

State of Oklahoma Citizen Participation Plan

2025 Annual Action Plan Update



OKLAHOMA
Commerce

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Purpose

The Consolidated Plan is a U.S. Department of Housing and Urban Development (HUD) requirement that combines the planning and application process for the following HUD grants: the Community Development Block Grant (CDBG), the Emergency Solutions Grants Program (ESG), the HOME Investment Partnerships Program (HOME), Housing Opportunities for People with AIDS (HOPWA), the Housing Trust Fund (HTF) and any new funding that may become available.

In effect, the Consolidated Plan examines the current housing situation, explores the housing and community development needs of the state, and sets priorities for spending the HUD grant funds. Public comment is a vital component of exploring the state's housing and community development needs and setting spending priorities. The Consolidated Plan offers the opportunity for strategic statewide planning to occur alongside citizen participation.

HUD requires development of a Citizen Participation Plan that outlines policies and procedures of how the state intends to solicit citizen participation. The primary goal is to provide citizens, especially low- and moderate-income residents, an opportunity to participate in an advisory role in the planning, implementation, and assessment of the programs and projects. The following information is to outline and define the citizen participation process.

The agency contact for the Consolidated Plan and this Citizen Participation Plan is:

Kellon Dixon, CDBG Director of Programs Planning, Community Development
Oklahoma Department of Commerce
900 N. Stiles Ave.
Oklahoma City, OK 73104-3234 (405) 215-5626
kellon.dixon@okcommerce.gov

Citizen Participation

The State of Oklahoma constructs a thorough citizen participation plan that encourages citizens to participate in the development of the five-year consolidated plan and subsequent annual action plans. The State's citizen participation plan was developed in accordance with the requirements listed in 24 CFR §91.110 (Consultation; States) and 24 CFR Part §91.115 (Citizen Participation Plan for States). The plan provides citizens (including minorities, the disabled and non-English speaking persons), units of local government, and other interested parties a reasonable opportunity to comment on the plan.

Citizen Participation Consultation

When preparing the Annual Action Plan updates to the Consolidated Plan, or the development of the Assessment of Fair Housing (AFH) consultation is made with public and private agencies that provide housing, health services and social services, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons. Consultation is also made with state based and regionally based organizations that represent protected class members and organizations that enforce fair housing laws.

This process shall also encourage the participation of local, regional, and statewide institutions including Continuum of Care, businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations.

The Annual Action Plan update to the Consolidated Plan, or the Assessment of Fair Housing (AFH) will be available for public review at the Oklahoma Department of Commerce website (okcommerce.gov) and copies will be available by direct internet download or email per request. Announcements are also sent through the New Pioneer, which serves as ODOC's Community Development newsletter. This newsletter reaches 600 communities, 77 Counties, Community Action Agencies, Public Housing Authorities, Council of Governments, and other state agencies. The New Pioneer newsletter directly emailed to approximately 6,500 email addresses. Additionally, CDBG and ESG program announcements are released through GovDelivery and Continuum of Care Networks.

Public Notification

Public meetings will be held prior to drafting the Annual Action Plan update to the Consolidated Plan and Assessment of Fair Housing (AFH) to gather input regarding proposed changes. The meetings will be held in person and online to accommodate interested parties. In-person meetings will be geographically centralized and handicap accessible within the Oklahoma City metropolitan area. Oklahoma City serves as the geographic center of the State. Notifications for the Annual Action Plan update to the Consolidated Plan and Assessment of Fair Housing (AFH) Public Input Session and Public Hearing will be posted to the Oklahoma Department of Commerce website (okcommerce.gov) at least thirty (30) days prior to the scheduled event.

Once drafted and before adoption, the proposed Annual Action Plan update to the Consolidated Plan and Assessment of Fair Housing (AFH) will be made available to interested parties for a

comment period of at least thirty (30) days. A public hearing will be conducted before the 30-day comment period to gather comments on the proposed plan. Citizens will be notified of the proposed plan's availability via Oklahoma Department of Commerce website (okcommerce.gov). Announcements are also sent through the New Pioneer and Gov Delivery.

