
Woods	No PHA located				

Table 29: ODOC's contact with Public Housing Authorities

TRIBAL NATIONS

ODOC/CD Contacted the following Tribal Nations for Action Plan input:

Tribal Nation	Response to ODOC received?		Unmet Housing Need?		Unmet Infrastructure Need?			
	Wa a	NI a	\ \\ \.	NI -	No	V	NI.	No
Al CI	Yes	No	Yes	No	Response	Yes	No	Response
Absentee Shawnee		X			X			X
Alabama Quassarte Tribal								
Town		X			X			X
Apache Tribe of Oklahoma		Χ			X			Χ
Caddo Nation		Χ			X			Χ
Cherokee Nation		Χ			Χ			Χ
Cheyenne and Arapaho								
Tribes		X			X			X
Chickasaw Nation	Х			Χ			Χ	
Choctaw Nation of				•				
Oklahoma	X				X			X
Citizen Potawatomi Nation	Х			Χ			Χ	
Comanche Nation		Χ			X			Χ
Delaware Nation		Χ			Χ			Χ
Eastern Shawnee Tribe of								
Oklahoma		X			X			X
Euchee (Yuchi) Tribe		Χ			Χ			Χ
Iowa Tribe of Oklahoma		Χ			X			Χ

Kaw Nation of Oklahoma	Χ	X	X
Kialegee Tribal Town	Χ	X	X
Kickapoo Tribe of Oklahoma	Χ	X	X
Kiowa Indian Tribe of			
Oklahoma	X	X	X
Miami Tribe of Oklahoma	X	X	X
Modoc Tribe of Oklahoma	Χ	X	X
Muscogee (Creek) Nation	Χ	X	X
Osage Nation	Χ	X	X
Otoe-Missouria Tribe of			
Indians	X	X	X
Ottawa Tribe of Oklahoma	Χ	X	X
Pawnee Nation	Χ	X	X
Peoria Tribe	Χ	X	X
Ponca Tribe of Oklahoma	Χ	X	X
Quapaw Tribe	Χ	X	X
Sac and Fox Nation	Χ	X	X
Seminole Nation of			
Oklahoma	X	X	X
Seneca Cayuga Nation	Χ	X	X
Shawnee Tribe	Χ	X	X
Thlopthlocco Tribal Town	Χ	X	X
Tonkawa Tribe of Oklahoma	X	X	X
United Keetoowah Band of			
Cherokees	X	X	X
Wichita and Affiliated Tribes	Χ	X	X

vvyandotte Nation A A A A	Wyandotte Nation	X	X	×
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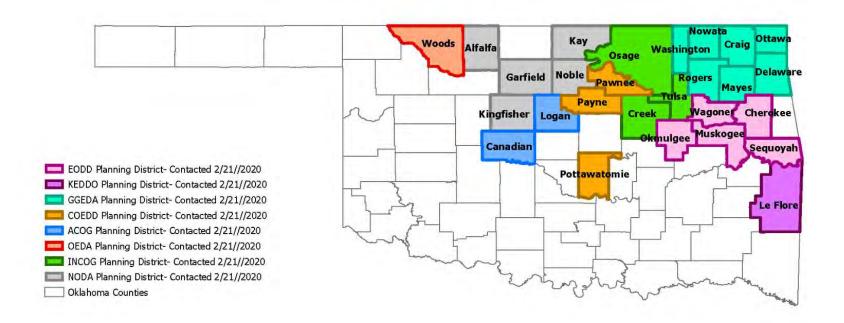
Table 30: ODOC's contact with tribal nations

No responses were received from tribal nations that indicated any unmet housing or infrastructure need.

COUNCILS OF GOVERNMENT

Substate Planning Districts (also known as Councils of Government) are interested in solving problems and planning needs that intersect multiple boundaries of local government. On February 21, 2020, emails were sent by ODOC/CD to Substate Planning Districts and eligible counties within the qualifying disaster zone requesting CDBG-DR disaster related information. The following Planning Districts were contacted on 2/21/2020 via e-mail: ACOG, COEDD, EODD, GGEDA, INCOG, KEDDO, NODA, and OEDA. All planning districts were contacted again via email on December 15th and again on December 18th of 2020. Only 1 COG, GGEDA, responded and directed ODOC to gather further information from the City of Miami within their district. No COG informed ODOC of any needs within their district. The map on the following page shows which DR-4388 eligible counties fall in each Planning District.

Contact of Planning Districts in the State of Oklahoma



Map 10: Planning districts in Oklahoma

ODOC/CD reached out to over 20 Continuum of Care organizations on March 21, 2019, to determine whether any shelters or housing received damage. A follow-up e-mail was sent to these same organizations on February 25, 2021. No agency reported any unmet housing needs.

		Phone				
NUM	Shelter Name	Number	Address	City	State	Zip Code
	Ada Homeless	580-272-				
1	Services	0211	317 W 12 th Street	Ada	Oklahoma	74820
		918-341-				
2	CARD CAA	5000	707 W Lowry Road	Claremore	Oklahoma	74018
		580-242-	114 S Independence			
3	CDSA	6131	Street	Enid	Oklahoma	73701
	City of Norman					
	Planning and					
	Community					
4	Development		201-A West Gray	Norman	Oklahoma	73070
	Community Services	918-585-				
5	Council of Tulsa	5551	16 E 16 th Street	Tulsa	Oklahoma	74119
		918-756-				
6	Deep Fork CAF	2826	223 W Sixth Street	Okmulgee	Oklahoma	74447
	·	405-360-				
7	Food and Shelter	4954	201 Reed Avenue	Norman	Oklahoma	73071
	Great Plains					
	Improvement	580-353-				
8	Foundation	2364	2 SE Lee Boulevard	Lawton	Oklahoma	73502

		918-456-				
9	Hope House Shelter	4673	1619 N Vinita Avenue	Tahlequah	Oklahoma	74464
	INCA Community	580-371-	202 S. Capitol Street,			
10	Action Agency	0277	Suite 2	Tishomingo	Oklahoma	73460
		918-967-				
11	KI BOIS CAF	3325	200 SE "A" Street	Stigler	Oklahoma	74462
		580-250-				
12	Marie Detty YFS	1123	317 SW C Avenue	Lawton	Oklahoma	73501
	Northeast Oklahoma	918-253-	856 E Melton Drive,			
13	CAA	4683	Ste C	Jay	Oklahoma	74346
	Northern Oklahoma	580-762-				
14	Youth Services	8341	2203 N Ash Street	Ponca City	Oklahoma	74601
	Northwest Domestic	580-256-				
15	Crisis Services	1215	1024 22 nd Street	Woodward	Oklahoma	73801
	Payne County Youth	405-377-				
16	Services	3380	2224 W 12 th Street	Stillwater	Oklahoma	74074
		918-341-				
17	Safenet Services	1424	1219 W Dupont Street	Claremore	Oklahoma	74017
	Stillwater Mission of	405-332-				
18	Норе	5521	1804 S Perkins Road	Stillwater	Oklahoma	74074
	Survivor Resource	580-762-				
19	Network (DV Shelter)	2883	PO Box 85	Ponca City	Oklahoma	74602
	Thunderbird	405-321-				
20	Clubhouse	7331	1251 Triad Village Drive	Norman	Oklahoma	73071
	Women's Resource	405-701-				
21	Center	5540	222 E Eufaula Street	Norman	Oklahoma	73069

		Youth Services of	918-582-				
/	22	Tulsa	0061	311 S. Madison Ave	Tulsa	Oklahoma	74112

Table 31: ODOC contact with COC

COORDINATION WITH MOFFETT, OKLAHOMA

The Town of Moffett was one of the communities with the highest depth of water damage to homes. The average water depth for Moffett citizens was 5.5 feet of flooding. With some of the greatest level of devastation and the high level of poverty in Moffett, there has been a clear need to aid the town and ensure residents receive adequate assistance. ODOC has been working with FEMA to address issues with residents being out of compliance with NFIP and FEMA. ODOC and FEMA are actively working together to offer the Town of Moffett assistance. During the time that FEMA sent Moffett residents a notice of noncompliance with NFIP, ODOC created a letter for residents to offer further options they have. The following letter was sent to 83 residents of Moffett, Oklahoma on February 3, 2021 (Please note that ODOC has since removed elevation of damaged structures lying within the 100-year floodplain):

Dear Resident of Moffett, Oklahoma:

Our job at the Oklahoma Department of Commerce is to help residents of Moffett obtain disaster recovery funding for the flood that happened in 2019.

Working closely with us on this effort is MaryLynn Lufkin with Catholic Charities. We have heard concerns that residents of Moffett feel as though they have been forgotten. Please note we want to help residents recover from this disaster, but we need your help to move forward in the process.

The U.S. Department of Housing and Urban Development (HUD) can offer financial assistance to residents through the Community Development Block Grant Disaster Recovery (CDBG-DR) grant program for residents of Moffett whose homes were damaged or destroyed. The Oklahoma Department of Commerce administers the grant program.

We're writing you today because we need your help. We would like to hear from you about what you would like to see happen in Moffett. Was your home damaged or destroyed from the flood? Do you want to stay in Moffett, or do you want to relocate elsewhere?

FINANCIAL ASSISTANCE MAY BE AVAILABLE

We're also writing to inform you about the financial assistance that may be available through the CDBG-DR program. There are two options available to residents of Moffett:

OPTION 1: For residents that want to continue to live in Moffett

Moffett will certainly flood again in the future. Financial assistance may be available to elevate homes above the Base Flood Elevation (BFE). The money for this option is limited and may not fully cover the cost of elevation. The cost of elevation substantially increases the lower the home is below the Base Flood Elevation.

OPTION 2: For residents that want to relocate

Residents whose homes were damaged or destroyed can be **voluntarily** bought out through the grant program. The Department of Commerce is **NOT** invoking

imminent domain (the forced sale of home and lot). If residents choose the voluntary buyout, the land will be turned into a permanent greenspace and the rebuilding of dwelling structures is prohibited by federal law.

We would like to hear from you by March 1, 2021. Your urgent response is greatly appreciated. Please give us a call or send us an e-mail.

NEXT STEPS

As mentioned above, we need to hear from residents of Moffett by March 1, 2021.

Please review the Financial Assistance section of this letter and contact ODOC Staff using the contact information on the last page of this letter. **The Oklahoma**Department of Commerce and our partners would like to meet with residents at Moffett Public School – 701 Belt Street Moffett, OK 74946. The meeting date and time has not yet been scheduled. Our hope is that we can coordinate with residents of Moffett to determine the best day and time to meet in person. In order for this to happen, we need residents to contact us.

QUESTIONS?

We're here to help residents of Moffett. Please contact us if you have any questions about this letter, or to discuss whether Option 1 or Option 2 is best for you and your family.

Jade Shain | Programs Planner

Community Development (CDBG-DR)

Oklahoma Department of Commerce

jade.shain@okcommerce.gov

p. 405-250-1844

OKcommerce.gov



Taylor Huizenga | Programs

Representative

Community Development (CDBG-DR)

Oklahoma Department of Commerce

taylor.huizenga@okcommerce.gov

p. 405-308-6691

OKcommerce.gov



Sincerely,

Jade Shain Taylor Huizenga

This letter and the subsequent town hall meeting in Moffett generated a lot of community engagement.

FEMA-STATE AGREEMENT (FSA) FOR FEMA-IA

On February 8, 2021, ODOC received Amendment Number Ten FEMA-State Agreement (FSA) for FEMA Individual Assistance (IA) data. This Amendment added to the list of State officials or employees that are authorized to request disaster survivor information.

INFORMATION SHARING ACCESS AGREEMENT (ISAA) FOR NFIP REPETATIVE LOSS

On February 19, 2021, ODOC received an ISAA from the Department of Homeland Security (DHS) and Federal Emergency Management Agency (FEMA) for data related to National Flood Insurance Program (NFIP) repetitive losses. This data will be used by ODOC to analyze which properties in eligible counties have experienced repetitive flood losses, leverage additional financial resources that may be available for a voluntary buyout program, and strengthen the State's 2019 CDBG-DR Action Plan.



State of Oklahoma

Emergency Solutions Grant ESG

2025 Annual Action Plan



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Timetable

The Oklahoma Department of Commerce will make available to Units of General Local Government and Non-Profit organizations all Emergency Solutions Grant Program funds within 60 days of the date the State receives its grant award notice from the U.S. Department of Housing and Urban Development (HUD).

Date	Description
March 25, 2025, 10:00 am	Mandatory Application Workshop
April 1, 2025	COC Documentation of any changes that have been made regarding ESG (such as additional requirements, changes to ESG awarding criteria, etc.)
April 1 – May 30, 2025	Applications entered into OKGrants
April 30, 2025	CoC Lead Agency Submits copy of PIT Count Data HDX Report to ODOC
May 16, 2025	CoC Lead Agency and Potential ESG Applicants Submits Reviewer Volunteers
May 30, 2025, 5:00 pm CST	Final application must be submitted into OKGrants
June 5, 2025	Application Reviewer Training Webinar
June – July, 2025	Continua score, rank and recommend
July 31, 2025	CoC Lead Agency Submits updated CoC Governance Charter and Policies
August – September, 2025	ODOC verifies eligibility of potential subrecipients
Second Week of September, 2025	Approximate Date for Award Notification to ESG subrecipients
September 26, 2025	CoC Lead Agency Submits copy of most current Consolidated Application showing name of Lead Agency or member agency who submitted application
October 1, 2025	ESG 2025 Contract Start Date
March 31, 2026	At least 50% of ESG25 funds must be expended
June 30, 2026	At least 75% of ESG25 funds must be expended
September 30, 2026	ESG 2025 Contract End Date - all funds must be expended by this date
November 30, 2026	ESG 2025 Closeout Documentation and Annual Report Due to ODOC

FY 2025 Emergency Solutions Grant Request for Application

Background

The original Homeless Assistance Grants were originally established by the Homeless Housing Act of 1986, in response to the growing issue of homelessness among men, women, and children in the United States. In 1987, the Emergency Shelter Grant Program was incorporated into subtitle B of title IV of the Stewart B. McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371-11378). In May 2009, the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act was signed establishing the newly reauthorized and updated Emergency Solutions Grant Program. This program is still the first step in a continuum of homeless assistance operated by HUD. Since its inception and incorporation into the McKinney-Vento Act, the ESG Program has helped States and localities provide facilities and services to meet the needs of homeless people.

Purpose

Strategies outlined by the United States Interagency Council on Homelessness (USICH) Federal Strategic Plan All In and supported by the Oklahoma Department of Commerce/ Community Development (ODOC/CD) continue to advance and energize the state's efforts to identify and combat the issues that result in homelessness. To that end ODOC/CD continues to lead the efforts for the preparation of the Consolidated Plan, devoted to the organization of federal resources to identify, strategize and implement effective ways to relieve the burden of low-income and in many cases homeless individuals and families. The Emergency Solutions Grant (ESG) Program is a component of the state's efforts to alleviate homelessness in Oklahoma. When used in conjunction with other local resources, the ESG program provides the foundation for homeless people moving toward and maintaining independence.

Eligible Applicants

Entities interested in making application, must meet one of three criteria:

- 1. Private Nonprofits that have a yearly independent audit and have received ODOC's ESG funds within two (2) grant cycles may directly apply for an ESG grant without sponsorship.
- 2. Private Nonprofits that have a yearly independent audit but are seeking ESG funding from ODOC for the first time must have a sponsor. After the first funded program year, the private nonprofit has received an audit with no major findings and an ODOC monitoring report with no major findings, the private nonprofit can request permission from ODOC to apply for ESG funding independently with no sponsor.
 - a. Community Action Agencies seeking ODOC ESG funding for the first time that have successful experience with following federal regulations, such as CSBG, Weatherization, etc., are exempt from this requirement and allowed to apply without a sponsor.
 - b. Private Nonprofits within the City of Tulsa ESG Entitlement area that have received ESG entitlement funds within the last two (2) grant cycles are also exempt from this requirement and allowed to apply without a sponsor.
 - i. Note: ODOC ESG funds can only serve clients outside of the City of Tulsa ESG Entitlement areas.
- 3. Private Nonprofits that do not have a yearly independent audit and/or have not received ODOC's ESG funds within two (2) grant cycles may seek sponsorship from either a unit of general local government, Community Action Agency (CAA) operating in that jurisdiction, or a private nonprofit that has previous experience with following federal regulations and being an umbrella organization. For example, a local United Way or the Nonprofit arm of a Housing Authority.
 - a. Emergency Shelters that are owned and/or operated by a unit of general local government or a CAA must submit their request for funding through their owner.
 - b. In the occurrence of a sponsor applying on behalf of more than one shelter, separate applications must be submitted for each shelter.

Sponsorship Responsibilities

The sponsor (unit of local government or local Community Action Agency) will be the signatory on the contract and the direct recipient of the ESG funds. In turn, there will be a process in which the sponsor receives documentation, such as invoices, to reimburse the non-profit for the services provided as approved in the written application.

The sponsor is responsible for the oversight of the financial reporting, Proof of Match and Federal Requirements of the sponsored non-profit.

A unit of general local government or CAA may retain housing or administrative funds (not exceeding 3.75% of the total grant) to carry out certain activities. Not all funds used by the unit of general local government or CAA for housing or administrative activities must be used by the non-profit.

A Sponsor/Shelter Agreement must be signed and submitted to ODOC before funds can be released.

ODOC/CD only funds ESG applicants serving non-entitlement areas. Potential applicants only serving program participants within the jurisdictions of the City of Tulsa or the City of Oklahoma City must apply through their respective entitlement communities.

Local Government Project Approval

Distribution of funding to CAA/Nonprofit is permitted only when the unit of general local government, in which the assisted project is to be located, certifies that it approves the proposed project. This certification must be submitted to ODOC with the application. If the CAA/Nonprofit intends to provide homeless assistance in multiple jurisdictions, a certification of approval must be submitted by each of the units of general local government in which the project(s) are to be located.

General Program Requirement Overview

- 1. These competitive program funds are to be used to provide services to clients who rent their residence (not homeowners) and meet the HUD <u>definition of homelessness</u> and <u>at risk of homelessness</u>.
- 2. Grant recipients must be an active participant in their local Continuum of Care.
- 3. Grant recipients must use their local Continuum of Care HMIS database. The only exception is for Domestic Violence Shelters who must have a comparable client-tracking database approved by ODOC. A comparable database must include the capacity to create reports that can be uploaded into the SAGE Reporting System.
- 4. Grant recipients must participate in the Continuum of Care Point in Time Count Survey.
- 5. Grant recipients must provide 100% match of grant funds to be used for services under the ESG program.
- 6. Grant recipients must be registered for the federal System for Award Management (SAM) system at www.sam.gov.
- 7. ODOC ESG grant recipients can only serve ESG program participants outside of the jurisdictions of the City of Tulsa or The City of Oklahoma City entitlement areas.
- 8. Each ESG applicant agency must provide at least one staff member familiar with ESG as an ESG application reviewer for their CoC.
 - a. Although new ODOC ESG applicants may not have staff members familiar with the ESG program, at least one ESG applicant reviewer must be provided.

Threshold Requirements for the Emergency Solutions Grant:

All Emergency Solutions Applicants must meet the listed threshold criteria. ODOC reserves the right to disqualify any applicant who does not meet one or more of the threshold criteria.

- Applicant / Shelter must have an emergency shelter component or partnership to provide emergency shelter services.
- Access to the Shelter or access to beds must be available 24 hours /7 days/365 days a year.
- Applicant/ Shelter must provide documentation of active involvement in Continuum of Care planning and coordination of service efforts.
- Applicant/Shelter must provide documentation that the applicant is a participating member of the Continuum of Care's Coordinated Intake/Assessment.
- Applicant/ Shelter must provide required data/reporting through their Continuum of Care HMIS or comparable (DV organizations only) database.
- All outstanding monitoring findings and audit or unresolved financial/program issues from previously awarded grants must be resolved.
- All required certifications must be received and signed by the appropriate signatory.
- One hundred percent (100%) of contract funds including match must be expended before newly awarded funds can be used.
- Must have a complete set of written policies and procedures in which to manage the Emergency Solutions Grant Program.
 - o Must have Termination of Participation and Grievance Procedures.
 - o Must have a process for participation of Homeless Persons in Policymaking and Operations.

- o Must have a Confidentiality Policy.
- Must have a current board approved Financial Audit submitted before funds can be requested from grant.
- Must follow all General Record Keeping Requirements, both for financial and client files.
- Must meet all spending timeline requirements. Fifty percent (50%) of awarded funds must be spent by the first six (6) months of the contract; seventy-five percent (75%) must be spent within nine (9) months of the contract and one hundred percent (100%) must be spent by the end of the contract period.
- Must be activated in the System for Award Management (SAM) at sam.gov. Applicant must be clear of any findings and show as eligible for federal contracts and assistance awards.
- Each ODOC ESG applicant must provide at least one (1) ESG application scorer with ESG experience (unless it is a first-time applicant) one (1) week before the ESG Application Reviewer Training.
 - o Although new ODOC ESG applicants may not have staff members familiar with the ESG program, at least one ESG applicant reviewer must be provided.

Continuum of Care

The model used by Continuum of Cares (CoCs) is based on an understanding that homelessness is not caused by simply a lack of shelter but involves a variety of underlying needs. ODOC partners with the CoCs for the purpose of alleviating homelessness through a community-based process providing a comprehensive response to the diverse needs of homeless persons. Applicants are not eligible to apply for ODOC's ESG funds unless they are an active member of their CoC. Therefore, applicants must obtain verification from their Continuum of Care that they are involved in the CoC organization and service delivery process as well as participate in the HMIS data collecting, Point-In-Time Count Survey and Coordinated Intake. The fundamental components of a Continuum of Care system are:

- Outreach and assessment to identify a homeless person's needs.
- Immediate (emergency) shelter as a safe, decent alternative to the streets.
- Transitional housing with appropriate supportive services to help people reach independent living.
- Permanent housing or permanent supportive housing for the disabled homeless.

Continuum of Care Criteria

The seven (7) State Program eligible Continuum of Care organizations will be allocated a portion of the State ESG program funds. A Continuum of Care will be allocated funds upon proof of compliance with the HUD Continuum rule definitions, regulations and timeline pertaining to Continuum structure and planning process.

An eligible Continuum of Care must manage the three primary responsibilities established by HUD under the CoC Program regulations:

1. Operate the CoC:

- Establish a Board to act on behalf of the Continuum of Care
- Conduct semi-annual (twice yearly) meetings of the full membership
- Issue a public invitation for new members, at least annually
- Adopt and follow a written process to select a board
- Appoint additional committees, subcommittees, or work groups
- Develop and follow a governance charter detailing the responsibilities of all parties
- Consult with recipients and subrecipients to establish performance targets appropriate for population and program type, monitor the performance of recipients and subrecipients, evaluate outcomes, and take action against poor performers
- Evaluate and report to HUD and ODOC outcomes of ESG and CoC projects as instructed.
- Establish and operate a centralized or coordinated assessment system
- Establish and follow written standards for providing CoC assistance

2. <u>Designate and Operate a Homeless Management Information System:</u>

- Designate a single HMIS
- Select an eligible applicant to manage the CoC's HMIS
- Monitor recipient and subrecipient participation in the HMIS
- Review and approve privacy, security, and data quality plans

3. Coordinate CoC Planning:

- Coordinate the implementation of a housing and service system within its geographic area
- Conduct a Point-in-Time count of homeless persons, at least biennially
- Conduct an annual gaps analysis
- Provide information required to complete the Consolidated Plan(s)
- Consult with ESG recipients regarding the allocation of ESG funds and the evaluation of the performance of ESG recipients and subrecipients

Any Continuum of Care entity that does not comply with the responsibilities above will not receive the allocated funds for their region. These funds will be re-distributed to other eligible Continuum of Care organizations through a procedure set by ODOC/CD.

Continuum of Care Authority Responsibility relating to the ESG Program:

- The CoC Governing Board must establish policies/procedures to decide the dollar amount of grants awarded in their CoC region. The overall total amounts awarded must meet at minimum the 60(Shelter)/40(Housing)% spending regulations of the ESG Program, with at least forty percent (40%) of the total amounts in Housing (Rapid Rehousing and Prevention together).
 - o If a CoC chooses not to track the amount each ESG applicant within their CoC has in housing, then, each ESG applicant within that CoC must have at least 40% of their total grant amount budgeted in Housing (Rapid Re-Housing and Prevention together) to meet this requirement.
- The CoC Governing Board must establish policies/procedures to add restrictions/ requirements to the scoring process for awarding ESG funds. Any restrictions/requirements added to the scoring process must be in line with making improvements to better adhere to the CoC's Action Plan and/or Performance Measures.
- The CoC Governing Board must establish an Appeal Process for a case in which an Emergency Solutions Grant Program applicant has its application rejected. The Process must include the following:
 - o Number of days in which the applicant must submit an appeal in writing;
 - o How the Board shall meet (including timeframe) to hear the appeal;
 - o After local appeal procedures are exhausted, the applicant may appeal the CoC's decision to ODOC.
- The CoC Governing Board must establish policies/procedures regarding how to redistribute funds that are returned to the CoC if funds are made available after initial awards are granted.
- The CoC Governing Board creates policies/procedures regarding how funds will be awarded/distributed throughout each Continua service area to best answer the Federal/State's overall "No Wrong Door" goals.
- The CoC Governing Board must schedule one Public Meeting between the months of June and September of each year. The meeting agenda must include time on the agenda to discuss any proposed changes to the Emergency Solutions Grant Program for the next funding year. The following process must be followed to allow public posting of the annual meeting:
 - O A meeting notice must be posted in the local paper and/or Collaborative Applicant's (CoC Lead Agency) Website.

o The meeting agenda must be posted at all CoC's members' offices and shelters, the site of the location and at the CoC's Lead Contact's Offices a minimum of 48-hours before the meeting.

Continuum of Care Eligibility Documentation:

Deadlines for the following documents can be found on the Timetable (Page 2):

- 1. CoC Lead Agency must submit the following to ODOC/CD:
 - a. Names of volunteer application reviewers above and beyond application reviewers each ESG applicant provides.
 - b. The following data to show proof of Lead CoC Eligibility:
 - i. Copy of most updated CoC Governance Charter.
 - ii. Copy of most current Point-in-Time Survey data showing who submitted the response into the HDX (Only if this has not already been submitted).
 - iii. Copy of most current Continuum of Care Grant Consolidated Application showing the name of the lead agency or member agency who submitted the application.
 - iv. Documentation of any changes that have been made regarding the grant amounts awarded and proof that membership was made aware and agreed to approved changes:
 - 1. Copy of Agenda and Minutes of meeting where changes were discussed and/or approved.
 - 2. Copy of policies/procedures created as a result of above discussion and approval.

Distribution/Redistribution of non-awarded funds:

CoC allocated funding will be redistributed to remaining Continuum of Care entities when:

- The CoC does not comply with the responsibilities listed above
- A CoC is not considered an eligible Continuum of Care.
- Funds are not allocated due to there being no eligible CoC in a region
- Dollars are returned due to lack of eligible applicants in a CoC region.

Funds not awarded through a first-round allocation will be redistributed to other eligible Continuum of Care organizations through a procedure set by ODOC/CD. Redistribution may be based on performance and need of each CoC as a whole network.

ODOC reserves the right to recapture any administrative funds not budgeted by the awarded subrecipients equal to the maximum spending requirement allowed by HUD regulations.

ESG Program Design

The ESG Program is designed to address the following priority areas:

- Identification/prioritization of community needs and assessments.
- Clients' successful movement towards self-sufficiency.
- Development of Continuum of Care Participation.
- Performance Measure Results and Reporting.

Performance Measures

Emergency Solutions subrecipients are required to choose and track all State Performance measures that best match their own organizational performance measures and local Continuum Action Plan. Each subrecipient establishes performance measures during the application process and are to use performance measures to systematically evaluate whether their efforts are making an impact on the program participants they are serving and/or the problem they are targeting. A subrecipient can have local performance measures that are different from the State Performance Measures listed in Part II.A. of this

requirement below, but at least two (2) out of the four (4) State Performance Measures must be tracked. Victim Service Providers must collect the same measures in their own comparable database. Status will be reviewed during monitoring and a final count will be reported for the program year's closeout.

The Statewide Performance Measures to be tracked are:

- 1. Number of persons that exit ESG programs that are not Homeless Prevention into permanent housing.
 - a. Found on CAPER #23C, Permanent Destinations Subtotal.
- 2. Number of persons in Homeless Prevention exiting to permanent housing.
 - a. Found on CAPER #24, Homeless Prevention Housing Assessment at Exit. Add the first 6 rows of the Total column.
- 3. Total number of persons served.
 - a. Found on CAPER #5A, 1. Total Number of Persons Served, Count of Clients column.
- 4. Total number of persons with income at exit or end of grant year.
 - a. Found on CAPER #17, Cash Income Sources. Add all numbers starting with Earned Income through Other source in both the Stayers and Leavers columns on the far right.

Performance Measures are Recorded and Tracked as Follows:

- 1. Goals for all appropriate performance measures start with what is reported by each Applicant in the Application.
 - a. A subrecipient can have local performance measures that are different from the State Performance Measures listed above, but at least two (2) out of the four (4) State Performance Measures must be tracked.
 - b. A subrecipient that has local performance measures different from the State Performance Measures listed above must explain in the Application how accomplishing their local goals or performance measures will overall help achieve the State Performance measures.
- 2. Each Performance Measure must have the following structure:
 - a. Clearly identify performance indicator;
 - b. Set performance target by establishing a clear plan for achieving the goal;
 - c. Measure performance realistically and quantitatively (with percentages or numbers);
 - d. Report Progress to ODOC during monitoring and at grant Closeout; and
 - e. Identify and make improvements.
- 3. Performance Measures must be tracked for a twelve-month (12) period, preferably the ESG contract period (between October 1st of one year to September 30th of the next).
- 4. Compliance of tracking performance measures will be reviewed during monitoring. Final performance measure numbers will be reported on the End of Program/Closeout Report when the subrecipient will identify areas where targets were not met and make improvements.
- 5. Subrecipients should use Point-in-Time (PIT) Data and/or data from HMIS (or a comparable database for Victim Service Providers).

<u>Definitions related to the Performance Measures:</u>

- 1. Performance Indicators:
 - a. Output what a program or system does or produces (e.g., number served, cost/ household, length of stay, etc.).
 - b. Outcomes what is gained or changed as a result of output related to client knowledge, skills, behaviors or conditions (e.g., housing destination, recidivism, income changes, etc.)
- 2. <u>Performance Target</u>: percentage or numeric goal set for an indicator.

Funds distributed to Rural Continuum of Care.

The State recognizes that use of the established Continuum of Care structure is the best method for determining appropriate entities for the distribution of the New ESG funds. Starting with a base of \$140,000, the formula described below will be used to distribute the remainder of the funds; each eligible Continuum will be provided a target allocation of funds for distribution within its service area. Tulsa CoC

will receive a base allocation of \$60,000 to be awarded to service providers that operate outside of the City of Tulsa entitlement area. Based on the 2023 HUD allocation of \$1,677,389 (minus the ODOC admin of \$62,902 and the ISOK HMIS contract of \$30,000), the 2025 Continuum of Care allocations *are projected to be* as follows:

СоС	Allocation with Base of \$140,000 Tulsa with Base of \$60,000
Cleveland	\$165,430.00
North Central	\$217,504.00
Northeast	\$235,512.00
Northwest	\$258,662.00
Southeast	\$349,282.00
Southwest	\$271,958.00
Tulsa (minus City of Tulsa)	\$ 86,138.00

The formula used for ESG project funding:

- a. 10% 2021 Estimated Total Population
- b. 30% Weighted Median Income Measure
- c. 30% April 2020 Unemployment Rate
- d. 30% 2017 2021 Housing units experience severe overcrowding (1.5 occupants per room)

The formula will be updated with current data in April 2025.

Once HUD has released the FY 2025 ESG allocations, the formula will be used and the allocations updated accordingly.

According to the set Timetable (page 2), Each Continuum will collect, score and rank submitted applications according to the ODOC provided rating system and return the scores and ranking to ODOC. The recommendations for funding will be assessed for compliance with all ESG and CoC threshold criteria. Applications meeting the threshold criteria will be verified and awards determined.

ODOC will follow a State version of the Continuum of Care grant process. Lead agencies must submit certain basic demographic and capacity data for their Continuum of Care service area.

Documentation will be required to show proof of capacity and prior success in managing of programs that match the eligible activities of ESG.

After ODOC has received the recommendations from each Continuum of Care, ODOC will enter into contractual agreements directly with the approved subrecipient to carry out the financial and programmatic requirements according to law. The contracts will outline the funding source, funding year, amount of funding, terms and conditions.

Each CoC has the authority and responsibility to create their own policies and procedures pertaining to funding amounts and division of funding eligible activities.

Eligible Program Participants

In order to receive financial assistance or services funded by ESG, individuals and families—whether homeless or housed—must at least meet the following minimum criteria:

- 1) The household must be at or below 30 percent of Area Median Income (AMI). Income limits are available on HUD's web site (https://www.hudexchange.info/resource/5079/esg-income-limits/).
 - a. When the household is literally homeless, the below 30% AMI Income limit cannot be used to determine approval for assistance. At the time the household is re-assessed or reevaluated for continued or extended assistance is when the household cannot make above 30 percent Area Median Income (AMI).
- 2) The household must be either homeless or at risk of losing its housing and meet both of the following circumstances:
 - a. no appropriate subsequent housing options have been identified; AND
 - b. the household lacks the financial resources and support networks needed to obtain immediate housing or remain in its existing housing.

Eligible Program Activities

While flexible in terms of the wide range of servings available to homeless sub-populations and preventing persons from becoming homeless, the ESG Program legislation and implementing regulations do limit the types of activities and amounts of funds that can be spent on different activities. Details regarding eligible activities are listed below. Subrecipients shall perform only those eligible activities prescribed by 24 CFR Part 576, Emergency Solutions Grant Program. If an activity/service is not listed, then that activity/service cannot be funded through the ESG program.

1. Street Outreach Component (24 CFR § 576.101).

- a. Eligible Costs. Subject to the expenditure limit in § 576.100(b), ESG funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. For the purposes of this section, the term "unsheltered homeless people" means individuals and families who qualify as homeless under paragraph (1)(i) of the "homeless" definition under § 576.2. The eligible costs and requirements for essential services consist of:
 - i. Engagement. The costs of activities to locate, identify, and build relationships with unsheltered homeless people and engage them for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs. These activities consist of making an initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting and providing information and referrals to programs targeted to homeless people and mainstream social services and housing programs, including emergency shelter, transitional housing, community-based services, permanent supportive housing, and rapid re-housing programs. Eligible costs include the cell phone costs of outreach workers during the performance of these activities.
 - ii. Case Management. The cost of assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant. Eligible services and activities are as follows: using the centralized or coordinated assessment system as required under § 576.400(d); conducting the initial evaluation required under § 576.401(a), including verifying and documenting eligibility; counseling; developing, securing and coordinating services; obtaining Federal, State, and local benefits; monitoring and evaluating program participant progress; providing information and referrals to other providers; and developing an individualized housing and service plan, including planning a path to permanent housing stability.
 - iii. Emergency health services.
 - 1) Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals operating in community-based settings, including streets, parks, and other places where unsheltered homeless people are living.

- 2) ESG funds may be used only for these services to the extent that other appropriate health services are inaccessible or unavailable within the area.
- 3) Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate emergency medical treatment; and providing medication and follow-up services.
- iv. Emergency mental health services.
 - 1) Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions operating in community-based settings, including streets, parks, and other places where unsheltered people are living.
 - 2) ESG funds may be used only for these services to the extent that other appropriate mental health services are inaccessible or unavailable within the community.
 - 3) Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances.
 - 4) Eligible treatment consists of crisis interventions, the prescription of psychotropic medications, explanation about the use and management of medications, and combinations of therapeutic approaches to address multiple problems.
- v. Transportation. The transportation costs of travel by outreach workers, social workers, medical professionals, or other service providers are eligible, provided that this travel takes place during the provision of services eligible under this section. The costs of transporting unsheltered people to emergency shelters or other service facilities are also eligible. These costs include the following:
 - 1) The cost of a program participant's travel on public transportation;
 - 2) If service workers use their own vehicles, mileage allowance for service workers to visit program participants;
 - 3) The cost of purchasing or leasing a vehicle for the recipient or subrecipient in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes and maintenance for the vehicle; and
 - 4) The travel costs of recipient or subrecipient staff to accompany or assist program participants to use public transportation.
- vi. Services for special populations. ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under paragraphs (a.)(i.) through (a.)(v.) of this section. The term victim services means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.
- b. Minimum period of use. The ESG subrecipient must provide services to homeless individuals and families for at least the period during which ESG funds are provided.
- c. Maintenance of effort.
 - i. If the recipient or subrecipient is a unit of general-purpose local government, its ESG funds cannot be used to replace funds the local government provided for street outreach and emergency shelter services during the immediately preceding 12-month period, unless HUD determines that the unit of general-purpose local government is in a severe financial deficit.
 - ii. Upon the recipient's request, HUD will determine whether the unit of general-purpose local government is in a severe financial deficit, based on the recipient's demonstration as outlined in 24 CFR 576.101 (c)(2)(i-iv).

2. Emergency Shelter Component (24 CFR § 576.102).

a. General. Subject to the expenditure limit in § 576.100(b), ESG funds may be used for costs of providing essential services to homeless families and individuals in emergency shelters,

renovating buildings to be used as emergency shelter for homeless families and individuals, and operating emergency shelters.

- i. Essential services. ESG funds may be used to provide essential services to individuals and families who are in an emergency shelter, as follows:
 - 1. Case management. The cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible. Component services and activities consist of:
 - a) Using the centralized or coordinated assessment system as required under § 576.400(d);
 - b) Conducting the initial evaluation required under § 576.401(a), including verifying and documenting eligibility;
 - c) Counseling;
 - d) Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;
 - e) Monitoring and evaluating program participant progress;
 - f) Providing information and referrals to other providers;
 - g) Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and
 - h) Developing an individualized housing and service plan, including planning a path to permanent housing stability.
 - 2. Childcare. The costs of childcare for program participants, including providing meals and snacks, and comprehensive and coordinated sets of appropriate developmental activities, are eligible. The children must be under the age of 13 unless they are disabled. Disabled children must be under the age of 18. The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.
 - 3. Education services. When necessary for the program participant to obtain and maintain housing, the costs of improving knowledge and basic educational skills are eligible. Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED). Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.
 - 4. Employment assistance and job training. The costs of employment assistance and job training programs are eligible, including classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is an eligible cost. Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates. Services that assist individuals in securing employment consist of employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching; and referral to community resources.
 - 5. Outpatient health services. Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals. Emergency Solutions Grant (ESG) funds may be used only for these services to the extent that other appropriate health services are unavailable within the community. Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate medical treatment, preventive medical care, and health maintenance services, including emergency medical services; providing medication and follow-up services; and providing preventive and non-cosmetic dental care.

6. Legal services.

- a) Eligible costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the State in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing.
- b) Emergency Solutions Grant (ESG) funds may be used only for these services to the extent that other appropriate legal services are unavailable or inaccessible within the community.
- c) Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, and the resolution of outstanding criminal warrants.
- d) Component services or activities may include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling.
- e) Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services.
- f) Legal services for immigration and citizenship matters and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are ineligible costs.
- 7. Life skills training. The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance use, and homelessness are eligible costs. These services must be necessary to assist the program participant to function independently in the community. Component life skills training are budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting.
- 8. Mental health services.
 - a) Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions.
 - b) ESG funds may only be used for these services to the extent that other appropriate mental health services are unavailable or inaccessible within the community.
 - c) Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances. Problem areas may include family and marital relationships, parent-child problems, or symptom management.
 - d) Eligible treatment consists of crisis interventions; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.
- 9. Substance abuse treatment services.
 - a) Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals.
 - b) ESG funds may only be used for these services to the extent that other appropriate substance abuse treatment services are unavailable or inaccessible within the community.

- c) Eligible treatment consists of client intake and assessment, and outpatient treatment for up to 30 days. Group and individual counseling and drug testing are eligible costs. Inpatient detoxification and other inpatient drug or alcohol treatment are not eligible costs.
- 10. Transportation. Eligible costs consist of the transportation costs of a program participant's travel to and from medical care, employment, childcare, or other eligible essential services facilities. These costs include the following:
 - a) The cost of a program participant's travel on public transportation;
 - b) If service workers use their own vehicles, mileage allowance for service workers to visit program participants;
 - c) The cost of purchasing or leasing a vehicle for the recipient or subrecipient in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes, and maintenance for the vehicle; and
 - d) The travel costs of recipient or subrecipient staff to accompany or assist program participants to use public transportation.
- 11. Services for special populations. ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under paragraphs a.i.1) through a.i.10) of this section. The term victim services means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.
- ii. Renovation. Eligible costs include labor, materials, tools, and other costs for renovation (including major rehabilitation of an emergency shelter or conversion of a building into an emergency shelter). The emergency shelter must be owned by a government entity or private nonprofit organization. Note The Oklahoma Department of Commerce does not allow for shelter renovation using ESG funds.
- iii. Shelter operations. Eligible costs are the costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter. Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual.
- iv. Assistance required under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA). Eligible costs are the costs of providing URA assistance under § 576.408, including relocation payments and other assistance to persons displaced by a project assisted with ESG funds. Persons that receive URA assistance are not considered "program participants" for the purposes of this part, and relocation payments and other URA assistance are not considered "rental assistance" or "housing relocation and stabilization services" for the purposes of this part.
- b. Prohibition against involuntary family separation. The age of a child under age 18 must not be used as a basis for denying any family's admission to an emergency shelter that uses Emergency Solutions Grant (ESG) funding or services and provides shelter to families with children under age 18.
- c. Minimum period of use.
 - i. Renovated buildings. Each building renovated with ESG funds must be maintained as a shelter for homeless individuals and families for not less than a period of 3 or 10 years, depending on the type of renovation and the value of the building. The "value of the building" is the reasonable monetary value assigned to the building, such as the value assigned by an independent real estate appraiser. The minimum use period must begin on the date the building is first occupied by a homeless individual or family after the completed renovation. A minimum period of use of 10 years, required for major rehabilitation and

conversion, must be enforced by a recorded deed or use restriction. *Note – The Oklahoma Department of Commerce does not allow for shelter renovation using ESG funds.*

- 1) Major rehabilitation. If the rehabilitation cost of an emergency shelter exceeds 75 percent of the value of the building before rehabilitation, the minimum period of use is 10 years.
- 2) Conversion. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the minimum period of use is 10 years.
- 3) Renovation other than major rehabilitation or conversion. In all other cases where ESG funds are used for renovation, the minimum period of use is 3 years.
- ii. Essential services and shelter operations. Where the recipient or subrecipient uses ESG funds solely for essential services or shelter operations, the recipient or subrecipient must provide services or shelter to homeless individuals and families at least for the period during which the ESG funds are provided. The recipient or subrecipient does not need to limit these services or shelter to a particular site or structure, so long as the site or structure serves the same type of persons originally served with the assistance (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or serves homeless persons in the same area where the recipient or subrecipient originally provided the services or shelter.
- iii. Long-term Emergency Housing (alternative to Transitional Housing). The Transitional Housing that was Grandfathered in as of 2010 is no longer an eligible activity for the ESG Program. Applicants are asked to propose projects for long-term Emergency Shelter. This type of shelter would be for clients whose needs to become stable enough for permanent housing will take longer than the regular shelter stay period. Details for approval of an extended length of stay in a shelter environment will have to be provided in the Project Narrative questions portion of the application.
- d. Maintenance of effort. The maintenance of effort requirements under § 576.101(c), which apply to the use of ESG funds for essential services related to street outreach, also apply for the use of such funds for essential services related to emergency shelter.

3. Homeless Prevention (24 CFR § 576.103).

a. ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the "homeless" definition in § 576.2. This assistance, referred to as homelessness prevention, may be provided to individuals and families who meet the criteria under the "at risk of homelessness" definition, or who meet the criteria in paragraph (2), (3), or (4) of the "homeless" definition in § 576.2 and have an annual income below 30 percent of median family income for the area, as determined by HUD. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing. Homelessness prevention must be provided in accordance with the housing relocation and stabilization services requirements in § 576.105, the short-term and medium-term rental assistance requirements in § 576.400.

4. Rapid Re-Housing Assistance Component (24 CFR § 576.104).

a. ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. This assistance, referred to as rapid re-housing assistance, may be provided to program participants who meet the criteria under paragraph (1) of the "homeless" definition in § 576.2 or who meet the criteria under paragraph (4) of the "homeless" definition and live in an emergency shelter or other place described in paragraph (1) of the "homeless" definition. The rapid re-housing assistance must be

provided in accordance with the housing relocation and stabilization services requirements in § 576.105, the short-term and medium-term rental assistance requirements in § 576.106, and the written standards and procedures established under § 576.400.

5. Housing Relocation and Stabilization Services (24 CFR § 576.105).

- a. Financial assistance costs. Subject to the general conditions under § 576.103 and § 576.104, ESG funds may be used to pay housing owners, utility companies, and other third parties for the following costs:
 - i. Rental application fees. ESG funds may pay for the rental housing application fee that is charged by the owner to all applicants.
 - ii. Security deposits. ESG funds may pay for a security deposit that is equal to no more than 2 months' rent.
 - iii. Last month's rent. If necessary to obtain housing for a program participant, the last month's rent may be paid from ESG funds to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. This assistance must not exceed one month's rent and must be included in calculating the program participant's total rental assistance, which cannot exceed 24 months during any 3-year period.
 - iv. Utility deposits. ESG funds may pay for a standard utility deposit required by the utility company for all customers for the utilities listed in paragraph (5) of this section.
 - v. Utility payments. ESG funds may pay for up to 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service. A partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments. Eligible utility services are gas, electric, water, and sewage. No program participant shall receive more than 24 months of utility assistance within any 3-year period.
 - vi. Moving costs. ESG funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance under paragraph (b) of this section and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.
 - vii. If a program participant receiving short- or medium-term rental assistance under § 576.106 meets the conditions for an emergency transfer under 24 CFR 5.2005(e), ESG funds may be used to pay amounts owed for breaking a lease to affect an emergency transfer. These costs are not subject to the 24-month limit on rental assistance under § 576.106.
- b. Services costs. Subject to the general restrictions under § 576.103 and § 576.104, ESG funds may be used to pay the costs of providing the following services:
 - i. Housing search and placement. Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing, include the following:
 - 1) Assessment of housing barriers, needs, and preferences;
 - 2) Development of an action plan for locating housing;
 - 3) Housing search;
 - 4) Outreach to and negotiation with owners;
 - 5) Assistance with submitting rental applications and understanding leases:
 - 6) Assessment of housing for compliance with Emergency Solutions Grant (ESG) requirements for habitability, lead-based paint, and rent reasonableness;
 - 7) Assistance with obtaining utilities and making moving arrangements; and
 - 8) Tenant counseling.
 - ii. Housing stability case management. ESG funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. This assistance

cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing. Component services and activities consist of:

- 1) Using the centralized or coordinated assessment system as required under § 576.400(d), to evaluate individuals and families applying for or receiving homelessness prevention or rapid re-housing assistance;
- 2) Conducting the initial evaluation required under § 576.401(a), including verifying and documenting eligibility, for individuals and families applying for homelessness prevention or rapid re-housing assistance;
- 3) Counseling;
- 4) Developing, securing, and coordinating services and obtaining Federal, State, and local benefits:
- 5) Monitoring and evaluating program participant progress;
- 6) Providing information and referrals to other providers;
- 7) Developing an individualized housing and service plan, including planning a path to permanent housing stability; and
- 8) Conducting re-evaluations required under § 576.401(b).
- iii. Mediation. ESG funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.
- iv. Legal services. ESG funds may pay for legal services, as set forth in § 576.102(a)(1)(vi), except that the eligible subject matters also include landlord/tenant matters, and the services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides.
- v. Credit repair. ESG funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.
- c. Maximum amounts and periods of assistance. The recipient may set a maximum dollar amount that a program participant may receive for each type of financial assistance under paragraph (a.) of this section. The recipient may also set a maximum period for which a program participant may receive any of the types of assistance or services under this section. However, except for housing stability case management, the total period for which any program participant may receive the services under paragraph (b.) of this section must not exceed 24 months during any 3-year period. The limits on the assistance under this section apply to the total assistance an individual receives, either as an individual or as part of a family.
- d. Use with other subsidies. Financial assistance under paragraph (a.) of this section cannot be provided to a program participant who is receiving the same type of assistance through other public sources or to a program participant who has been provided with replacement housing payments under the URA, during the period of time covered by the URA payments.
- e. Housing counseling. Housing counseling, as defined in § 5.100, that is funded with or provided in connection with ESG funds must be carried out in accordance with § 5.111. When recipients or sub recipients provide housing services to eligible persons that are incidental to a larger set of holistic case management services, these services do not meet the definition of housing counseling, as defined in § 5.100, and therefore are not required to be carried out in accordance with the certification requirements of § 5.111.

6. Short-term and Medium-term Rental Assistance (24 CFR § 576.106).

a. General provisions. Subject to the general conditions under § 576.103 and § 576.104, the recipient or subrecipient may provide a program participant with up to 24 months of rental

assistance during any 3-year period. This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance.

- i. Short-term rental assistance is assistance for up to 3 months of rent.
- ii. Medium-term rental assistance is assistance for more than 3 months but not more than 24 months of rent.
- iii. Payment of rental arrears consists of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.
- iv. Rental assistance may be tenant-based or project-based, as set forth in paragraphs (h.) and (i.) of this section. *Note The Oklahoma Department of Commerce does not allow ESG funds to be expended on project-based rental assistance.*
- b. Discretion to set caps and conditions. Subject to the requirements of this section, the recipient may set a maximum amount or percentage of rental assistance that a program participant may receive, a maximum number of months that a program participant may receive rental assistance, or a maximum number of times that a program participant may receive rental assistance. The recipient may also require program participants to share in the costs of rent.
- c. Use with other subsidies. Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance or living in a housing unit receiving project-based rental assistance or operating assistance, through other public sources. Rental assistance may not be provided to a program participant who has been provided with replacement housing payments under the URA during the period of time covered by the URA payments.
- d. Rent restrictions.
 - i. Rental assistance cannot be provided unless the rent does not exceed the Fair Market Rent established by HUD, as provided under 24 CFR part 888, and complies with HUD's standard of rent reasonableness, as established under 24 CFR 982.507.
 - a. ESG cannot pay for the rent of any unit that does not meet HUD's FMR and Rent Reasonableness Standards, even if excess rent costs are paid with other non-ESG funds.
 - b. Rent reasonableness and FMR requirements do not apply when a program participant receives only financial assistance or services under Housing Stabilization and Relocation Services or rent arrears.
 - ii. For purposes of calculating rent under this section, the rent shall equal the sum of the total monthly rent for the unit, any fees required for occupancy under the lease (other than late fees and pet fees) and, if the tenant pays separately for utilities, the monthly allowance for utilities (excluding telephone) established by the public housing authority for the area in which the housing is located.
- e. Rental assistance agreement. The subrecipient may make rental assistance payments only to an owner with whom the subrecipient has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the recipient or subrecipient a copy of any notice to the program participant to vacate the housing unit or any complaint used under State or local law to commence an eviction action against the program participant.
- i. Each rental assistance agreement that is executed or renewed on or after December 16, 2016, must include all protections that apply to tenants and applicants under 24 CFR part 5, subpart L, as supplemented by § 576.409, except for the emergency transfer plan requirements under 24 CFR 5.2005(e) and 576.409(d). If the housing is not assisted under another "covered housing program", as defined in 24 CFR 5.2003, the agreement may provide that the owner's obligations under 24 CFR part 5, subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), expire at the end of the rental assistance period.
- f. Late payments. The recipient or subrecipient must make timely payments to each owner in accordance with the rental assistance agreement. The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program

- participant's lease. The recipient or subrecipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds.
- g. Lease. Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears. The lease must be between the owner and the program participant for a duration of no less than 30 days. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or canceled checks.
- i. For program participants living in housing with project-based rental assistance under paragraph (i) of this section, the lease must have an initial term of 1 year. Each lease executed on or after December 16, 2016, must include a lease provision or incorporate a lease addendum that includes all requirements that apply to tenants, the owner or lease under 24 CFR part 5, subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), as supplemented by 24 CFR 576.409, including the prohibited bases for eviction and restrictions on construing lease terms under 24 CFR 5.2005(b) and (c). If the housing is not assisted under another "covered housing program," as defined in 24 CFR 5.2003, the lease provision or lease addendum may be written to expire at the end of the rental assistance period.
 - 1) Note The Oklahoma Department of Commerce does not allow ESG funds to be expended on project-based rental assistance.
- h. Tenant-based rental assistance.
 - i. A program participant who receives tenant-based rental assistance may select a housing unit in which to live and may move to another unit or building and continue to receive rental assistance, as long as the program participant continues to meet the program requirements.
 - ii. The recipient may require that all program participants live within a particular area for the period in which the rental assistance is provided.
 - iii. The rental assistance agreement with the owner must terminate and no further rental assistance payments under that agreement may be made if:
 - 1) The program participant moves out of the housing unit for which the program participant has a lease;
 - 2) The lease terminates and is not renewed; or
 - 3) The program participant becomes ineligible to receive ESG rental assistance.
- i. Project-based rental assistance. If the recipient or subrecipient identifies a permanent housing unit that meets ESG requirements and becomes available before a program participant is identified to lease the unit, the recipient or subrecipient may enter into a rental assistance agreement with the owner to reserve the unit and subsidize its rent in accordance with the requirements outlined in 24 CFR 576.106(a)(i). Note The Oklahoma Department of Commerce does not allow ESG funds to be expended on project-based rental assistance.
- j. Changes in household composition. The limits on the assistance under this section apply to the total assistance an individual receives, either as an individual or as part of a family.

7. HMIS Component (24 CFR § 576.107).

- a. Eligible costs.
 - i. The recipient or subrecipient may use ESG funds to pay the costs of contributing data to the HMIS designated by the Continuum of Care for the area, including the costs of:
 - 1) Purchasing or leasing computer hardware;
 - 2) Purchasing software or software licenses;
 - 3) Purchasing or leasing equipment, including telephones, fax machines, and furniture;
 - 4) Obtaining technical support;
 - 5) Leasing office space;
 - 6) Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS;

- 7) Paying salaries for operating HMIS, including:
 - a) Completing data entry;
 - b) Monitoring and reviewing data quality;
 - c) Completing data analysis;
 - d) Reporting to the HMIS Lead;
 - e) Training staff on using the HMIS or comparable database; and
 - f) Implementing and complying with HMIS requirements;
- 8) Paying costs of staff to travel to and attend HUD-sponsored and HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act;
- 9) Paying staff travel costs to conduct intake; and
- 10) Paying participation fees charged by the HMIS Lead if the recipient or subrecipient is not the HMIS Lead. The HMIS Lead is the entity designated by the Continuum of Care to operate the area's HMIS.
- ii. If the recipient is the HMIS lead agency, as designated by the Continuum of Care in the most recent fiscal year Continuum of Care Homeless Assistance Grants Competition, it may also use ESG funds to pay the costs of:
 - 1) Hosting and maintaining HMIS software or data;
 - 2) Backing up, recovering, or repairing HMIS software or data;
 - 3) Upgrading, customizing, and enhancing the HMIS;
 - 4) Integrating and warehousing data, including development of a data warehouse for use in aggregating data from subrecipients using multiple software systems;
 - 5) Administering the system;
 - 6) Reporting to providers, the Continuum of Care, and HUD; and
 - 7) Conducting training on using the system or a comparable database, including traveling to the training.
- iii. If the subrecipient is a victim services provider or a legal services provider, it may use ESG funds to establish and operate a comparable database that collects client-level data over time (i.e., longitudinal data) and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to an HMIS.
- b. General restrictions. Activities funded under this section must comply with HUD's standards on participation, data collection, and reporting under a local HMIS.

8. Administrative Activities (24 CFR § 576.108).

- a. Eligible costs. Subrecipients may use up to 3.75 percent of its ESG grant for the payment of administrative costs related to the planning and execution of ESG activities. This does not include staff and overhead costs directly related to carrying out activities eligible under § 576.101 through § 576.107, because those costs are eligible as part of those activities. Eligible administrative costs include:
 - i. General management, oversight and coordination. Costs of overall program management, coordination, monitoring, and evaluation. These costs include, but are not limited to, necessary expenditures for the following:
 - 1) Salaries, wages, and related costs of the recipient's staff, the staff of subrecipients, or other staff engaged in program administration. In charging costs to this category, the recipient may either include the entire salary, wages, and related costs allocable to the program of each person whose primary responsibilities with regard to the program involve program administration assignments, or the pro rata share of the salary, wages, and related costs of each person whose job includes any program administration assignments. The recipient may use only one of these methods for each fiscal year grant. Program administration assignments include the following:
 - a) Preparing program budgets and schedules, and amendments to those budgets and schedules;

- b) Developing systems for assuring compliance with program requirements;
- c) Developing interagency agreements and agreements with subrecipients and contractors to carry out program activities;
- d) Monitoring program activities for progress and compliance with program requirements;
- e) Preparing reports and other documents directly related to the program for submission to HUD;
- f) Coordinating the resolution of audit and monitoring findings;
- g) Evaluating program results against stated objectives; and
- h) Managing or supervising persons whose primary responsibilities with regard to the program include such assignments as those described in paragraph a.i.1)a) through g) of this section.
- 2) Travel costs incurred for monitoring of subrecipients;
- 3) Administrative services performed under third-party contracts or agreements, including general legal services, accounting services, and audit services; and
- 4) Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space.
- ii. Training on ESG requirements. Costs of providing training on ESG requirements and attending HUD-sponsored ESG trainings.
- iii. Consolidated plan. Costs of preparing and amending the ESG and homelessness-related sections of the consolidated plan in accordance with ESG requirements and 24 CFR part 91.

Policy and Procedures Standards

Each ESG subrecipient must establish written standards for providing ESG assistance and provide a copy to ODOC. Returning applicants much submit documentation that the Program's Written Policies and Procedures have been reviewed by the Staff and Board at least once a year. Documentation must include a Board Agenda showing the Policies/Procedures as an Agenda item as well as the minutes produced from the meeting showing the discussion and approval of the Policies/Procedures from the Board. New subrecipients must have an established set of Policies and Procedures within ninety (90) days of receiving their ESG Award letter. The new subrecipient must submit a copy to ODOC of the written Policies/Procedures, Board Agenda showing the Policies/Procedures as an Agenda item as well as the minutes produced from the meeting showing the discussion and approval of the Policies/Procedures from the Board.

The following standards must be applied consistently within the subrecipient's program:

- ODOC's ESG Implementation Manual Requirement 708 Written Standards and Procedures
- ODOC's ESG Implementation Manual Requirement 707, Part II-M Habitability Standards

Provision of Supportive Services

While ESG sub-recipients are required to offer treatment and supportive services when necessary to assist vulnerable homeless populations, individuals and families experiencing homelessness must not be required to receive treatment or perform any other prerequisite activities, including the activities outlined in 24 CFR 5.109 (c) - (f), as a condition for receiving shelter, housing, or other services for which these funds are used, with the exception of housing stability case management for RRH and Prevention outlined in 24 CFR 576.401(e).

ESG Program Requirements

Release of Funds

Applicants awarded funds must submit and receive authority to use grants funds prior to expending grant funds. Funds will not be released until all required documentation has been received. Funds expended prior to the authority to use grant funds will not be reimbursed.

Budget

Each recipient must complete a project budget and budget narrative form. Project budget should list the amount of ESG funds to be expended in each separate category and the project narrative should provide a description detailing the anticipated expenditures by category.

Matching Funds

The ESG Program requires a dollar-for dollar local match. All eligible match funds, in-kind contributions, and cash included in the application must be available for spending during the grant's contract period. The dates available for each match resource must be entered on the Match Certification form in OK Grants. Each applicant is required to complete certification documenting the sources and amounts submitted for match available in the contract period. Matching funds cannot be used to match any other Federal program's funds nor any other ESG grant and ESG funds cannot be used to meet the matching requirements of another program that is being used to match ESG.

The matching funds are provided based on the total grant amount and do not have to be provided on a component-by-component basis. For example, if a recipient is spending \$10,000 on HMIS, they do not need to find \$10,000 in data collection funds from another source to use as match.

The amount of match must be tracked and reconciled by month and reflected on the monthly Reimbursement Claim Form submitted to ODOC in OKGrants on the 20th of each month. It is the award recipient's responsibility to ensure that match must be spent on ESG eligible activities only. Match funds and expenditures must also be included in the annual audit.

The following are examples of what can be used as match:

- Cash (can only be spent on ESG eligible activities)
- The value or fair rental value of any building used for program purposes (in-kind)
- Donated material (in-kind)
- The value of an owned or donated building (match may be used only one time)
- Salary paid to staff to carry out the program of the recipient (Source of funding for staff salaries must be listed on Match Certification form and tracked monthly.)
- Volunteer time (Must be valued at rates consistent with those ordinarily paid for similar work in the recipient's or subrecipient's organization.)

Match fiscal supporting records must include the following:

- 1. The fiscal year grant for which each matching contribution is counted.
- 2. How the value placed on third-party, noncash contributions was derived. Requirement: You must use a method reasonably calculated to establish the fair market value.
- 3. Document that the matching funds were used in accordance with both the other federal program's requirements and the requirements that apply to ESG grant funds, except for the expenditure limits in 24 CFR 576.100. This includes requirements such as documentation requirements, eligibility requirements, and eligible costs.

Reporting

Emergency Solutions Grant recipients will use HMIS through the applicable Continuum of Care to collect data and report on outputs and outcomes as required by HUD. The required data elements to be collected are included in the FY 2024 HMIS Data Standards Manual released October 2023 found on HUD's HMIS Data Standards page: https://www.hudexchange.info/resource/3824/hmis-data-dictionary/.

According to HUD's final ruling over data collection from Domestic Violence (DV) Shelters, the revised "VAWA Protections" include that Domestic Violence Shelters are exempt from having to use any shared database such as the HMIS software to collect client information and services provided. However, data collection relating to non-confidential demographics and services provided is required to be reported by

the DV shelter. A comparable database can be used to collect such data. The comparable database must meet all HMIS data standards and reporting requirements.

Reports due to ODOC using data from HMIS (or comparable database for DV Shelters) are as follows:

Report Type	Reporting Period
Monthly Progress (CAPER) Report – Shelter,	Due the 20 th of the following month.
RRH, Prevention, and/or Outreach CAPER report	For example, the January Progress (CAPER)
for the reporting month.	Report would be due no later than February 20 th
	and uploaded with the Reimbursement Claim
	Form in OKGrants.
Contract Closeout Report – Report due with	Captures data for October 1 of one year to
Contract Closeout.	September 30 of the next – Due November 30 th .
SAGE Upload – Must be uploaded 45 days	Period from April 1st of one year to March 30th of
before CAPER is due to HUD	the next - Due May 15 th .

Sage Reporting

SAGE is the online portal for the submission of aggregate, de-identified data from HMIS or comparable databases via a Comma Separated Value (CSV) import. All Applicants who receive ESG funds will be required to upload Performance

Report data to the SAGE System. Domestic Violence Shelters are not exempt from providing required aggregate data to upload into SAGE. The comparable system that the Domestic Violence Shelters use must be able to create a CSV file needed to upload to the SAGE system to meet requirements. If a Domestic Violence Shelter's comparable database cannot provide required demographic data and cannot provide required reports in the required format (CSV file for SAGE) the Domestic Violence Shelter may be disqualified from receiving Emergency Solution Grant funds.

HMIS Data Quality and Reporting

ODOC will procure using HMIS funds to provide HMIS technical support, training, data analysis and quality, and to assist in uploading data in SAGE as allowed by 24 CFR 576.107.

Payments

ODOC shall disburse funds to the Applicants awarded funds upon receipt and approval by ODOC of the Request for Release of Funds. Once the "Release of Funds" form has been received by the new subrecipient, a reimbursement payment process will be implemented.

Deadline for Using Grant Amounts

The grant period for the ESG project is twelve (12) months effective October 1 of one year to September 30 of the next year. All grant funds must be expended by September 30. Extensions to the program (grant) periods are made at the discretion of the State and will only be approved in extreme circumstances.

In addition, timelines within the twelve-month contract period have been established to ensure one hundred percent (100%) of program funds are spent within the program period. Grant funds must be spent within the following timelines: Fifty percent (50%) of awarded funds must be spent by the first six (6) months of the contract; seventy-five percent (75%) must be spent within nine (9) months of the contract and one hundred percent (100%) must be spent by the end of the contract period.

Obligated

Once ODOC has received an ESG grant agreement by HUD, ODOC will send a letter to each rural continuum notifying each Lead agency the total dollar amount the CoC will be allowed to award in their service area. Each CoC Governance Board has a certain time period in which they review the submitted applications. Once reviewed and final decisions made, each CoC will submit a letter to ODOC with their recommendations for funding to eligible applicants. Funds cannot be expended until ODOC/CD receives

an Environmental Review (if applicable), Sponsor/Shelter Agreement or summary (if applicable) and a Request for Release of Funds. Upon receipt of these documents, ODOC will return to the Applicant a signed Authority to Use Grant Funds (Release of Funds).

Certifications

Federal requirements will be assured by certifications in the grant application. Federal requirement certifications that must be submitted by applicants are as follows:

- Local Government Certification This form is signed by the local unit of government Chief Elected Official when the unit of government agrees to be the Sponsor for a nonprofit organization. The local unit of government agrees to follow federal regulations as it relates to building standards, assistance to the homeless along with other Department of Housing and Urban Development (HUD) laws and regulations.
- **Private Non-Profit Certification** This form is signed by the Executive Director of the Community Action Agency when said agency agrees to be the Sponsor for a nonprofit organization or the independent nonprofit itself. The signing entity agrees to follow federal regulations
- Certification of Local Government Approval for Nonprofit Organizations This form is signed by the Chief Elected Official of the city/town in which the Homeless Assistance program activities are being provided. The local government approves of the services being provided in their city/town.
- **Applicant Assurances** This is signed by the Applicant. The Applicant agrees that Homeless individuals will receive an appropriate level of service and will be given opportunities to participate in policy making decisions regarding shelter and services provided.
- **Program Certifications** This is signed by the Applicant. The Applicant agrees to comply with having policies relating to the State's Consolidated Plan, Confidentiality, Discharge Planning, Affirmatively Further Fair Housing and HMIS.
- Certification of Consistency with Consolidated Plan HUD 2991 This form is signed by the Certifying Official at ODOC. Do not wait until the last minute to obtain this signature, as it takes 3-5 business days to process. The Certifying Jurisdiction agrees that the Applicant's program is consistent with the jurisdiction's Consolidated Plan.
- **J. Drug-Free Workplace Requirements** The Drug-Free Workplace Act of 1988 (41 U.S.C. 701, et seq.) and HUD's implementing regulations as applied to ESG.
- Lead-Based Paint Requirements The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4801 et seq.), as amended by the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851 et seq.) and implementing regulations at 24 CFR part 35, subparts A, B, M, and R shall apply to housing occupied by families receiving assistance through ESG.
- **Anti-Lobbying Certification** This is signed by the Applicant. The Applicant agrees that no Federally appropriated funds will be used for lobbying activities.
- Request for Release of Funds and Certification This is signed by the Applicant. The Applicant submits all forms necessary for Environmental Review compliance or states exemption status for Environmental Review process.
- Applicant/Recipient Disclosure/Update Report This form is signed by the Applicant. The applicant must disclose if they are receiving, or expect to receive, assistance from other HUD Programs that are subject to the disclosure requirements of Subpart C of 24 CFR Part 12.
- Continuum of Care Lead Agency Participation letter This is provided by the Continuum of Care Lead Agency. The letter must include that the shelter is a member of the Continuum of Care, the level of participation in the HMIS or comparable data collection database, level of participation during the Annual Point-in-Time Survey Count and any Continuum of Care committees or related participation.

Audit Requirement

All audits of prior awards from ODOC/CD must be in accordance with ODOC Audit Policies and Procedures Manual.

Per ODOC's Audit Policies and Procedures Manual, <u>Oklahoma Administrative Code Title 150 Chapter 1</u> <u>Subchapter 21</u> establishes the policy and procedures for the audit of state and federal funds administered by ODOC.

- 1. If a private non-profit subrecipient has an annual income of \$50,000 or more during a fiscal year, it is required by Oklahoma State Statute to have an audit prepared. When such funds are awarded through ODOC, a report also needs to be submitted to ODOC.
- 2. If a private non-profit subrecipient expends a total of \$1,000,000 or more in Federal awards during the fiscal year, a Single Entity Audit or program specific audit in accordance with the provisions of 2 CFR part 200.500-521 needs to be conducted. When such funds are awarded through ODOC, a report also needs to be submitted to ODOC.
- 3. Audit requirements for sponsors that are units of general local governments (UGLGs):
 - a. An UGLG (city, town, or municipality) with an annual income of \$50,000 or more must complete an annual audit (HB1058) unless otherwise required by a stricter regulation.
 - b. If the revenue of an UGLG that is a city, town, or municipality is \$50,000 or more, but its population is less than 2,500, it has the option to request a biennial agreed-upon-procedures engagement, which would be prescribed by the State Auditor and Inspector and developed in collaboration with a representative from an organization representing municipal governments, a representative from an organization that advises municipal clerks and treasurers and a certified public accountant (HB1058 which repeals 11 O.S. 17-108). This is allowed unless otherwise required by a stricter regulation.
 - c. An UGLG that is a county must have the Oklahoma State Auditor and Inspector complete their audit at least every two years. [19 OK Stat § 19-171 (2021)]

Audit reports must be submitted to ODOC within thirty (30) days of completion of report but no later than nine (9) months after the end of the subrecipient's fiscal year.

Late audits

- 1. The subrecipient should request a letter from their contracted auditor stating why they cannot complete the audit within the required timeframe and submit it to ODOC/CD.
 - a. Fault of the auditor:
 - i. While ODOC cannot authorize an extension to the due date, if the audit is late by fault of the auditor, ODOC will provide as much leniency as allowed while remaining compliant with regulations.
 - b. Fault of the agency:
 - i. If it is determined that the audit is late due to the fault of the subrecipient, ODOC may provide necessary technical assistance and will require a plan for compliance.
- 2. If the audit has not been submitted or the audit is not closed prior to the release of funds, then subrecipient may be unable to draw funds unless a good cause is shown and approved by ODOC/CD.
- 3. Any contract awarded while an audit remains late, will include contract special conditions which may include restricting access to funds until the audit is received.

Match is a contractual requirement on ESG and must be reported in the audit for both revenue and expenditures. Here are two examples:

- 1. Note with an asterisk or a number/letter on the financials for both revenues and expenditures. At the bottom of that audit page the explanation would include that this amount includes the match of \$____ as required for contract number.
- 2. Add a Note to the financial statements that states the match of \$_____ as required in the contract for contract number ____ was met.

Client Confidentiality

All ESG recipients must develop and implement procedures to ensure:

1. The confidentiality of records pertaining to any individual provided with assistance; and

2. That the address or location of any assisted housing will not be made public, except to the extent that this prohibition contradicts a preexisting privacy policy of the grantee.

Language Access

The ESG Program assists many beneficiaries throughout the state of Oklahoma, but many eligible Limited English Proficient (LEP) persons are challenged with accessing this program and services because of linguistic barriers. Due to the many LEP individuals in Oklahoma, the ESG program will follow ODOC's Language Access Plan (LAP) to ensure equitable access to federally funded programs for all linguistic groups within the state in compliance with Title VI of the Civil Rights Act and Executive Order 13166. Title VI requires that recipients of federal funds, such as ODOC/CD and its subrecipients, take reasonable steps to ensure equal access to federally funded programs, projects, and activities.

Based on the Four Factor Analysis described in ODOC's LAP, all ESG subrecipients throughout the state are required to offer ESG vital documents, which includes all documents ESG program participants must complete to qualify for and receive ESG services (and subrecipients are required to keep in the client file), translated into Spanish. Subrecipients within Payne and Cleveland counties are required to offer ESG vital documents in Chinese, while subrecipients within Canadian and Cleveland counties are required to offer ESG vital documents in Vietnamese. Anticipating that the LEP populations speaking these languages will grow in the future and also understanding the large administrative costs of translating documents into other languages, ODOC has taken the initiative to translate ESG vital documents into Spanish, Chinese, and Vietnamese so that ODOC ESG subrecipients are able to provide them to LEP persons when necessary. These translated documents, along with the ESG standardized client file documents, can be found on ODOC's ESG Website: https://www.okcommerce.gov/community-development/community-action-agencies/emergency-solutions-grants-esg/.

Standardized ESG Client File Documents

ODOC requires that subrecipients are responsible for verifying and documenting the eligibility of all ESG applicants prior to providing ESG assistance. They are also responsible for maintaining documentation in the ESG participant case file once an applicant is approved for assistance. ODOC ESG subrecipients are required to use the standardized client file forms provided on the ODOC ESG website: https://www.okcommerce.gov/community-development/community-action-agencies/emergency-solutions-grants-esg/.

Racial Equity

The ESG program is a critical resource in the homeless crisis response system throughout Oklahoma. Unhoused people become stably housed when the system is low barrier, trauma-informed, culturally responsive and Housing First oriented. People living unstably housed become stably housed when the system is oriented toward problem solving conversations and personal advocacy to help them identify practical solutions based on their own available resources.

ODOC expects ESG subrecipients to be leaders in their crisis response systems, facilitating partnerships among service organizations and promoting evidence-based, anti-racist practices. To achieve this, ESG subrecipients must respond to the disproportionality in access to services, service provision, and outcomes and cannot simply rely on standard business practices to address inequity. ESG subrecipients have the responsibility to ensure all those eligible for services receive support and are served with dignity, respect, and compassion regardless of race or perceived identity. This includes marginalized populations such as Black, Native and Indigenous, Latinx, Asian, Pacific Islander, People of Color, immigrants, and other individuals that may not access mainstream support.

The concepts listed above are crucial in ensuring programs that address homelessness are equitable, trauma-informed, and culturally responsive. The ESG program highlights the importance of addressing disparities and ensuring that marginalized communities are served with dignity and respect, fostering an anti-racist approach to homelessness services.

Each ODOC ESG subrecipient is expected to identify inequities between the populations marginalized by race/ethnicity in its service territory compared to the subrecipient's clients. Where there are differences that negatively impact the identified marginalized populations, strategies should be defined, developed, and implemented to help close the gap and be more culturally responsive to the populations identified in the analysis.

Beginning with ESG25, ODOC intends to update the ESG25 Application scoring matrix to provide more points for applicants developing and implementing racial equity plans.

Performance

ODOC reserves the right to recapture Emergency Solution Grant funds under the following circumstances:

- o Failure to obligate and spend within the time periods as specified:
 - o Fifty percent (50%) of awarded funds must be spent by the first six (6) months of the contract; seventy-five percent (75%) must be spent within nine (9) months of the contract.
- o Failure, without approved modification, to implement the project as set forth in the approved ESG grant application.
- o Failure to meet the specified performance measures.
- o Failure to meet threshold responsibilities during the contract period.

Note: Any ESG sub-recipient that returns ESG funds due to non-compliance with ESG spending and/or other ESG requirements, will automatically be ineligible to receive ESG funds in the next ESG funding year. Additionally, ESG sub-recipients that return funds after month nine (9) of the contract period will be ineligible to receive ESG funds in the next ESG funding year.

<u>Application Procedures, Submission and Selection Requirements:</u> Continuum of Care Scoring Process:

- 1. After applications are submitted into OKGrants, volunteers whose names have been submitted from each CoC (according to the timeframe outlined in the Timetable) will receive training through a Webinar training to become a Reviewer. Reviewers will be trained how to use the ESG Scoring tool and shown how to enter scores into OKGrants. Reviewers will then be given a login to OKGrants and additional instructions to score their assigned applications online.
- 2. There will be three (3) Reviewers assigned to every eligible application. The two (2) highest scores will be averaged for the CoC Governing Board to use to make final funding recommendations.
- 3. Reviewers will be given a deadline to score applications.
- 4. Once the applications have been scored, the CoC Lead agency will submit a letter to ODOC listing the applicants that are being recommended for funds and the dollar amount being awarded equaling the dollar amount allocated to the CoC.
- 5. ODOC will then conduct a Pre-Award Risk Assessment. The results of this survey will determine if an applicant is a Low, Medium or High Risk and will help determine any additional special conditions that will be added to the Applicant's contract. First time applicants that are awarded funds will be automatically scored as a "High Risk" and will have special conditions added to their contract, including additional Technical Assistance, monitoring and submitted source documentation with every expense report.
- 6. ODOC will either approve the CoC's recommendation for funds or amend/refuse funding to applicants for, but not limited to:
 - a. Receiving less than 50% of the total points available for the application from at least one (1) of the three (3) application reviewers,
 - b. Scoring 100 or more on an ESG Risk Assessment (Scores of 0-29 is Low Risk, 30-59 is Medium Risk, and 60 and above is High Risk),
 - c. Receiving a High-Risk assessment score more than two consecutive ESG funding years in a row (not including the first application year),
 - d. Not meeting all ESG threshold requirements, and/or

- e. Requesting ineligible expenses in their budget not found by the Reviewers.
- 7. ODOC will send award letters to subrecipients with final instructions regarding how contracts are initiated in OKGrants.

Application Workshop

A mandatory application workshop will be scheduled and held at least a week before the application opens in OKGrants. Attendance will be mandatory for all organizations planning on applying for an ODOC ESG Program year. After the Application is made available in OKGrants, only questions of a clarifying nature will be answered after the workshop has been held. ODOC will not answer any questions regarding the Emergency Solutions program or provide technical assistance during the application process.

Verification and On-site Visits

The Oklahoma Department of Commerce/Community Development reserves the right to verify information and documentation received as part of the ESG application. An on-site visit may be scheduled by ODOC to conduct an observation of the facility where the proposed ESG project will be carried out. On site observations of shelter facilities may receive no more than 24-hour notice via telephone. A representative from both the shelter and the sponsor must be available during the visit.