The proposed Annual Action Plan update to the Consolidated Plan and Assessment of Fair Housing (AFH) will be available on the Oklahoma Department of Commerce's website at (okcommerce.gov) for the full public comment period. Copies of the proposed plan will also be available from ODOC during the public comment period if lack of internet and/or printing service is not available.

Comments from individuals or groups received in writing or at the public meetings will be considered. A summary of the written public comments and will be included in the final Annual Action Plan update to the Consolidated Plan Assessment of Fair Housing (AFH) as applicable.

Citizen Participation – Consolidated Plan and Annual Action Plan

The Consolidated Plan is designed to be a collaborative process whereby the State establishes a unified vision for community development actions. It offers the State the opportunity to shape the various housing and community development programs into effective, coordinated community development strategies. The vision outlines the state's overall policies and objectives for housing and community development throughout the state. It also creates the opportunity for strategic planning and citizen participation to take place in a comprehensive context, and to reduce duplication of effort at the state level and serves as a management tool that helps the state, local governments, and citizens assess performance and track results.

Before the State adopts the consolidated plan, citizens, public agencies and other interested parties are given access to information about the programs involved in the plan, including the amount of assistance the State expects to receive and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low-to-moderate income, plans to minimize displacement of persons, and to assist any persons displaced.

For the public meeting on the Annual Action Plan update to the Consolidated Plan, the State will make available to the public, residents, public agencies and other interested parties:

1. The amount of HUD assistance expected to be received by program;
2. The range of activities that can be undertaken including the estimated amount that will benefit persons of low and moderate income;
3. Plans to minimize displacement of persons and assist any persons displaced (as applicable);

4. Opportunity to identify and discuss barriers to affordable housing and impediments to fair housing choice;
5. An anticipated time schedule for receiving public comments and submission of the Annual Action Plan update to the Consolidated Plan to the U.S. Department of Housing and Urban Development (HUD); and
6. The State's Citizen Participation Plan.

FY 2024 – FY 2028 Consolidated Plan (2025 Annual Update) Cycle:

HUD provided the following waiver in regard to the COVID-19 pandemic. HUD recognizes that efforts to contain COVID-19 require limiting public gatherings, such as those often used to obtain citizen views and respond to proposals and questions. Therefore, HUD waives provisions found at 24 CFR 91.105(e)(1) and (2), 24 CFR 91.115(b)(3)(i), 24 CFR 91.401, and 24 CFR 570.431, 570.441, and 570.486 (a)(5) to the extent necessary to establish the following alternative requirement:

For as long as national or local health authorities recommend social distancing and limiting public gatherings for public health reasons, CDBG, ESG, HOME, HTF, and HOPWA grantees, units of general local government receiving CDBG funds from state, or insular area CDBG grantees, may hold virtual hearings in lieu of in-person public hearings to fulfill public hearing requirements imposed by 42 USC 12707(a)(3) and the regulations at 24 CFR part 91 and 24 CFR part 570, or by the grantee's citizen participation plan for the preparation of FY 2021 Consolidated Plans, Action Plans and any substantial amendments thereto or to prior year plans.

For each virtual hearing, a grantee shall provide reasonable notification and access for citizens in accordance with the grantee's certifications, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses. Therefore, grantees may use online platforms to hold virtual hearings that provide public access to questions and responses and provide timely responses from local officials.

Additionally, grantees must take appropriate actions to encourage the participation of all residents, including the elderly, minorities, persons with limited English proficiency, as well as persons with disabilities, consistent with the jurisdiction's citizen participation plan. Grantees may use online platforms such as Zoom, Slack, Facebook Live, Google Meet, and Microsoft Teams to hold virtual hearings that facilitate public access to all questions and responses and provide timely responses from local officials, so long as such platforms ensure equal access and opportunity for all residents to participate in the process. Grantees should be aware of the difference in functionality with respect to the various types of technology available in order to

ensure that any online hearings comply with fair housing and civil rights requirements. For example, Zoom may have functionality that provides greater accessibility compared to other platforms. Grantees should also consider other practices and protocols that expand upon the procedures set forth in the citizen participation plan, which may be necessary to ensure access to the citizen participation process. Such practices include the preparation and distribution of accessible and appropriate language versions of any prepared materials in advance of a virtual hearing.

July 25, 2024:

Informal Public Input Session held by OHFA. For a copy of the records related to the informal public input session, please contact OHFA.

August 28, 2024:

Notice of the formal Public Input and Public Hearing Sessions was released via Media Notice in English and Spanish.

September 3-4, 2024:

Notice of the formal Public Input and Public Hearing Sessions was released via GovDelivery, the New Pioneer, and posted on the Oklahoma Department of Commerce website at OKCommerce.gov.

October 3, 2024, 10 A.M.:

Formal Public Input Session: (CDBG, ESG, HOME, HTF, & HOPWA programs)
A draft of the proposed plans was posted online for public review at OKCommerce.gov.
Meeting Link: <https://okcommerce.zoomgov.com/j/1610708274>
Meeting ID: 160 070 8274

November 7, 2024, 2:00 P.M.:

Formal Public Hearing: (CDBG, ESG, HOME, HTF, & HOPWA programs)
Meeting Link: <https://okcommerce.zoomgov.com/j/1604003859>
Meeting ID: 160 400 3859

November 7, 2024 – December 9, 2024:

Public Comment Period

Public involvement in the development of the Consolidated Plan includes Private Citizens, Various Community Action Agencies (CAAs), various sub-state planning districts/Councils of Governments (COGs), various public housing authorities and emergency shelters, various state agencies, and others.

Citizen Participation - Consolidated Annual Performance Evaluation Report (CAPER)

The Consolidated Annual Performance Evaluation Report (CAPER) is used by grantees to report on accomplishments and progress towards Consolidated Plan goals. Before the CAPER is submitted to HUD, the report will be made available to interested parties for a comment period of no less than fifteen (15) days. This comment period will begin (15) days prior to the CAPER's submission date to HUD. Notice of the CAPER's availability will be posted online at the Oklahoma Department of Commerce's website (okcommerce.gov) no later than the day the CAPER's comment period begins.

During the public comment period, the CAPER will be available for public review at the Oklahoma Department of Commerce website (okcommerce.gov) and copies will be available by direct internet download or email per request.

Comments will be considered from individuals or groups received in writing. A summary of the written comments will be included in the final CAPER.

Citizen Participation – Assessment of Fair Housing (AFH)

For the public meeting on the Assessment of Fair Housing (AFH), the State will make available to the general public and interested parties:

1. Any HUD-provided data and other supplemental information the State plans to incorporate into the AFH;
2. The proposed strategies and actions for affirmatively furthering fair housing;
3. A summary of the AFH describing the content; and
4. During the public comment period, the AFH will be available for public review at the Oklahoma Department of Commerce website (okcommerce.gov) and copies will be available by direct internet download or email per request.

Public Comment

The State will receive comments on the proposed Citizen Participation Plan during a thirty (30) day comment period. In the event that there are substantial amendments to this Citizen Participation Plan, an additional comment period of at least fifteen (15) days will be allotted. This proposed Citizen Participation Plan (and, if necessary, the substantially amended Citizen Participation Plan) will be made available to the public before the fifteen (15) day comment period begins. As applicable, the aforementioned comment period standards will remain in place unless otherwise specifically altered by regulation in the Federal Register Notice such as in the case of a HUD new program.

Upon request, the Citizen Participation Plan will be made available in a format accessible to persons with disabilities and/or special needs. The State will make reasonable accommodations in order to facilitate persons with disabilities and/or special needs.