If and when an ESG contract is executed, ODOC/CD reserves the right to verify subrecipient programmatic and fiscal management of the ESG program/funds and may request any documentation and/or proof to assess compliance with the ESG Implementation Manual, Contract Part II, and the ESG RFA. On-site observations of subrecipient shelter facilities may receive no more than a 2-week notice via telephone or email.

Program Application Guidelines and Submission Requirements

All grant applications must be submitted electronically through the ODOC OKGrants Grant Management System:

https://grants.ok.gov/

OKGrants instructions can be found on the <u>OKGrants Resource Page</u> and in the <u>OKGrants Subgrantee</u> <u>User Manual</u>.

In the instance of a private non-profit, unit of general local government, or CAA applying on behalf of more than one shelter, separate applications must be submitted for each shelter. Applicants may present multiple funding requests in a single application (e.g., HMIS, Shelter, Rapid Re-Housing, Prevention, Outreach).

FY 2025 Emergency Solutions Grant Checklist (Form Online in OK Grants)

To be considered for ESG funds, an application must contain the items detailed below:

OK	Example 2 Grants Section
	Application Summary
	Fill this section out completely.
	Include all counties where ESG funds will be used, if more than one county.
	Ensure signature is the OKGrants Authorized Official.
	Ensure grant dates are correct: October 1, 2025 – September 30, 2026
	Project Narrative Exhibits (Responses to Section I through Section V below)
	Enter detailed explanations of programs on this page.
	Exhibits align with Budget Detail and Budget Narrative.
	CAPER for last 12 months, Letters relating to match, and CoC Agreement for HMIS Data Entry must
	be uploaded in the appropriate answers on this page.
	Risk Assessment questions must all be answered.
	Budget Detail
	Must be in line with Project Narrative and Budget Narrative.
	Match does not have to equal 'ESG Requested Funds' per line item, though the Match total
	must equal the 'ESG Requested Funds' total. For example, if \$1,000 in ESG funds is budgeted for
	HMIS, it is not necessary to budget \$1,000 in data collection funds from another source to use as
	match.
	Budget Narrative
_	Must be in line with Project Narrative and Budget Detail.
П	Audit
_	Most recent audit must be uploaded to this section.
	If most recent audit is not complete, provide a document (letter) from agency auditor stating when
	expected completion and upload to ESG25 application will be.
	NOTE: Funding could be held up if most recent audit is not received.
П	Match Certification Form
	Match funds must equal ESG grant amount awarded.
	This same match supporting documentation should also uploaded in the Project Narrative
	Exhibits. DO NOT upload this information in the Uploads section.
	Date of availability of match funds must coincide with ESG25 funding dates and match
	documentation should clearly provide dates and amounts.
	documentation should elearly provide dates and amounts.
OK	EXECUTE: Grants Uploads Section – List of Forms that must be Uploaded to this Section
	Program Certifications and Assurances, which includes:
	☐ Section I. Applicant Assurances
	☐ Section II. Program Certifications
	☐ Section III. Drug-Free Workplace
	☐ Section IV. Anti-Lobbying Certification
	Applicant/Recipient Disclosure/Update Report
	Certification of Consistency with Consolidated Plan HUD 2991 (signed by ODOC's Director of
	Community Development)
	Environmental Review Record for Exemptions/Release of Funds
	Continuum of Care Agreement for HMIS Data Entry (HMIS User Policy and Responsibility
_	Statement) – must be signed after last update of June 2023 (same agreement was also uploaded to
	Project Narrative Exhibits)
	☐ Victim Service Providers using a comparable database should upload the agreement with the
	comparable database provider (i.e., EmpowerDB agreement between agency and EmpowerDB).
	Continuum of Care Lead Agency Participation letter

	System for Award Management (sam.gov) PDF Search Verification of Non-Debarred Status, UEI#,
	and date of expiration
	Current Board Roster including email addresses for each Board member
	Documentation showing proof of Annual Board Review of ESG Written Policies and Procedures
	Sponsor/Shelter agreement (for applicants who are sponsoring shelters)
	Shelter Habitability Standards Checklist (must also be completed for hotel/motel voucher programs)
	Shelter Lead-Based Paint Checklist (must also be completed for hotel/motel voucher programs)
Dag	avined forms for Units of Consul Local Covernment
	quired forms for Units of General Local Government
Ш	Local Government Certification
	-Or-
Rec	quired forms for Community Action Agency (CAA) or Independent Nonprofit
	Private Non-Profit Certification
	Certification of Local Government Approval for Nonprofit Organizations
All	new applicants, or returning applicants who have changed addresses, contact personnel, and/or
ban	king/financial updates, must complete and upload the following:
	W-9 (found at https://www.irs.gov/pub/irs-pdf/fw9.pdf)
	OMES Vendor/Payee form

NOTE: If uploading a document to a space in the uploads section that is not prelabeled, PLEASE use the space provided to label the document.

Section I – V Questions (Answers to be entered into OKGrants Project Narrative Exhibits Page)

Projects will be evaluated by a point system scoring each category of the narrative and taking into consideration the overall quality of the application and information collected during on-site reviews. In the Narrative Exhibit Section (In OKGrants), please provide as much thorough information as possible. If ESG funds are not being requested for a particular activity, the applicant should describe how they still do that activity or partner with others to do so.

Section I Community Needs (15 Pts)			
Description	Question		
I-1) The applicant has a targeted and clearly demonstrated need. The applicant's services will make a significant impact on the community in alleviating homelessness. The applicant is knowledgeable of the level of need in the community and provides local data to document who is being served and projections for those that may need to be served in the community.	I-1) Describe the need for homeless assistance services in your area o Include where "proof of need" data was collected.		
I-2) The Applicant's response must clearly describe how their staff/volunteers participated in the annual Point-in-time (PIT) Count. The results from the PIT must be included and applicant must also describe how they use collected numbers to make decisions for their program(s).	I-2) Describe Applicants participation in Annual Point-in- time Count. Explain the numbers collected by the applicant and how the applicant uses the PIT results to change program priorities or services.		
Section II Proposed U			
Description	Question		
 II-1) Each applicant must provide one of two Shelter options: 1) In communities where no appropriate emergency shelter is available, written agreements or a voucher system may be implemented to pay for hotel or motel costs for the family or individual, or a written agreement with a partnering organization that does have a shelter facility within reasonable distance of the applicant; or 2) Applicant has an Emergency Shelter facility designed to provide temporary shelter for individuals and/or families lacking a fixed, regular, and adequate nighttime residence. Local policy shall determine length of stay in the shelter. 	 II-1) Describe the organization's Emergency Shelter Component. Include details such as: How shelter remains accessible/open to meet the 24/7/365 accessibility requirement The maximum length of stay Description and explanation of any fees for services that the shelter charges Essential services to persons in emergency shelters Emergency shelter operating costs Staff costs related to carrying out emergency shelter activities are also eligible 		

II-2) Applicant describes a well-defined Outreach program II-2) Describe the organization's Street Outreach Services. independent from their Shelter services. A Street Outreach program cannot be one where the potential client is coming to any of the Shelter's facilities (i.e., Soup kitchen or Day Center). Services are provided to eligible participants on the street or in parks, abandoned buildings, bus stations, campgrounds, and in other such settings where unsheltered persons are staying. Staff salaries related to carrying out street outreach activities are also eligible. There are several different ways Street Outreach can be done and agencies do not always go to the 'streets' to outreach to those in need. For example, youth shelters may provide outreach services to a young person by going to the school of that youth when they are called by school administrators. Domestic Violence (DV) agencies may go to other places those experiencing DV flee (hospitals, police departments, friend's houses, etc.) to provide outreach services. Some DV agencies may not even do street outreach given confidentiality requirements and the nature of DV such as the safety of those fleeing it. Applicants are not required to provide Outreach services or to use ESG funds to do so. The point of this question is to understand the overall services an agency provides even if they are not using ESG funds to provide those services. II-3) Thorough description of how Rapid Rehousing and/or II-3) Describe how clients access requested Rapid Prevention funds can be accessed and how client's program Rehousing/Prevention Services, including what eligibility is determined as well as indication of what documentation is collected/verified regarding the client's documentation is collected/verified. Applicant may have included program eligibility and how housing is selected. a plan relating to short-term and medium-term assistance. Depending on the needs of the community and the funding needs of the applicant, the applicant is not required to provide both Rapid Rehousing and Prevention assistance or to use ESG funds to do so. The applicant does not need to provide all activities listed to receive full points but must provide at least RRH or Prevention II-4) Proposed case management services are well described II-4) Describe what level of case management clients and easily relate to the needs of the clients' applicants intend receive at the agency. to serve with ESG funds (Outreach, Shelter, Rapid Identify the person(s) responsible for carrying out case Rehousing and/or Prevention). management activities. All key positions are described in relation to program Include the qualifications of the case managers implementation and operation and the Applicant must identified in the response. include qualifications required of case managers. II-5) Applicant must describe some level of external training II-5) Describe the training ESG staff receives to improve provided for case management/ housing assistance staff quality of service for the program participants approved for members. SOAR should be mentioned for all staff that shelter/housing assistance. Whom in the received the training. organization/shelter has received the following training: SOAR, ADA compliance training, Housing first, trauma informed care, evidenced-based case management practices, racial equity, etc.

II-6) Response should include a brief description about appropriate policies and protocols for the discharge of persons from applicant's ESG Shelter, Outreach, RRH, and/or Prevention programs. Policies and protocols should also include how agency is working/will work with their CoC, partner agencies, and publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) to prevent such discharge from immediately resulting in homelessness for such persons.

II-6) Describe the agency's Participant Discharge Plan from agency homeless services programs to prevent the discharge of persons into homelessness. The Discharge Plan should also include how the agency is working/will work with CoC, partner agencies, and publicly funded institutions or systems of care to prevent the discharge of persons into homelessness.

II-7) Equity refers to proportional representation (by race, class, gender, etc.) of opportunities in housing, healthcare, employment, and all indicators of living a healthy life.

Response should include description of the following:

Advancing Equity through Homeless Response Inclusion:

To what extent are the diverse identities and perspectives of Black, Indigenous and people of color included in this decision-making process that will impact their lives?

Data (quantitative and qualitative): To what extent do you know who is most impacted beyond who currently presents at the front door(s)?

<u>Strategies</u>: To what extent do the strategies (programs and policies) meet the needs of those impacted and does not cause harm?

<u>Impact</u>: To what extent do you seek out the unintended harm and creation of new margins through policies and program requirements?

<u>Evaluation</u>: To what extent do you use disaggregated data and feedback from those with lived experience to monitor the impact that your decision, policy, or program has on each population.

<u>Accountability</u>: To what extent have you built gathering input, advice and recommendations on an on-going basis into the homeless response system?

Applicant must upload completed Demographics Comparison Report. Missing or incomplete reports will not be given full available points. II-7) Describe the agency's process and status in gathering data and developing a plan to improve racial equity within the services provided to the community.

Complete Demographics Comparison Report and upload in available space below response for II-7 on Projects Narrative Exhibit form in OKGrants.

Section III Performance Measures (30 Pts)			
Description	Questions		
III-1) Performance measures of the program, whether local or State, are clearly identified and applicant has described a clear plan for achieving those goals. Goals are quantitative, realistic and appear well thought out in relation to the services identified in the application narrative. At least 2 out of the 4 State Performance Measures must be tracked. The applicant is not required to set an estimate for services they do not provide. For example, if an applicant does not provide prevention services, then they do not have to provide the number of persons in Homeless Prevention exiting to permanent housing.	III-1) List local Performance Measures and Outcome Goals, if applicable. List State Performance Measures and Outcome Goals. At least 2 out of the 4 State Performance Measures must be tracked. Outcome goals must be quantitative (as percentages or numbers) and for a 12- month period – preferably during the ESG program year. Describe a clear plan for achieving the goals listed. Refer to the Performance Measures section of the application for more guidance. 1) Number of persons that exit ESG programs that are not Homeless Prevention into permanent housing. Outcome: 2) Number of persons in Homeless Prevention exiting to permanent housing. Outcome: 3) Total number of persons served. Outcome: 4) Total number of persons with income at exit or end of grant year. Outcome:		
II-2) It is acceptable that the applicant has local performance measures or goals that are different from the State performance measures. In this case, the applicant must explain how accomplishing their local goals or performance measures will overall help achieve the State Performance measures.	III-2) How will achieving the local performance measures help achieve the State Performance Measures?		
III-3) Applicant must upload separate CAPERs from each project in which ESG funds were expended (Shelter, Outreach, RRH, Prevention). Scores/percentages/error rates more than 5% (found on the CAPER question 6) should not be given full available points. If the applicant has never applied for ESG before and never entered into HMIS, they have no report to upload and should not receive less points.	III-3) How will the data be collected? Include HMIS or comparable database CAPER from each project in which ESG funds were expended (Shelter, Outreach, RRH, Prevention) for the last 12 months. Upload separate CAPERs for last 12 months in available spaces below response for III-3 on Projects Narrative Exhibit form in OKGrants. NOTE: Each time a CAPER is uploaded and saved, an additional upload line will be provided.		

Section IV Community and Local Government Commitment (5 Pts)			
Description	Questions		
IV-1) The match sources/amounts listed and the uploaded supporting documentation must correspond with the total listed on Match/Additional Funds Form in OK Grants. Match documentation must be provided to show as much of the ESG25 program year (October 1, 2025-September 30, 2026) as possible is covered. Points will be taken away if source documentation is not provided. However, if match documentation for that timeframe has not yet been provided (since State and Federal grant award letters might not even be available for the ESG25 program year before the application submittal date of May 31, 2025), the applicant may provide current award letters that may be outside of the ESG25 program year as examples of the match that will probably be provided during the ESG25 grant. Approved applicants will be required to provide updated documentation in September-October, if necessary, before contract execution.	 IV-1) List match source and amounts that will be provided to match 100% of the ESG funds from October 1, 2025 through September 30, 2026. Source documentation showing match funding sources/amounts must be on the letterhead of the organization's providing the match and uploaded in the space provided under response IV-2 of the Projects Narrative Exhibits form in OKGrants. The same letters will also need to be uploaded in the Match Certification page in OKGrants. Eligible forms of match include but are not limited to: Volunteer time (must be valued at rates consistent with those ordinarily paid for similar work in the recipient's or subrecipient's organization). The value of volunteers providing professional services such as medical or legal services valued at the reasonable and customary rate in the community. The value of any donated goods, material or building. The value of any building lease using a method to reasonably calculate fair market value. (Can only be used as ESG match once.) The value of salary paid to staff to carry out the ESG Program. Cash awards from foundations, organizations, private individuals, and other government sources. 		
IV-2) Maximum points should be awarded to the organizations that can prove their community is involved and have obtained multiple resources to provide for the needs of their clients.	IV-2) Describe how community and local government support (in-kind or cash contributions) is received and how these contributions benefit the proposed program.		

Section V Continuum of Care Requirements (50 Pts)			
Description	Questions		
V-1) The applicant should provide a description of how their services fit in with the performance measures, action plan and/or mission of their local Continuum.	V-1) Explain how services proposed fit into the local CoC's Action Plan to end homelessness? If exempt from using HMIS, describe how method for collecting data is comparable to HMIS.		
	Upload CoC Agreement for HMIS Data Entry in space below V-1 in Projects Narrative Exhibit Form in OKGrants. Victim Service Providers using a comparable database should upload the agreement with the comparable database provider (i.e., EmpowerDB agreement between agency and EmpowerDB). The same agreement will also need to be uploaded in the Uploads section of the Application in OKGrants.		
V-2) Applicant describes the organization's participation in the CoC's Coordinated Intake Process required by HUD. The description must provide enough detail that the reviewer has a clear understanding of the Coordinated process and the applicant's involvement in the process.	V-2) Describe the Organization's involvement in the CoC's Coordinated Entry Process required by HUD. Explain what and how priorities were changed to accommodate the updated HUD guidance.		
V-3) Mainstream services and the process by which clients are connected to those services is thoroughly described and appears feasible. Mainstream services include SSI/SSDI, TANF, Food Stamps, services through DHS, OJA, etc.; services that are mainly provided through Federal or State funding. The Applicant can also mention how they work with local law enforcement, hospitals and mental health facilities regarding discharge planning	V-3) Describe the mainstream services available in your area and the process for connecting clients to these services.		
V-4) The applicant should include names of specific organizations they partner and describe how services are delegated to prevent duplication of services/benefits. This is where local partners can be mentioned.	V-4) What agencies in your area do you collaborate with to provide better care for your clients and to prevent duplication of services?		
This is also the section where the applicant mentions local partners; such as local churches, Rotary, AMBUCS, Lion's Club, local clinics and mental health facilities that provide services and partnerships to provide better services to clients.	A duplication of benefits/services occurs when a person, household, business, government, or other entity receives financial assistance from multiple sources for the same purpose, and the total assistance received for that purpose is more than the total need for assistance.		
V-5) The organization must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient, to the extent that the entity considers and makes policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG).	V-5) Describe how homeless and/or formerly homeless persons participate in the operations, planning, development, and/or policy making at your agency.		

Do not forget to fill out the Section VI. Risk Assessment questions in OKGrants. They will not be used in scoring the application, but they will be used by ODOC staff before contract execution.

HUD Programs Subject to the Disclosure Requirements

Please read before filling out the Applicant/Recipient Disclosure/Update Report

Following is a list of all the HUD Programs that are subject to the disclosure requirements of Subpart C of 24 CFR Part 12. All applicants for Emergency Solutions Grant assistance must review this list to determine if they are receiving, or expect to receive, assistance from other covered programs. Applicants must consider HUD funds that are received either directly from HUD or through the State.

It is the total amount of funds received from all the below sources that the applicant uses to answer the second question of Part II of the Disclosure Report.

- Section 312 Rehabilitation Loans under 24 CFR Part 510, except loans for single-family properties.
- Applications for grant amounts for a specific project or activity under the Rental Rehabilitation Grant Program under 24 CFR Part 511 made to:
 - o A State grantee under Subpart F;
 - o A unit of general local government or consortium of units of general local government or a consortium of units of general local government receiving funds from a State or directly from HUD whether or not by formula under Subparts D, F, and G; and
 - o HUD, for technical assistance under § 511.3.
 - o (Excludes formula distributions to States, units of general local government, or consortia of units of general local government under Subparts D and G, within-year reallocations under Subpart D, and the HUD-administered Small Cities Program under Subpart F.)
- Applications for grant amounts for a specific project or activity under Title I of the Housing and Community Development Act of 1974 made to:
 - HUD, for a Special Purpose Grant under Section 105 of the Department of Housing and Urban Development Reform Act of 1989 for technical assistance, the Work Study Program or Historically Black colleges;
 - o HUD, for a loan guarantee under 24 CFR Part 470, Subpart M;
 - o HUD, for a grant to an Indian tribe under Title I of the Housing and Community Development Act of 1974;
 - o HUD, for a grant under the HUD-administered Small Cities Program under CFR Part 570, Subpart F; and
 - o A State or unit of general local government under 24 CFR Part 570.
- Applications for grant amounts for a specific project or activity under the Emergency Shelter Grant Program under 24 CFR Part 576 made to a State or to a unit of general local government, including a Territory.
 - o (Excludes formula distributions to States and units of general local government [including Territories]; reallocations to States, units of general local government [including Territories] and non-profit organizations; and applications to an entity other than HUD or a State or unit of general local government.)
- Transitional Housing under 24 CFR Part 577.
- Permanent Housing for Handicapped Homeless Persons under 24 CFR Part 578.
- Section 8 Housing Assistance Payments (only project-based housing under the Existing Housing and Moderate Rehabilitation programs under 24 CFR Part 882, including the Moderate Rehabilitation Program for Single Room Occupancy Dwellings for the Homeless under Subpart H).
- Section 8 Housing Assistance Payments for Housing for the Elderly or Handicapped under 24 CFR Part 885.
- Loans for Housing for the Elderly or Handicapped under Section 202 of the Housing Act of 1959 (including operating assistance for Housing for the Handicapped under Section 162 of the Housing and Community Development Act of 1987 and Seed Money Loans under Section 106(b) of the Housing and Urban Development Act of 1968).
- Section 8 Housing Assistance Payments Special Allocations under 24 CFR Part 886.

- Flexible Subsidy under 24 CFR Part 219 both Operating Assistance under Subpart B and Capital Improvement Loans under Subpart C.
- Low-Rent Housing Opportunities under 24 CFR Part 904.
- Indian Housing under 24 CFR Part 905.
- Public Housing Development under 24 CFR Part 941.
- Comprehensive Improvement Assistance under 24 CFR Part 968.
- Resident Management under 24 CFR Part 964, Subpart C.
- Neighborhood Development Demonstration under Section 123 of the Housing and Urban-Rural Recovery Act of 1983.
- Nehemiah Grants under 24 CFR Part 280.
- Research and Technology Grants under Title V of the Housing and Urban Development Act of 1970.
- Congregate Services under the Congregate Housing Services Act of 1978.
- Counseling under Section 106 of the Housing and Urban Development Act of 1968.
- Fair Housing Initiatives under 24 CFR Part 125.
- Public Housing Drug Elimination Grants under Section 5129 of the Anti-Drug Abuse Act of 1988.
- Fair Housing Assistance under 24 CFR Part 111.
- Public Housing Early Childhood Development Grants under Section 222 of the Housing and Urban-Rural Recovery Act of 1983.
- Mortgage Insurance under 24 CFR Subtitle B, Chapter II (only multi-family and non-residential).
- Supplemental Assistance for Facilities to Assist the Homeless under 24 CFR Part 579.
- Shelter Plus Care Assistance under Section 837 of the Cranston-Gonzalez National Affordable Housing Act.
- Planning and Implementation Grants for HOPE for Public and Indian Housing Homeownership under Title IV, Subtitle A, of the Cranston-Gonzalez National Affordable Housing act.
- Planning and Implementation Grants for HOPE for Homeownership of Multi-family Units under Title IV, Subtitle B, of the Cranston-Gonzalez National Affordable Housing act.
- HOPE for Elderly Independence Demonstration under Section 804 of the Cranston-Gonzalez National Affordable Housing Act.

FY 2025 Emergency Solutions Grant (ESG) Program Request for Application (RFA) - Definitions

For the purposes of this Request for Application, the following definitions will be used:

<u>Administration</u>: Units of General Local Government and/or Community Action Agencies are allowed 3.75% of the total award for administration of the ESG grant. These funds may be passed on to the shelter.

Anti-racist: A person who opposes racism and promotes racial equality.

At risk of homelessness:

- 1) An individual or family who:
 - a. Has an annual income below 30 percent of median family income for the area, as determined by HUD:
 - b. Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the "homeless" definition in this section; and
 - c. Meets one of the following conditions:
 - i. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - ii. Is living in the home of another because of economic hardship;
 - iii. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 14days after the date of application for assistance;
 - iv. Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals:
 - v. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;
 - vi. Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
 - vii. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;
- 2) A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or
- 3) A child or youth who does not qualify as "homeless" under this section but qualifies as "homeless" under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

Chronically Homeless:

- 1) A homeless individual with a disability as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:
 - a. Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - b. Has been homeless and living as described continuously for at least 12 months without a break in homelessness (a "break" in homeless is considered to be 7 or more nights) or on at least 4

separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described.

- 2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria of this definition, before entering that facility (an individual residing in an institutional care facility does not constitute a break in homelessness); or
- 3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

Consolidated plan: A plan prepared in accordance with 24 CFR part 91. An <u>approved consolidated plan</u> means a consolidated plan that has been approved by HUD in accordance with 24 CFR part 91.

Continuum of Care: The group composed of representatives of relevant organizations, which generally includes nonprofit homeless providers; victim service providers; faith-based organizations; governments; businesses; advocates; public housing agencies; school districts; social service providers; mental health agencies; hospitals; universities; affordable housing developers; law enforcement; organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons that are organized to plan for and provide, as necessary, a system of outreach, engagement, and assessment; emergency shelter; rapid re-housing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless persons and persons at risk of homelessness for a specific geographic area.

<u>Co-Occurring Disorder</u>: Persons who have a diagnosis of mental illness and a diagnosis of substance abuse, HIV/AIDS, or other health condition.

<u>Cultural Competency</u>: Behaviors and actions that reflect and respond effectively to the racial, ethnic, cultural, and linguistic experiences of the communities involved with a particular program, policy, or procedure.

<u>Cultural Responsiveness</u>: Involves understanding and appropriately including and responding to the combination of cultural variables and the full range of dimensions of diversity that an individual brings to interactions.

<u>Debarment</u>: Debarment is the state of being excluded from certain possessions, rights, privileges, or practices and the act of prevention by legal means. For example, companies can be debarred from contracts due to allegations of fraud, mismanagement, and similar improprieties.

<u>Developmental Disability</u>: As defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002):

- 1) A severe, chronic disability of an individual that
 - a. Is attributable to a mental or physical impairment or combination of mental and physical impairments;
 - b. Is manifested before the individual attains age 22;
 - c. Is likely to continue indefinitely;
 - d. Results in substantial functional limitations in three or more of the following areas of major life activity:
 - i. Self-care;
 - ii. Receptive and expressive language;
 - iii. Learning;
 - iv. Mobility;
 - v. Self-direction;

- e. Capacity for independent living;
- f. Economic self-sufficiency; and
- g. Reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.
- 2) An individual from birth to age 9, inclusive, who has a substantial developmental delay or specific congenital or acquired condition, may be considered to have a developmental disability without meeting three or more of the criteria described in paragraphs (1)(i) through (v) of this definition if the individual, without services and supports, has a high probability of meeting those criteria later in life.

<u>Duplication of Benefits</u>: A duplication of benefits occurs when a person, household, business, government, or other entity receives financial assistance from multiple sources for the same purpose, and the total assistance received for that purpose is more than the total need for assistance.

<u>Eligible Applicants</u>: Units of General Local Government and Community Action Agencies (CAAs). Cities of Tulsa and Oklahoma City must apply directly to HUD and are therefore excluded from the receipt of funds administered by ODOC.

Emergency shelter: Emergency Shelter is a facility designed to provide temporary housing for individuals and/or families lacking a fixed, regular, and adequate nighttime residence, and which does not require occupants to sign leases or occupancy agreements. Local policy shall determine length of stay in the shelter.

Emergency Shelter services are available to all persons or individuals who meet the definition of homeless. No person or family shall be denied shelter or services if they are a part of the sub-population to be served by the shelter and do not pose a safety risk to themselves or others. Emergency Shelter operators must have a plan in place to assist in the provision of emergency services, including clothing, food, and assistance locating other state and local services and funds. Emergency Shelters shall be available 24 hours a day and seven (7) days per week.

<u>Equipment and Furnishings</u>: Typically large, one-time expenditures essential for the continued operation of the homeless shelter. Office equipment and major furniture replacement or purchase such as beds or cots for an expanding facility, are examples of items to be budgeted under Equipment and Furnishings.

<u>Equity</u>: The consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders, and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, queer, intersex, and asexual (LGBTQIA+) persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality.

<u>Families with Children and Youth Defined as Homeless under other Federal Statutes</u>: This term means any children or youth that are defined as homeless under any Federal statute other than this subtitle but are not defined as "homeless" under Section 103 of Subtitle I of the McKinney-Vento Act, and shall also include the parent, parents, or guardian of such children or youth under subtitle B of title VII this Act (42 U.S.C. 11431 et seq.).

Homeless, homeless individual and homeless person:

- 1) An individual or family who lacks a fixed, regular, and adequate nighttime residence and is:
 - a. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
 - b. An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including hotels and motels paid for by Federal,

- State, or local government programs for low-income individuals or by charitable organizations and congregate shelters); or
- c. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in a shelter or place not meant for human habitation immediately before entering that institution:
- 2) An individual or family who will imminently lose their primary nighttime residence, provided that:
 - a. The primary nighttime residence will be lost within 14 days of the application for homeless assistance;
 - b. No subsequent residence has been identified; and
 - c. The individual or family lacks the resources or support networks needed to obtain other permanent housing;
- 3) Unaccompanied youth and homeless families with children and youth defined as homeless under other Federal statutes who do not otherwise qualify as homeless under this definition, but who:
 - a. Are defined as homeless under the other listed federal statutes:
 - Section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
 - b. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the application for homeless assistance;
 - c. Have experienced persistent instability as measured by three moves or more during the 90-day period immediately before applying for homeless assistance; and
 - d. Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse, the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration, and a history of unstable employment; and
- 4) Any individual or family who:
 - a. Is experiencing trauma or a lack of safety related to, or fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or lifethreatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized;
 - b. Has no other residence; and
 - c. Lacks the resources to obtain other safe permanent housing.

Exclusion: For ESG, the term "homeless" or "homeless individual" does not include any individual imprisoned or otherwise detained pursuant to an Act of the Congress or State Law.

Homeless individual with a disability:

- 1) A person shall be considered to be a homeless individual with a disability if he or she has a disability that:
 - a. Is expected to be long-continuing or of indefinite duration;
 - b. Substantially impedes the individual's ability to live independently;
 - c. Could be improved by the provision of more suitable housing conditions; and
 - d. Is a physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury;
- 2) A person shall also be considered to be a homeless individual with a disability if he or she has a disability that is a developmental disability, as defined in this section; or

3) If he or she has acquired immunodeficiency syndrome (AIDS) or any conditions arising from the etiologic agency for acquired immunodeficiency syndrome, including infection with the human immunodeficiency virus (HIV)?

<u>Homeless Management Information System (HMIS)</u>: The information system designated by the Continuum of Care to comply with the HUD's data collection, management, and reporting standards and used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at-risk of homelessness.

Homeless Prevention: ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the "homeless" definition in § 576.2. This assistance, referred to as homelessness prevention, may be provided to individuals and families who meet the criteria under the "at risk of homelessness" definition, or who meet the criteria in paragraph (2), (3), or (4) of the "homeless" definition in § 576.2 and have an annual income below 30 percent of median family income for the area, as determined by HUD. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing. Homelessness prevention must be provided in accordance with the housing relocation and stabilization services requirements in § 576.105, the short-term and medium-term rental assistance requirements in § 576.106, and the written standards and procedures established under § 576.400.

<u>Households</u>: A single individual or group of persons who either currently live together in one dwelling unit or would live together in one dwelling unit were they able to maintain suitable housing accommodations.

Housing First: An approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements. Housing First prioritizes providing permanent housing to people experiencing homelessness, thus ending their homelessness and serving as a platform from which they can pursue personal goals and improve their quality of life. This approach is guided by the belief that people need basic necessities like food and a place to live before attending to anything less critical, such as getting a job, budgeting properly, or attending to substance use issues. Additionally, Housing First is based on the understanding that client choice is valuable in housing selection and supportive service participation, and that exercising that choice is likely to make a client more successful in remaining housed and improving their life.

HUD: U.S. Department of Housing and Urban Development.

<u>Income Eligibility</u>: A homeless individual shall be eligible for assistance under any program provided by the Stewart B. McKinney Homeless Assistance Act, or by the amendments made by this Act, only if the individual complies with the income eligibility requirements otherwise applicable to such program.

<u>Individuals</u>: Persons not accompanied by children or adult partner. Individuals can also mean the number of family members in a household.

<u>Marginalized Populations</u>: Those groups excluded from mainstream social, economic, educational, and/or cultural life. Examples of marginalized communities include, but are not limited to, groups excluded due to race, gender identity, sexual orientation, age, physical ability, religion, language, and/or immigration status. Marginalization occurs due to unequal power relationships between social groups.

<u>Match Funds</u>: Funds contributed to the project for the expressed purpose of implementing the eligible activities proposed in the application. Eligible match includes cash on deposit, and cash committed from other sources, as documented by bank statements, and funding award letters. Non-cash match shall be documented by timesheets, appraisals, or other sufficient documentation. Match funds must be expended during the time frame of the ESG contract. Match Funds are a contractual requirement in ESG and must be reported in the audit for both revenue and expenditures.

<u>Major Rehabilitation</u>: Rehabilitation that involves costs in excess of 75 percent of the value of the building before rehabilitation. Major rehabilitation undertaken with ESG funds must meet local government safety and sanitation standards under 24 CFR 576.55. In addition, for projects of 15 or more units where rehabilitation costs are 75 percent or more of the replacement cost of the building, that project must meet the requirements of 24 CFR 8.23(a). The facility must be used as an emergency shelter for a period of not less than ten years after the ESG contract is closed or the applicant may be required to repay grant funds.

Nonprofit Recipient: Any nonprofit organization assisting the homeless to which a Unit of General Local Government or CAA distributes ESG funds.

<u>Obligated</u>: The ESG contractor, as appropriate, has placed orders, awarded contracts, received services, or entered similar transactions that require payment from the grant amount.

<u>Operations</u>: Recurring costs incurred by a recipient operating a homeless shelter with respect to administration, rent, food for feeding the homeless, security, maintenance, utilities, fuels, and insurance for the homeless shelter.

<u>Private nonprofit organization</u>: A private nonprofit organization that is a secular or religious organization described in section 501(c) of the Internal Revenue Code of 1986 and which is exempt from taxation under subtitle A of the Code, has an accounting system and a voluntary board, and practices nondiscrimination in the provision of assistance. A private nonprofit organization does not include a governmental organization, such as a public housing agency or housing finance agency.

<u>Program income</u>: Program income includes any amount of a security or utility deposit returned to the subrecipient and shall have the meaning provided in 2 CFR 200.80. Per 24 CFR 576.201(f), costs paid by program income shall count toward meeting the subrecipient's matching requirements, provided the costs are eligible ESG costs that supplement the subrecipient's ESG program.

Program participant: an individual or family who is assisted under ESG program.

Program year: the consolidated program year established by the recipient under 24 CFR part 91.

<u>Project-Based Rental Assistance (PBRA)</u>: In PBRA, the subrecipient contracts for a particular unit or property and the participant then enters a lease with the landlord. If the participant moves, the PBRA stays with the unit for the next eligible participant. Program participants must reside in housing provided through a contract with the owner of an existing structure whereby the owner agrees to lease subsidized units to program participants. Program participants do not retain the rental assistance if they relocate to a unit outside the project; the subsidy remains with the project. Note - The Oklahoma Department of Commerce does not allow ESG funds to be expended on project-based rental assistance.

<u>Race</u>: The social construction of categorizing people largely based on physical differences features, such as skin color or ancestry, without a biological basis.

<u>Racial Equity</u>: When an individual's racial identity does not predict how they will fare, as demonstrated by statistics, by the examination and elimination of policies, practices, attitudes, and messages that allow for disparate outcomes.

<u>Racial Inequity</u>: When two or more racial groups are not standing on approximately equal footing, such as the percentages of each ethnic group in terms of their representation in the homelessness population.

<u>Racism</u>: Prejudice, discrimination, or antagonism by an individual, community, or institution against a person or people on the basis of their membership in a particular racial or ethnic group, typically one that is a minority or marginalized.

Rapid re-housing assistance: The provision of housing relocation and stabilization services and short-and/or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing.

<u>Recipient</u>: Any State, territory, metropolitan city, or urban county, or in the case of reallocation, any unit of general-purpose local government that is approved by HUD to assume financial responsibility and enters into a grant agreement with HUD to administer assistance under this part.

Rehabilitation: Labor, materials, tools, and other costs of improving the building, including repair directed toward an accumulation of deferred maintenance; replacement of principal fixtures and components of existing buildings; installation of security devices; and improvements through alterations or incidental additions to or enhancement of existing buildings including improvements to increase the efficient use of energy. Rehabilitation includes the conversion of a building to an emergency shelter where the costs of conversion and any rehabilitation do not exceed 75 percent of the cost of the building before rehabilitation and includes structural changes necessary to make a facility accessible to persons with physical handicaps. The facility must be used as an emergency shelter for a period of not less than three years after the ESG contract is closed or the applicant may be required to repay grant funds.

<u>Subrecipient</u>: A unit of general-purpose local government or private nonprofit organization to which a recipient makes available ESG funds.

System for Award Management (SAM): A Federal Government owned and operated free web site that consolidates the capabilities in Central Contractor Registration (CCR), Online Representations and Certifications Applications (ORCA) and the Excluded Parties List System (EPLS). To receive ESG funds, a business or non-profit organization needs to be registered at sam.gov. This registration is sometimes referred to as "self-certifying" an organization with the primary database of vendors doing business with the federal government. Any organization shown as debarred in sam.gov (due to allegations of fraud, mismanagement, and similar improprieties) will not be eligible to receive ESG funds.

<u>Telework</u>: As defined in the Telework Enhancement Act of 2010: "[t]he terms 'telework' or 'teleworking' refers to a work flexibility arrangement under which an employee performs the duties and responsibilities of such employee's position, and other authorized activities, from an approved worksite other than the location from which the employee would otherwise work."

<u>Tenant-Based Rental Assistance (TBRA)</u>: In TBRA, the program participants locate housing in the private rental market and enter into a lease with the property owner. Program participants are responsible for locating housing in the private rental market. If a program participant later moves to another unit, he/she can take the rental assistance and use it in the new unit.

<u>Transitional Housing</u>: Facility-based or scattered-site temporary housing combined with essential services, with occupancy typically limited to 24 months. The applicant would administer the transitional

housing activities and establish eligibility for occupants. Transitional Housing is an eligible activity under the Continuum of Care Grant funds only. Transitional housing also functions to do the following:

- 1) Assist homeless families and individuals overcome the problems/conditions that made them homeless;
- 2) Increase skills and/or income and aid in obtaining and remaining in permanent housing; and
- 3) Provide or coordinate, as required, substance abuse services, mental health services, day care, life skills training, educational services, family support, and other services.

Transitional Housing, as compared to a general shelter, implies a greater level of responsibility in that residents typically maintain their own home or apartment without 24-hour supervision, while at the same time receiving essential services from the administrators of the facility, or from a contracted service provider. These services function to teach each resident the necessary skills in order for them to move to permanent housing and independent living. Individual rehabilitation plans are also emphasized over a group treatment approach.

Trauma: An experience that is physically or emotionally harmful with long lasting adverse effects. This can be from an event, series of events, or set of circumstances. Trauma can impact an individual's mental, physical, social, emotional, or spiritual wellbeing. Trauma can affect people of every race, ethnicity, age, sexual orientation, gender, psychosocial background, and geographic region. A traumatic experience can be a single event, a series of events, and/or a chronic condition (e.g., childhood neglect, domestic violence). Traumas can affect individuals, families, groups, communities, specific cultures, and generations. It generally overwhelms an individual's or community's resources to cope, and it often ignites the "fight, flight, or freeze" reaction at the time of the event(s). It frequently produces a sense of fear, vulnerability, and helplessness.

<u>Trauma-Informed Approach</u>: A program, organization, or system that is trauma-informed realizes the widespread impact of trauma and understands potential paths for recovery; recognizes the signs and symptoms of trauma in clients, families, staff, and others involved with the system; and responds by fully integrating knowledge about trauma into policies, procedures, and practices while seeking to actively resist re-traumatization.

<u>Unaccompanied Youth</u>: Youth for the purposes of this program under the age of 25 years of age that qualify under the category for unaccompanied youth defined as homeless under other federal statutes. Youth who are in the official custody of the State, as a ward of the State, do not qualify for Emergency Solutions Grant assistance.