The State will consider any comments or views received in writing or expressed orally at the public meeting in preparing the proposed Annual Action Plan update to the Consolidated Plan or the proposed Assessment of Fair Housing (AFH). Upon receiving a comment, the State will provide a timely, substantive written response addressing the comment within fifteen (15) working days. Depending on the nature of the comment and depth of the issue, an extended response time may be required by the State in order to obtain the required regulatory guidance or obtain the appropriate level of HUD staff assistance. Should an extended response time be required, the State will notify the individuals or entities making the comment of the following:

1. The comment has been received by the State;
2. The comment is of a nature that cannot be reasonably responded to within fifteen (15) working days.
3. Provide an appropriate staff contact name, telephone number, and email address in order that the progress on the response/solution can be monitored or additional inquiries can be made as applicable.

Comments regarding the 2025 State Annual Action Plan can be located in **Attachment A**. The comment period was from November 7, 2024, through December 9, 2024. Each agency addresses responses to each comment, either the Oklahoma Department of Commerce Community Development Division (ODOC/CD) or the Oklahoma Housing Finance Agency (OHFA).

Amendment Criteria

Per 24 CFR §91.505, the following criteria will constitute either a Substantial Amendment or Non- Substantial Amendment to the Annual Action Plan update to the Consolidated Plan, or Assessment of Fair Housing (AFH) as applicable:

Substantial Amendment Criteria

- a) A change in the allocation priorities or a change in the method of distribution of federal funds that was not previously discussed in the plan.
 1. A change in the application process for Units of General Local Governments, non-profits, and other eligible entities.
 2. A change in selection criteria.

3. A change in an allocation amount exceeding ten (10) percent within any individual program component of the Consolidated Plan (CDBG, ESG, HOME, HTF, and HOPWA).
 4. An addition or deletion of a funding priority as defined in the Consolidated Plan.
- b) The addition of a funding category not previously described in the plan, using funds from any federal program covered in the plan.
 - c) A material change in circumstances affecting the information on which the AFH is based, to the extent that the analysis of the fair housing contributing factors, or the priorities and goals of the AFH no longer reflect actual circumstances.

Non-Substantial Amendment Criteria

- a) A change in the purpose, scope, location, or beneficiaries of an individual sub-recipient activity funded by any federal program covered in the plan.
- b) CDBG Program: Re-Use Funds – Under the State’s CDBG Program, the definition of re-use is the funds available from cancellation of projects; from projects completed under budget; from funds designated but not expended; the Community Development loan repayment program income or from funds allocated by this Plan in a set-aside but not utilized. 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 or federally declared disaster areas. All re-use funds must be used for CDBG eligible activities and must comply with applicable State and Federal rules and regulations.

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

Consideration of Public Comment on Amended Plans

Per 24 CFR §91.505, in some instances, minor changes and updates warrant non-substantive amendments to the Annual Action Plan update to the Consolidated Plan and Assessment of Fair Housing (AFH). ODOC/CD reserves the right to make non-substantive changes to the Annual Action Plan update to the Consolidated Plan and Assessment of Fair Housing (AFH) without opening a public comment period. As defined in 24 CFR Part §91.505, the State may submit a copy of each amendment to HUD as it occurs, or at the end of the program year.

In the event of a Substantial Amendment to the Annual Action Plan update to the Consolidated

Plan or Assessment of Fair Housing (AFH), the proposed amended plan will be made available to interested parties for a comment period of no less than thirty (30) days unless otherwise required by regulation such as contained in the Federal Register. The notice of the public comment will be available for viewing on the Oklahoma Department of Commerce's website (okcommerce.gov) no later than one (1) day prior to the beginning of the amended plan's comment period.

The amended Plans will be available for viewing and electronic download on Oklahoma Department of Commerce's website (okcommerce.gov) during the public comment period.

Comments on the amended Annual Action Plan update to the Consolidated Plan or Assessment of Fair Housing (AFH) by individuals or groups received in writing or at public meetings will be considered. A summary of the public comments received will be included in the final amended plans or Assessment of Fair Housing (AFH) as applicable.

Requirements for Local Governments Receiving CDBG Funds

Per 24 CFR §91.115(e), States are required to ensure that Units of General Local Governments (UGLGs) fully understand how Citizen Participation requirements will be met. Recipients of CDBG funds must comply with the Citizen Participation Plan requirements as found in 24 CFR §570.486. All applicants and recipients of grant funds shall be required to conduct all aspects of the program in an open manner with access to records on the proposed and actual use of funds for all interested persons. All records of applications and grants must be kept at the recipient's offices and be available during normal business hours. Any activity of the Grantee regarding the CDBG project, with the exception of confidential matters relating to housing and economic development programs, shall be open to examination by all citizens.

Citizens shall be provided adequate and timely information, so as to enable them to be meaningfully involved in important decisions at the various stages of the program, including at least:

- a. the determination of needs;
- b. the review of the proposed activities; and
- c. the review of past program performance, in the following manner:
 - 1. At least two public hearings shall be scheduled at times and locations felt to be most likely to make it possible for the majority of interested persons to attend without undue inconvenience, addressing the three items above. At least one hearing must be held to address items (a.) and (b.) above prior to the submission of the application for housing and/or non-

housing needs. Item (c.) must be addressed in a public hearing to review performance of the recipient in a previous program and must occur prior to closeout of any loan or grant for which performance evaluation has not occurred in a previous hearing.

2. Notification of any and all hearings shall be given a minimum of seven (7) working days in advance to allow citizens the opportunity to schedule their attendance. Notifications can be made in the form of notices placed in the local newspaper with the greatest distribution or may be conducted by posting notices where most practical for general public viewing. If notifications are posted, they must be posted in a minimum of three (3) public places. Additionally, notices may be posted via the internet by the participating Unit of General Local Government provided the website is available for public access. All hearings must be accessible to handicapped persons. Provisions for interpretation shall be made at all public hearings for non-English speaking residents if such residents are expected to be in attendance.

The chief elected official's office shall receive and relate to appropriate persons or groups any views or proposals submitted to aforesaid office within the following decision-making time. Any comment submitted in writing at any time should be answered in writing within fifteen (15) working days by the chief elected official's office. If the complaint is not resolved, it shall be referred to the governing body for final disposition.

Technical Assistance

The State will make available technical assistance as applicable to eligible citizens, local governments, nonprofit organizations, community groups, Community Housing Development Organizations (CHDOs), and any other organization developing proposals per written request.

The State will provide the Consolidated Plan and/or Annual Action Plan update, as adopted, substantial amendments, and the performance reports to the public, including materials in a form accessible to persons with disabilities, upon request. These documents are made available to the public electronically at (okcommerce.gov). In addition, to accommodate those with disabilities, a text telephone/teletypewriter (TTY) service is provided as an option. The communications assistant reads aloud the message typed to the other party and types the other party's voiced message and background sounds. This service is designed for people who are Deaf, Hard of Hearing or have a Speech Disability. This relay service is available in English-to-English (800-722-0353) and Spanish-to-Spanish (800-662-4955). Further directions on using this service can be found at: <https://hamiltonrelay.com/oklahoma/index.html>. These services can also be provided in the form of braille and audio tape upon request.

Access to Public Records

Per 24 CFR §91.115(g), citizens, public agencies and other interested parties will be provided access to information and records relating to the Consolidated Plan, the Annual Action Plan, Assessment of Fair Housing (AFH), and any other uses of assistance under the programs covered in the plan. In accordance with 24 CFR §570.490, the public will be provided reasonable access to housing assistance records, subject to state and local laws regarding privacy and obligations of confidentiality. The State is subject to the Oklahoma Open Records Act (51 O.S. § 24A). A formal Open Records Request for inquiries relating to public record access will be required in accordance with the Oklahoma Open Records Act (51 O.S. § 24A).

24 CFR §570.490 Recordkeeping requirements

(a) State records.