<u>Underserved Populations</u>: The term 'underserved populations' includes populations underserved because of geographic location, underserved racial and ethnic populations, populations underserved because of special needs (such as language barriers, disabilities, alienage status, or age), and any other population determined to be underserved by the Secretary, as appropriate.

<u>Unit of local government</u>: Any city, county, town, township, parish, village, or other general-purpose political subdivision of a State.

<u>Value of building</u>: Value of building is defined as the monetary value assigned to a building by an independent real estate appraiser or as otherwise reasonably established. If the value of the building is established other than by an appraisal, ODOC must be advised and provided with written documentation of the method for determining the value. The value of the building can only be used as match if the building is donated after the ESG contract is entered into with ODOC. If the shelter is purchasing or renting the facility, only the mortgage or lease amount paid with non-ESG funds multiplied by 12 months (the term of the ESG contract) can be used as match. Please refer to Federal Register, Title 24, Volume 3, revised April 1, 1998, for further clarification and for other related definitions.

<u>Victim Service Provider</u>: A private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women's shelters, domestic violence transitional housing programs, and other programs.

<u>Victim Services</u>: The term 'victim services' means services that assist domestic violence, dating violence, sexual assault, or stalking victims, including services offered by rape crisis centers and domestic violence shelters, and other organizations, with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.

<u>Weather and Safety Leave</u> - Pursuant to Administrative Leave Act of 2016 and 5 CFR 630, an agency may grant weather and safety leave to employees only if they are prevented from safely traveling to or safely performing work at a location approved by the agency due to:

- 1) An act of God;
- 2) A terrorist attack; or
- 3) Another condition that prevents an employee or group of employees from safely traveling to or safely performing work at an approved location.

Home Investment Partnerships Program (HOME) Program Annual Action Plan Program Year 2025

Oklahoma Housing Finance Agency Housing Development Team 100 N.W. 63rd P.O. Box 26720 Oklahoma City, OK 73126-0720 (405) 419-8261

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HOME Program: One-Year Action Plan

The State of Oklahoma's allocation of HOME funds for Program Year 2025 is \$8,108,903. The range of activities planned for 2024 is similar to that of Program Year 2025, but some changes have been made.

Title 24 Code of Federal Regulations, Part 92, governs this program. Those regulations are incorporated by reference in this Action Plan. In some cases, the Oklahoma Housing Finance Agency (OHFA) has adopted more restrictive requirements than are included in Title 24 CFR Part 92. The primary goal of the OHFA HOME Program is to retain and increase the supply of decent, safe, and sanitary affordable housing. OHFA furthers this goal by using the HOME Program financial resources as a catalyst in the development and strengthening of public partnerships with local governments, nonprofit organizations, private sector development entities, financial institutions, and debt and equity capital outlets.

Participating Jurisdiction Service Area

Applications for HOME funds will be accepted from all parts of the State of Oklahoma with the exception of the HUD designated HOME Program Metropolitan Participating Jurisdictions of Oklahoma City, the Tulsa Consortium, Lawton, and Norman. These communities receive a direct annual allocation of HOME funds from HUD.

An exception will be made for applications for Tenant-Based Rental Assistance (TBRA) only. TBRA funds may be utilized anywhere within the State of Oklahoma, including within the city limits of Oklahoma City, the Tulsa Consortium, Lawton and Norman.

1. HOME Eligible Entities

OHFA encourages partnerships that promote the goals of the HOME program. OHFA plans to partner with the following entities. Only these entities are eligible to receive HOME funds from OHFA.

State Recipients: Units of general local government, including cities, towns, counties and Indian tribes.

CHDOs: A Community Housing Development Organization (CHDO) is a private, nonprofit organization that meets a series of qualifications prescribed in the HOME regulations. OHFA must use a minimum of 15 percent of its annual allocation for housing owned, developed or sponsored by CHDOs. OHFA will evaluate organizations' qualifications and designate them as CHDOs. CHDOs also may be involved in the program as sub-recipients, but the use of HOME funds in this capacity is not counted toward the 15 percent minimum requirement.

Sub-recipients: A sub-recipient is a public agency or nonprofit organization selected by OHFA to administer all or a portion of the HOME Program. It may or may not also qualify as a CHDO. **Sub-recipients run programs, not projects**.

Nonprofit Developers: Private, nonprofit housing development organizations that do not meet the qualifications to be a CHDO, or that have not applied to be a CHDO with OHFA. **Nonprofit developers may also be CHDOs applying for non-CHDO funds.** Nonprofit developers may

undertake individual projects that comply with the HOME Program requirements, and may do so out of any set-aside for which they are eligible.

Private, for-profit Developers: Private, for-profit developers are eligible to apply for HOME funds only for projects developed in conjunction with Affordable Housing Tax Credits. **They are ineligible to apply for HOME funds for any of the other HOME-eligible activities.**

2. HOME Funding Activities

Homeowner Rehabilitation

HOME funds may be used by eligible applicants to assist existing homeowners with the repair, rehabilitation, or reconstruction of owner-occupied units.

Homeownership

HOME funds may be used by eligible applicants to assist individuals or families for homebuyer assistance, acquisition, acquisition and rehabilitation, new construction, and lease-purchase of affordable housing for homeownership. All Homebuyer activities must incorporate housing counseling into project designs. Housing counseling must be provided by a HUD approved certified housing counselor.

Rental Housing

HOME funds may be used by eligible applicants for acquisition, rehabilitation, acquisition and rehabilitation, or new construction of affordable rental housing.

Tenant-Based Rental Assistance (TBRA)

HOME funds may be used by eligible applicants to help individual households afford housing costs such as rent and utility costs.

CHDO Project Pre-development Loans

HOME funds may be used by eligible CHDOs for project-specific pre-development assistance intended to assure funds for up-front, eligible project expenditures.

CHDO Operating Assistance

HOME funds may be used by eligible CHDOs for general operating assistance. CHDO Operating Assistance funds will be awarded at the same time a CHDO receives an award of HOME funds for a CHDO activity. CHDO Operating Assistance funds will only be awarded to CHDOs that are currently receiving HOME funds for a CHDO activity.

3. HOME Program Funds Allocation

OHFA will use the funds allocated for Program Year 2025 in accordance with the percentages listed below. The percentages identified below will be used to calculate the final dollar amounts.

Administrative Funds

<u>Ten percent (10%)</u>, of the annual allocation will be used for administration. These funds will be used by OHFA to support its overall program delivery and monitoring.

CHDO Operating

No more than <u>five percent (5%)</u>, of the State PJ's annual allocation will be available for CHDO operating assistance. For the 2025 Program Year, the amount for which any eligible CHDO may apply will be limited to a maximum of \$50,000.

CHDO Set-Aside

<u>Twenty-five percent (25%)</u> of the annual allocation shall be reserved for CHDOs applying for CHDO activities. Only CHDO-eligible activities as defined in the HOME Final Rule, 24 CFR Part 92, will be funded from this set-aside.

Rental/Homeownership

<u>Fifty percent (40%)</u> of the annual allocation shall be used for other Rental or Homeownership activities. This set-aside will be open to eligible non-CHDO Applicants. It will also be available to CHDOs applying for non-CHDO activities, and to CHDOs applying for CHDO activities once the CHDO Set-Aside funds have been exhausted, <u>but not sooner</u>.

Homeowner Rehabilitation

Ten percent (10%) of the annual allocation shall be used for Homeowner Rehabilitation activities.

If any funds remain in this set-aside after the January 2026 Board of Trustees meeting, it will then be determined at OHFA's discretion whether such funds should be transferred to the Rental/Homeownership Set-Aside.

Down-Payment Assistance

<u>Ten percent (10%)</u> of the annual allocation shall be used for Down-Payment Assistance programs. Assistance to individual households cannot exceed \$18,999

If any funds remain in this set-aside after the January 2026 Board of Trustees meeting, it will then be determined at OHFA's discretion whether such funds should be transferred to the Rental/Homeownership Set-Aside.

General Information on Funds Allocation:

All amounts set forth in this Action Plan may be changed at the discretion of OHFA, except where mandated by HOME Program rules. Such decisions shall be based upon demand, need, efficient resource use, and other Program-relevant considerations. Funding awards are subject to the availability of HOME funds and the timing needs of individual Projects.

Program Income

Awardees are required to clearly identify whether or not the proposed activity will result in Program Income. All Program Income must be returned to OHFA. OHFA no longer permits Awardees to retain Program Income. Exceptions may be made for Awardees that are currently reusing Program Income derived from Written Agreements already completed and closed out. Such exceptions must be specifically approved by OHFA and HUD and may be rescinded at any time should OHFA Monitoring Staff determine that the Program Income is not being used in accordance with HOME Program and OHFA rules and regulations.

Recaptured Funds

If OHFA recaptures any HOME funds, they will be allocated by OHFA to eligible activities. In the event a significant amount of funding becomes available, a public announcement of the availability of funds may be made.

4. Administrative funds

OHFA will use all of the administrative funds for its costs of administering the HOME Program for the State of Oklahoma. <u>OHFA will not accept Applications for administrative funds</u>.

5. Mode of HOME investment

 OHFA shall award HOME funds in the form of equity grants. The only exception is for CHDO Pre-Development Loans, which per the Final Rule must be in the form of loans, and for applicants who are applying in conjunction with an Affordable Tax Credit Applicatrion.

6. HOME Written Agreement Award Instrument

Written Agreements will be used to contract with funded Applicants in order to implement proposed HOME activities and govern project execution. All Written Agreements will provide for protection of the Period of Affordability throughout its entire term.

At OHFA's discretion, a pre-agreement meeting between OHFA, the HOME Awardee, and any Project partners may be required prior to execution of Written Agreements.

For all Homebuyer activities, OHFA will require that funded Applicants execute Written Agreements with the ultimate beneficiaries of the HOME funds, setting forth the restrictions and requirements of the HOME Program. The Written Agreements must contain, at a minimum, the following requirements:

- The housing must conform to the requirements of 24 CFR 92.254(a).
- The housing must be modest; its value must not exceed 95% of the median price of comparable housing. It must also not include any luxury improvements as defined by HUD and/or OHFA.
- The home must be the principal place of residence of the homebuyer.
- Recapture or Resale provisions must be set forth in detail and written in such a way that the homebuyer can understand them.
- The agreement should set forth the amount of HOME assistance provided, the form of such assistance, and the deadline for acquiring the housing unit with the HOME funds, if applicable.
- The agreement should be drafted in such a manner as to ensure compliance with all HOME Program requirements and ensure that the homebuyer fully understands such requirements.

Activity and design modifications to funded projects are strongly discouraged. Activity and

design modifications cannot be made to funded Projects without the prior written approval of OHFA.

Extensions of Written Agreement periods may, at OHFA's discretion, be permitted for any HOME Awardee that can demonstrate that the Project is proceeding in a manner such that completion of the Project is certain in the time identified. However, Written Agreements cannot be extended beyond the Project completion deadlines set forth in the Final Rule.

Funded Applications are subsequently made a part of all Written Agreements between OHFA and the HOME Awardee. Unapproved variations to funded Project designs are considered violations of contractual agreements and may result in disallowed costs, the repayment of HOME funds, or possible suspension from future Program participation.

Projects selected for funding in conjunction with Applications for Affordable Housing Tax Credits (AHTC), National Housing Trust Fund (HTF), or Oklahoma Housing Trust Fund may receive a contingent HOME commitment, since they may be considered prior to a reservation of Tax Credits or an award of HTF funds. Contingent commitments will be withdrawn should an Applicant be unable to obtain a reservation of Tax Credits or an award of HTF funds, as applicable, within the time period specified by OHFA.

Projects selected for funding that involve the acquisition and rehabilitation of existing housing, and the specific address or addresses of the housing unit(s) cannot be identified at the time of application, will also receive a contingent HOME commitment. **The HOME Program Final Rule states that no Written Agreement can be executed without a specific address or legal description**. Therefore, for these projects, the Written Agreement will be executed once the legal description, address or addresses have been determined.

No other contingent HOME commitments are permitted. Contingent HOME commitments will not be made for any other eligible activities or in conjunction with any other type of funding source. All other funding sources must already be committed to the Project.

Contingent commitment amounts are good faith estimates by OHFA and may be adjusted based on the actual award of Tax Credits and/or HTF funds, or the work write-ups and cost estimates of acquisition/rehabilitation Projects. OHFA may reduce the amount of the contingent award, but under no circumstances will OHFA increase the amount of a contingent award.

OHFA will limit to five (5) the number of open HOME Written Agreements that any one entity may have at any given time. This includes Written Agreements for which said entity is either the Awardee or the Administrator. OHFA defines an open HOME Written Agreement as one that has not been 100% expended and all close-out documents submitted to OHFA. This limit will not include CHDO Operating Assistance Written Agreements.

A large number of open Written Agreements represents a possible capacity issue, especially should key staff leave before the Written Agreements are completed and closed out. Capacity is of great concern to OHFA, since OHFA must certify in the Integrated Disbursement and Information System (IDIS) that an Awardee has the capacity to undertake the Project or activity for which an award has been made. Further, the five (5) Written Agreement limit prevents any one entity from monopolizing the very limited HOME funds available.

7. HOME Written Agreement Performance

OHFA regularly assesses the performance of its HOME partners. Based on the performance pursuant to the requirements contained in its Written Agreements and the Program regulations, OHFA may withdraw funding due to non-performance, poor performance, and/or untimely performance. In addition, OHFA may, at its discretion and within its regulatory authority pursuant to 24 CFR Part 92.2, reassign untimely Written Agreement funding in order to affect timely expenditure, performance, and Project completion.

Satisfactory performance in regard to HOME Written Agreements is a threshold requirement for all Applications for new awards of HOME funds. The 2024 HOME Application will set forth specific performance standards. Failure to meet these performance standards will be grounds for denial of any new Application for HOME funds. Some information on how Written Agreement performance will be measured can be found in Section 22 of this Action Plan, "Written Agreement Performance Measurement".

8. Compliance Monitoring

These compliance monitoring procedures apply to all buildings placed in service in Oklahoma, which have received allocations of HOME funds determined under the HOME Regulations. The compliance monitoring procedures and requirements are as follows:

- A. OHFA will verify that the Awardee of a low-income housing Project is maintaining records for each qualified low-income unit in the Project. These records must show, for each year in the compliance period, the information required by the record-keeping provisions contained in the HOME Regulations, incorporated herein by reference.
- B. OHFA will verify that the records documenting compliance with the HOME Regulations for each year as described in Paragraph A above are retained for the entire affordability period.
- C. OHFA will conduct construction inspections in order to ensure that HOME funds are not being drawn down for work that has not been completed, work that has not been done according to the specifications of the Written Agreement, or costs that are ineligible for HOME funding.
- D. OHFA will inspect one hundred percent (100%) of the HOME Written Agreements as prescribed by HUD regulations and will inspect the low-income certification, the documentation the Awardee has received to support that certification, the rent records for Rental Projects and the home valuation limits for Homebuyer Projects.
- E. For Rental Projects, OHFA will perform on-site inspections at the time of property completion and, at a minimum, every three years thereafter, in order to determine compliance with construction standards and physical condition standards. All HOME-assisted Rental housing must meet the Uniform Physical Condition Standards, or UPCS. HOME Compliance monitors will not conduct a REAC inspection, but will monitor for any violations. OHFA may perform more frequent on-site inspections based upon a risk assessment of all projects.
- F. The Awardee must allow OHFA to perform an on-site inspection of any low-income unit and/or building in the Project through the end of the Period of Affordability. This inspection may be separate or in conjunction with any review of tenant files, and will include habitability requirements.
- G. During programmatic monitoring activities, OHFA shall review Program Awardees' affirmative marketing, minority outreach, and fair housing activities to ascertain compliance with standards established by HUD's Fair Housing Office.
- H. OHFA will promptly notify the Awardee in writing if OHFA is not permitted to inspect and review as described in Paragraphs C, D, E, F and G, or otherwise discovers that the

- Project does not comply with the HOME Regulations. In such event, the Awardee will be allowed a correction period to supply missing documentation or to correct noncompliance.
- OHFA will notify HUD of an Awardee's noncompliance or failure to certify no later than forty-five 45 days after the end of the time allowed for correction and no earlier than the end of the correction period.
- J. Compliance with requirements of the HOME Regulations is the responsibility of the Awardee and the owner of the building for which HOME funds are loaned or granted. OHFA's obligation to monitor for compliance with the requirements of the HOME Regulations does not make OHFA or the State of Oklahoma liable to any owner or to any shareholder, officer, director, partner, member or manager of any owner or of any entity comprising any owner for an owner's non-compliance therewith.
- K. The Final Rule for the HOME Program permits Participating Jurisdictions to charge compliance monitoring fees for all projects funded after August 23, 2013. OHFA intends to charge a small monitoring fee for some properties at some point in the future. Any fee increase must be incorporated into OHFA's HOME Program Rules, Title 330, Chapter 55, before they can be implemented. No compliance monitoring fees will be charged in Program Year 2025.

9. Affirmative Marketing, Minority Outreach, and Fair Housing

All Applicants for HOME Program funds for Rental and Homebuyer projects containing five (5) or more units must adopt affirmative marketing procedures and follow all affirmative marketing requirements for all HOME-assisted housing. Affirmative marketing requirements and procedures must include:

- methods for informing the public, owners and potential tenants about fair housing laws and the policies of the local program;
- a description of what owners and/or the program administrator will do to affirmatively market housing assisted with HOME Program funds;
- a description of what owners and/or the program administrator will do to inform persons not likely to apply for housing without special outreach;
- maintenance of records to document actions taken to affirmatively market HOME-assisted units and to assess marketing effectiveness; and
- a description of how efforts will be assessed and what corrective actions will be taken when requirements are not met.

In order to achieve compliance with the Affirmative Marketing, Minority Outreach, and Fair Housing requirements at 24 CFR Parts 92.350 and 92.351, Written Agreements shall be executed between OHFA and all Program Awardees. Written Agreements shall prohibit discrimination on the basis of race, color, national origin, religion, sex, age, handicap, or familial status in connection with any activities funded with HOME Investment Partnerships Program assistance.

Implementation manuals shall be provided to Awardees and shall contain information regarding Affirmative Marketing, Minority Outreach, and Fair Housing Standards and Procedures. At a minimum, Written Agreements shall require all contractors and subcontractors to comply with equal opportunity requirements, procurement efforts to solicit the use of minority and women's' business enterprises, undertake activities to further fair housing, and, where five (5) or more units are HOME- assisted, implement Affirmative Marketing procedures.

Affirmative Marketing is now required for all HOME Program activities, including Down-Payment Assistance and Tenant-Based Rental Assistance. All HOME Program activities must comply with the White House's Justice 40 Initiative, which orders at least 40% of certain federal investments to benefit disadvantaged communities that have historically been overburdened by pollution. For more information on the Justice 40 Initiative, go to Justice 40 Whole-of-government Initiative:

https://www.whitehouse.gov/environmentaljustice/justice4o/

Executive Order 14008: https://www.regulations.gov/document/EPA-HQ-OPPT-2021-0202-0012

Section 281 of the National Affordable Housing Act (the "Act") requires the State to prescribe procedures acceptable to the Secretary of HUD to establish and oversee a minority outreach program to ensure the inclusion, to the maximum extent possible, of minorities and women, and entities owned by minorities and women, including without limitation, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking firms, underwriters, accountants, and legal firms, in all Written Agreements, entered into by the Participating Jurisdiction with such persons or entities, public and private, in order to facilitate the activities of the Participating Jurisdiction to provide affordable housing authorized under the Act or any other federal housing law applicable to such jurisdiction.

Minority Business Enterprises/Women Business Enterprises

Applicants will be required to solicit and encourage the participation of Minority Business Enterprises/Women Business Enterprises (M/WBEs) in connection with their Project. **Applicants must affirm and certify to the same in their Applications or they will not be eligible to receive an award of HOME funds.**

Recommended Methods for the Encouragement of M/WBEs:

The following methods are recommended for Applicants who wish to encourage the participation of M/WBEs on HOME-assisted contracts:

- (i) Actively and affirmatively solicit bids for contracts and subcontracts from qualified M/WBEs, including solicitations to minority and women contractor associations;
- (ii) Ensure that plan specifications, request for proposals and other documents used to secure proposals for the performance of work or supply of materials will be made available in sufficient time for review by prospective M/WBEs;
- (iii) Divide, where economically and technically feasible, the work into smaller portions to enhance participation by M/WBEs;
- (iv) Encourage, where economically and technically feasible, the formation of joint ventures, partnerships or other arrangements among contractors to enhance participation by M/WBEs;
- (v) Consult with and use the services of governmental agencies, their consultants and contractor associations to further the participation of M/WBEs;
- (vi) Ensure that progress payments to M/WBEs are made on a timely basis and with such frequency that undue financial hardship is avoided and other credit requirements are waived or appropriate alternatives developed to encourage M/WBE participation;
- (vii) Make written solicitations in a timely fashion of M/WBEs listed in the Minority and Women-Owned Business Directory; and
- (viii) Make timely responses to any advertisements and solicitations provided by M/WBEs.

Reporting

All applicants must submit M/WBE Utilization reports, which will include, but are not limited to the following:

- (i) The name, address and telephone number of each M/WBE the Applicant intends to use;
- (ii) A brief description of the contract scope of work to be performed for the Applicant by each M/WBE and the scheduled dates for performance;
- (iii) A statement of whether the Applicant has a written agreement with each M/WBE, and if requested, copies of the agreements the applicant is using or intends to use;
- (iv) The actual total cost of the contract, the work performed and the materials provided, scope of work to be performed by each M/WBE for each contract;
- (v) The actual amounts of any payments made by the Applicant to each M/WBE as of the date the compliance report was submitted; and
- (vi) The percentage of total contractors, subcontractors, vendors and suppliers utilized for the project and the total prices for each.

10. Language Access

Recipients of federal financial assistance, including HOME funds, are required to provide meaningful access to their programs and services for persons with limited English proficiency (LEP). The U.S. Supreme Court has held that failing to take reasonable steps to ensure meaningful access for LEP persons is a form of national origin discrimination prohibited by Title VI of the Civil Rights Act of 1964.

The requirement to provide language assistance to LEP individuals applies to all recipients of federal financial assistance, including HOME funds, regardless of conflicting state or local laws. When meaningful access requires interpretation, interpreters should be provided at no cost to the persons involved. Budgeting adequate funds to ensure language access is essential. While costs are a consideration in determining what language assistance is reasonably required, fiscal pressures do not provide an exemption from civil rights requirements.

Recipients of HOME funds should develop, and periodically update, a written LEP plan that describes their language assistance services and explains how staff and LEP persons can access those services. Recipients who are not fully compliant with the LEP guidance issued by the federal government should be making steady progress toward becoming fully compliant. Guidance regarding LEP compliance can be accessed on the HUD website at www.hud.gov.

11. HOME Subsidy limits and minimums

<u>Minimum HOME Investment</u>: The minimum amount of HOME funds that must be invested in a project is \$1,000 multiplied by the number of HOME- assisted units in a project. The minimum only relates to the HOME funds, and not to any other funds that might be used for Project costs. The minimum HOME investment does not apply to Tenant-based Rental Assistance.

Special Minimum Investment for HOME awards in conjunction with Affordable Housing Tax Credits (AHTCs): The minimum amount of HOME funds that must be invested in a project that is utilizing HOME funds in conjunction with AHTCs is \$200,000.

<u>Maximum HOME investment</u>: There are three limiting factors that must be taken into account when determining the maximum HOME investment:

1. An award of HOME funds cannot exceed the HOME Program Maximum per Unit Subsidy Limits as established by HUD. The limits are based on the Section 234 Mortgage Limits and are determined by number of bedrooms.

- 2. The maximum HOME investment is limited to the minimum amount required to cover the project's financial gap, as determined by subsidy layering analysis.
- The maximum HOME investment is limited to the pro-rata share of HOME-eligible project costs, as determined by multiplying the total HOME-eligible project costs multiplied by the percentage of HOME units to total units or the percentage of HOME unit square footage to total unit square footage (whichever percentage is less).

The maximum HOME investment, therefore, is limited to the <u>LOWEST</u> of the pro-rata share of eligible costs, the HOME Program Maximum per Unit Subsidy Limit, or the financial gap as determined by a subsidy layering analysis.

The maximum for HOME Down-payment Assistance is \$14,999 per HOME-assisted unit. However, it should be noted that this limit is also subject to underwriting analysis, and HOME Awardees cannot provide Down-Payment Assistance in an amount over and above the amount required to permit the homebuyer(s) to qualify to purchase the home.

Maximum Awards for Activities

The maximum amount of HOME funds that will be awarded to a Rental or a Homeownership project is \$1,000,000. The maximum amount of HOME funds that will be awarded to a Homeowner Rehabilitation project is \$300,000 plus 5% of the Award in Administrative funds. The maximum amount of HOME funds for Down-Payment Assistance programs will be \$250,000. The Maximum amount of HOME funds for a Tenant-Based Rental Assistance program will be \$500,000.

12. Period of Affordability

Rental Housing:

Rehabilitation or Acquisition

\$1,000 - 14,999 HOME funds per unit 5 years \$15,000 - 40,000 HOME funds per unit 10 years \$40,001 - maximum allowable HOME funds per unit 15 years

New Construction (or acquisition of newly constructed housing): <u>20 years</u>, regardless of the amount of HOME funds invested.

Homeowner Rehabilitation

5-year period of affordability

Homeownership:

\$1,000 - 14,999 HOME funds per unit 5 years \$15,000 - 40,000 HOME funds per unit 10 years \$40,001 - maximum allowable HOME funds per unit 15 years

13. Resale and Recapture Options

24 CFR 92.254 provides guidance for Resale/Recapture options for Homeownership. OHFA is authorized under the HOME Rules to select which option will be used for preserving the Period of Affordability. For 2024, OHFA has chosen the Recapture option. If applicants demonstrate to OHFA staff that special conditions exist that would make the Resale option superior,

then it may be considered as an exception. If there is no direct subsidy to the homebuyer, the resale option must be used.

Since Recapture is only possible if there is a direct subsidy to the homebuyer, some Written Agreements between OHFA and a CHDO, non-profit developer, State Recipient or Sub-recipient may be structured such that under certain circumstances a Recapture Agreement with one homebuyer will be required, and under other circumstances a Resale Agreement with a different homebuyer will be required. Nonetheless, the agreement between the CHDO, non-profit developer, State Recipient or Sub-recipient and any individual recipient of HOME funds may contain only one provision, either Recapture or Resale. An agreement with an individual recipient of HOME funds cannot contain both.

The Applicant is to describe to OHFA its procedures as they relate to the HOME Recapture (or Resale) requirements. The procedures must fully comply with the HOME Rules, and must be approved by OHFA before implementation.

Recapture provisions must ensure that there is recovery of all or a portion of the HOME assistance that represents a direct subsidy to the homebuyer, if the housing does not continue to meet the affordability requirements and/or continue to be the principal residence of the family for the duration of the Period of Affordability. **Mortgages, deed restrictions, land covenants or other similar legal mechanisms must be in place to enforce these provisions.**

The amount subject to recapture is based on the amount of HOME assistance that represents a direct subsidy to the homebuyer. The amount subject to recapture may be forgiven over time. It must be forgiven on a prorated basis based on the amount of time remaining on the Period of Affordability. For instance, if the Period of Affordability is five years, the amount subject to recapture may be forgiven at the rate of twenty percent (20%) per year. The recaptured funds must be returned to OHFA. OHFA requires that all Recapture provisions for Homeownership and Homeowner Rehabilitation activities base the recapture amount on the net proceeds available from the sale and not the entire amount of the HOME investment. Applicants may structure their Recapture provisions such that the HOME funds are recaptured in one of the following three methods:

- Recapture of the HOME investment first, with the homeowner receiving any remaining net proceeds
- Allow the homeowner to recover his/her initial investment first, with the remainder of the net proceeds recaptured
- A "shared appreciation" method, where a pre-determined percentage of the net proceeds is retained by the homeowner, and the remainder of the net proceeds is recaptured

14. Match Requirements

Match contributions must meet the definition of eligible Match under the federal program regulations at 24 CFR Part 92. Written, itemized documentation of all proposed Match contributions must be provided.

Specific documentation requirements will be detailed in the application. At a minimum, Match documentation must include a signed statement that Match is not from federal sources, as well as documentation of the sources and amounts of commitments. Applicants proposing to

meet their Match liability using banked Match must at a minimum include confirmation that the banked Match has not been expended or committed to any other application or project. Banked Match cannot be derived from an open contract. Banked Match can only be derived from a closed, audited contract.

The HOME Program operates using a twenty-five percent (25%) non-federal Matching requirement. All Applicants must structure their proposals based on the twenty-five percent (25%) Match requirement. Waivers granted by HUD will not affect this requirement.

OHFA may make available to Applicants a portion of its banked Match credit. This will be set forth more specifically in the 2025 HOME Program Application Packet.

Potential sources of local Match include, but are not limited to, donated or discounted land, donated or discounted materials, and donated or discounted labor.

15. Leverage

Applicants must fully describe all development leverage resources, inducements and incentives that are present in the proposed Application. All sources of financing, except HOME, paying development budget costs are potentially eligible for leverage. Assistance for Homebuyers, such as a first mortgage, is not considered leverage.

Any leveraged funds will require a commitment letter to be attached to the application.

16. Troubled Public Housing Authorities

OHFA will wait to hear from HUD regarding whether or not there are currently any troubled public housing authorities.

OHFA will work closely with HUD to provide technical assistance and oversight where necessary. It is not anticipated that any HOME funds will be used to help troubled public housing authorities. The State of Oklahoma has not appropriated funds for this purpose, nor has it authorized OHFA to assume the federal government's role of subsidizing the operations of public housing agencies.

17. Projected Production

The following chart details the units the OHFA is projecting will be produced with the 2025 HOME allocation. This projection is based upon the actual numbers from prior years and amounts allotted to the various set-asides for 2025. It includes only HOME units and not any other units in the HOME-assisted projects:

Activity	HOME	Leveraged
-		
Rental	40	20
Homeownership	20	0
DPA	50	0
TBRA	0 tenants	0

18. Application Process

The HOME Program operates on a continuous Application basis. The Board of Trustees of OHFA must review and approve all awards of HOME funds to Applicants. The Board meets every other month throughout the year, and therefore deadlines will be established for the consideration of Applications at each of the upcoming Board meetings. These deadlines will be set forth specifically in the 2025 HOME Program Application Packet, and are established in order to allow OHFA Staff to properly review each individual Application.

Even though Applications for HOME Program activities are continuously accepted, it may become necessary to cease accepting Applications before the end of the Program Year because funds are no longer available.

The Program Year 2025 HOME Program Application Packet, as well as the 2025 HOME Program Processes, Procedures and Topical Guidance will be drafted, and will be made available for public input. The Application Packet will contain the Application submission requirements, threshold factors, and the evaluation criteria for all HOME Program Applications.

Applications for Rental Activities in Conjunction with AHTCs

For Program Year 2025, all eligible entities wishing to submit an Application for Rental Activities in Conjunction with AHTCs for the Second AHTC Funding Period of 2025 must submit their applications on or before June 29, 2025. The Applications for Rental Activities in Conjunction with AHTCs will be considered at either the September or November 2025 meeting of the OHFA Board of Trustees. It is OHFA's intent to consider them at the September 2025 Board meeting if possible.

Applications that meet all threshold requirements will be funded in rank order by score, from highest to lowest. Tie-breakers as set forth in the 2025 Application Packet will be used in the event that there are sufficient funds remaining for only one application, and the next two or more applications in rank order have achieved an equal score.

Application timeline:

- A draft of the proposed 2025 HOME Program Application Packet, including all Application and scoring evaluation criteria was presented for public comment and input on or about December 10, 2024. The draft will be posted on OHFA's website, www.ohfa.org
- An informal public input sessions on the 2025 HOME Application were held on July 25th and August 22nd, 2024.
- The final version of the 2025 HOME Application Packet was posted on OHFA's website, www.ohfa.org, on or about January 30th, 2025.
- OHFA may hold a training session on the 2025 HOME Program Application Packet in Febraury of 2025 via Zoom. If OHFA Staff determines that the changes to the HOME Program for 2025 are minimal, OHFA may decide not to hold such a training session.
- OHFA will begin accepting Applications April 1, 2025.

OHFA staff will make every effort to meet this timeline. The dates for each step in the Application process will be published on OHFA's website. The web address is www.ohfa.org. All prospective

Applicants and interested parties are encouraged to check the website frequently for updated information concerning important dates.

2025 Program Year - Important Dates

- January 30, 2025 Final version of 2025 HOME Application Packet available
- April 1, 2025 OHFA will begin accepting applications for the 2025 Program Year for all eligible activities
- June 29, 2025 Applications for Rental Activities in Conjunction with AHTCs are due

During Application review, the following are the factors that may be considered as Threshold Factors and/or Evaluation Criteria:

- Application Information Form
- Attachments A, B, C, and D
- BABA Certification
- URA Seller Notice
- HOME Application Certification
- Description
- Audit
- Match
- Monitoring
- Federal Requirements
- Market Analysis
- Development Commitments
- Organizational Structure and Experience
- Capital Needs Assessment
- Financial Management
- Financing
- Readiness to Proceed

- Special Populations
- HOME Training
- Leverage
- HOME Investment per Unit
- CHDO Status
- Energy Efficiency
- HOME/Fair Housing Training
- Tenant Special Needs Populations
- Storm Shelter
- Vistibility

The complete list of Threshold Factors and Evaluation Criteria may not be limited to those above, and also may not include every criteria listed above.

Applications to be considered at the next OHFA Board of Trustees meeting must be submitted by the deadlines listed in OHFA's 2025 Application Packet. Applicants are encouraged to access the 2025 HOME Program Application Packet available on OHFA's web-site at www.ohfa.org to verify submission deadlines and ensure timely filing of their applications.

Applicants proposing to incorporate the use of HOME funds with Affordable Housing Tax Credits (AHTCs) should confirm the deadlines for submission in the HOME Application and the AHTC Application.

Awards of HOME funds are subject to the availability of funds and the satisfaction of all threshold factors. **Applications that do not satisfy these criteria are ineligible for funding.**In the event that insufficient funds remain to award HOME funds to all Applications for any eligible activity, Applications for each activity will be funded in rank order by score, as determined by Staff review of the evaluation criteria. In the event that two or more Applications achieve an equal score, tie-breakers as set forth in the 2025 HOME Application Packet will be used to determine funding.

Applications for Down-Payment Assistance and CHDO Operating Assistance will not be scored. If insufficient funds remain to award to all Applications for Down-Payment Assistance and CHDO Operating Assistance, tie-breakers as set forth in the 2025 HOME Application will be used to determine which Applications will be funded.

Application Requirements Specific to CHDOs

CHDOs are responsible for notifying OHFA of any changes relating to the HOME Program CHDO eligibility criteria elements. Therefore, OHFA certified CHDOs making Application for CHDO activities, including CHDO Operating and Project Specific Loans, must, at the time of Application, indicate any changes in the eligibility criteria elements since the date of their last certification.

Eligibility criteria elements:

- Legal status
- Capacity and Experience
- Organizational structure
- Board Composition of current members.
- Relationships with for-profit entities
- Service Area

CHDOs with current OHFA certifications that have had no eligibility criteria element changes since their certification date, must submit a certification signed by the Board Chairman or Executive Director indicating that no eligibility criteria element changes have occurred.

If eligibility criteria element changes have occurred since the date of the CHDO's last OHFA certification, updated documentation relating to all changes must be provided. In addition, the CHDO must provide a certification signed by the Board Chairman or Executive Director that clearly identifies all the relevant changes that have been made. All certifications must indicate that all supporting documents relating to the CHDO's certification are on file in the CHDO's corporate office and available for OHFA's review.

19. CHDO Annual Recertification Process

OHFA requires that CHDOs meet the CHDO eligibility criteria in order to apply for HOME funds for CHDO activities.

20. New Applicants for CHDO Certification

Any not-for-profit organization receiving OHFA HOME-CHDO funding must be certified by OHFA as a CHDO under 24 CFR 92.2.

New Applicants for certification must meet with OHFA Staff. Those in attendance must be authorized representatives of the organization. They must also be principals in the operation of the applicant. This meeting is <u>required</u> before an application may be submitted for CHDO certification.

OHFA will prepare an Application Packet for CHDO Certification, and will make it available to prospective Applicants <u>after the required meeting has taken place</u>. A completed Application must be submitted with all required documentation.

Applications for CHDO certification may be submitted to OHFA at any time throughout the year. However, the not-for-profit organization must have received its CHDO certification from OHFA before submitting an Application for HOME CHDO funding.

Applicants should allow 4-6 weeks for OHFA to review a fully completed CHDO Certification Application. Once OHFA is satisfied that all certification requirements have been met, a CHDO certification letter and a certificate will be issued within two weeks.

21. Outcome Performance Measurement System

The Office of Community Planning and Development (CPD) at HUD has developed an Outcome Performance Measurement System. This system will enable HUD to collect information on the outcomes of activities funded with CPD formula grant assistance, and to aggregate that information at the national, state, and local level. The outcome performance measurement system is not intended to replace existing local performance measurement systems that are used to inform local planning and management decisions and increase public accountability.

Performance Measurement Objectives

The outcome performance measurement system has three overarching objectives: (1) Creating Suitable Living Environments, (2) Providing Decent Affordable Housing, and (3) Creating Economic Opportunities. There are also three outcomes under each objective: (1) Availability/Accessibility, (2) Affordability, and (3) Sustainability. Thus, the three objectives, each having three possible outcomes, will produce nine possible ``outcome/objective statements' within which to categorize HOME activities. OHFA will complete an outcome/objective statement in HUD's Integrated Disbursement and Information System (IDIS) by entering data in the form of an output indicator.

It is mandatory for OHFA to collect this data. The collection and reporting of performance data is not optional, but individual outcome indicators can and will vary, depending on the activity. The proposed outcome measurement framework will not change the types of activities available to eligible applicants, but it will require new ways of reporting the data. The flexibility of the Program will be maintained. The objectives and outcomes will be determined by OHFA, based on the intent of the activity.

The following is a list of the activities to be undertaken with HOME funds in Program Year 2025, and the outcome and objective for each of those activities:

Rental/Homeownership: Affordability for the purpose of providing Decent Housing Affordability for the purpose of providing Decent Housing Homeowner Rehabilitation: CHDO Pre-Development Loans: Affordability for the purpose of providing Decent Housing CHDO Operating Assistance:

This activity is not covered in the Performance

Measurement System.

22. **Written Agreement Performance Measurement**

Meeting affordable housing objectives and obtaining satisfactory outcomes is important, but proper performance goes beyond housing production. Administration of the HOME Written Agreement is also important. The OHFA HOME Finance Staff has developed the following chart outlining how contract progress will be monitored. All time periods are from the date of the execution of the Written Agreement unless otherwise specified by OHFA.