- 1) The State shall establish and maintain such records as may be necessary to facilitate review and audit by HUD of the State's administration of CDBG funds under §570.493. The content of records maintained by the State shall be as jointly agreed upon by HUD and the States and sufficient to enable HUD to make the determinations described at §570.493. For fair housing and equal opportunity purposes, and as applicable, such records shall include documentation related to the State's AFH, as described in 24 CFR part 5, subpart A (§5.168). The records shall also permit audit of the States in accordance with 2 CFR 200, subpart F.
- 2) The state shall keep records to document its funding decisions reached under the method of distribution described in 24 CFR 91.320(j)(1), including all the criteria used to select applications from local governments for funding and the relative importance of the criteria (if applicable), regardless of the organizational level at which final funding decisions are made, so that they can be reviewed by HUD, the Inspector General, the Government Accountability Office, and citizens pursuant to the requirements of §570.490(c).
- 3) Integrated Disbursement and Information System (IDIS). The state shall make entries into IDIS in a form prescribed by HUD to accurately capture the state's accomplishment and funding data, including program income, for each program year. It is recommended that the state enter IDIS data on a quarterly basis and it is required to be entered annually.

(b) Unit of general local government's record.

- 1) The State shall establish recordkeeping requirements for units of general local government receiving CDBG funds that are sufficient to facilitate reviews and audits of such units of general local government under §570.492 and §570.493. For fair housing

and equal opportunity purposes, and as applicable, such records shall include documentation related to the State's AFH as described in 24 CFR part 5, subpart A (§5.168).

(c) Access to records.

- 1) Representatives of HUD, the Inspector General, and the General Accounting Office shall have access to all books, accounts, records, reports, files, and other papers, or property pertaining to the administration, receipt and use of CDBG funds and necessary to facilitate such reviews and audits.
- 2) The State shall provide citizens with reasonable access to records regarding the past use of CDBG funds and ensure that units of general local government provide citizens with reasonable access to records regarding the past use of CDBG funds consistent with State or local requirements concerning the privacy of personal records.

(d) Record retention.

- 1) Records of the State and units of general local government, including supporting documentation, shall be retained for the greater of three years from closeout of the grant to the state, or the period required by other applicable laws and regulations as described in §570.487 and §570.488.

Public Complaints

Per 24 CFR §91.115(h), to comply with the requirements regarding public complaints, the State has designated an appropriate and practicable procedure to handle complaints from citizens related to the consolidated plan, amendments, and performance reports. This procedure is as follows:

- 1) Upon receiving a complaint, the State will provide a timely, substantive written response to written citizen complaints within a fifteen (15) working day period. Depending on the nature of the complaint and depth of the issue, an extended response time may be required by the State in order to obtain the required regulatory guidance or obtain the appropriate level of HUD staff assistance. Should an extended response time be required, the State will notify the individuals or entities making the complaint of the following:
 - a) The complaint has been received by the State;

- b) The complaint is of a nature that cannot be reasonably responded to within the fifteen (15) working day period.
- 2) Provide an appropriate staff contact name, telephone number, and email address in order that the progress on the response/solution can be monitored or additional inquiries can be made as applicable.

The State takes complaints very seriously and will require that complaints be submitted in a written format to ensure the best possible clarity regarding the nature of the complaint and the circumstances or issues involved.

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Formal Public Comments and Responses – Attachment A

Language Access Plan- Attachment B

Notice: State Public Input Session & Hearing Plan Year 2025

State 2025 Public Input Session

Location:

Oklahoma Department of Commerce
Gallery 1-1
900 N. Stiles
Oklahoma City, OK 73104

Online Zoom Meeting Link:

<https://okcommerce.zoomgov.com/j/1610708274>

Meeting ID: 160 070 8274

Find your local number:

<https://okcommerce.zoomgov.com/u/adISgSEzpR>

Date & Time:

October 3, 2024, 10:00 AM

State 2025 Public Hearing

Location:

Oklahoma Department of Commerce
Gallery 1-1
900 N. Stiles
Oklahoma City, OK 73104

Online Zoom Meeting Link:

<https://okcommerce.zoomgov.com/j/1604003859>

Meeting ID: 160 400 3859

Find your local number:

<https://okcommerce.zoomgov.com/u/aeuPixRcRk>

Date & Time:

November 7, 2024, 2:00 PM

General program information and relevant changes regarding the five (CDBG, ESG, HTF, HOME, HOPWA) programs covered under the 2025 State Plan will be presented at both the State Plan Public Input Session and Public Hearing. The U.S. Department of Housing and Urban Development (HUD) funds these programs.