Written Agreement Performance Measurement

Time Period	% Expended	Action	Performance
12 months from WA begin date	If 0% expended	send letter	Concern
18 months from WA begin date	0% expended	Determine contract feasibility	
18 months from WA begin date	< 25% expended and no explanation	send letter	Finding
24 months from WA begin date	< 50% expended	send letter	Concern
36 months from WA begin date	<100% send letter Concern There must be a plan in place to complete by 4-yr deadline If not, it will be a finding and awardee may have to pay back HOME funds (Plan must be approved by OHFA)		
0 – 60 days after WA end date	Need closeout documents; Will send a letter 1-month before WA end date to request closeout documents; If documents are not received within 60-day closeout period, a compliance visit will be scheduled and this will be a Finding		
	IDIS Expenditure Measurement per Activity		

Time Period	% Expended	Action	Performance
9 months after IDIS setup	0%	Send letter to request reimbursement request	Concern

12 months after IDIS setup	0%	Activity flagged and cancelled in IDIS	Concern
12 months between drawdowns		Activity flagged; need explanation from Grantee to continue	Concern
90 days from last drawdown	100%	Send letter if no activity completion report received	Concern
120 days from last drawdown drawdowns	100%	Activity flagged; Need completion report to continue processing drawdown requests	Finding

Written Agreement Extensions

Written Agreements will be for three-year periods. However, Written Agreements will contain specific performance benchmarks, and except in very unusual circumstances, project completion will be required well in advance of the three-year term. If an extension beyond the three-year period is required, it will be a **Finding.**

For CHDOs, excessive findings in regard to Written Agreement performance may result in CHDOs being placed on probation or, in severe cases, decertified.

Additional performance benchmarks will be set forth in Written Agreements and the failure to meet a performance benchmark could result in a concern, a finding or cancellation of the agreement, depending on the severity.



OKLAHOMA HOUSING FINANCE AGENCY 2025 HOUSING TRUST FUND Allocation Plan/Action Plan

100 N.W. 63rd St. P.O. Box 26720 Oklahoma City, OK 73126-0720

Introduction

This 2025 Allocation Plan/Action Plan is necessary to implement the federal government's National Housing Trust Fund (HTF). The Oklahoma Housing Finance Agency (OHFA) has been designated by the Governor of the State of Oklahoma to administer the HTF for the State. HTF funding is provided through the U.S. Department of Housing and Urban Development (HUD). OHFA will receive \$3,144,833 for HTF in 2025.

All HTF funds that OHFA receives in 2025 will be used to provide housing for Extremely Low-Income families or families at or below the Poverty Line, whichever is greater. In accordance with 24 CFR Part 93, OHFA will allocate 10% of its grant to program planning and administration costs (\$314,483.30); up to one-third for funding operating cost reserves; the balance of the grant will provide capital funding for new construction or rehabilitation of housing units.

1. National Housing Trust Fund Strategic Plan §91.315(b)(2)

Geographic Priorities

The HTF funds will be targeted to address specific and critical needs in rental housing markets, including multiple geographic areas if at all possible.

Goals

- Number of HTF units constructed or rehabilitated with 2025 funds: 450
- Number of HTF units receiving operating subsidies in the form of operating reserves: 55

2. National Housing Trust Fund Action Plan §91.320(k)(5)

Distribution of HTF funds

OHFA for 2025 will <u>not</u> allocate funds to sub-grantees for their distribution to owners/developers. Instead, HTF funds will be distributed directly to owner/developers of affordable housing via OHFA's 2025 HTF Application, a competitive process of selecting the best possible Projects for an award of HTF funds.

Application Requirements and Selection Criteria

Developers, owners, and the entire development team are required to meet the same threshold eligibility criteria as for other OHFA programs, as specified in the 2025 HTF Application Packet.

In addition, points will be awarded for certain other priorities, including those set forth in 24 CFR Part 91.320. These are highlighted to distinguish them from OHFA's own requirements. They may include, but are not limited to:

Threshold Requirements:

- Affirmatively Furthering Fair Housing Marketing Plan
- Audit
- Program and Financial Monitoring
- Market Analysis

- Description of the Project
- Affordable Rents
- Financing, Underwriting and Subsidy Layering
- Applicant Organizational Structure, Capacity and Experience
- Capital Needs Assessment (for acquisition/rehabilitation projects only)
- Nonprofit
- Readiness to Proceed
- NHTF Environmental Training

Priority (Points) for Awarding Funding to Eligible Applicants:

Leveraging

OHFA will award points for leveraging the HTF funds with other funding sources, including the extent to which an Application makes use of non-federal funding sources, such as State and local funding sources and private funding. Points will not be awarded for funding from the developer or the ownership entity

Duration of Affordability Period

New Construction, rehabilitation, and rehabilitation and acquisition rental projects have an affordability period of thirty (30) years. OHFA will award points for Projects promising an additional ten (10) years of affordability.

Energy Efficiency/Green Building

OHFA will award points for energy efficient/green building items that exceed the minimum requirements of the applicable building codes.

Project-based Rental Assistance

OHFA will award points for the preservation of rent-assisted projects; and for projects with binding commitments for project-based vouchers.

Special Populations

Points will be awarded for Projects that propose to serve special populations. The special populations for 2025 will be the homeless, families or individuals dealing with mental and physical disabilities, veterans, youth aging out of foster care (18-24 years of age), and individuals transitioning out of incarceration and their families.

Services for Special Populations

OHFA will award points for access to high quality supportive services focused on staying housed, improving physical and mental health, increasing income and employment, and developing social and community connections. Applications for HTF funding should be tied to funding for services that are appropriate to the population to be served.

Storm Shelter

Points will be awarded for storm shelters or safe rooms that meets or exceeds FEMA guidelines and the ICC/NSSA standards ((ICC-500).

Visitability

OHFA will award points for Projects committing to provide the following: 1) Door openings must be at a minimum 32" wide to accommodate a wheelchair 2) One bathroom on the main floor of the property that is accessible by wheelchair, this does not apply to the shower. 3) One zero-step entry located on at least one accessible entrance to the unit. If there is not one zero-step entry located on at least one accessible entrance to the unit, a ramp must be provided.

Geographic Diversity

OHFA will give bonus points to the highest scoring applications from the two main areas of the State, Eastern Oklahoma and Western Oklahoma, as set forth in the 2025 HTF Application Packet. The areas will be designated on a county-by-county basis. Due to the limited funding for 2025, OHFA believes that this is the most that can be done to encourage Geographic Diversity. Tiebreakers will be used if two or more applications achieve the same score.

Priority housing needs

Oklahoma's most current Consolidated Plan identifies priority housing needs among ELI renters for all renter household types from small and large families to elderly households. OHFA will award points for **the merits of the Application in meeting the State's priority housing needs** as set forth in the Consolidated Plan.

Cross-agency collaboration is particularly important when serving an ELI population because they may be frequent users of other public services, and providing affordable, service enriched housing may represent cost savings that could be reinvested in services funding)

In addition, many ELI populations want to work but have experienced barriers related to health, disability, criminal justice background, access to childcare, or lack of skills that could put them on a path to family-sustaining work. HTF developers are encouraged to show evidence of partnerships with workforce development agencies.

Roles, responsibilities and communication strategies should be clearly established among the supportive housing partners, codified in written agreements (MOUs, MOAs, contractual or grant agreements) and revisited regularly.

Relative Importance of Scoring Criteria

OHFA will award the above described points using the following scoring system, in order to ensure that the best projects are awarded funds.

Application responses are to be structured and information presented in such a way as to fully address each scoring criterion. The information, data, and statements provided in response to each criterion will be the basis for evaluating each Application. Failure to submit or properly address evaluation criteria items will disqualify the Application from receiving points for those items. Some criteria may not apply to all Applications. Some requirements under a particular criterion may not apply to all Applications.

The scores for all Applications will be totaled, and the Application scores will be used to determine the order of funding if there are insufficient funds available to fund all of the Applications for HTF funds. The highest scoring Application will receive an award of funds. In the event of a tie on scores between Applications, tiebreakers shall be used. The tiebreakers are set forth in the Tiebreakers criterion at the end of this section.

Leveraging - 10 Points

Applicants must fully describe all development leverage resources, inducements and incentives that are present in the proposed Application. All sources of construction or permanent financing, except HTF, paying development budget costs are eligible for leverage points. If any source of funding provides both construction and permanent financing, it will not be counted twice.

Public and private resources, such as Rural Housing Incentive Districts, CDBG, AHP, AHTC equity, Historic Tax Credit equity, USDA-RHS, HUD, foundation funds, and private capital will be considered in the leverage analysis.

Leverage points to be awarded:

At least 10% up to 25% of the HTF funds requested	1 point
At least 26% up to 50% of the HTF funds requested	2 points
At least 51% up to 75% of the HTF funds requested	3 points
At least 76% up to 100% of the HTF funds requested	4 points
101% or more of the HTF funds requested	5 points

When determining the leverage percentage, **normal rounding shall apply**. Thus, for example, 50.5% will be rounded up to 51%. 50.4% will be rounded down to 50%.

Duration of Affordability - 5 Points

Five (5) points will be awarded for Applicants who promise to extend the affordability period from thirty (30) to forty (40) years.

Energy Efficient Building Materials – 10 Points The following is an <u>exclusive list</u> of amenities for which OHFA may award points.

- Shower heads with a maximum of 2.0 gallons per minute flow rate (1 point)
- LED lighting in units or parking lot (2 points)
- Drought tolerant exterior plantings and grass to limit need for watering (2 points)
- Use of Low or no VOC paint throughout the Development for compliance period (1 point)
- An overhead fan in every bedroom and living space (2 points)
- Fire suppressant system installed in the stove vent hood (1 point)
- Programmable thermostats (1 point)

- Foaming gaps at windows, doors, eave lines, electrical outlets, switches (2 point)
- Mold guard drywall, at least in bathrooms, kitchen, and laundry rooms. (3 Points)
- Radiant barrier per ASTM standards in attic and/or roof sheathing and/or exterior wall sheathing. May not be combined with spray foam insulation. N/A for Rehabilitation Developments. (2 points)

Applicants applying for Rental activities in conjunction with AHTC's must commit to receive a HOME Energy Efficiency Rating System (HERS) score within the specific range chosen as evidenced by a report from Certified RESNET Home Energy Rater who conducted an inspection of the property post-constructive/rehabilitation.

Priority Housing Needs – 5 Points

Points will be awarded for addressing any of the following priority housing needs as identified in the Consolidated Plan. (Serving Extremely Low Income individuals and families was identified as the highest priority, but that is already a requirement of the HTF.)

- Families with Children
- Elderly
- Public Housing Residents
- Rural
- Chronic Homelessness
- Mentally Ill
- Chronic Substance Abuse
- Veterans
- Victims of Domestic Violence
- Persons with Mental Disabilities
- Persons with Physical Disabilities
- Persons with Developmental Disabilities
- Persons with Alcohol or Other Addictions
- Victims of Domestic Violence

Project Based Rental Assistance – 5 Points

Points will be awarded to a Project that will preserve project-based rental assistance from any federal, State or local program, or for Projects with a binding commitment for project-based vouchers.

The Applicant must provide an executed agreement with the entity providing the project-based rental assistance, or a signed letter promising to provide such assistance. The commitment to provide project-based rental assistance must be a firm commitment.

Tenant Special Needs Populations – 10 Points

Points will be awarded to a Project that commits to dedicate at least ten percent (10%) of the total residential units to serve a Special Needs Population, or multiple Special Needs Populations. A minimum of one (1) unit dedicated to a Special Needs Population is required in order to receive the points, regardless of the percentage. Points will be awarded for the following Special Needs Populations. This is an exclusive list:

- Homeless
- Persons with mental or physical disabilities
- Military veterans
- Youth aging out of foster care (age 18-24)
- Formerly incarcerated individuals transitioning into society

Services for Special Populations – 5 Points

OHFA will award points for Applications promising access to high quality supportive services focused on the ELI beneficiaries remaining housed, improving physical and/or mental condition, increasing income and employment, and developing social and community connections. To receive the points, Applications for HTF funding must be tied to funding for services that are appropriate for the population to be served.

The Applicant must provide an executed agreement with the entity providing the services, or a signed letter promising to provide such services. OHFA must be able to determine that the commitment to provide the services is a firm commitment. OHFA may request additional documentation if necessary to make such a determination.

Storm Shelter – 5 Points

Storm shelter or Safe room that meets or exceeds FEMA guidelines and the ICC/NSSA standards (ICC-500). Storm shelters/Safe room must accommodate all possible residents based on number of bedrooms one and a half (1.5) people per bedroom. For developments of less than five (5) units, the Storm shelter or Safe room does not have to be accessible.

Vistiability – 5 Points

Applicants must commit to <u>all</u> three items in order to receive points by completing attachment #17. It is up to the applicant to follow all Section 504 requirements if applicable to the specific project. Accepted items:

- 1. Door openings must be at a minimum 32" to accommodate a wheelchair
- 2. Wheelchair accessible bathroom on the main floor of the property.
- 3. Ramp located on at least one entrance of the unit.

Bonus Points:

Geographic Diversity – 5 Points

OHFA will give bonus points to the highest scoring Application from each of the two main areas of the State, the counties grouped with the Oklahoma City MSA for establishing the HOME Program Maximum Per-Unit Subsidy Limits, and the counties grouped with the Tulsa MSA for the same purpose. Due to the limited funding available for 2025, OHFA believes that this is the

most that can be done to encourage Geographic Diversity. Tiebreakers, as set forth below, will be used if two or more Applications achieve the same score.

Tiebreakers

Applications compete only against other Applications for funding being considered at the same Board meeting. If there are sufficient funds to fund all Applications that meet all threshold requirements, then all of the Applications will be funded. If not, Applications will be funded in rank order by score, from highest to lowest. Tie-breakers will be used in the event that there are sufficient funds remaining for only one Application, and the next two or more Applications in rank order have achieved an equal score.

- 1. First, priority will be given to developments that are not utilizing any other OHFA funding source. If there is still a tie;
- 2. Second, Application proposing the most HTF units will be awarded ahead of the others. If there is still a tie;
- **3.** Third, the Application utilizing the least amount of HTF funding per HTF-assisted unit will be awarded ahead of the others. If there is still a tie;
- **4.** The fourth and final tiebreaker will be a random drawing.

3. Eligible Activities

Activities to be undertaken include rehabilitation (including acquisition), preservation, and new construction of rental housing, including operating reserves if necessary to ensure the financial feasibility of the Project.

All Applications must include descriptions of the Eligible Activities that include, at a minimum, all of the following:

- A. Describe the location of the Project (e.g. county, city or town, street address if known, general location, or service area).
- B. Define the number and type of units. This should include bedroom mix. Specify if the units are fixed or floating units.
- C. The Applicant must show the calculation of the number of HTF-assisted units at the HTF Rents established by HUD as set forth in 24 CFR Part 93.302. The number of HTF-assisted units must be equal or greater than a pro rata share of the total units according to the percentage of HTF monies in the Project, compared to the total Project costs.
- D. Describe how the Period of Affordability will be implemented. Include drafts or templates of all documents that will be used for this purpose.
- E. Address the relocation of tenants or residents if applicable.
- F. For Rental New Construction only, Applicants must provide sufficient documentation to allow OHFA to make the determination that proposed sites for new construction meet the requirements in 24 CFR Part 983.57(e)(2) and (3) (Site and Neighborhood Standards). Applicants for Rental New Construction activities should carefully review the Site and Neighborhood Standards section of the 2025 HOME Program Processes, Procedures and

Topical Guidance. All documentation utilized in making the determination must be included with the Application. OHFA is responsible to maintain records that document the results of the site and neighborhood standards review. If the documentation does not support the conclusion that a site meets the requirements, additional documentation will be requested.

4. Eligible Recipients

- **Nonprofit developers:** A nonprofit developer is a nonprofit housing development organization selected by OHFA, through the competitive Application process described herein, to develop a single HTF Program Project.
- **For-profit developers:** A for-profit developer is a for-profit housing development organization or individual selected by OHFA, through the competitive Application process described herein, to develop a single HTF Program Project.
- State Recipients: A State Recipient is a governmental entity within the State of Oklahoma selected by OHFA, through the competitive Application process described herein, to develop a single HTF Program Project. This includes cities, towns, counties and Indian tribes.

Eligible Recipients must certify that housing assisted with HTF funds comply with all HTF regulations. OHFA will provide an Application Certification Form with the Application Packet.

5. Performance Goals and Benchmarks

The amount of OHFA's allocation of National Housing Trust funds for Program year 2025 is unavailable at this time but is anticipated to be similar to the allocation for Program Year 2024, which was approximately \$5,907,079. The exact amount will be determined via formulas by HUD. All HTF funds received in 2025 will be used to house Extremely Low-Income families, or families at or below the Poverty Line.

OHFA will execute Written Agreements with all eligible recipients that receive an award of HTF funds. Such Written Agreements will contain multiple performance goals and benchmarks, allowing OHFA to ensure that the Projects will be completed successfully and in a timely manner, and that all the requirements of OHFA and the HTF will be met.

These goals and benchmarks include, but are not limited to:

- Deadlines for construction commencement and construction completion
- Regular construction inspections by OHFA's inspector
- Deadlines for the submission of required documentation
- Written New Construction Standards or Written Rehabilitation Standards, as applicable
- Documentation of Environment Review

• Performance reports

6. Maximum Per-unit Development Subsidy Limits

For 2025, OHFA will use the most current HOME Program Maximum Per-Unit Subsidy Limits for the HTF. In future years OHFA may develop separate per-unit subsidy limits for the HTF when historical data is available.

OHFA already uses the HOME Program Maximum Per-Unit Subsidy Limits not only for the HOME Program but also for the federal Low Income Housing Tax Credit Program (Also known as the Affordable Housing Tax Credit Program), which OHFA administers. OHFA has found these limits to be appropriate for both programs.

HUD's experts have calculated these limits. Due to the fact that OHFA is not a direct lender, OHFA does not maintain staff to closely monitor development costs, other than through its historical records of the federal programs it administers. Based both on the HOME Program and the LIHTC Program results over the last several years, these limits have allowed sufficient funding to create long-term sustainability, while not allowing excessive per-unit subsidies.

OHFA believes there will be a need to partner the HTF funding with other federal, State and local funds, due to the limitation on the amount of HTF funds available to the State, and in order to create sustainable projects by blending funding for ELI households with funding for households at 50 to 80% of Area Median Income, allowing for higher rents for those units. The use of a single per-unit subsidy limit would reduce the administrative burden for both OHFA and the Recipients of the HTF funds.

A single limit for the entire State is appropriate because OHFA's records indicate that costs across the State of Oklahoma are fairly consistent. Oklahoma is a rural state with only two metropolitan areas of even moderate size. Development costs in those metro areas are relatively low compared to some major metro areas around the United States, where housing prices and related costs, especially land costs, are extremely high.

The most current Maximum Subsidy Limits are as follows:

The following limits are determined, pursuant to 24 CFR 92.250(a), as amended, by taking the Basic Statutory Mortgage Limits for Section 234 Condominium Housing, elevator-type projects, and multiplying them by the latest published multiplier for the Ft. Worth, TX Southwest Regional Office, which at this time is 240%. These limits were effective March 17, 2024.

Number of Bedroom(s) Maximum Subsidy Limit
0 \$181,488

1	\$208,049
2	\$252,994
3	\$327,293
4+	\$359,263

7. Rehabilitation Standards

Projects awarded HTF funds must comply with all applicable State and local codes, standards and ordinances by project completion. In cases where standards differ, the most restrictive standard will apply. In the absence of a State or local building code, the latest version of the International Residential Code will apply. In addition, all Projects must meet or exceed OHFA's Written New Construction Standards or OHFA's Written Rehabilitation Standards, whichever applicable.

Projects must meet local housing habitability or quality standards throughout the affordability period. Projects must also meet HUD's Uniform Physical Conditions Standards (UPCS), as set forth in 24 CFR 5.705. In addition, Projects proposing rehabilitation of rental housing must follow the federal Lead-Based Paint requirements.

A copy of OHFA's Written Rehabilitation Standards for the HTF Program is attached and marked as "Attachment A." A chart of the Inspect-able Items under UPCS is attached and marked as "Attachment B."

8. Resale and Recapture Provisions

OHFA will not undertake any Homeownership activities with the HTF for 2025, and therefore no Resale and Recapture provisions would apply.

9. Affordable Homeownership Limits

OHFA will not undertake any Homeownership activities with the HTF for 2025, and therefore no Affordable Homeownership Limits would apply.

10. Limitation on Beneficiaries or Preferences

OHFA does not plan to limit the HTF funding to certain beneficiaries. However, preference will be given to certain special populations by way of extra points in the 2025 HTF Application Packet.

Points will be awarded to a Project that commits to dedicate at least ten percent (10%) of the total residential units to serve a Special Needs Population, or multiple Special Needs Populations. A

minimum of one (1) unit dedicated to a Special Needs Population is required in order to receive the points, regardless of the percentage. Points will be awarded for the following Special Needs Populations. This is an exclusive list:

- Homeless
- Persons with mental or physical disabilities
- Military veterans
- Youth aging out of foster care
- Formerly incarcerated individuals transitioning into society

11. Refinancing Existing Debt

OHFA will not use HTF to refinance existing debt.

ATTACHMENT A

OKLAHOMA HOUSING FINANCE AGENCY National Housing Trust Fund Minimum Rehabilitation Standards

Please note: Regardless of the standards set forth herein, all housing assisted by Housing Trust Fund monies must meet all applicable State and local codes, ordinances and requirements, as well as such other requirements HUD may establish. In the absence of State or local building codes, the housing must meet the International Existing Building Code or the International Code Council.

For Rental housing, Awardees must produce an estimate, based on age and condition, of the remaining useful life of all major systems, including structural support, roofing, cladding and weatherproofing, plumbing, electrical, and HVAC.

A capital needs assessment (CNA), prepared no longer than 18 months prior to the date of Application, is required for all multi-family Rental Rehabilitation or Acquisition/Rehabilitation Projects of 26 or more units, and for all Applications in conjunction with Affordable Housing Tax Credits, regardless of the number of units. A CNA may be requested by OHFA for smaller Projects if deemed necessary to properly underwrite the Projects. Capital needs assessments performed for the same Project as a requirement of another funding source will be accepted in lieu of a specific CNA for the HTF Application.

Capital Needs Assessment (CNA) means a qualified professional's opinion of a property's current physical condition determined after a physical inspection of the interior and exterior of the units and structures. The

physical inspection should include an interview with the onsite manager and maintenance personnel. This assessment should identify deferred maintenance, physical needs, **remaining useful life**, material building code violations that affect the property use, structural and mechanical integrity, and the future physical and financial needs. The assessment must include the cost of labor and materials identified in detail and the extent of future expenditures contemplated to ensure the costs will be addressed through operating and replacement reserves. Components which should be examined and analyzed in this assessment include but are not limited to:

- Site, including topography, drainage, pavement, curbing, sidewalks, parking, landscaping, amenities, water, sewer, storm drainage, gas and electric utility lines;
- Structural systems, both substructure and superstructure, including exterior walls and balconies, exterior doors and windows, roofing system and drainage;
- Interiors, including unit and common area finishes (carpeting, vinyl or tile flooring, plaster walls, paint condition, etc.), unit kitchen finishes, cabinets and appliances, unit bathroom finishes and fixtures, and common area lobbies and corridors; and
- Mechanical systems, including plumbing and domestic hot water, HVAC, electrical, lighting fixtures, fire protection, and elevators.

In all cases, f the remaining useful life of one or more major systems is less than the Period of Affordability, the Awardee must establish and maintain a replacement reserve and make adequate monthly payments thereto, such that there are sufficient funds to repair or replace systems as needed.

For Homebuyer housing, upon completion each of the major systems must have a minimum useful life of five years, or the major systems must be rehabilitated or replaced as a part of the rehabilitation work.

If the housing is occupied at the time of rehabilitation, Awardees must identify any life-threatening deficiencies and must address them <u>immediately</u> before any further work is undertaken. The potential life-threatening deficiencies, pursuant to the Uniform Physical Condition Standards (UPCS), are highlighted in orange on Attachment B, which contains the complete list of inspect-able items covered by UPCS.

OHFA will review and approve all written cost estimates and ensure that construction contracts and work performed will meet these Rehabilitation Standards.

OHFA will conduct initial, progress and final inspections to ensure that all work is done in accordance to work write-ups.

I. PURPOSE OF STANDARDS

A. The National Housing Trust Fund Rehabilitation Standards (known herein as the "HTF Standards") are designed to outline the requirements for building rehabilitation for all National Housing Trust Fund (HTF) funded multi-family housing projects in the State of Oklahoma. The HTF Standards, though a requirement specifically to the development entity in direct receipt of HTF funding, are written to provide guidance to all relevant members of a project development team.

B. The goal of the HTF Program is to provide functional, safe, affordable and durable housing that meets the needs of the tenants and communities in which the housing is located. The purpose of the HTF Standards is to ensure that property rehabilitation puts each building in the best possible position to meet this goal over its extended life and that, at a minimum, all health and safety deficiencies are addressed.

C. If a project is out of compliance with the HTF Standards, the Awardee shall bring to the attention of OHFA Staff the specific portion of the project which does not comply, stating the reasons for non-

compliance. OHFA Staff will make a determination as to whether an exception to the HTF Standards shall be granted.

D. Note: At the time of publication and adoption of the HTF Standards, the adopted codes referenced are believed to be those in force. As standards and codes change and are put into effect by the governing authorities having jurisdiction, the new standards and codes will apply in lieu of those referenced.

II. QUALITY OF WORK

- A. Quality of Work: Awardees and developers shall ensure that all rehabilitation work is completed in a thorough and workmanlike manner in accordance with industry practice and contractually agreed upon plans and specifications as well as subsequent mutually agreed upon change orders during the construction process. Awardees and developers will employ best practice industry standards relating to quality assurance to verify all work completed.
- B. By meeting the various code requirements as a minimum standard, together with the other standards herein or in attendant OHFA policies, each building rehabilitation project is assured to be brought up to an acceptable level of rehabilitation.
- C. Warranties shall be required per the standard construction contracts on all materials, equipment and workmanship.

III. CODE COMPLIANCE

- A. All work shall comply with all applicable Oklahoma State and local codes, ordinances, and zoning requirements.
- B. Please note that the OHFA HTF Awardee must demonstrate compliance with all State and local codes through project affiliation with professional design team drawing certifications (e.g. architectural design stamp) and/or other approved methods such as State inspector certification.
- C. The HTF Standards are designed to meet or exceed the Uniform Physical Condition Standards (UPCS) and ensure that upon completion, the HTF-assisted project and units will be decent, safe, sanitary, and in good repair as described in 24 CFR 5.703. See Attachment B to the 2025 HTF Allocation Plan for a list of Inspect-able Items and Observable Deficiencies, including descriptions of the type and degree of deficiency for each item that any HTF-assisted project must address, at a minimum.

IV. HEALTH AND SAFETY

A. If the housing is occupied at the time of rehabilitation, any life-threatening deficiencies must be identified and addressed immediately. See Attachment B to the 2025 HTF Allocation Plan for a list of Inspect-able Items and Observable Deficiencies, including the identification of life-threatening deficiencies (highlighted in orange) for the property site, building exterior, building systems, common areas, and units.

V. SCOPE OF WORK DETERMINATION

A. In developing scopes of work, Awardees and developers will work with OHFA to ensure that all requirements under the HTF Standards are satisfied and that the proposed scope of work meets the goals of Part I above. OHFA approval of all scopes of work is required in accordance with OHFA standard practices.

VI. EXPECTED USEFUL LIFE

A. In developing scopes of work on housing rehabilitation projects, OHFA HTF Awardees and developers will consider the remaining expected useful life of all building components with regard to building long-term sustainability and performance. Specifically, each building component with a remaining expected useful life of less than the applicable HTF period of affordability (30 years) shall be considered for replacement, repair or otherwise updated. Additionally, new building components with an expected useful life of less than 30 years shall be considered for future replacement.

B. OHFA Staff will underwrite the proposed project to determine if sufficient replacement reserves will be set aside each month to cover the full cost of any such replacement, repair or update. Whether or not a particular building component has been replaced, repaired or otherwise updated as part of the rehabilitation scope of work, all building components and major systems must demonstrate adequate funding to be viable throughout the 30-year affordability period.

VII. DISASTER MITIGATION

A. To the extent applicable/relevant, the housing must be improved to mitigate the impact of potential disasters (e.g. earthquakes, tornadoes, floods, wildfires) in accordance with State or local codes, ordinances, and requirements, or such other requirements that HUD may establish. The relevant State codes are the International Residential Code of 2009, as amended, for new construction and the International Building Code for rehabilitation

B. In addition, construction of the housing must adhere to the Oklahoma Standard Hazard Mitigation Plan adopted in 2014. Awardees of HTF funds should particularly review and adhere to Chapter 3 regarding Risk Assessment and Chapter 4 regarding Mitigation Strategies.

VIII. ENERGY CONSERVATION

- A. Equipment, appliances, windows, doors and appurtenances replaced during rehabilitation shall be replaced with Energy Star qualified products.
- B. If feasible, attics should be insulated to R38 and walls to a minimum of R11.
- C. Replacement heating and/or cooling systems shall be properly sized as evidenced by completion of ACCA/ANSI Manual J® or an equivalent sizing calculation tool.
- D. All accessible air ducts shall be tightly sealed.
- E. Heating or cooling supply running through unconditioned space should be avoided or rerouted if possible, but when present and accessible, shall be insulated.

IX. ACCESSIBILITY REQUIREMENTS

- A. Housing that is rehabilitated with HTF funds must meet all applicable federal and State regulations regarding accessibility for persons with disabilities. The applicability of these rules is complex and therefore it is recommended that developers seeking HTF funds consult with a qualified design professional.
- B. Projects shall comply with other standards as may apply or be required by funding sources (i.e. USDA Rural Development)
- C. Projects, if applicable, shall comply with Section 504 of the Rehabilitation Act of 1973 implemented at 24 CFR Part 8 a. For "substantial" rehabilitation (projects with 15 or more total units and the cost of rehabilitation is 75% or more of the replacement cost): i. At least 5% of the units (1 minimum) must be made fully accessible for persons with mobility impairments based on the Uniform Federal Accessibility Standards (UFAS) ii. In addition, at least 2% of the units (1 additional unit minimum) must be made accessible for persons with sensory impairments. iii. Common spaces must be made accessible to the greatest extent feasible
- D. For projects with "less-than-substantial" rehabilitation (anything less than "substantial"), the project must be made accessible to the greatest extent feasible until 5% of the units are physically accessible, and common spaces should be made accessible as much as possible.

X. REHABILITATION CONSTRUCTION STANDARDS

A. SITE

1. General: a. Assure that the site is safe, clean and usable, and designed with details, assemblies and materials to provide ongoing durability without undue future maintenance.

- a. Site design and engineering shall be by a licensed professional civil engineer, or other qualified professional.
- b. Design and systems shall conform to all applicable codes, rules and regulations: i. Local and municipal zoning; ii. NFPA Codes as they may apply
- 2. Sprinkler water service Underground water service as required for building sprinkler system shall be in accordance with NFPA 24.
- 3. Drainage assure that the grading surrounding the building will slope away from the building and drain properly, without ponding or erosion.
- 4. Sewer connections to municipal sewage systems and on-site sewage disposal: a. Existing sewer laterals that are to be reused should be evaluated to assure that they are serviceable and have a remaining useful life of 30 years, or are covered by a plan to repair or replace during the 30-year affordability period.
- b. New systems designed to conform to the State codes and regulations.
- 5. Water service: a. Existing municipal water supplies to buildings shall be evaluated to assure that they are serviceable, of adequate capacity and have a remaining useful life of 30 years, or are covered by a plan to repair or replace during the 30-year affordability period.
- b. Required new systems shall be designed to conform to State codes and regulations.
- 6. Vehicular access to public way site design shall conform to local zoning and regulations, as well as be sensible in its layout to maximize vehicular and pedestrian safety.
- 7. On-site Parking parking shall be adequate for project type, meet local codes, and be designed to drain well, with a durable appropriate surface material. Handicapped parking shall be provided as required.
- 8. Pedestrian access and hardscape In general, paved walkways within the site will be designed to provide sensible pedestrian access from the public way into the site, from parking areas, and provide access to buildings. All walkways should generally conform to applicable codes for width and slopes, and fall protection. Site stairs shall be safe and sound, constructed of durable materials, with proper rise and run, and with code approved railings as required. Accessible routes into buildings shall be provided as required by code.
- 9. Site amenities site amenities may be provided which enhance the livability of the project including playground areas, seating, benches, patio areas, picnic tables, bike racks, grills, and fencing, etc.
- 10. Mailboxes Provision will be made for USPS-approved cluster mailbox units if required by the USPS.
- 11. Landscaping lawns, ground cover, planting beds, perennial plants, shrubs and trees may be provided to enhance the livability, and to provide a positive aesthetic sense. a. Planting choices specified should be low maintenance, non-invasive species, of an appropriate size and scale and located, when adjacent to building structures, with regard to their size at maturity.
- 12. Solid waste collection & storage if necessary, provision shall be made for the outdoor storage and collection of solid waste and recycling materials in receptacles (dumpsters, wheeled trash cans, totes). Enclosures may be provided and should be accessible as required by code.
- 13. Site lighting with shielded fixtures may be provided to illuminate parking and pedestrian walkways, and will conform to local zoning.
- 14. Fuel Storage On site outdoor placement and storage of fuels per applicable regulations and utility requirements.
- 15. Underground or overhead utilities as regulated by code and utility rules.

B. FOUNDATIONS

- 1. Existing foundations shall be examined by a qualified professional. a. Foundations to be adequately sized, free of broken components or deterioration which may compromise the load bearing structural integrity.
- b. Design and implement structural reinforcements or reconstruction as necessary.
- 2. Above-grade masonry unit block or brick shall be reasonably stable, plumb and sound with no missing units or voids.
- 3. Pointing of mortar joints shall be specified as necessary to assure the continued integrity of the structural assembly.

4. New below-grade structures to conform to Chapter 18 of IBC as appropriate.

C. MASONRY COMPONENTS

- 1. Buildings with masonry bearing walls shall be examined for their structural integrity. Existing masonry building components shall be examined to assure sound condition, and repaired as necessary to provide the load-bearing capacity, resistance to water penetration, and aesthetic quality to assure the assemblies will perform for the purpose intended. a. Masonry shall be plumb, and structurally sound.
- 2. Repair or replace deteriorated portions or missing units. a. Brick veneer shall be sound, or repaired to be sound
- 3. Masonry mortar joints shall be sound, and free of loose or deteriorated mortar, with no voids. a. Pointing of mortar joints shall be specified as necessary to assure the continued integrity of the structural assembly, and prevent water intrusion.
- 4. Historic masonry designated to remain shall be restored to sound serviceable condition, and in accordance with Section 106 of National Historic Preservation Act. a. Where masonry is considered historic, repairs will be carried out utilizing the Secretary of the Interior's "Standards of Rehabilitation" and related NPS Preservation Briefs for "Repointing Mortar Joints on Historic Masonry Buildings"
- 5. Chimneys a. Assure structural integrity, reconstruct, and point as necessary
- b. If used for fuel heating appliances provide lining as may be required by code and as prescribed by the heating appliance manufacturer.

D. STRUCTURE

- 1. A qualified professional shall examine each building's load-bearing structure, and assess its existing condition to determine suitability of continued use.
- 2. In general, structure evaluation and design shall be in conformance with IBC, Chapter 16. a. In most residential rehab projects where there is no change in use, it is not expected that the structure will be brought up to new construction standards.
- b. Consideration shall be given if there are any proposed changes in use which would impact the historical loading.
- 3. Deficiencies identified shall be addressed and repairs designed and specified as necessary to correct such conditions: a. Repairs shall be made to any deteriorated load-bearing structural elements.
- b. Reinforce, install supplemental or replace structural members determined not to be adequate for use.

E. ENCLOSURE - SHELL

- 1. Roofing a. Existing: i. Examine existing roofing and flashing systems to determine suitability for continued use. Continued life expectancy of existing roofing should be a minimum of 30 years, or covered by a plan to repair or replace during 30-year affordability period. ii. Repair existing roofing as required. iii. Existing historical slate roofs shall be repaired in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements if applicable.
- b. New Roofing i. New roofing shall be installed where existing roofing does not meet requirements for continued use. ii. New roofing system components shall be compatible, and include the nail base, the underlayment layer, ice & water shield self-adhesive membrane flashings, metal flashings and roofing. Strip existing roofing and dispose of properly. Examine exposed existing substrate for structural soundness Install new roofing system per code and per NCRA trade practices, and manufacturer specifications Flashings deteriorated flashings shall be replaced, and the weather proof integrity of the roof system shall be assured.
- c. Ventilation i. Roof assemblies shall be properly ventilated in accordance with applicable code requirements, and appropriate building science detailing.
- 2. Exterior Finishes a. Cladding i. Wood Siding • Examine existing siding for soundness shall be free of major cracks, rot, and other deterioration which may compromise its useful life and be suitable to hold exterior paint. Siding shall be free of gaps and holes and provide continuous weatherproof system.

- Repair or re-side as necessary to provide a weather resistant enclosure. Replace existing wood siding on historic buildings as necessary in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements. ii. Masonry Masonry bearing walls and veneers shall be restored as necessary. All work on historic masonry shall be done in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements. iii. Other existing cladding system types and materials shall be repaired and/or restored in-kind with matching or similar materials to provide a durable weather resistant enclosure.
- 3. Trim Exterior trim and architectural woodwork. a. Existing wood trim: i. Existing trim to remain must be sound, free of defects and deterioration which compromises its use. ii. Repair and restore trim to usable condition. Patch or replace in kind any deteriorated wood trim components. iii. Repair of historic woodwork and trims shall be in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements. b. New wood trim shall be installed in a workmanlike manner. Reference may be made to Architectural Woodwork Institute (AWI) standards. c. Other trim materials which are suitable may be used as appropriate and shall be installed per manufacturer's recommendations.
- d. Trim which is part of the weather tight enclosure shall be flashed or caulked with joint sealers as necessary to prevent water intrusion.
- 4. Paint a. In general, all existing exterior wood surfaces shall receive new paint coatings, except as appropriate due to the recent application of paint and/or the sound condition of existing coatings.
- b. Examine surfaces and apply paint only to sound acceptable materials / surfaces. i. Prepare surfaces properly, removing loose or peeling previous paint. ii. Paint prep shall be done in accordance with applicable lead safe standards. c. Before painting, assure that any moisture issues which may compromise the life expectancy of the paint system are remedied. d. Exterior paint systems shall be compatible, and installed in accordance with manufacturers' specifications.
- 5. Porches, decks and steps i. Existing porches, decks, steps and railings proposed to remain shall be examined and repaired as necessary. Repair and reconstruction shall be carried out to assure that they will have a continued useful life of 30 years, or covered by a plan to repair or reconstruct during the 30-year affordability period. ii. Inspect structure for soundness and reconstruct any deteriorated members as required. iii. Install new support piers as may be required. iv. Patch existing decking with matching materials, or install new durable decking. b. Railings i. shall be sound and adequately fastened to meet code requirements for structural loading. Repair or replace in-kind as appropriate. ii. Shall meet code requirements for height of protective guards, or have supplemental guards installed. c. Steps shall be safe and sound and meet applicable codes, with railings as necessary. d. Historic porches designated to remain shall be restored to sound serviceable condition, and in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements. e. All porch elements shall be able to withstand the weather elements to prevent premature deterioration.

F. ACOUSTICAL TREATMENTS

1. Dwelling units separated acoustically using Chapter 1207 of IBC as a guideline minimum standard.

G. DOORS

- 1. General a. Doors to meet code requirements of NFPA 101, Chapters 7.2, 8.3, 30.3.6.2 & 30.2.2.2
- b. Meet egress requirements for dimensions, swing and clearances, and be accessibility compliant as required. c. Be sound and secure. d. New doors shall be installed per manufacturers' recommendations and standard trade practice standards. e. Flash properly, and have shim spaces insulated. f. Existing doors to remain should be examined and determined to be suitable for reuse with a remaining life after restoration of 30 years, or covered by a plan to repair or replace during the 30-year affordability period. i. Restore as required to provide useful life. ii. Shall be tested and modified as necessary to operate properly. iii. Install new weather stripping and sweeps to provide seal against weather elements and air infiltration. iv. Historic

doors designated to remain shall be restored to sound serviceable condition, and in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements.

- 2. Unit doors a. Unit entry doors shall be fire rated as required.
- 3. Other doors Access doors shall meet code requirements for fire rating.
- 4. Door hardware shall operate properly, be secure and shall meet accessibility standards and NFPA 101, Chapters 7.2, 8.3, 30.3.6.2 & 30.2.2.2.

H. WINDOWS

- 1. Windows shall be of legal egress size when required by code a. In townhouse units, existing windows which are non-conforming egress size shall be reviewed for code compliance.
- 2. Existing windows: a. Existing windows to remain should be examined and determined to be suitable for reuse with a reasonable remaining life after restoration of 30 years without undue future maintenance, or covered by a plan to maintain or replace during the 30-year affordability period. b. Capable of providing adequate seal against air infiltration, weather elements, and be determined to be appropriately energy efficient in keeping with the overall energy efficiency strategy of the project. c. Install new weather stripping to provide seal against weather elements and air infiltration. d. Air seal shim spaces and window weight pockets if possible. e. Restore and modify as required to provide useful life. f. Shall be tested and modified as necessary to operate smoothly and properly per code. g. Historic windows designated to remain shall be restored to sound serviceable condition, and in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements. h. Hardware shall be intact and operational, or be replaced with new hardware as required
- 3. New Windows: a. where existing windows do not meet the standards for egress, condition, and/or energy efficiency deemed appropriate to the project, they shall be replaced by new windows. b. New windows shall be code compliant. Developers are encouraged to consider upgrading to Tier II level by providing R-5 windows. c. Additionally, new window units should be tested assemblies meeting ASTM standards for water penetration & air leakage. d. All windows shall be installed per manufacturer's installation guidelines and specifications, and shall incorporate appropriate detail, flashings, joint sealers, and air sealing techniques.

I. INTERIOR FINISHES

- 1. In general, all interior finishes will be new and installed per manufacturer's recommendations and the standards of quality construction per trade practices and associations related to the particular product or trade.
- 2. Per chapter 10 of NFPA 101 (Reference also Chapter 8 of the IBC).
- 3. Walls & ceilings a. Where existing finishes are proposed to remain, they will be determined to meet the standard of being sound, durable, lead-safe, and have a remaining useful life of no less than 30 years, or covered by a plan to repair or replace during the 30-year affordability period.
- 4. Flooring a. Existing wood flooring in good condition should be repaired, sanded and refinished.
- b. All new flooring materials (resilient flooring, wood flooring, laminate flooring, carpet, and/or ceramic tile) shall be installed over suitable substrates per manufacturer's specs and the trade association practices.
- 5. Trim Wood trim and architectural woodwork a. Existing trim shall be repaired and restored to usable condition, free of deterioration which compromises its use. Repair of historic woodwork & trims shall be in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements.
- b. New wood trim shall be installed in a workmanlike manner. Reference may be made to AWI standards.
- 6. Paint In general, all interior ceiling, wall, and trim surfaces shall receive renewed coatings of paint (or other clear/stain) finishes. Painting shall be done in a workmanlike manner, and in accordance with the manufacturer's recommendations. All painting including preparation of existing surfaces shall be done in a lead-safe manner (See Section X. N).

J. SPECIALTIES

- 1. Toilet accessories each bath will have appropriate accessories such as towel bars, robe hooks, bath tissue holders, etc., installed and securely fastened in place. Accessories shall be located per accessibility requirements where necessary.
- 2. Medicine cabinets and mirrors install in each unit bath as appropriate.
- 3. Signage and identification building signage shall be provided as appropriate: a. Including building address 911 #'s, units' identification, building directory, exits, stairways, common and utility spaces, etc. shall be in conformance with NFPA 101 Life Safety Code, and be accessibility compliant and 911 approved.
- 4. Exit signage will be provided as required by code and be accessibility compliant as required.
- 5. Fire protection specialties provide fire extinguishers in buildings, and in units as required by code and/or by State or local fire authorities. Locate as directed by authorities.
- 6. Shelving provide durable, cleanable shelving for pantries, linen closets, clothes closets and other storage as appropriate, securely fastened in place.

K. EQUIPMENT

- 1. All new equipment to be ENERGY STAR® rated.
- 2. Existing equipment to be retained and continued to be used shall be in serviceable condition with an expected useful life of 30 years, or covered by a plan to replace during the 30-year affordability period.
- 3. Kitchen appliances a. provide new stove and refrigerator in each unit. b. Existing appliances to be reused shall be in good and serviceable condition. c. Provide other appliances (such as microwaves) as may be appropriate to the project. d. All appliances in accessible unit units shall be accessibility compliant, and located in an arrangement providing required clear floor spaces.
- 4. Laundries —where adequate space is available and when appropriate to meet the project goals, washers and dryers may be provided in laundry rooms or in units. a. Heat pump dryers are encouraged where appropriate and readily available. b. Where a project is served by natural gas, consideration of the use of natural gas dryers is encouraged. In projects not served by natural gas, propane fired dryers should be considered for cost of operation reasons where feasible and appropriate.
- 5. Solid waste handling Provide trash and recycling receptacles as appropriate to enable the tenants and property management staff to handle and store solid waste.
- 6. Playground equipment Provide safe, code-approved new playground equipment if a playground is appropriate to the project.

L. FURNISHINGS - CASEWORK

- 1. Kitchen cabinetry and counters a. Existing cabinetry and/or countertops proposed to remain shall be in good condition with a remaining useful life of 30 years, or covered by a plan to restore or replace during the 30-year affordability period. b. New cabinetry i. shall be of good quality, meeting ANSI/KCMA A161.1-2012 "Performance & Construction Standards for Kitchen Cabinetry and Bath Vanities" standards. Other industry standards for cabinetry may be used as guidelines, such as the Kitchen Cabinet Manufacturer's Association (KCMA) "Severe Use Specification 2014," the Architectural Woodwork Institute's (AWI) Woodwork Standards and Cabinet Fabrication Handbook. ii. New counters shall be provided with a cleanable sanitary surface material impervious to water such as high pressure laminate (HPL). Shop fabricated as one piece assembly where possible. Seal field joints. Installed level and securely fastened to cabinetry
- 2. Bath cabinetry and counters vanity lavatory tops, when used, should be one piece integral bowl with integral backsplash.

M. ASBESTOS REMOVAL

1. Project will be assessed for the existence of asbestos-containing building materials by qualified professionals: i. National Emission Standards for Hazardous Air Pollutants (NESHAP) apply. ii. Removal of asbestos shall be carried out per Federal EPA and State regulations and rules.

N. LEAD-BASED PAINT

As required under 24 CFR Part 35, the Final HUD Regulation on Lead-Based Paint Hazards in Federally Owned Housing and Housing Receiving Federal Assistance, all assisted dwelling units constructed before January 1, 1978, will be evaluated for lead-based paint hazards or presumed to have lead-based paint present throughout the unit when paint is disturbed.

- 1. Evaluation will be done by a qualified, certified or licensed person as required under the regulation.
- 2. All lead-based paint hazards will be identified and reduced or eliminated through paint stabilization, interim controls or abatement with work being done by supervised, trained, qualified, certified or licensed persons as required under the regulation.
- 3. Safe work practices will be followed at all times.
- 4. Occupants shall be protected or temporarily relocated as required by the regulation. With some exceptions, as listed at 24 CFR 35.1345, occupants shall be temporarily relocated before and during hazard reduction activities to a suitable, decent, safe and similarly accessible dwelling unit that does not have lead hazards.
- 5. The dwelling unit and worksite shall be secured. The worksite shall be prepared and warning signs shall be posted as required by the regulation.
- 6. Clearance examinations will be performed by qualified personnel and final clearance shall be cleared by DEQ certified personnel.

O. CONVEYANCE SYSTEMS

- 1. Elevators may be installed when appropriate and possible, when such elevator is part of the project's program goals, or as required by code, as follows: a. Installed per code NFPA 101, Chapter 9.4 b. ASME 17.1 Safety Code for Elevators 2013
- 2. Existing elevators and lifts may be retained if they are appropriate to the use of the building and in serviceable condition with an expected useful life of 30 years, or covered by a plan to maintain or replace during the 30-year affordability period, and approved by agencies having jurisdiction.

P. MECHANICAL

- 1. General: a. all mechanical systems shall be designed by a mechanical engineer or other qualified professional. b. All mechanical systems shall meet all applicable codes.
- 2. Fire protection a. In general, all buildings assisted with HTF funds shall have fire suppression as required by applicable codes with approved sprinkler systems installed as required by NFPA 101 and NFPA 1: i. System design to conform to applicable NFPA standard 13 or 13R. ii. System installed by State approved persons. iii. Underground water services for sprinkler system shall meet NFPA 24
- iv. Provide fire pumps, standpipes, and fire department connection as required per NFPA 13, 14 & 25.
- b. Where possible, piping for the sprinkler system shall be concealed.
- 3. Plumbing a. Where existing components of a system are to be reused, they will be examined and determined to be in good condition, code compliant and have a remaining useful life of a minimum of 30 years, or covered by a plan to repair or replace during the 30-year affordability period. Substandard or critical non-code compliant components shall be replaced. b. Use water-saving shower heads and faucet aerators. c. All fixtures, piping fittings and equipment shall be lead-free. d. Kitchen fixtures When existing kitchen fixtures are not reused in accordance with a. above, new sinks and faucets, and associated plumbing shall be installed in each unit. e. Bath fixtures When existing bath fixtures are not reused in accordance with a. above, new toilets, tubs and tub surrounds, lavatory sinks, and faucets shall be installed in each unit. i. Three and four-bedroom units are encouraged to be designed to include 1½ baths minimum where adequate space is available. f. Provision for laundry rooms or laundry hook-ups may be made per project's
- i. Three and four-bedroom units are encouraged to be designed to include 1½ baths minimum where adequate space is available. f. Provision for laundry rooms or laundry hook-ups may be made per project's program requirements. g. Provision for other utility plumbing for janitor sinks, floor drains, outdoor faucets, drains for dehumidification systems, etc., may be made as desired or required.
- 4. Heating a. System design: a. where existing components of a system are proposed to be reused, they will be examined and determined to be in good and serviceable condition, code compliant and have a remaining

useful life of a minimum of 30 years, or covered by a plan to repair or replace during the 30-year affordability period. b. Temperature control - The temperature in each unit shall be individually thermostatically controlled. c. Provide adequate heat in common spaces. d. Install pipe insulation with minimum 1.5" wall thickness.

- 5. Ventilation a. Code-compliant indoor air quality will be addressed by the installation of either exhaust only or balanced (heat recovery) ventilation systems as required by: Fire protection of system ducts per NFPA 101, Chapter 9.2 b. Balanced mechanical ventilation systems are encouraged. c. Ventilation controls shall be per applicable codes
- 6. Domestic Hot Water: a. System shall be designed as required for efficiency. b. Install pipe insulation per code.

O. ELECTRICAL

- 1. Project electrical design should be done by a licensed electrical engineer, or other qualified professional.
- 2. Project electrical must be installed by a licensed electrician
- 3. Design shall be comply with all the applicable codes: a. Oklahoma State and local fire codes. b. NFPA 101, Life Safety Code c. NFPA 70, National Electrical Code, 2011 Edition d. NFPA 72, National Fire Alarm and Signaling Code e. NFPA 20, Standard for the Installation of Stationary Pumps for Fire Protection 4. In general, the electrical system should be new throughout a building: a. Where existing service entrances, disconnects, meters, distribution wiring, panels, and devices are proposed to remain, they will be examined and determined to be in good condition, code compliant and have a remaining useful life of a minimum of 30 years, or covered by a plan to repair or replace during the 30-year affordability period. The designer, in concert with the State electrical inspector, shall examine the system and equipment. Existing components of the electrical system may be reused as appropriate. Substandard or critical non-code compliant components shall be replaced.
- 5. Utility connections shall be installed per the rules and regulations of the electrical utility.
- 6. Electrical service and metering: a. the service entrance size shall be calculated to handle the proposed electrical loads. b. Metering and disconnects shall be per code and mounted at approved locations.
- 7. Elevator wiring shall conform to the ANSI 17.1 as modified by State or local codes.
- 8. Electrical distribution system: a. Lighting and receptacle circuits shall be designed per code.
- b. Locations and layout of devices and lighting to be logical and accessibility compliant where required.
- c. Provision shall be made for the wiring of dedicated equipment circuits and connections for heating, ventilation equipment/exhaust fans, pumps, appliances, etc.
- 9. Artificial Lighting shall be provided using IBC 1205 as a minimum guideline. Developers are encouraged to upgrade to Energy Star® Category.
- 10. Site lighting with shielded fixtures may be provided to illuminate parking and pedestrian walkways, and will conform to local zoning.
- 11. Emergency and exit lighting/illuminated signage shall be per the NFPA 101, Life Safety Code.

ATTACHMENT B OKLAHOMA HOUSING FINANCE AGENCY

Uniform Physical Condition Standards for Housing Rehabilitation Oklahoma Housing Finance Agency National Housing Trust Fund / Minimum Rehab Standards

Please note: Regardless of the standards set forth herein, all housing assisted by Housing Trust Fund monies must meet all applicable State and local codes, ordinances and requirements, as well as such other requirements HUD may establish. In the absence of State or local building codes, the housing must meet the International Existing Building Code or the International Code Council

For Rental housing, Awardees must produce an estimate, based on age and condition, of the remaining useful life of all major systems, including structural support, roofing, cladding and weatherproofing, plumbing, electrical, and HVAC.

A capital needs assessment (CNA), prepared no longer than 18 months prior to the date of Application, is required for all multi-family Rental Rehabilitation or Acquisition/Rehabilitation Projects of 26 or more units, and for all Applications in conjunction with Affordable Housing Tax Credits, regardless of the number of units. A CNA may be requested by OHFA for smaller Projects if deemed necessary to properly underwrite the Projects. Capital needs assessments performed for the same Project as a requirement of another funding source will be accepted in lieu of a specific CNA for the HTF Application. Capital Needs Assessment (CNA) means a qualified professional's opinion of a property's current physical condition determined after a physical inspection of the interior and exterior of the units and structures. The physical inspection should include an interview with the onsite manager and maintenance personnel. This assessment should identify deferred maintenance, physical needs, remaining useful life, material building code violations that affect the property use, structural and mechanical integrity, and the future physical and financial needs. The assessment must include the cost of labor and materials identified in detail and the extent of future expenditures contemplated to ensure the costs will be addressed through operating and replacement reserves. Components which should be examined and analyzed in this assessment include but are not limited to:

- Site, including topography, drainage, pavement, curbing, sidewalks, parking, landscaping, amenities, water, sewer, storm drainage, gas and electric utility lines;
- Structural systems, both substructure and superstructure, including exterior walls and balconies, exterior doors and windows, roofing system and drainage;
- Interiors, including unit and common area finishes (carpeting, vinyl or tile flooring, plaster walls, paint condition, etc.), unit kitchen finishes, cabinets and appliances, unit bathroom finishes and fixtures, and common area lobbies and corridors; and
- Mechanical systems, including plumbing and domestic hot water, HVAC, electrical, lighting fixtures, fire protection, and elevators.

In all cases, if the remaining useful life of one or more major systems is less than the Period of Affordability, the Awardee must establish and maintain a replacement reserve and make adequate monthly payments thereto, such that there are sufficient funds to repair or replace systems as needed.

For Homebuyer housing, upon completion each of the major systems must have a minimum useful life of five years, or the major systems must be rehabilitated or replaced as a part of the rehabilitation work.

If the housing is occupied at the time of rehabilitation, Awardees must identify any life-threatening deficiencies and must address them immediately before any further work is undertaken. The potential life-threatening deficiencies, pursuant to the Uniform Physical Condition Standards (UPCS), are highlighted in orange on Attachment A, which contains the complete list of inspectable items covered by UPCS.

OHFA will review and approve all written cost estimates and ensure that construction contracts and work performed will meet these Rehabilitation Standards.

OHFA will conduct initial, progress and final inspections to ensure that all work is done in accordance to work write-ups.

I. PURPOSE OF STANDARDS

- A. The National Housing Trust Fund Rehabilitation Standards (known herein as the "HTF Standards") are designed to outline the requirements for building rehabilitation for all National Housing Trust Fund (HTF) funded multi-family housing projects in the State of Oklahoma. The HTF Standards, though a requirement specifically to the development entity in direct receipt of HTF funding, are written to provide guidance to all relevant members of a project development team.
- B. The goal of the HTF Program is to provide functional, safe, affordable and durable housing that meets the needs of the tenants and communities in which the housing is located. The purpose of the HTF Standards is to ensure that property rehabilitation puts each building in the best possible position to meet this goal over its extended life and that, at a minimum, all health and safety deficiencies are addressed.
- C. If a project is out of compliance with the HTF Standards, the Awardee shall bring to the attention of OHFA Staff the specific portion of the project which does not comply, stating the reasons for non-compliance. OHFA Staff will make a determination as to whether an exception to the HTF Standards shall be granted.
- D. Note: At the time of publication and adoption of the HTF Standards, the adopted codes referenced are believed to be those in force. As standards and codes change and are put into effect by the governing authorities having jurisdiction, the new standards and codes will apply in lieu of those referenced.

II. QUAILITY OF WORK

A. Quality of Work: Awardees and developers shall ensure that all rehabilitation work is completed in a thorough and workmanlike manner in accordance with

- industry practice and contractually agreed upon plans and specifications as well as subsequent mutually agreed upon change orders during the construction process. Awardees and developers will employ best practice industry standards relating to quality assurance to verify all work completed.
- B. By meeting the various code requirements as a minimum standard, together with the other standards herein or in attendant OHFA policies, each building rehabilitation project is assured to be brought up to an acceptable level of rehabilitation.
- C. Warranties shall be required per the standard construction contracts on all materials, equipment and workmanship.

III. CODE COMPLIANCE

- **A.** All work shall comply with all applicable Oklahoma State and local codes, ordinances, and zoning requirements
- **B.** Please note that the OHFA HTF Awardee must demonstrate compliance with all State and local codes through project affiliation with professional design team drawing certifications (e.g. architectural design stamp) and/or other approved methods such as State inspector certification.
- C. The HTF Standards are designed to meet or exceed the Uniform Physical Condition Standards (UPCS) and ensure that upon completion, the HTF-assisted project and units will be decent, safe, sanitary, and in good repair as described in 24 CFR 5.703. See Attachment A for a list of Inspectable Items and Observable Deficiencies, including descriptions of the type and degree of deficiency for each item that any HTF-assisted project must address, at a minimum.

IV. HEALTH AND SAFETY

A. If the housing is occupied at the time of rehabilitation, any life-threatening deficiencies must be identified and addressed immediately. See Attachment A for a list of Inspect-able Items and Observable Deficiencies, including the identification of life-threatening deficiencies (highlighted in orange) for the property site, building exterior, building systems, common areas, and units.

V. SCOPE OF WORK DETERMINATION

A. In developing scopes of work, Awardees and developers will work with OHFA to ensure that all requirements under the HTF Standards are satisfied and that the proposed scope of work meets the goals of Part I above. OHFA approval of all scopes of work is required in accordance with OHFA standard practices.

VI. EXPECTED USEFUL LIFE

A. In developing scopes of work on housing rehabilitation projects, OHFA HTF Awardees and developers will consider the remaining expected useful life of all building components with regard to building long-term sustainability and performance. Specifically, each building component with a remaining expected

- useful life of less than the applicable HTF period of affordability (30 years) shall be considered for replacement, repair or otherwise updated. Additionally, new building components with an expected useful life of less than 30 years shall be considered for future replacement.
- B. OHFA Staff will underwrite the proposed project to determine if sufficient replacement reserves will be set aside each month to cover the full cost of any such replacement, repair or update. Whether or not a particular building component has been replaced, repaired or otherwise updated as part of the rehabilitation scope of work, all building components and major systems must demonstrate adequate funding to be viable throughout the 30-year affordability period.

VII. DISASTER MITIGATION

- A. To the extent applicable/relevant, the housing must be improved to mitigate the impact of potential disasters (e.g. earthquakes, tornadoes, floods, wildfires) in accordance with State or local codes, ordinances, and requirements, or such other requirements that HUD may establish. The relevant State codes are the International Residential Code of 2009, as amended, for new construction and the International Building Code for rehabilitation.
- B. In addition, construction of the housing must adhere to the Oklahoma Standard Hazard Mitigation Plan adopted in 2014. Awardees of HTF funds should particularly review and adhere to Chapter 3 regarding Risk Assessment and Chapter 4 regarding Mitigation Strategies.

VIII. ENERGY CONSERVATION

- A. Equipment, appliances, windows, doors and appurtenances replaced during rehabilitation shall be replaced with Energy Star qualified products.
- B. If feasible, attics should be insulated to R38 and walls to a minimum of R11.
- C. Replacement heating and/or cooling systems shall be properly sized as evidenced by completion of ACCA/ANSI Manual J® or an equivalent sizing calculation tool. All accessible air ducts shall be tightly sealed. Heating or cooling supply running through unconditioned space should be avoided or rerouted if possible, but when present and accessible, shall be insulated.

IX. ACCESSIBILITY REQUIREMENTS

- A. Housing that is rehabilitated with HTF funds must meet all applicable federal and State regulations regarding accessibility for persons with disabilities. The applicability of these rules is complex and therefore it is recommended that developers seeking HTF funds consult with a qualified design professional
- B. Projects shall comply with other standards as may apply or be required by funding sources (i.e.
- C. Projects, if applicable, shall comply with Section 504 of the Rehabilitation Act of 1973 implemented at 24 CFR Part 8 a. For "substantial" rehabilitation (projects with 15 or more total units and the cost of rehabilitation is 75% or more of the replacement cost): i. At least

5% of the units (1 minimum) must be made fully accessible for persons with mobility impairments based on the Uniform Federal Accessibility Standards (UFAS) ii. In addition, at least 2% of the units (1 additional unit minimum) must be made accessible for persons with sensory impairments. iii. Common spaces must be made accessible to the greatest extent feasible

D. For projects with "less-than-substantial" rehabilitation (anything less than "substantial"), the project must be made accessible to the greatest extent feasible until 5% of the units are physically accessible, and common spaces should be made accessible as much as possible.

X. Rehabilitation Construction Standards

A. **SITE** 1. General:

a. Assure that the site is safe, clean and usable, and designed with details, assemblies and

materials to provide ongoing durability without undue future maintenance.

- b. Site design and engineering shall be by a licensed professional civil engineer, or other qualified professional.
- c. Design and systems shall conform to all applicable codes, rules and regulations:
 - i. Local and municipal zoning; ii. NFPA Codes as they may apply
- 2. Sprinkler water service Underground water service as required for building sprinkler system shall be in accordance with NFPA 24
- 3. Drainage assure that the grading surrounding the building will slope away from the building and drain properly, without ponding or erosion.
- 4. Sewer connections to municipal sewage systems and on-site sewage disposal:
 - a. Existing sewer laterals that are to be reused should be evaluated to assure that they are serviceable and have a remaining useful life of 30 years, or are covered by a plan to repair or replace during the 30-year affordability period.
 - b. New systems designed to conform to the State codes and regulations.

5. Water service:

- a. Existing municipal water supplies to buildings shall be evaluated to assure that they are serviceable, of adequate capacity and have a remaining useful life of 30 years, or are covered by a plan to repair or replace during the 30-year affordability period.
- b. Required new systems shall be designed to conform to State codes and regulations.
- 6. Vehicular access to public way site design shall conform to local zoning and regulations, as well as be sensible in its layout to maximize vehicular and pedestrian safety
- 7. On-site parking parking shall be adequate for project type, meet local codes, and be designed to drain well, with a durable appropriate surface material. Handicapped parking shall be provided as required.
- 8. Pedestrian access and hardscape In general, paved walkways within the site will be designed to provide sensible pedestrian access from the public way into the

site, from parking areas, and provide access to buildings. All walkways should generally conform to applicable codes for width and slopes, and fall protection. Site stairs shall be safe and sound, constructed of durable materials, with proper rise and run, and with code approved railings as required. Accessible routes into buildings shall be provided as required by code.

- 9. Site amenities site amenities may be provided which enhance the livability of the project including playground areas, seating, benches, patio areas, picnic tables, bike racks, grills, and fencing, etc.
- 10. Mailboxes Provision will be made for USPS-approved cluster mailbox units if required by the USPS
- 11. Landscaping lawns, ground cover, planting beds, perennial plants, shrubs and trees may be provided to enhance the livability, and to provide a positive aesthetic sense. a. Planting choices specified should be low maintenance, non-invasive species, of an appropriate size and scale and located, when adjacent to building structures, with regard to their size at maturity.
- 12. Solid waste collection & storage if necessary, provision shall be made for the outdoor storage and collection of solid waste and recycling materials in receptacles (dumpsters, wheeled trash cans, totes). Enclosures may be provided and should be accessible as required by code. 13. Site lighting with shielded fixtures may be provided to illuminate parking and pedestrian walkways, and will conform to local zoning.
- 13. Fuel Storage On site outdoor placement and storage of fuels per applicable regulations and utility requirements.
- 14. Underground or overhead utilities as regulated by code and utility rules.

B FOUNDATIONS

- 1. Existing foundation shall be examined by a qualified professional.
 - a. Foundations to be adequately sized, free of broken components or deterioration which may compromise the load bearing structural integrity.
 - b. Design and implement structural reinforcements or reconstruction as necessary.
- 2. Above-grade masonry unit block or brick shall be reasonably stable, plumb and sound with no missing units or voids
- 3. Pointing of mortar joints shall be specified as necessary to assure the continued integrity of the structural assembly.
- 4. New below-grade structures to conform to Chapter 18 of IBC as appropriate.

C MASONRY COMPONENTS

1. Buildings with masonry bearing walls shall be examined for their structural integrity. Existing masonry building components shall be examined to assure sound condition, and repaired as necessary to provide the load-bearing capacity, resistance to water penetration, and aesthetic quality to assure the assemblies will perform for the purpose intended. a. Masonry shall be plumb, and structurally sound.

- 2. Repair or replace deteriorated portions or missing units. a. Brick veneer shall be sound, or repaired to be sound.
- 3. Masonry mortar joints shall be sound, and free of loose or deteriorated mortar, with no voids. a. Pointing of mortar joints shall be specified as necessary to assure the continued integrity of the structural assembly, and prevent water intrusion.
- 4. Historic masonry designated to remain shall be restored to sound serviceable condition, and in accordance with Section 106 of National Historic Preservation Act. a. Where masonry is considered historic, repairs will be carried out utilizing the Secretary of the Interior's "Standards of Rehabilitation" and related NPS Preservation Briefs for "Repointing Mortar Joints on Historic Masonry Buildings"

5. Chimneys

- a. Assure structural integrity, reconstruct, and point as necessary
- b. If used for fuel heating appliances provide lining as may be required by code and as prescribed by the heating appliance manufacturer

D STRUCTURE

- 1. A qualified professional shall examine each building's load-bearing structure, and assess its existing condition to determine suitability of continued use.
- 2. In general, structure structure evaluation and design shall be in conformance with IBC, Chapter 16.
 - a. In most residential rehab projects where there is no change in use, it is not expected that the structure will be brought up to new construction standards
 - b. Consideration shall be given if there are any proposed changes in use which would impact the historical loading.
- 3. Deficiencies identified shall be addressed and repairs designed and specified as necessary to correct such conditions:
 - a. Repairs shall be made to any deteriorated load-bearing structural elements.
 - b. Reinforce, install supplemental or replace structural members determined not to be adequate for use.

E ENCLOSURE - SHELL

- 1. Roofing
 - a. Existing:
 - i. Examine existing roofing and flashing systems to determine suitability for continued use. Continued life expectancy of existing roofing should be a minimum of 30 years, or covered by a plan to repair or replace during 30-year affordability period. ii. Repair existing roofing as required. iii. Existing historical slate roofs shall be repaired in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements if applicable.
 - b. New Roofing

- i. New roofing shall be installed where existing roofing does not meet requirements for continued use.
- ii. New roofing system components shall be compatible, and include

 the nail base, the underlayment layer, ice & water shield selfadhesive membrane flashings, metal flashings and roofing.
 - Strip existing roofing and dispose of properly.
 - Examine exposed existing substrate for structural soundness
 - Install new roofing system per code and per NCRA trade practices, and manufacturer specifications
 - Flashings deteriorated flashings shall be replaced, and the weather proof integrity of the roof system shall be assured

c. Ventilation

i. Roof assemblies shall be properly ventilated in accordance with applicable code requirements, and appropriate building science detailing.

2. Exterior Finishes

- a. Cladding
 - i. Wood Siding -
 - Examine existing siding for soundness shall be free of major cracks, rot, and other deterioration which may compromise its useful life and be suitable to hold exterior paint
 - Siding shall be free of gaps and holes and provide continuous weatherproof system
 - Repair or re-side as necessary to provide a weather resistant enclosure.
 - Replace existing wood siding on historic buildings as necessary in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements.

ii. Masonry

- Masonry bearing walls and veneers shall be restored as necessary.
 All work on historic masonry shall be done in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements
- iii. Other existing cladding system types and materials shall be repaired and/or restored in-kind with matching or similar materials to provide a durable weather resistant enclosure.
- 3. Trim Exterior trim and architectural woodwork.
 - a. Existing wood trim:
 - Existing trim to remain must be sound, free of defects and deterioration which compromises its use. ii. Repair and restore trim to usable condition. Patch or replace in kind any deteriorated wood trim components. iii. Repair of historic woodwork and trims shall be in accordance with the

Secretary of the Interior's "Standards for Rehabilitation" project requirements

- b. New wood trim shall be installed in a workmanlike manner. Reference may be made to Architectural Woodwork Institute (AWI) standards.
- c. Other trim materials which are suitable may be used as appropriate and shall be installed per manufacturer's recommendations.
- d. Trim which is part of the weather tight enclosure shall be flashed or caulked with joint sealers as necessary to prevent water intrusion.

4. Paint

- a. In general, all existing exterior wood surfaces shall receive new paint coatings, except as appropriate due to the recent application of paint and/or the sound condition of existing coatings
- b. Examine surfaces and apply paint only to sound acceptable materials / surfaces.
 - i. Prepare surfaces properly, removing loose or peeling previous paint
 - ii. Paint prep shall be done in accordance with applicable lead safe standards
- c. Before painting, assure that any moisture issues which may compromise the life expectancy of the paint system are remedied.
- d. Exterior paint systems shall be compatible, and installed in accordance with manufacturers' specifications

5. Porches, decks and steps

- i. Existing porches, decks, steps and railings proposed to remain shall be examined and repaired as necessary. Repair and reconstruction shall be carried out to assure that they will have a continued useful life of 30 years, or covered by a plan to repair or reconstruct during the 30-year affordability period.
- ii. Inspect structure for soundness and reconstruct any deteriorated members as required. iii. Install new support piers as may be required.
- iii. Install new support priers may be required.
- iv. Patch existing decking with matching materials, or install new durable decking.

b. Railings

- i. shall be sound and adequately fastened to meet code requirements for structural loading. Repair or replace in-kind as appropriate
- ii. Shall meet code requirements for height of protective guards, or have supplemental guards installed.
- c. Steps shall be safe and sound and meet applicable codes, with railings as necessary.
- d. Historic porches designated to remain shall be restored to sound serviceable condition, and in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements.
- e. All porch elements shall be able to withstand the weather elements to prevent premature deterioration.

F. ACOUSTICAL TREATMENTS

1. Dwelling units separated acoustically using Chapter 1207 of IBC as a guideline minimum standard.

G. DOORS

1. General

- a. Doors to meet code requirements of NFTPA 101, Chapters 7.2, 8.3, 30.3.6.2 & 30.2.2.2
- b. Meet egress requirements for dimensions, swing and clearances, and be accessibility compliant as required.
- c. Be sound and secure.
- d. New doors shall be installed per manufacturers' recommendations and standard trade practice standards.
- e. Flash properly, and have shim spaces insulated.
- f. Existing doors to remain should be examined and determined to be suitable for reuse with a remaining life after restoration of 30 years, or covered by a plan to repair or replace during the 30-year affordability period.
 - i. Restore as required to provide useful life
 - ii. Shall be tested and modified as necessary to operate properly.
 - iii. Install new weather stripping and sweeps to provide seal against weather elements and air infiltration.
 - iv. Historic doors designated to remain shall be restored to sound serviceable condition, and in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements.
- 2. Unit doors a. Unit entry doors shall be fire rated as required.
- 3. Other doors Access doors shall meet code requirements for fire rating.
- 4. Door hardware shall operate properly, be secure and shall meet accessibility standards and NFPA 101, Chapters 7.2, 8.3, 30.3.6.2 & 30.2.2.2.

H. WINDOWS

- 1. Windows shall be of legal egress size when required by code a. In townhouse units, existing windows which are non-conforming egress size shall be reviewed for code compliance.
- 2. Existing windows:
 - a. Existing windows to remain should be examined and determined to be suitable for reuse with a reasonable remaining life after restoration of 30 years without undue future maintenance, or covered by a plan to maintain or replace during the 30-year affordability period.
 - b. Capable of providing adequate seal against air infiltration, weather elements, and be determined to be appropriately energy efficient in keeping with the overall energy efficiency strategy of the project.
 - c. Install new weather stripping to provide seal against weather elements and air infiltration.
 - d. Air seal shim spaces and window weight pockets if possible.
 - e. Restore and modify as required to provide useful life.
 - f. Shall be tested and modified as necessary to operate smoothly and properly per code.
 - g. Historic windows designated to remain shall be restored to sound serviceable condition, and in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements.
 - h. Hardware shall be intact and operational, or be replaced with new hardware as required.
- 3. New Windows:
 - a. where existing windows do not meet the standards for egress, condition, and/or energy efficiency deemed appropriate to the project, they shall be replaced by new windows.
 - b. New windows shall be code compliant. Developers are encouraged to consider upgrading to Tier II level by providing R-5 windows.

- c. Additionally, new window units should be tested assemblies meeting ASTM standards for water penetration & air leakage.
- d. All windows shall be installed per manufacturer's installation guidelines and specifications, and shall incorporate appropriate detail, flashings, joint sealers, and air sealing techniques.

I. INTERIOR FINISHES

- 1. In general, all interior finishes will be new and installed per manufacturer's recommendations and the standards of quality construction per trade practices and associations related to the particular product or trade.
- 2. Per chapter 10 of NFPA 101 (Reference also Chapter 8 of the IBC).
- 3. Walls & ceilings a. Where existing finishes are proposed to remain, they will be determined to meet the standard of being sound, durable, lead-safe, and have a remaining useful life of no less than 30 years, or covered by a plan to repair or replace during the 30-year affordability period.
- 4. Flooring
 - a. Existing wood flooring in good condition should be repaired, sanded and refinished.
 - b. All new flooring materials (resilient flooring, wood flooring, laminate flooring, carpet, and/or ceramic tile) shall be installed over suitable substrates per manufacturer's specs and the trade association practices.
- 5. Trim Wood trim and architectural woodwork
 - a. Existing trim shall be repaired and restored to usable condition, free of deterioration which compromises its use. Repair of historic woodwork & trims shall be in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements.
 - b. New wood trim shall be installed in a workmanlike manner. Reference may be made to AWI standards.
- 6. Paint In general, all interior ceiling, wall, and trim surfaces shall receive renewed coatings of paint (or other clear/stain) finishes. Painting shall be done in a workmanlike manner, and in accordance with the manufacturer's recommendations. All painting including preparation of existing surfaces shall be done in a lead-safe manner (See Section X. N).

J. SPECIALTIES

- 1. Toilet accessories each bath will have appropriate accessories such as towel bars, robe hooks, bath tissue holders, etc., installed and securely fastened in place. Accessories shall be located per accessibility requirements where necessary.
- 2. Medicine cabinets and mirrors install in each unit bath as appropriate.
- 3. Signage and identification building signage shall be provided as appropriate: a. Including building address 911 #'s, units' identification, building directory, exits, stairways, common and utility spaces, etc. shall be in conformance with NFPA 101 Life Safety Code, and be accessibility compliant and 911 approved.
- 4. Exit signage will be provided as required by code and be accessibility compliant as required.
- 5. Fire protection specialties provide fire extinguishers in buildings, and in units as required by code and/or by State or local fire authorities. Locate as directed by authorities.
- 6. Shelving provide durable, cleanable shelving for pantries, linen closets, clothes closets and other storage as appropriate, securely fastened in place.

K. EQUIPMENT

- 1. All new equipment to be ENERGY STAR® rated.
- 2. Existing equipment to be retained and continued to be used shall be in serviceable condition with an expected useful life of 30 years, or covered by a plan to replace during the 30-year affordability period.

- 3. Kitchen appliances a. provide new stove and refrigerator in each unit. b. Existing appliances to be reused shall be in good and serviceable condition. c. Provide other appliances (such as microwaves) as may be appropriate to the project. d. All appliances in accessible unit units shall be accessibility compliant, and located in an arrangement providing required clear floor spaces.
- 4. Laundries —where adequate space is available and when appropriate to meet the project goals, washers and dryers may be provided in laundry rooms or in units. a. Heat pump dryers are encouraged where appropriate and readily available. b. Where a project is served by natural gas, consideration of the use of natural gas dryers is encouraged. In projects not served by natural gas, propane fired dryers should be considered for cost of operation reasons where feasible and appropriate.
- 5. Solid waste handling Provide trash and recycling receptacles as appropriate to enable the tenants and property management staff to handle and store solid waste.
- 6. Playground equipment Provide safe, code-approved new playground equipment if a playground is appropriate to the project.

L. FURNISHINGS-CASEWORK

- 1. Kitchen cabinetry and counters
 - a. Existing cabinetry and/or countertops proposed to remain shall be in good condition with a remaining useful life of 30 years, or covered by a plan to restore or replace during the 30-year affordability period.
 - b. New cabinetry
 - shall be of good quality, meeting ANSI/KCMA A161.1-2012 "Performance & Construction Standards for Kitchen Cabinetry and Bath Vanities" standards.
 Other industry standards for cabinetry may be used as guidelines, such as the Kitchen Cabinet Manufacturer's Association (KCMA) "Severe Use Specification 2014," the Architectural Woodwork Institute's (AWI) Woodwork Standards and Cabinet Fabrication Handbook.
 - ii. New counters shall be provided with a cleanable sanitary surface material impervious to water such as high pressure laminate (HPL).
 - 1. Shop fabricated as one piece assembly where possible. Seal field joints.
 - 2. Installed level and securely fastened to cabinetry
- 2. Bath cabinetry and counters vanity lavatory tops, when used, should be one piece integral bowl with integral backsplash

M. ASBESTOS REMOVAL

- 1. Project will be assessed for the existence of asbestos-containing building materials by qualified professionals:
 - a. National Emission Standards for Hazardous Air Pollutants (NESHAP) apply
 - b. Removal of asbestos shall be carried out per Federal EPA and State regulations and rules.