To accommodate those with disabilities, a text telephone/teletypewriter (TTY) service is provided as an option. The communications assistant reads aloud the message you typed to the other party and the types of the other party's voiced message and background sounds, if any, to you. This service is designed for people who are Deaf, Hard of Hearing or have a Speech Disability. This relay service is available in English-to-English (800-722-0353) and Spanish-to-Spanish (800-662-4955). Further instructions on how to use this service can be found at <https://hamiltonrelay.com/oklahoma/index.html>. These services can also be provided in the form of braille and audio tape upon request.

Specific translation services for other languages are also provided as needed. If you are in need of translation services or have other questions about the State Plan, please contact Kellon Dixon at 405-215-5626 or by email at kellon.dixon@okcommerce.gov.

Si necesita traducción al español, comuníquese con Jessica Izquierdo al 405-534-6814 o por correo electrónico a jessica.izquierdo@okcommerce.gov.

Written comments regarding the 2025 State Plan will be accepted until December 9, 2024. Comments regarding the State Plan can be addressed by email or phone to linda.goode@okcommerce.gov or 405-815-5351.

Aviso: Sesión y Audiencia de Opinión Pública Estatal Plan del Año 2025

Sesión de Opinión Pública Estatal de 2025

Ubicación:

Oklahoma Department of Commerce
Galería 1-1
900 N. Stiles
Oklahoma City, OK 73104

Enlace de reunión en línea de Zoom:

<https://okcommerce.zoomgov.com/j/1610708274>

ID de la reunión: 160 070 8274

Encuentre su número local:

<https://okcommerce.zoomgov.com/u/adISgSEzpR>

Fecha y hora:

3 de octubre de 2024, 10:00 a. m.

Audiencia Pública Estatal 2025

Ubicación:

Oklahoma Department of Commerce
Galería 1-1
900 N. Stiles
Oklahoma City, OK 73104

Enlace de reunión en línea de Zoom:

<https://okcommerce.zoomgov.com/j/1604003859>

ID de la reunión: 160 400 3859

Encuentre su número local:

<https://okcommerce.zoomgov.com/u/aeuPixRcRk>

Fecha y hora:

7 de noviembre de 2024, 2:00 p. m.

La información general del programa y los cambios relevantes con respecto a los cinco programas (CDBG, ESG, HTF, HOME, HOPWA) cubiertos bajo el Plan Estatal Consolidado 2024 se presentarán tanto en la Sesión de Opinión Pública como en la Audiencia Pública del Plan Estatal Consolidado.

Para acomodar a las personas con discapacidades, se ofrece como opción un servicio de teléfono de texto/teletipo (TTY). El asistente de comunicaciones lee en voz alta el mensaje que usted le escribió a la otra parte y le escribe el mensaje de voz de la otra parte y los sonidos de fondo, si los hubiera, para usted. Este servicio está diseñado para personas sordas, con problemas de audición o con discapacidad del habla. Este servicio de retransmisión está disponible de inglés a inglés (800-722-0353) y de español a español (800-662-4955). Puede encontrar más instrucciones sobre el uso de este servicio en: <https://hamiltonrelay.com/oklahoma/index.html>. Estos servicios también se pueden proporcionar en forma de braille y cinta de audio, previa solicitud.

Si necesita traducción al español, comuníquese con Jessica Izquierdo al 405-534-6814 o por correo electrónico a jessica.izquierdo@okcommerce.gov.

También se proporcionan servicios de traducción específicos para otros idiomas según sea necesario. Si necesita servicios de traducción o tiene otras preguntas sobre el Plan Consolidado, comuníquese con Kellon Dixon al 405-215-5626 o por correo electrónico a kellon.dixon@okcommerce.gov.