N. LEAD BASED PAINT

As required under 24 CFR Part 35, the Final HUD Regulation on Lead-Based Paint Hazards in Federally Owned Housing and Housing Receiving Federal Assistance, all assisted dwelling units constructed before January 1, 1978, will be evaluated for lead-based paint hazards or presumed to have lead-based paint present throughout the unit when paint is disturbed

- 1. Evaluation will be done by a qualified, certified or licensed person as required under the regulation
- 2. All lead-based paint hazards will be identified and reduced or eliminated through paint stabilization, interim controls or abatement with work being done by supervised, trained, qualified, certified or licensed persons as required under the regulation
- 3. Safe work practices will be followed at all times.
- 4. Occupants shall be protected or temporarily relocated as required by the regulation. With some exceptions, as listed at 24 CFR 35.1345, occupants shall be temporarily relocated before and during hazard reduction activities to a suitable, decent, safe and similarly accessible dwelling unit that does not have lead hazards.
- 5. The dwelling unit and worksite shall be secured. The worksite shall be prepared and warning signs shall be posted as required by the regulation.
- 6. Clearance examinations will be performed by qualified personnel and final clearance shall be cleared by DEQ certified personnel.

O. CONVEYANCE SYSTEMS

- 1. Elevators may be installed when appropriate and possible, when such elevator is part of the project's program goals, or as required by code, as follows:
 - a. Installed per code NFPA 101, Chapter 9.4
 - b. ASME 17.1 Safety Code for Elevators 2013
- 2. Existing elevators and lifts may be retained if they are appropriate to the use of the building and in serviceable condition with an expected useful life of 30 years, or covered by a plan to maintain or replace during the 30-year affordability period, and approved by agencies having jurisdiction.

P. MECHANICAL

- 1. General:
 - a. all mechanical systems shall be designed by a mechanical engineer or other qualified professional.
 - b. All mechanical systems shall meet all applicable codes.
- 2. Fire protection
 - a. In general, all buildings assisted with HTF funds shall have fire suppression as required by applicable codes with approved sprinkler systems installed as required by NFPA 101 and NFPA 1:
 - i. System design to conform to applicable NFPA standard 13 or 13R.
 - ii. System installed by State approved persons.
 - iii. Underground water services for sprinkler system shall meet NFPA 24
 - iv. Provide fire pumps, standpipes, and fire department connection as required per NFPA 13, 14 & 25.
 - b. Where possible, piping for the sprinkler system shall be concealed.
- 3. Plumbing
 - a. Where existing components of a system are to be reused, they will be examined and determined to be in good condition, code compliant and have a remaining useful life of a minimum of 30 years, or covered by a plan to repair

- or replace during the 30-year affordability period. Substandard or critical non-code compliant components shall be replaced.
- b. Use water-saving shower heads and faucet aerators.
- c. All fixtures, piping fittings and equipment shall be lead-free.
- d. Kitchen fixtures When existing kitchen fixtures are not reused in accordance with a. above, new sinks and faucets, and associated plumbing shall be installed in each unit.
- e. Bath fixtures When existing bath fixtures are not reused in accordance with a above, new toilets, tubs and tub surrounds, lavatory sinks, and faucets shall be installed in each unit.
 - i. Three and four-bedroom units are encouraged to be designed to include 1½ baths minimum where adequate space is available.
- f. Provision for laundry rooms or laundry hook-ups may be made per project's program requirements.
- g. Provision for other utility plumbing for janitor sinks, floor drains, outdoor faucets, drains for dehumidification systems, etc., may be made as desired or required.

4. Heating a System Design

- a. where existing components of a system are proposed to be reused, they will be examined and determined to be in good and serviceable condition, code compliant and have a remaining useful life of a minimum of 30 years, or covered by a plan to repair or replace during the 30-year affordability period.
- b. Temperature control The temperature in each unit shall be individually thermostatically controlled.
- c. Provide adequate heat in common spaces.
- d. Install pipe insulation with minimum 1.5" wall thickness

5. Ventilation

- a. Code-compliant indoor air quality will be addressed by the installation of either exhaust only or balanced (heat recovery) ventilation systems as required by:
 - i. Fire protection of system ducts per NFPA 101, Chapter 9.2
- b. Balanced mechanical ventilation systems are encouraged
- c. Ventilation controls shall be per applicable codes

6. Domestic Hot Water:

- a. System shall be designed as required for efficiency
- b. Install pipe insulation per code

Q. ELECTRICAL

- 1. Project electrical design should be done by a licensed electrical engineer, or other qualified professional.
- 2. Project electrical must be installed by a licensed electrician.
- 3. Design shall comply with all the applicable codes:
 - a. Oklahoma State and local fire codes.
 - i. NFPA 101, Life Safety Code
 - ii. NFPA 70, National Electrical Code, 2011 Edition

- iii. NFPA 72, National Fire Alarm and Signaling Code
- iv. NFPA 20, Standard for the Installation of Stationary Pumps for Fire Protect
- 4. In general, the electrical system should be new throughout a building:
 - a. Where existing service entrances, disconnects, meters, distribution wiring, panels, and devices are proposed to remain, they will be examined and determined to be in good condition, code compliant and have a remaining useful life of a minimum of 30 years, or covered by a plan to repair or replace during the 30-year affordability period. The designer, in concert with the State electrical inspector, shall examine the system and equipment. Existing components of the electrical system may be reused as appropriate. Substandard or critical non-code compliant components shall be replaced.
- 5. Utility connections shall be installed per the rules and regulations of the electrical utility.
- 6. Electrical service and metering: a. the service entrance size shall be calculated to handle the proposed electrical loads. b. Metering and disconnects shall be per code and mounted at approved locations.
- 7. Elevator wiring shall conform to the ANSI 17.1 as modified by State or local codes.
- 8. Electrical distribution system:
 - a. Lighting and receptacle circuits shall be designed per code.
 - b. Locations and layout of devices and lighting to be logical and accessibility compliant where required.
 - c. Provision shall be made for the wiring of dedicated equipment circuits and connections for heating, ventilation equipment/exhaust fans, pumps, appliances, etc.
- 9. Artificial Lighting shall be provided using IBC 1205 as a minimum guideline. Developers are encouraged to upgrade to Energy Star® Category.
- 10. Site lighting with shielded fixtures may be provided to illuminate parking and pedestrian walkways, and will conform to local zoning.
- 11. Emergency and exit lighting/illuminated signage shall be per the NFPA 101, Life Safety Code.

Attachment A: Uniform Physical Condition Standards for Housing Rehabilitation		
threatening and must be addressed immediately, if the housing is occupied.		
Observable Deficiency	Type and Degree of Deficiency that must be addressed	
Damaged/Falling/Leaning	Fence or gate is missing or damaged to the point it does not function as it should	
Holes	Hole in fence or gate is larger than 6 inches by 6 inches	
Missing Sections	An exterior fence, security fence or gate is missing a section which could threaten safety or security	
Erosion/Rutting Areas	Runoff has extensively displaced soils which has caused visible damage or potential failure to adjoining structures or threatens the safety of pedestrains or makes the grounds unusable	
Overgrown/Penetrating Vegetation	Vegetation has visibly damaged a component, area or system of the property or has made them unusable or unpassable	
Ponding/Site Drainage	There is an accumulation of more than 5 inches deep and/or a large section of the grounds-more than 20%-is unusable for it's intended purpose due to poor drainage or ponding	
Air Quality - Sewer Odor Detected	Sewer odors that could pose a health risk if inhaled for prolonged periods	
Air Quality - Propane/Natural Gas/Methane Gas Detected	Strong propane, natural gas or methane odors that could pose a risk of explosion/ fire and/or pose a health risk if inhaled	
Electrical Hazards - Exposed Wires/Open Panels	Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)	
Electrical Hazards - Water Leaks on/near Electrical Equipment	Any water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion	
Flammable Materials - Improperly Stored	Flammable materials are improperly stored, causing the potential risk of fire or explosion	
Garbage and Debris - Outdoors	Too much garbage has gathered-more than the planned storage capacity, or garbage has gathered in an area not sanctioned for staging or storing garbage or debris	
Hazards - Other	Any general defects or hazards that pose risk of bodily injury	
Hazards - Sharp Edges	Any physical defect that could cause cutting or breaking of human skin or other bodily harm	
Hazards - Tripping	Any physical defect in walkways or other travelled area that poses a tripping risk	
Infestation - Insects	Evidence of infestation of insects-including roaches and ants-throughout a unit or room, food preperation or storage area or other area of building substantial enough to present a health and safety risk	
Infestation - Rats/Mice/Vermin	Evidence of rats or micesightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk	
Mailbox Missing/Damaged	Mailbox cannot be locked or is missing	
Signs Damaged	The project sign is not legible or readable because of deterioration or damage	
Cracks	Cracks that are large enough to affect traffic ability over more than 5% of the property's parking lots/driveways/roads or pose a safety hazard	
Ponding	3 inches or more of water has accumulated making 5% or more of a parking lot/driveway unusable or unsafe	
Potholes/Loose Material	Potholes or loose material that have made a parking lot/driveway unusable/unpassbale for vehicles and/or pedestrians or could cause tripping or falling	
Settlement/Heaving	Settlement/heaving has made a parking lot/driveway unusable/unpassable or creates unsafe conditions for pedestrians and vehicles	
Damaged/Broken Equipment	More than 20% of the equipment is broken or does not operate as it should or any item that poses a safety risk	
Deteriorated Play Area Surface	More than 20% of the play surface area shows deterioration or the play surface area could cause tripping or falling and thus poses a safety risk	
Broken/Damaged Enclosure-Inadequate Outside Storage Space	A single wall or gate of the enclosure has collapsed or is leaning and in danger of falling or trash cannot be stored in the designated area because it is too small to store refuse until disposal	
Damaged/Falling/Leaning	A retaining wall is damaged and does not function as it should or is a safety risk	
Damaged/Obstructed	The sytem is partially or fully blocked by a large quantity of debris , causing backup into adjacent areas or runoffs into areas where runoff is not intended	
Broken/Missing Hand Railing	The hand rail is missing, damaged, loose or otherwise unusable	
Cracks/Settlement/Heaving	Cracks, hinging/tilting or missing sections that affect traffic ability over more than 5% of the property's walkways/steps or any defect that creates a tripping or falling hazard	
Spalling/Exposed rebar	More than 5% of walkways have large areas of spallinglarger than 4 inches by 4 inchesthay affects traffic ability	
Observable Deficiency		
Damaged Frames/Threshold/Lintels/Trim	Any door that is not functioning or cannot be locked because of damage to the frame, threshold, lintel or trim	
Damaged Hardware/Locks	Any door that does not function as it should or cannot be locked because of damage to the door's hardware	
Damaged Surface (Holes/Paint/Rusting/Glass)	Any door that has a hole or holes greater than 1 inch in diameter, significant peeling/cracking/no paint or rust that affects the integrity of the door surface, or broken/missing glass	
Damaged/Missing Screen/Storm/Security Door	Any screen door or storm door that is damaged or is missing screens or glassshown by an empty frame or frames or any security door that is not functioning or is missing	
Deteriorated/Missing Caulking/Seals	The seals/caulking is missing on any entry door, or they are so damaged that they do not function as they should	
Missing Door	Any exterior door that is missing	
Blocked Egress/Ladders	Stored items or other barriers restrict or block people from exiting	
Visibly Missing Components	Any of the functional components that affect the function of the fire escapeone section of a ladder or railing, for exampleare missing	
Cracks/Gaps	Large cracks in foundation more than 3/8 inches wide by 3/8 inches deep by 6 inches long that present a possible sign of a serious structural problem, or opportunity for water penetration or sections of w	
Spalling/Exposed Rebar	Significant spalled areas affecting more than 10% of any foundation wall or any exposed reinforcing material—rebar or other	
Electrical Hazards - Exposed Wires/Open Panels	Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)	
	Cheervable Deficiency Damaged/Falling/Leaning Holes Missing Sections Erosion/Rutting Areas Overgrown/Penetrating Vegetation Ponding/Site Drainage Air Quality - Sewer Odor Detected Air Quality - Sewer Odor Detected Electrical Hazards - Exposed Wires/Open Panels Electrical Hazards - Exposed Wires/Open Panels Electrical Hazards - Water Leaks on/near Electrical Equipment Flammable Materials - Improperly Stored Garbage and Debris - Outdoors Hazards - Sharp Edges Hazards - Tripping Infestation - Insects Infestation - Insects Infestation - Rats/Mice/Vermin Mailbox Missing/Damaged Signs Damaged Cracks Ponding Potholes/Loose Material Settlement/Heaving Damaged/Broken Equipment Deteriorated Play Area Surface Broken/Damaged Enclosure-Inadequate Outside Storage Space Damaged/Falling/Leaning Damaged/Fostruted Broken/Missing Hand Railling Cracks/Settlement/Heaving Spalling/Exposed rebar Observable Deficiency Damaged Farames/Threshold/Lintels/Trim Damaged Hardware/Locks Damaged Surface (Holes/Paint/Rusting/Glass) Damaged Missing Screen/Storm/Security Door Deteriorated/Missing Caulking/Seals Missing Door Blocked Egress/Ladders Visibly Missing Components Cracks/Gaps Spalling/Exposed Rebar	

	Electrical Hazards - Water Leaks on/near Electrical Equipment	Any water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion
	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable	The exit cannot be used or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage, or other conditions block exit
	Emergency Fire Exits - Missing Exit Signs	Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign
	Flammable/Combustible Materials - Improperly Stored	Flammable materials are improperly stored, causing the potential risk of fire or explosion
	Garbage and Debris - Outdoors	Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris
	Hazards - Other	Any general defects or hazards that pose risk of bodily injury
	Hazards - Sharp Edges	Any physical defect that could cause cutting or breaking of human skin or other bodily harm
	Hazards - Tripping	Any physical defect in walkways or other travelled area that poses a tripping risk
	Infestation - Insects	Evidence of infestation of insects-including roaches and ants-throughout a unit or room, food preperation or storage area or other area of building substantial enough to present a health and safety risk
	Infestation - Rats/Mice/Vermin	Evidence of rats or micesightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk
Lighting	Broken Fixtures/Bulbs	10% or more of the lighting fixtures and bulbs surveyed are broken or missing
Roofs	Damaged Soffits/Fascia	Soffits or fascia that should be there are missing or so damaged that water penetration is visibly possible
	Damaged Vents	Vents are missing or so visibly damaged that further roof damage is possible
	Damaged/Clogged Drains	The drain is damaged or partially clogged with debris or the drain no longer functions
	Damaged/Torn Membrane/Missing Ballast	Balast has shifted and no longer functions as it should or there is damage to the roof membrane that may result in water penetration
	Missing/Damaged Components from Downspout/Gutter	Drainage system components are missing or damaged causing visibile damage to the roof, structure, exterior wall surface, or interior
	Missing/Damaged Shingles	Roofing shingles are missing or damaged enough to create a risk of water penetration
	Ponding	Evidence of standing water on roof, causing potential or visible damage to roof surface or underlying materials
Walls	Cracks/Gaps	Any large crack or gap that is more than 3/8 inches wide or deep and 6 inches long that presents a possible sign of serious structural problem or opportunity for water penetration
	Damaged Chimneys	Part or all of the chimney has visibly seperated from the adjacent wall or there are cracked or missing pieces large enough to present a sign of chimney failure or there is a risk of falling pieces that could create
	Missing/Damaged Caulking/Mortar	Any exterior wall caulking or mortar deterioration that presents a risk of water pentration or risk of structural damage
	Missing Pieces/Holes/Spalling	Any exterior wall deterioration or holes of any size that present a risk of water penetration or risk of structural damage
	Stained/Peeling/Needs Paint	More than 20% of the exterior paint is peeling or paint is missing and siding surface is exposed thereby exposing siding to water penetration and deterioration
Windows	Broken/Missing/Cracked Panes	Any missing panes of glass or cracked panes of glass where the crack is either greater than 4" and/or substantial enough to impact the structural integrity of the window pane
	Damaged Sills/Frames/Lintels/Trim	Sills, frames, lintels, or trim are missing or damaged, exposing the inside of the surrounding walls and compromising its weather tightness
	Damaged/Missing Screens	Missing screens or screens with holes greater than 1 inch by 1 inch or tears greater than 2 inches in length
	Missing/Deteriorated Caulking/Seals/Glazing Compound	There are missing or deteriorated caulk or seals—with evidence of leaks or damage to the window or surrounding structure
	Peeling/Needs Paint	More than 20% of the exterior window paint is peeling or paint is missing and window frame surface is exposed thereby exposing window frame to water penetration and deterioration
	Security Bars Prevent Egress	The ability to exit through egress window is limited by security bars that do not function properly and, therefore, pose safety risks
Requirements for Building Systems		
Inspectable Item	Observable Deficiency	
Domestic Water	Leaking Central Water Supply	Leaking water from water supply line is observed
	Missing Pressure Relief Valve	There is no pressure relief valve or pressure relief valve does not drain down to the floor
	Rust/Corrosion on Heater Chimney	The water heater chimney shows evidence of flaking, discoloration, pitting, or crevices that may create holes that could allow toxic gases to leak from the chimney
	Water Supply Inoperable	There is no running water in any area of the building where there should be
Electrical System	Blocked Access/Improper Storage	One or more fixed items or items of sufficient size and weight impede access to the building system's electrical panel during an emergency
	Burnt Breakers	Carbon residue, melted breakers or arcing scars are evident
	Evidence of Leaks/Corrosion	Any corrosion that affects the condition of the components that carry current or any stains or rust on the interior of electrical enclosures, or any evidence of water leaks in the enclosure or hardware
	Frayed Wiring	Any nicks, abrasion, or fraying of the insulation that exposes any conducting wire
	Missing Breakers/Fuses Missing Outlet Covers	Any open and/or exposed breaker port A cover is missing, which results in exposed visible electrical connections
Flevators		
Elevators Emergancy Power	Not Operable Auviliant Lighting Inoperable (if applicable)	The elevator does not function at all or the elevator doors open when the cab is not there Available lighting does not function
Emergency Power Fire Protection	Auxiliary Lighting Inoperable (if applicable) Missing Sprinkler Head	Auxiliary lighting does not function
THE FIOLECTION	Missing Sprinkler Head	Any sprinkler head is missing, visibly disabled, painted over, blocked, or capped
Haralda O Cafado	Missing/Damaged/Expired Extinguishers	There is missing, damaged or expired fire extinguisher an any area of the building where a fire extinguisher is required
Health & Safety	Air Quality - Mold and/or Mildew Observed	Evidence of mold or mildew is observed that is substantial enough to pose a health risk
	Air Quality - Propane/Natural Gas/Methane Gas Detected	Strong propane, natural gas or methane odors that could pose a risk of explosion/ fire and/or pose a health risk if inhaled
	Air Quality - Sewer Odor Detected	Sewer odors that could pose a health risk if inhaled for prolonged periods

Any water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion

An elevator is misaligned with the floor by more than 3/4 of an inch. The elevatordoes not level as it should, which causes a tripping hazard

Electrical Hazards - Water Leaks on/near Electrical Equipment

Elevator - Tripping

	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable	The exit cannot be used or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage, or other conditions block exit
	Emergency Fire Exits - Missing Exit Signs	Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the
	Flammable Materials - Improperly Stored	Flammable materials are improperly stored, causing the potential risk of fire or explosion
	Garbage and Debris - Indoors	Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sactioned for staging or storing garbage or debris
	Hazards - Other	Any general defects or hazards that pose risk of bodily injury
	Hazards - Sharp Edges	Any physical defect that could cause cutting or breaking of human skin or other bodily harm
	Hazards – Tripping Hazards	Any physical defect in walkways or other travelled area that poses a tripping risk
	Infestation - Insects	Evidence of infestation of insects-including roaches and ants-throughout a unit or room, food preperation or storage area or other area of building substantial enough to present a health and safety risk
	Infestation - Rats/Mice/Vermin	Evidence of rats or micesightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk
HVAC	Boiler/Pump Leaks	Evidenceof water or steam leaking in piping or pump packing
	Fuel Supply Leaks	Evidence of any amount of fuel leaking from the supply tank or piping
	General Rust/Corrosion	Significant formations of metal oxides, significant flaking, discoloration, or the development of a noticable pit or crevice
	Misaligned Chimney/Ventilation System	A misalighnment of an exhaust system on a combustion fuel-fired unit (oil, natural gas, propane, wood pellets etc.) that causes improper or dangerous venting of gases
Roof Exhaust System	Roof Exhaust Fan(s) Inoperable	The roof exhaust fan unit does not function
Sanitary System	Broken/Leaking/Clogged Pipes or Drains	Evidence of active leaks in or around the system components or evidence of standing water, puddles or pondinga sign of leaks or clogged drains
	Missing Drain/Cleanout/Manhole Covers	A protective cover is missing
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Requirements for Common Areas		
Inspectable Item	Observable Deficiency	
Basement/Garage/Carport	Baluster/Side Railings - Damaged	Any damaged or missing balusters or side rails that limit the safe use of an area
Closet/Utility/Mechanical	Cabinets - Missing/Damaged	10% or more of cabinet, doors, or shelves are missing or the laminate is separating
Community Room	Call for Aid - Inoperable	The system does not function as it should
Halls/Corridors/Stairs	Ceiling - Holes/Missing Tiles/Panels/Cracks	Any holes in ceiling, missing tiles or large cracks wider than 1/4 of an inch and greater than 11 inches long
Kitchen	Ceiling - Peeling/Needs Paint	More than 10% of ceiling has peeling paint or is missing paint
Laundry Room	Ceiling - Water Stains/Water Damage/Mold/Mildew	Evidence of a leak, mold or mildewsuch as a darkened areaover a ceiling area greater than 1 foot square
Lobby	Countertops - Missing/Damaged	10% or more of the countertop working surface is missing, deteriorated, or damaged below the laminatenot a sanitary surface to prepare food
Office	Dishwasher/Garbage Disposal - Inoperable	The dishwasher or garbage disposal does not operate as it should
Other Community Spaces	Doors - Damaged Frames/Threshold/Lintels/Trim	Any door that is not functioning or cannot be locked because of damage to the frame, threshold, lintel or trim
Patio/Porch/Balcony	Doors - Damaged Hardware/Locks	Any door that does not function as it should or cannot be locked because of damage to the door's hardware
Restrooms	Doors - Damaged Surface (Holes/Paint/Rust/Glass)	Any door that has a hole or holes greater than 1 inch in diameter, significant peeling/cracking/no paint or rust that affects the integrity of the door surface, or broken/missing glass
Storage	Doors - Damaged/Missing Screen/Storm/Security Door	Any screen door or storm door that is damaged or is missing screens or glassshown by an empty frame or frames or any security door that is not functioning or is missing
-	Doors - Deteriorated/Missing Seals (Entry Only)	The seals/caulking is missing on any entry door, or they are so damaged that they do not function as they should
	Doors - Missing Door	Any door that is missing that is required for the functional use of the space
	Dryer Vent -Missing/Damaged/Inoperable	The dryer vent is missing or it is not functioning because it is blocked. Dryer exhaust is not effectively vented to the outside
	Electrical - Blocked Access to Electrical Panel	One or more fixed items or items of sufficient size and weight impede access to the building system's electrical panel during an emergency
	Electrical - Burnt Breakers	Carbon residue, melted breakers or arcing scars are evident
	Electrical - Evidence of Leaks/Corrosion	Any corrosion that affects the condition of the components that carry current or any stains or rust on the interior of electrical enclosures or any evidence of water leaks in the enclosure or hardware
	Electrical - Frayed Wiring	Any nicks, abrasion, or fraying of the insulation that exposes any conducting wire
	Electrical - Missing Breakers	Any open and/or exposed breaker port
	Electrical - Missing Covers	A cover is missing, which results in exposed visible electrical connections
	Floors - Bulging/Buckling	Any flooring that is bulging, buckling or sagging or a problem with alignment between flooring types
	Floors - Floor Covering Damaged	More than 10% of floor covering has stains, surface burns, shallow cuts, small holes, tears, loose areas or exposed seams.
	Floors - Missing Floor/Tiles	More than 5% of the flooring or tile flooring is missing
	Floors - Peeling/Needs Paint	Any painted flooring that has peeling or missing paint on more than 10% of the surface
	Floors - Rot/Deteriorated Subfloor	Any rotted or deteriorated subflooring greater than 6 inches by 6 inches
	Floors - Water Stains/Water Damage/Mold/Mildew	Evidence of a leak, mold or mildewsuch as a darkened areacovering a flooring area greater than 1 foot square
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	GFI - Inoperable	The GFI does not function
	Graffiti	Any graffiti on any exposed surface greater than 6 inches by 6 inches
	HVAC - Convection/Radiant Heat System Covers Missing/Damaged	Cover is missing or substantially damaged, allowing contact with heating/surface elements or associated fans
	HVAC - General Rust/Corrosion	Significant formations of metal oxides, flaking, or discolorationor a pit or crevice
	HVAC - Inoperable	HVAC does not function. It does not provide the heating and coolingit should. The system does not respond when the controls are engaged
	HVAC - Misaligned Chimney/Ventilation System	Any misalignment that may cause improper or dangerous venting of gases
	HVAC - Noisy/Vibrating/Leaking	HVAC system shows signs of abnormal vibrations, other noise, or leaks when engaged
	Lavatory Sink - Damaged/Missing	Sink has extensive discoloration or cracks in over 50% of the basin or the the sink or associated hardware have failed or are missing and the sink can't be used
	Lighting - Missing/Damaged/Inoperable Fixture	More than10% of the permanent lighting fixtures are missing or damaged so they do not function
	Mailbox - Missing/Damaged	The U.S Postal Service mailbox cannot be locked or is missing
	Outlets/Switches/Cover Plates - Missing/Broken	Outlet or switch is missing or a cover plate is missing or broken, resulting in exposed wiring
	Pedestrian/Wheelchair Ramp	A walkway or ramp is damaged and cannot be used by people on foot, in wheelchair, or using walkers
	Plumbing - Clogged Drains	Drain is substantially or completely clogged or has suffered extensive deterioration
	Plumbing - Leaking Faucet/Pipes	A steady leak that is adversely affecting the surrounding area
	Range Hood /Exhaust Fans - Excessive Grease/Inoperable	A substantial accumulation of dirt or grease that threatens the free passage of air
	Range/Stove - Missing/Damaged/Inoperable	One or more burners are not functioning or doors or drawers are impeded or on gas ranges pilot is out and/or flames are not distributed equally or oven not functioning
	Refrigerator - Damaged/Inoperable	The refrigerator has an extensive accumilation of ice or the seals around the doors are deteriorated or is damaged in any way which substantially impacts its performance
	Restroom Cabinet - Damaged/Missing	Damaged or missing shelves, vanity top, drawers, or doors that are not functioning as they should for storage or their intended purpose
	Shower/Tub - Damaged/Missing	Any cracks in tub or shower through which water can pass or extensive discoloration over more than 20% of tub or shower surface or tub or shower is missing
	Sink - Missing/Damaged	Any cracks in sink through which water can pass or extensive discoloration over more than 10% of the sink surface or sink is missing
	Smoke Detector - Missing/Inoperable	Smoke detector is missing or does not function as it should
	Stairs - Broken/Damaged/Missing Steps	A step is missing or broken
	Stairs - Broken/Missing Hand Railing	The hand rail is missing, damaged, loose or otherwise unusable
	Ventilation/Exhaust System - Inoperable	exhaust fan is not functioning or window designed for ventilation does not open
	Walls - Bulging/Buckling	Bulging, buckling or sagging walls or a lack of horizontal alignment
	Walls - Damaged	Any hole in wall greater than 2 inches by 2 inches
	Walls - Damaged/Deteriorated Trim	10% or more of the wall trim is damaged
	Walls - Peeling/Needs Paint	10% or more of interior wall paint is peeling or missing
	Walls - Water Stains/Water Damage/Mold/Mildew	Evidence of a leak, mold or mildewsuch as a common areacovering a wall area greater than 1 foot square
	Water Closet/Toilet - Damaged/Clogged/Missing	Fixture elementsseat, flush handle, cover etcare missing or damaged or the toilet seat is cracked or has a broken hinge or toilet cannot be flushed
	Windows - Cracked/Broken/Missing Panes	Any missing panes of glass or cracked pains of glass where the crack is either greater than 4" and/or substantial enough to impact the structural integrity of the window pane
	Windows - Damaged Window Sill	The sill is damaged enough to expose the inside of the surrounding walls and compromise its weather tightness
	Windows - Inoperable/Not Lockable	Any window that is not functioning or cannot be secured because lock is brocken
	Windows - Missing/Deteriorated Caulking/Seals/Glazing Compound	There are missing or deteriorated caulk or sealswith evidence of leaks or damage to the window or surrounding structure
	Windows - Peeling/Needs Paint	More than 10% of interior window paint is peeling or missing
	Windows - Security Bars Prevent Egress	The ability to exit through the window is limited by security bars that do not function properly and, therefore, pose safety risks
Health & Safety	Air Quality - Mold and/or Mildew Observed	Evidence of mold or mildew is observed that is substantial enough to pose a health risk
	Air Quality - Propane/Natural Gas/Methane Gas Detected	Strong propane, natural gas or methane odors that could pose a risk of explosion/ fire and/or pose a health risk if inhaled
	Air Quality - Sewer Odor Detected	Sewer odors that could pose a health risk if inhaled for prolonged periods
	Electrical Hazards - Exposed Wires/Open Panels	Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)
	Electrical Hazards - Water Leaks on/near Electrical Equipment	Any water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion
	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable	The exit cannot be used or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage, or other conditions block exit
	Emergency Fire Exits - Missing Exit Signs	Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign
	Flammable/Combustible Materials - Improperly Stored	Flammable or combustible materials are improperly stored, causing the potential risk of fire or explosion
	Garbage and Debris - Indoors	Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sactioned for staging or storing garbage or debris
	Garbage and Debris - Outdoors	Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris

	Hazards - Other	Any general defects or hazards that pose risk of bodily injury
	Hazards - Sharp Edges	Any physical defect that could cause cutting or breaking of human skin or other bodily harm
Ī	Hazards - Tripping	Any physical defect in walkways or other travelled area that poses a tripping risk

	Infestation - Insects	Evidence of infestation of insects-including roaches and ants-throughout a unit or room, food preperation or storage area or other area of building substantial enough to present a health and safety risk
	Infestation - Rats/Mice/Vermin	Evidence of rats or mice-sightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk
Pools and Related Structures	Fencing - Damaged/Not Intact	Any damage that could compromise the integrity of the fence
Trash Collection Areas	Chutes - Damaged/Missing Components	Garbage has backed up into chutes, because the collection structure is missing or broken or compactors or componenentschute, chute door, and other componenetshave failed
Requirements for Unit		
Inspectable Item	Observable Deficiency	
Bathroom	Bathroom Cabinets - Damaged/Missing	Damaged or missing shelves, vanity tops, drawers, or doors that are not functioning as they should for storage or their intended purpose
	Lavatory Sink - Damaged/Missing	Any cracks in sink through which water can pass or extensive discoloration over more than 10% of the sink surface or sink is missing
	Plumbing - Clogged Drains, Faucets	Drain or faucet is substantially or completely clogged or has suffered extensive deterioration
	Plumbing - Leaking Faucet/Pipes	A steady leak that is adversely affecting the surrounding area
	Shower/Tub - Damaged/Missing	Any cracks in tub or shower through which water can pass or extensive discoloration over more than 20% of tub or shower surface or tub or shower is missing
	Ventilation/Exhaust System – Absent/Inoperable	exhaust fan is not functioning or window designed for ventilation does not open
	Water Closet/Toilet - Damaged/Clogged/Missing	Fixture elementsseat, flush handle, cover etcare missing or damaged or the toilrt seat is cracked or has a broken hinge or toilet cannot be flushed
Call-for-Aid (if applicable)	Inoperable	The system does not function as it should
Ceiling	Bulging/Buckling/Leaking	Bulging, buckling or sagging ceiling or problem with alignment
g	Holes/Missing Tiles/Panels/Cracks	Any holes in ceiling, missing tiles or large cracks wider than 1/4 of an inch and greater than 6 inches long
	Peeling/Needs Paint	More than 10% of ceiling has peeling paint or is missing paint
	Water Stains/Water Damage/Mold/Mildew	Evidence of a leak, mold or mildewsuch as a darkened areaover a ceiling area greater than 1 foot square
Doors	Damaged Frames/Threshold/Lintels/Trim	Any door that is not functioning or cannot be locked because of damage to the frame, threshold, lintel or trim
20013	Damaged Hardware/Locks	Any door that does not function as it should or cannot be locked because of damage to the door's hardware
	Damaged/Missing Screen/Storm/Security Door	Any screen door or storm door that is damaged or is missing screens or glassshown by an empty frame or frames or any security door that is not functioning or is missing
	Damaged Surface - Holes/Paint/Rusting/Glass/Rotting	Any door that has a hole or holes greater than 1 inch in diameter, significant peeling/cracking/no paint or rust that affects the integrity of the door surface, or broken/missing glass
	Deteriorated/Missing Seals (Entry Only)	The seals/caulking is missing on any entry door, or they are so damaged that they do not function as they should Any door that is required for security (entry) or privacy (Bathroom) that is missing or any other unit door that is missing and is required for proper unit functionality
Electrical System	Missing Door Blocked Access to Electrical Panel	
Electrical System		One or more fixed items or items of sufficient size and weight impede access to the building system's electrical panel during an emergency
	Burnt Breakers	Carbon residue, melted breakers or arcing scars are evident
	Evidence of Leaks/Corrosion	Any corrosion that affects the condition of the components that carry current or any stains or rust on the interior of electrical enclosures or any evidence of water leaks in the enclosure or hardware
	Frayed Wiring	Any nicks, abrasion, or fraying of the insulation that exposes any conducting wire
	GFI - Inoperable	The GFI does not function
	Missing Breakers/Fuses	Any open and/or exposed breaker port
	Missing Covers	A cover is missing, which results in exposed visible electrical connections
Floors	Bulging/Buckling	Any flooring that is bulging, buckling or sagging or a problem with alignment between flooring types
	Floor Covering Damage	More than 10% of floor covering has stains, surface burns, shallow cuts, small holes, tears, loose areas or exposed seams.
	Missing Flooring Tiles	Any flooring or tile flooring that is missing
	Peeling/Needs Paint	Any painted flooring that has peeling or missing paint on more than 10% of the surface
	Rot/Deteriorated Subfloor	Any rotted or deteriorated subflooring greater than 6 inches by 6 inches
	Water Stains/Water Damage/Mold/Mildew	Evidence of a leak, mold or mildewsuch as a darkened areacovering a flooring area greater than 1 foot square
Health & Safety	Air Quality - Mold and/or Mildew Observed	Evidence of mold or mildew is observed that is substantial enough to pose a health risk
	Air Quality - Sewer Odor Detected	Sewer odors that could pose a health risk if inhaled for prolonged periods
	Air Quality - Propane/Natural Gas/Methane Gas Detected	Strong propane, natural gas or methane odors that could pose a risk of explosion/fire and/or pose a health risk if inhaled
	Electrical Hazards - Exposed Wires/Open Panels	Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)
	Electrical Hazards - Water Leaks on/near Electrical Equipment	Any water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion
	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable	The exit cannot be used or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage, or other conditions block exit
	Emergency Fire Exits - Missing Exit Signs	Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign
	Flammable Materials - Improperly Stored	Flammable materials are improperly stored, causing the potential risk of fire or explosion

Garbage and Debris - Indoors	Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sactioned for staging or storing garbage or debris
Garbage and Debris - Outdoors	Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris
Hazards - Other	Any general defects or hazards that pose risk of bodily injury

	Electrical Hazards - Water Leaks on/near Electrical Equipment	Any water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion
	Elevator - Tripping	An elevator is misaligned with the floor by more than 3/4 of an inch. The elevatordoes not level as it should, which causes a tripping hazard
	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable	The exit cannot be used or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage, or other conditions block exit
	Emergency Fire Exits - Missing Exit Signs	Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign
	Flammable Materials - Improperly Stored	Flammable materials are improperly stored, causing the potential risk of fire or explosion
	Garbage and Debris - Indoors	Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sactioned for staging or storing garbage or debris
	Hazards - Other	Any general defects or hazards that pose risk of bodily injury
	Hazards - Sharp Edges	Any physical defect that could cause cutting or breaking of human skin or other bodily harm
	Hazards – Tripping Hazards	Any physical defect in walkways or other travelled area that poses a tripping risk
	Infestation - Insects	Evidence of infestation of insects-including roaches and ants-throughout a unit or room, food preperation or storage area or other area of building substantial enough to present a health and safety risk
	Infestation - Rats/Mice/Vermin	Evidence of rats or micesightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk
HVAC	Boiler/Pump Leaks	Evidenceof water or steam leaking in piping or pump packing
	Fuel Supply Leaks	Evidence of any amount of fuel leaking from the supply tank or piping
	General Rust/Corrosion	Significant formations of metal oxides, significant flaking, discoloration, or the development of a noticable pit or crevice
	Misaligned Chimney/Ventilation System	A misalighnment of an exhaust system on a combustion fuel-fired unit (oil, natural gas, propane, wood pellets etc.) that causes improper or dangerous venting of gases
Roof Exhaust System	Roof Exhaust Fan(s) Inoperable	The roof exhaust fan unit does not function
Sanitary System	Broken/Leaking/Clogged Pipes or Drains	Evidence of active leaks in or around the system components or evidence of standing water, puddles or ponding—a sign of leaks or clogged drains
	Missing Drain/Cleanout/Manhole Covers	A protective cover is missing
Requirements for Common Areas		
Inspectable Item	Observable Deficiency	
Basement/Garage/Carport	Baluster/Side Railings - Damaged	Any damaged or missing balusters or side rails that limit the safe use of an area
Closet/Utility/Mechanical	Cabinets - Missing/Damaged	10% or more of cabinet, doors, or shelves are missing or the laminate is separating
Community Room	Call for Aid - Inoperable	The system does not function as it should
Halls/Corridors/Stairs	Ceiling - Holes/Missing Tiles/Panels/Cracks	Any holes in ceiling, missing tiles or large cracks wider than 1/4 of an inch and greater than 11 inches long
Kitchen	Ceiling - Peeling/Needs Paint	More than 10% of ceiling has peeling paint or is missing paint
Laundry Room	Ceiling - Water Stains/Water Damage/Mold/Mildew	Evidence of a leak, mold or mildew-such as a darkened areaover a ceiling area greater than 1 foot square
Lobby	Countertops - Missing/Damaged	10% or more of the countertop working surface is missing, deteriorated, or damaged below the laminatenot a sanitary surface to prepare food
Office	Dishwasher/Garbage Disposal - Inoperable	The dishwasher or garbage disposal does not operate as it should
Other Community Spaces	Doors - Damaged Frames/Threshold/Lintels/Trim	Any door that is not functioning or cannot be locked because of damage to the frame, threshold, lintel or trim
Patio/Porch/Balcony	Doors - Damaged Hardware/Locks	Any door that does not function as it should or cannot be locked because of damage to the door's hardware
Restrooms	Doors - Damaged Surface (Holes/Paint/Rust/Glass)	Any door that has a hole or holes greater than 1 inch in diameter, significant peeling/cracking/no paint or rust that affects the integrity of the door surface, or broken/missing glass
Storage	Doors - Damaged/Missing Screen/Storm/Security Door	Any screen door or storm door that is damaged or is missing screens or glassshown by an empty frame or frames or any security door that is not functioning or is missing
	Doors - Deteriorated/Missing Seals (Entry Only)	The seals/caulking is missing on any entry door, or they are so damaged that they do not function as they should
	Doors - Missing Door	Any door that is missing that is required for the functional use of the space
	Dryer Vent -Missing/Damaged/Inoperable	The dryer vent is missing or it is not functioning because it is blocked. Dryer exhaust is not effectively vented to the outside
	Electrical - Blocked Access to Electrical Panel	One or more fixed items or items of sufficient size and weight impede access to the building system's electrical panel during an emergency
	Electrical - Burnt Breakers	Carbon residue, melted breakers or arcing scars are evident
	Electrical - Evidence of Leaks/Corrosion	Any corrosion that affects the condition of the components that carry current or any stains or rust on the interior of electrical enclosures or any evidence of water leaks in the enclosure or hardware
	Electrical - Frayed Wiring	Any nicks, abrasion, or fraying of the insulation that exposes any conducting wire
	Electrical - Missing Breakers	Any open and/or exposed breaker port
	Electrical - Missing Covers	A cover is missing, which results in exposed visible electrical connections
	Floors - Bulging/Buckling	Any flooring that is bulging, buckling or sagging or a problem with alignment between flooring types
	Floors - Floor Covering Damaged	More than 10% of floor covering has stains, surface burns, shallow cuts, small holes, tears, loose areas or exposed seams.
	Floors - Missing Floor/Tiles	More than 5% of the flooring or tile flooring is missing
	Floors - Peeling/Needs Paint	Any painted flooring that has peeling or missing paint on more than 10% of the surface

	Floors - Rot/Deteriorated Subfloor	Any rotted or deteriorated subflooring greater than 6 inches by 6 inches
	Floors - Water Stains/Water Damage/Mold/Mildew	Evidence of a leak, mold or mildew—such as a darkened area—covering a flooring area greater than 1 foot square

	GFI - Inoperable	The GFI does not function
	Graffiti	Any graffiti on any exposed surface greater than 6 inches by 6 inches
	HVAC - Convection/Radiant Heat System Covers Missing/Damaged	Cover is missing or substantially damaged, allowing contact with heating/surface elements or associated fans
	HVAC - General Rust/Corrosion	Significant formations of metal oxides, flaking, or discolorationor a pit or crevice
	HVAC - Inoperable	HVAC does not function. It does not provide the heating and coolingit should. The system does not respond when the controls are engaged
	HVAC - Misaligned Chimney/Ventilation System	Any misalignment that may cause improper or dangerous venting of gases
	HVAC - Noisy/Vibrating/Leaking	HVAC system shows signs of abnormal vibrations, other noise, or leaks when engaged
		Sink has extensive discoloration or cracks in over 50% of the basin or the the sink or associated hardware have failed or are missing and the sink can't be used
	Lavatory Sink - Damaged/Missing Lighting - Missing/Damaged/Inoperable Fixture	More than 10% of the permanent lighting fixtures are missing or damaged so they do not function
	Mailbox - Missing/Damaged	The U.S Postal Service mailbox cannot be locked or is missing
	Outlets/Switches/Cover Plates - Missing/Broken	Outlet or switch is missing or a cover plate is missing or broken, resulting in exposed wiring
	Pedestrian/Wheelchair Ramp	A walkway or ramp is damaged and cannot be used by people on foot, in wheelchair, or using walkers
	Plumbing - Clogged Drains	Drain is substantially or completely clogged or has suffered extensive deterioration
	Plumbing - Leaking Faucet/Pipes	A steady leak that is adversely affecting the surrounding area
	Range Hood /Exhaust Fans - Excessive Grease/Inoperable	A substantial accumulation of dirt or grease that threatens the free passage of air
	Range/Stove - Missing/Damaged/Inoperable	One or more burners are not functioning or doors or drawers are impeded or on gas ranges pilot is out and/or flames are not distributed equally or oven not functioning
	Refrigerator - Damaged/Inoperable	The refrigerator has an extensive accumilation of ice or the seals around the doors are deteriorated or is damaged in any way which substantially impacts its performance
	Restroom Cabinet - Damaged/Missing	Damaged or missing shelves, vanity top, drawers, or doors that are not functioning as they should for storage or their intended purpose
	Shower/Tub - Damaged/Missing	Any cracks in tub or shower through which water can pass or extensive discoloration over more than 20% of tub or shower surface or tub or shower is missing
	Sink - Missing/Damaged	Any cracks in sink through which water can pass or extensive discoloration over more than 10% of the sink surface or sink is missing
	Smoke Detector - Missing/Inoperable	Smoke detector is missing or does not function as it should
	Stairs - Broken/Damaged/Missing Steps	A step is missing or broken
	Stairs - Broken/Missing Hand Railing	The hand rail is missing, damaged, loose or otherwise unusable
	Ventilation/Exhaust System - Inoperable	exhaust fan is not functioning or window designed for ventilation does not open
	Walls - Bulging/Buckling	Bulging, buckling or sagging walls or a lack of horizontal alignment
	Walls - Damaged	Any hole in wall greater than 2 inches by 2 inches
	Walls - Damaged/Deteriorated Trim	10% or more of the wall trim is damaged
	Walls - Peeling/Needs Paint	10% or more of interior wall paint is peeling or missing
	Walls - Water Stains/Water Damage/Mold/Mildew	Evidence of a leak, mold or mildewsuch as a common areacovering a wall area greater than 1 foot square
	Water Closet/Toilet - Damaged/Clogged/Missing	Fixture elementsseat, flush handle, cover etcare missing or damaged or the toilet seat is cracked or has a broken hinge or toilet cannot be flushed
	Windows - Cracked/Broken/Missing Panes	Any missing panes of glass or cracked pains of glass where the crack is either greater than 4" and/or substantial enough to impact the structural integrity of the window pane
	Windows - Damaged Window Sill	The sill is damaged enough to expose the inside of the surrounding walls and compromise its weather tightness
	Windows - Inoperable/Not Lockable	Any window that is not functioning or cannot be secured because lock is brocken
	Windows - Missing/Deteriorated Caulking/Seals/Glazing Compound	There are missing or deteriorated caulk or sealswith evidence of leaks or damage to the window or surrounding structure
	Windows - Peeling/Needs Paint	More than 10% of interior window paint is peeling or missing
	Windows - Security Bars Prevent Egress	The ability to exit through the window is limited by security bars that do not function properly and, therefore, pose safety risks
Health & Safety	Air Quality - Mold and/or Mildew Observed	Evidence of mold or mildew is observed that is substantial enough to pose a health risk
	Air Quality - Propane/Natural Gas/Methane Gas Detected	Strong propane, natural gas or methane odors that could pose a risk of explosion/fire and/or pose a health risk if inhaled
	Air Quality - Sewer Odor Detected	Sewer odors that could pose a health risk if inhaled for prolonged periods
	Electrical Hazards - Exposed Wires/Open Panels	Any exposed bare wires or openings in electrical panels (capped wires do not pose a risk)
	Electrical Hazards - Water Leaks on/near Electrical Equipment	Any water leaking, puddling or ponding on or immediately near any electrical apparatus that could pose a risk of fire, electrocution or explosion
	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable	The exit cannot be used or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage, or other conditions block exit
	Emergency Fire Exits - Missing Exit Signs	Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the
	Flammable/Combustible Materials - Improperly Stored	Flammable or combustible materials are improperly stored, causing the potential risk of fire or explosion
	Garbage and Debris - Indoors	Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sactioned for staging or storing garbage or debris
	Garbage and Debris - Outdoors	Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sanctioned for staging or storing garbage or debris
L	1	

	Hazards - Other	Any general defects or hazards that pose risk of bodily injury
	Hazards - Sharp Edges	Any physical defect that could cause cutting or breaking of human skin or other bodily harm
ı	Hazards - Tripping	Any physical defect in walkways or other travelled area that poses a tripping risk

	Infestation - Insects	Evidence of infestation of insects-including roaches and ants-throughout a unit or room, food preperation or storage area or other area of building substantial enough to present a health and safety risk
	Infestation - Rats/Mice/Vermin	Evidence of rats or mice-sightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk
Pools and Related Structures	Fencing - Damaged/Not Intact	Any damage that could compromise the integrity of the fence
Trash Collection Areas	Chutes - Damaged/Missing Components	Garbage has backed up into chutes, because the collection structure is missing or broken or compactors or componenentschute, chute door, and other componenetshave failed
Requirements for Unit		
Inspectable Item	Observable Deficiency	
Bathroom	Bathroom Cabinets - Damaged/Missing	Damaged or missing shelves, vanity tops, drawers, or doors that are not functioning as they should for storage or their intended purpose
	Lavatory Sink - Damaged/Missing	Any cracks in sink through which water can pass or extensive discoloration over more than 10% of the sink surface or sink is missing
	Plumbing - Clogged Drains, Faucets	Drain or faucet is substantially or completely clogged or has suffered extensive deterioration
	Plumbing - Leaking Faucet/Pipes	A steady leak that is adversely affecting the surrounding area
	Shower/Tub - Damaged/Missing	Any cracks in tub or shower through which water can pass or extensive discoloration over more than 20% of tub or shower surface or tub or shower is missing
	Ventilation/Exhaust System — Absent/Inoperable	exhaust fan is not functioning or window designed for ventilation does not open
	Water Closet/Toilet - Damaged/Clogged/Missing	Fixture elementsseat, flush handle, cover etcare missing or damaged or the toilrt seat is cracked or has a broken hinge or toilet cannot be flushed
Call-for-Aid (if applicable)	Inoperable	The system does not function as it should
Ceiling	Bulging/Buckling/Leaking	Bulging, buckling or sagging ceiling or problem with alignment
	Holes/Missing Tiles/Panels/Cracks	Any holes in ceiling, missing tiles or large cracks wider than 1/4 of an inch and greater than 6 inches long
	Peeling/Needs Paint	More than 10% of ceiling has peeling paint or is missing paint
	Water Stains/Water Damage/Mold/Mildew	Evidence of a leak, mold or mildewsuch as a darkened areaover a ceiling area greater than 1 foot square
Doors	Damaged Frames/Threshold/Lintels/Trim	Any door that is not functioning or cannot be locked because of damage to the frame, threshold, lintel or trim
20013	Damaged Hardware/Locks	Any door that does not function as it should or cannot be locked because of damage to the door's hardware
	Damaged/Missing Screen/Storm/Security Door	Any screen door or storm door that is damaged or is missing screens or glassshown by an empty frame or frames or any security door that is not functioning or is missing
	Damaged Surface - Holes/Paint/Rusting/Glass/Rotting	Any door that has a hole or holes greater than 1 inch in diameter, significant peeling/cracking/no paint or rust that affects the integrity of the door surface, or broken/missing glass
	Deteriorated/Missing Seals (Entry Only)	The seals/caulking is missing on any entry door, or they are so damaged that they do not function as they should
		Any door that is required for security (entry) or privacy (Bathroom) that is missing or any other unit door that is missing and is required for proper unit functionality
Electrical System	Missing Door Blocked Access to Electrical Panel	
Electrical System		One or more fixed items or items of sufficient size and weight impede access to the building system's electrical panel during an emergency
	Burnt Breakers	Carbon residue, melted breakers or arcing scars are evident
	Evidence of Leaks/Corrosion	Any corrosion that affects the condition of the components that carry current or any stains or rust on the interior of electrical enclosures or any evidence of water leaks in the enclosure or hardware
	Frayed Wiring	Any nicks, abrasion, or fraying of the insulation that exposes any conducting wire
	GFI - Inoperable	The GFI does not function
	Missing Breakers/Fuses	Any open and/or exposed breaker port
	Missing Covers	A cover is missing, which results in exposed visible electrical connections
Floors	Bulging/Buckling	Any flooring that is bulging, buckling or sagging or a problem with alignment between flooring types
	Floor Covering Damage	More than 10% of floor covering has stains, surface burns, shallow cuts, small holes, tears, loose areas or exposed seams.
	Missing Flooring Tiles	Any flooring or tile flooring that is missing
	Peeling/Needs Paint	Any painted flooring that has peeling or missing paint on more than 10% of the surface
	Rot/Deteriorated Subfloor	Any rotted or deteriorated subflooring greater than 6 inches by 6 inches
W N 0 6 6	Water Stains/Water Damage/Mold/Mildew	Evidence of a leak, mold or mildewsuch as a darkened areacovering a flooring area greater than 1 foot square
Health & Safety	Air Quality - Mold and/or Mildew Observed	Evidence of mold or mildew is observed that is substantial enough to pose a health risk
	Air Quality - Sewer Odor Detected	Sewer odors that could pose a health risk if inhaled for prolonged periods
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	Emergency Fire Exits - Missing Exit Signs	Exit signs that clearly identify all emergency exits are missing or there is no illumination in the area of the sign
	Flammable Materials - Improperly Stored	Flammable materials are improperly stored, causing the potential risk of fire or explosion

Garba	bage and Debris - Indoors	Too much garbage has gathered-more than the planned storage capacity or garbage has gathered in an area not sactioned for staging or storing garbage or debris
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Hazaro	ards - Other	Any general defects or hazards that pose risk of bodily injury

	Hazards - Sharp Edges	Any physical defect that could cause cutting or breaking of human skin or other bodily harm						
		Any physical defect in walkways or other travelled area that poses a tripping risk						
	Hazards - Tripping Infestation - Insects	Evidence of infestation of insects-including roaches and ants-throughout a unit or room, food preperation or storage area or other area of building substantial enough to present a health and safety risk						
	Infestation - Rats/Mice/Vermin	Evidence of rats or mice-sightings, rat or mouse holes, or droppings substantial enough to present a health and safety risk						
Hot Water Heater	Misaligned Chimney/Ventilation System							
not water neater	Inoperable Unit/Components	Any misalignment that may cause improper or dangerous venting of gases Het water from het water tage is no warmer than soom temperature indicating het water heater is not functioning, properly						
		Hot water from hot water taps is no warmer than room temperature indicating hot water heater is not functioning properly There is avidance of active water larks from hot water heater or related, components						
	Leaking Valves/Tanks/Pipes	There is evidence of active water leaks from hot water heater or related components						
	Pressure Relief Valve Missing	There is no pressure relief valve or pressure relief valve does not drain down to the floor Significant formations of motel evides, floking, or discolaration, or a pit or creation.						
III/AC Contains	Rust/Corrosion	Significant formations of metal oxides, flaking, or discoloration—or a pit or crevice						
HVAC System	Convection/Radiant Heat System Covers Missing/Damaged	Cover is missing or substantially damaged, allowing contact with heating/surface elements or associated fans						
	Inoperable	HVAC does not function. It does not provide the heating and coolingit should. The system does not respond when the controls are engaged						
	Misaligned Chimney/Ventilation System	Any misalignment that may cause improper or dangerous venting of gases						
	Noisy/Vibrating/Leaking	The HVAC system shows signs of abnormal vibrations, other noise, or leaks when engaged						
	Rust/Corrosion	Deterioration from rust or corrosion on the HVAC system in the dweling unit						
Kitchen	Cabinets - Missing/Damaged	10% or more of cabinet, doors, or shelves are missing or the laminate is separating						
	Countertops - Missing/Damaged	10% or more of the countertop working surface is missing, deteriorated, or damaged below the laminate not a sanitary surface to prepare food						
	Dishwasher/Garbage Disposal - Inoperable	The dishwasher or garbage disposal does not operate as it should						
	Plumbing - Clogged Drains	Drain is substantially or completely clogged or has suffered extensive deterioration						
	Plumbing - Leaking Faucet/Pipes	A steady leak that is adversely affecting the surrounding area						
	Range Hood/Exhaust Fans - Excessive Grease/Inoperable	A substantial accumulation of dirt or grease that threatens the free passage of air						
	Range/Stove - Missing/Damaged/Inoperable	One or more burners are not functioning or doors or drawers are impeded or on gas ranges pilot is out and/or flames are not distributed equally or oven not functioning						
	Refrigerator-Missing/Damaged/Inoperable	The refrigerator has an extensive accumilation of ice or the seals around the doors are deteriorated or is damaged in any way which substantially impacts its performance						
	Sink - Damaged/Missing	Any cracks in sink through which water can pass or extensive discoloration over more than 10% of the sink surface or sink is missing						
Laundry Area (Room)	Dryer Vent - Missing/Damaged/Inoperable	The dryer vent is missing or it is not functioning because it is blocked. Dryer exhaust is not effectively vented to the outside						
Lighting	Missing/Inoperable Fixture	A permanent light fixture is missing or not functioning, and no other switched light source is functioning in the room						
Outlets/Switches	Missing	An outlet or switch is missing						
	Missing/Broken Cover Plates	An outlet or switch has a broken cover plate over a junction box or the cover plate is missing						
Patio/Porch/Balcony	Baluster/Side Railings Damaged	Any damaged or missing balusters or side rails that limit the safe use of an area						
Smoke Detector	Missing/Inoperable	Smoke detector is missing or does not function as it should						
Stairs	Broken/Damaged/Missing Steps	A step is missing or broken						
	Broken/Missing Hand Railing	The hand rail is missing, damaged, loose or otherwise unusable						
Walls	Bulging/Buckling	Bulging, buckling or sagging walls or a lack of horizontal alignment						
	Damaged	Any hole in wall greater than 2 inches by 2 inches						
	Damaged/Deteriorated Trim	10% or more of the wall trim is damaged						
	Peeling/Needs Paint	10% or more of interior wall paint is peeling or missing						
	Water Stains/Water Damage/Mold/Mildew	Evidence of a leak, mold or mildew covering a wall area greater than 1 foot square						
Windows	Cracked/Broken/Missing Panes	Any missing panes of glass or cracked pains of glass where the crack is either greater than 4" and/or substantial enough to impact the structural integrity of the window pane						
	Damaged Window Sill	The sill is damaged enough to expose the inside of the surrounding walls and compromise its weather tightness						
	Missing/Deteriorated Caulking/Seals/Glazing Compound	There are missing or deteriorated caulk or sealswith evidence of leaks or damage to the window or surrounding structure						
	Inoperable/Not Lockable	Any window that is not functioning or cannot be secured because lock is brocken						
	Peeling/Needs Paint	More than 10% of interior window paint is peeling or missing						
	Security Bars Prevent Egress	The ability to exit through the window is limited by security bars that do not function properly and, therefore, pose safety risks						

Housing Opportunities for People with AIDS

(HOPWA) 2025 Action Plan-Five-Year Strategic Plan for 2024-2028 Updated For Program Year 2025

Oklahoma Housing Finance Agency HOPWA Development Team 100 N.W. 63rd, Suite 200 P.O. Box 26720 Oklahoma City, OK 73126-0720 405/419-8275

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Action Plan for Addressing Housing for People with HIV/AIDS

The Oklahoma Housing Finance Agency (OHFA), in its role as a housing service provider for low-income persons, is making \$504,209 available during the program year April 1, 2024, to March 31, 2025 (PY2024). This budgeted amount does not include amounts appropriated under the Housing Opportunities for People with AIDS (HOPWA) Program for the City of Oklahoma City or the City of Tulsa. All funds will be used to ensure housing for persons living with HIV/AIDS is an essential component of the Continuum of Care approach. Priority will be given to projects that target low-income individuals living with HIV/AIDS in Oklahoma, who are either currently homeless or in eminent danger of becoming homeless.

OHFA has designated its HOPWA Program to support:

- Project or tenant-based rental assistance, including assistance for group housing;
- Short-term emergency rent and utility payments to prevent eviction or loss of services;
- Supportive services which include, but are not limited to: health and mental health, substance abuse, child care, assessment and case management, nutrition, intensive medical care, assistance in accessing federal, state, and local programs, and assistance in locating permanent housing;
- Resource identification to establish, coordinate, and develop housing assistance to eligible persons;
- Technical assistance in establishing and operating a community residence, including planning and other pre-construction activities;
- Operating costs for housing;
- Acquisition, rehabilitation, conversion, or lease of buildings used in the project; and
- Administrative expenses.

Funds Distribution

Ten percent (10%) of the allocation will be used for Administrative costs that will be shared with the Project Sponsors. Sixty percent (60%) of the allocation maybe distributed to Tulsa Cares, Inc. to serve the Eastern region. Thirty percent (30%) of the allocation maybe distributed to RAIN, OK to serve the Western region. OHFA is seeking additional Project Sponsors to administer the HOPWA program.

2024 Program Goals

Program goals are as follows:

Western Oklahoma

Short-term rent thirty-five (35) households Tenant – Based Rental assistance fifteen (15) households Supportive Services fifteen (15) households Permanency Planning five (5) households

Eastern Oklahoma

Short-term rent eleven (11) households Tenant – Based assistance five (5) households Permanency Planning five (5) households Supportive Services sixty-five (65) households

EXHIBIT 1: PROGRAM ABSTRACT

The State of Oklahoma is proposing to utilize *Housing Opportunities for People with AIDS* (HOPWA) FY 2025 program funds to ensure that housing becomes an essential component of the continuum of care for persons living with HIV disease in our State. The proposed plan seeks to address both short and immediate housing needs, and to build a foundation to meet future housing needs. The plan consists of statewide rental assistance including emergency, short term and long-term assistance and a utility bill assistance program combined with mental health and intensive case management services. Up to approximately one-fifth of Oklahoma's total award could be realigned for other eligible activities (e.g., rehabilitation, acquisition). This plan strives to develop a program that will provide housing and supportive services to those persons who have the fewest resources to access these services and those who have the greatest need. It is essential that low-income individuals living with the HIV disease be able to access available direct care resources in the most accommodating environment possible rather than negotiating through a traditional bureaucracy.

EXHIBIT 2: PROGRAM DESCRIPTION

Characteristics of Eligible Persons:

Persons to be served by the proposed activities of this plan include the men, women and children of our State who are living with and/or affected by HIV disease.

Although the HIV/AIDS epidemic in Oklahoma may not reflect the alarming number of cases observed in larger epicenters, this disease has nonetheless had a devastating effect on those persons living with HIV. From the first reported case in 1983, the needs of persons living with HIV in our State have far exceeded the resources available. As a low-incident state, Oklahoma has struggled to secure funding for services, often to discover we were ineligible for funds due to our lower number of reported AIDS cases. Despite this, Oklahoma service providers have been successful in developing a service delivery system that continues to be strengthened as more resources become available.

HIV/AIDS in Oklahoma:

From the Oklahoma State Department of Health, as of December 31, 2021 (last update available):

People Living with HIV/AIDS (PLWHA) 2021

- •At the end of 2021, an estimated 7,477 people were living with HIV/AIDS (PLWHA) in Oklahoma.
- •Males accounted for 6,132 cases of the HIV/AIDS cases living in Oklahoma, while females accounted for 1,345 cases.
 - •The highest number of PLWH 20-29 years of age (2,730 people).
 - •In 2021, Whites had the highest number of PLWHA 3,764, people.
 - •Of the 7,477 PLWHA in 2021, 4,189 cases self-reported as MSM.

Deaths among HIV/AIDS 2021

- •In 2021, 62 deaths occurred among persons diagnosed with HIV/AIDS in Oklahoma.
- ■In 2021 people who were 50-59 years of age at the time of death accounted for the largest number of deaths (23 cases).
- ■Non Hispanic White had the highest death rate in 2021 at 34 deaths, and accounted for 54.84% of deaths in 2021 among all racial and ethnic groups.

HIV/AIDS Cases Diagnosed in OKC Metropolitan Statistical Area (MSA) 2021

- Men Who Have Sex with Men (MSM) accounted for 56% of persons living HIV/AIDS.
- •Males accounted for 83% of the persons living HIV/AIDS in the OKC MSA.
- •Age group 45-54 years had the highest percentage (24%) of persons living with HIV.

HIV/AIDS Cases Diagnosed in Tulsa Metropolitan Statistical Area (MSA) 2021

- •Men Who Have Sex with Men (MSM) accounted for 57% of persons living HIV/AIDS.
- •Males accounted for 82% of the persons living HIV/AIDS in the OKC MSA.
- •Age group 55-64 years had the highest percentage (25%) of persons living with HIV.

OVERVIEW

At the end of 2021, an estimated 7,477 cases were living with HIV/AIDS in Oklahoma.

BY SEX

Males accounted for 82% (6,132) of the HIV/AIDS cases living in Oklahoma, while females accounted for 18% (1,345). The rate of males (6,132) living with HIV/AIDS in Oklahoma was 4.6 times higher than the rate of females (1,345).

BY RACE/ETHNICITY

At the end of 2021, Whites had the highest rate of living HIV/AIDS cases (3,764 among the racial/ethnic groups in Oklahoma. Blacks (1,849) had the second highest rate Of the 7,477 persons living with HIV/AIDS at the end of 2021:

- 3,764 were White,
- 1,849 were Black,
- 899 were Hispanic,
- 410 were American Indian/Alaska Native,
- 129 were Asian/Pacific Islander, and
- 426 were Multi Race.

BY MODE OF TRANSMISSION

Of the 7,477 HIV/AIDS cases living in Oklahoma:

- 4,189 were men who have sex with men (MSM),
- 887 were heterosexual contact,
- 604 were MSM and injection drug use (IDU),
- 603 were IDU.
- 70 were perinatal,
- 19 were blood recipients, and
- 1,105 were no reported risk or no identified risk.

BY GEOGRAPHY

Approximately 72% of the living HIV/AIDS cases reside in four counties: Oklahoma (2,856Oklahoma County had the highest rate of cases living with HIV/AIDS (3,262). Tulsa County had the second highest rate of cases living with HIV/AIDS cases (1,914).

The Oklahoma City MSA accounted for nearly half of the living HIV/AIDS cases (3,415; 45.67%). The Tulsa MSA accounted for 30.17% (2,256) of the living cases. The Lawton MSA accounted for 3.52% (263) of the living cases. Of the living HIV/AIDS cases, 19.05% (1,424) resided in counties outside of these MSAs in Oklahoma

Regardless of the location of HIV/AIDS cases as set forth above, Project Sponsors of eligible activities are required to ensure access to services throughout the state.

Eligibility:

Experience in other HIV-AIDS service delivery programs has proven how critical well-defined, concrete guidelines for eligibility are to the success of any plan. Criteria used to determine eligibility for services vary to some degree within the service areas. Basic considerations in determining eligibility for any program services will utilize the following criteria:

- HIV/AIDS Status
- Current Housing/Living Situations
- Income Levels

HIV/AIDS Status and Current Housing Living Situation:

Five levels of priority have been established to determine eligibility based on HIV/AIDS status and current housing/living situation:

Five Levels of Priority:

- 1) Homeless individuals (AIDS & HIV+)
- 2) Individuals who have received an AIDS diagnosis and are seeking to get new housing (they would go to Priority 1 if they are at eminent risk of becoming homeless).
- Individuals who have received an AIDS diagnosis and are seeking assistance where they are living (they would go to Priority 1 if they are at eminent risk of becoming homeless).
- 4) Individuals who have received an HIV+ diagnosis and are seeking to get new housing (they would go to Priority 1 if they are at eminent risk of becoming homeless).
- 5) Individuals who have received an HIV+ diagnosis and are seeking assistance where they are living (they would go to Priority 1 if they too were at eminent risk of becoming homeless).

Income Levels:

Recipients of HOPWA assistance must be low-income as defined by HUD. Households receiving HOPWA assistance must earn no more than 80% of the Area Median Income (AMI) established by HUD for the county in which they reside. Out-of-pocket documented medical expenses are deducted from their gross monthly income.

The following are links to the HUD-established HOPWA Income Limits and the HUD 80% of AMI limits:

https://www.hudexchange.info/resource/5332/hopwa-income-limits/

https://www.huduser.gov/portal/datasets/il.html#year2023

Medical expenses do not include over-the-counter medications and/or supplies. Any allowable medical expenses must be documented through either paid receipt or check stub.

Mental health and case management services will use these same eligibility requirements to establish priority in service delivery to ensure those persons who are most in need receive the services that are available. Staff members providing these services will be allowed to extend services to other persons living with HIV disease as their workload permits.

The effectiveness of the established eligibility criteria will be evaluated throughout the year to ensure it continues to meet the needs of persons in need of program services. Adjustments will be made by the grant administrator if indicated.

General Locations and Costs of Proposed Activities

Location:

The purpose of this plan is to ensure the provision of resources and incentives to devise short and long-term comprehensive strategies for meeting the housing needs of low-income individuals and their families who are living with HIV disease. Given the rural nature of Oklahoma's population, these strategies must include a method of comprehensive service delivery throughout the state. ITB guidelines require successful contractors to submit plans that include service provision to Western Oklahoma, Eastern Oklahoma, or the entire state. Western and Eastern Oklahoma are defined by area code, Western being the 405 and 580-usage area and Eastern, the 539/918-usage area. This method of division is widely used within this state to assign service delivery responsibility. It also mirrors the current division of service responsibility assigned to the HIV CARE Consortia within the state. Oklahoma City, in the western half of the state, and Tulsa, in the eastern half of the state, will serve as "hubs" of service delivery.

Cost:

The State of Oklahoma has been awarded a total of \$\frac{\$598,558}{}\$ HOPWA funds for use in program year 2024. We anticipate level funding for program year 2025. Analysis of

epidemiological data has been utilized to determine an equitable distribution of funds.

Western Oklahoma will be eligible to receive approximately 30% of State and City funding, which would include the funding available exclusively for the City of Oklahoma City while the City of Tulsa; and Eastern Oklahoma will be eligible to receive the remaining 60%. Funding awards are granted through a competitive bidding process whereby an ITB is developed by OHFA and distributed to potential bidders. The ability to provide specified services of sufficient quality and quantity have been evaluated and evidence has been provided demonstrating their abilities to cooperate with a network of public and private agencies providing complementary services concerning HIV disease.

Urgent Housing Needs

As the need for stable housing resources has become more pressing, it is evident that Oklahoma does not have adequate resources to meet these needs. HOPWA funds represent an opportunity to provide resources and incentives to devise long-term comprehensive strategies for meeting housing needs of persons with AIDS in our state. Initial responses to the AIDS epidemic focused on who, what, when, where and how of this devastating diseases' evolution and its effect on individuals. Now the focus is on who, what, when, where, and how of providing a better quality of life for the same individuals. One emerging concern is how and where persons living with AIDS will find stable housing. We now know enough about this disease to recognize how critical stable living conditions are to the medical management of HIV/AIDS. Traditional resources available to homeless or marginally homeless individuals often are not a viable option for people with HIV/AIDS. For example, shelters often pose infection control problems that place persons with HIV disease at risk for other infections (e.g., tuberculosis). They also may not have safeguards on confidentiality sufficient to protect the rights of individuals living with HIV/AIDS or staff trained to deal with HIV-related problems. OHFA worked with a variety of agency representatives, community leaders, and individuals living with HIV disease to develop a comprehensive plan that would provide the most critically needed services to those least able to meet those needs without assistance.

OHFA met with representatives of the two HIV CARE consortia responsible for the continuum of care for individuals living with HIV disease within the state as well as other state agencies responsible for related care, to set priorities for program activities. Years of first-hand experience, results of the housing needs assessment, and a review of case history information, led to a decision to provide short-term rent, rental, and utility bill assistance program with a comprehensive and intensive mental health and case management component. The rental assistance and short-term rent and utility bill assistance programs were designed to meet the immediate housing needs of persons living with HIV disease and their families who are homeless or in eminent danger of becoming homeless. Individuals in immediate need (e.g., currently homeless or at risk of becoming homeless in the near future) will be eligible to utilize the short-term rental assistance program for up to 21 weeks. Case managers will work to ensure that Housing Quality Standards are met in all housing units in the event that rental assistance is needed for a longer period of time. Clients of the short-term rental assistance program will be able to

access the longer-term rental assistance component. Case managers will also work to facilitate access to Section 8 Housing and other long term housing solutions when and where appropriate. Past state plans required payments for utility bills, short-term rent and/or long-term rental assistance could not exceed a cap of \$4,848 per person per year. The total maximum for short term was \$2,020 with the cap for long term set at \$3,272. There is no longer a need to limit these resources. Additionally, even though the HOPWA Program has been successful over the past several years a housing consultant may be utilized to evaluate program efficiencies. And, although not anticipated, OHFA reserves the right to realign program funding in the event the pursuit of other eligible housing activities such as acquisition or rehab becomes a more appropriate approach to meeting the housing needs as outlined.

Other Points of Agreement:

- Need for collaborative efforts to achieve an integrated service delivery system statewide.
- Need to diminish barriers to access of care for persons with AIDS (e.g., bureaucratic red tape).
- Need for continuity of care; diminish fragmentation of service delivery.
- Need to address the reluctance of traditional health and service delivery systems to provide services to individuals living with HIV disease.

Project Sponsors Selection/Process:

Project Sponsors will be selected in 2024 through an Invitation to Bid (ITB) process conducted by OHFA. Copies of the ITB will be available by contacting OHFA. The ITB will be used to select Project Sponsors to provide rental assistance, short-term rent and utility bill assistance and administer a supportive services program. Grant Agreements for Project Sponsors are renewable on an annual basis.

The ITB will be developed based on:

- Prior experience with HIV service delivery programs within Oklahoma
- needs assessment
- models from housing programs in other areas of the country
- community input

Eligibility requirements and the evaluation criteria to be used by reviewers in the selection process will be outlined in the ITB. A review committee maybe established that includes representatives from agencies not eligible to apply for funds, but involved in the delivery of services to individuals living with HIV disease.

Successful applicants will be required to ensure complete coverage of an entire services area (e.g., the 405 and 580 area codes and/or the 539/918 area code).

Project Promotion/Accessibility:

Methods of informing eligible persons of the housing assistance and supportive services available are integrated into the service delivery plan. Project Sponsors will be required to develop and implement effective strategies to increase awareness of, and accessibility to, services for clients.

These strategies should include, but not be limited to, the following:

- media coverage (e.g., radio, television, newspapers)
- newsletters, journals or other publications that are widely read by persons living with HIV disease and their service providers
- inclusion in resource directories
- pamphlet describing program placed at HIV-related service provider sites (e.g., Social Security Offices, Food Stamp Offices)
- presentations at coalition and committee meetings attended by HIV service community and/or individuals living with HIV
- outreach
- referrals by service provider network

Accessibility to the programs will be enhanced by mobile case managers who will be working within the community on a full-time basis. For instance, case managers could complete the application process with any potential client at the site of convenience for the client rather than at a designated office. Sponsors will utilize existing HIV service delivery infrastructure to enhance statewide accessibility to clients. State agencies such as Oklahoma State Department of Health (OSDH), the Department of Human Services (DHS), and the Department of Mental Health & Substance Abuse Services (DMHSAS) who have facilities serving persons with HIV disease throughout the 77 counties may be used as points of access to services.

Coordination/Collaboration:

OHFA developed the state plan for HOPWA funds through the cooperation and collaborative efforts of other state agencies including continuum of care agencies, community-based organizations, and the Oklahoma HIV Treatment and Care Consortium (OHTCC).

Specific examples of these efforts include:

- Housing Needs Assessment developed by both the OSDH and the OHTCC and distributed to HIV-related service community-based organizations throughout the state.
- Program planning and development involving the state HIV CARE Consortia; DHS;
 Oklahoma Department of Corrections; OSDH; Oklahoma Department of Education;
 Oklahoma Department of Veteran's Affairs and DMHSAS.
- Technical assistance from OSDH and Department of Central Services (now the Office of Management and Enterprise Services) in preparation of the HOPWA ITB.
- Mutual agreement by planning group that letters of commitment will be provided to ensure integrated service delivery.

Other measures to ensure future coordination and collaboration:

- Requirement that Project Sponsors utilize existing HIV service delivery infrastructure in provision of housing services.
- Evaluation methods that require input from community (e.g., patient satisfaction survey, public comment meetings).

EXHIBIT 3: PROGRAM SUMMARY BUDGET

Eligible Activities For more detail see	Short Term Facilities SRO D			ellings	Reside	Community Residences		Other Housing Activities		Non-Housing Based Activities		
574.300 of the program	HOPWA	Other	HOPWA	Other	HOPWA	Other	HOPWA	Other	HOPWA	Other	HOPWA	Other
regulations.	Funds	Funds	Funds	Funds	Funds	Funds	Funds	Funds	Funds	Funds	Funds	Funds
Acquisition												
Rehab/Conversion												
Lease												
Repairs												
New Construction												
Operating Costs							<mark>22,830</mark>				<mark>22,830</mark>	
Technical Assistance												
Supportive Services Associated With Housing							205,334				<mark>205,334</mark>	
Supportive Services Not Associated With Housing												
Housing Information												
Resources Identification												
Rental Assistance												
Short Term Rent, Mortgage, & Utility Payments							63,227				63,227	
Grantee Administrative Expenses							<mark>171,468</mark>				<mark>171,468</mark>	
Project Sponsor Admin. Expenses							<mark>41,350</mark>				41,350	
Totals							504,209				504,209	
Instructions: Enter the amount of funding proposed for each eligible activity in the appropriate column. For example, if a building will be acquired to be used for a community residence, the amount of funds involved should be entered in the "Community Residences" column across from "Acquisition." If an eligible activity is not associated with a particular type of housing, the "Non-Housing Based Activities" column should be used. Shaded boxes indicate that HOPWA funds cannot be used for those purposes.							Total HOPWA Funds (should equal formula allocation) Total Other Funds Total Program		504,209			
									Funds	alli	JU4,2U3	

EXHIBIT 4: DESCRIPTION/EVALUATION OF SUPPORTIVE SERVICES

Supportive Services Associated With Housing:

Supportive services associated with housing will be provided by case managers assigned to work throughout the State. The main objective will be to complete a housing plan that would include both long and short-term housing goals. In addition, case managers will provide the following types of client services:

- assist in the completion of application for housing services
- determine eligibility
- assist with financial planning
- secure cooperation of applicant's landlord and utility company representatives
- provide assistance to ensure housing program resources are more easily accessible and available
- evaluate rental units for Housing Quality Standards (HQS)
- assist with transportation
- assist with referrals and provide outreach

Supportive Services Not Associated With Housing:

Supportive services not associated with housing will be provided by the case managers assigned to work throughout the State and by the mental health therapists. Services will include a broad range of mental health services, as well as case management services unrelated to housing. These services would include, but not be limited to:

- crisis intervention
- support groups
- individual, couple and family counseling
- referrals to appropriate mental health resources including drug and alcohol treatment
- referrals for other supportive living resources
- transportation
- major health crisis intervention
- food, dietary, and nutrition services

Evaluation and Monitoring of Program Services Will Consist of:

- monthly reports of demographic characteristics of clients and types of services rendered
- service provider satisfaction surveys
- client satisfaction surveys
- programmatic review performed by outside technical assistance