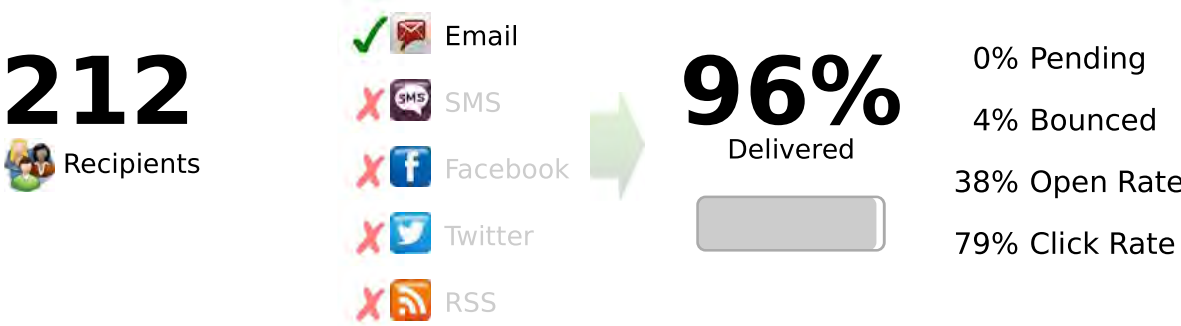
Se aceptarán comentarios escritos sobre el Plan/Plan de Acción Consolidado Estatal 2025 hasta el 9 de diciembre de 2024. Los comentarios sobre el Plan Estatal Consolidado pueden enviarse por correo electrónico o por teléfono a linda.goode@okcommerce.gov o 405-815-5351.

Subject:Media Notice: State Public Input Session & Hearing | Plan Year 2025

Sent:08/28/2024 01:23 PM CDT

Sent By:stefanie.appleton@okcommerce.gov

Sent To:Subscribers of News and Media Releases



Email Delivery Stats

Minutes	Cumulative Attempted
3	97%
5	98%
10	98%
30	98%
60	98%
120	98%

Delivery Metrics - Details

212 Total Sent

204 (96%) Delivered

0 (0%) Pending

8 (4%) Bounced

0 (0%) Unsubscribed

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Digest	n/a	n/a	0	0	0 / 0.0%	0	0
SMS Message	Delivered	0.0%	0	0	n/a	0	n/a

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https://okcommerce.zoom.us/j/95145566262	19	20
https://okcommerce.zoomgov.com/u/adISgSEzpR	19	20
https://okcommerce.zoomgov.com/u/aeuPixRcRk	19	20
https://hamiltonrelay.com/oklahoma/index.html	18	19
https://public.govdelivery.com/accounts/OKDOC/subscriber/new?preferences=true	18	19
https://subscriberhelp.govdelivery.com/	17	18
http://www.okcommerce.gov/	17	18
http://okcommerce.gov/privacy	17	18
https://subscriberhelp.granicus.com/	17	18

Kellon Dixon

From: Oklahoma Department of Commerce <info@marketing.okcommerce.gov>
Sent: Tuesday, September 3, 2024 2:35 PM
To: Kellon Dixon
Subject: [EXTERNAL] Public Notice: State 2025 Consolidated Plan Public Input Session and Public Hearing



**OKLAHOMA
Commerce**

Public Notice: State 2025 Consolidated Plan Public Input Session and Public Hearing

State 2025 Public Input Session: October 3, 2024, 10 a.m.

**Location: Oklahoma Department of Commerce Gallery 1-1
900 N. Stiles, Oklahoma City, OK 73104**

Zoom Link: <https://okcommerce.zoomgov.com/j/1610708274>

Meeting ID: 160 070 8274

Find your local number:

<https://okcommerce.zoomgov.com/u/adISgSEzpR>

State 2025 Public Hearing: November 7, 2024, 2 p.m.

**Location: Oklahoma Department of Commerce Gallery 1-1
900 N. Stiles, Oklahoma City, OK 73104 Zoom**

Link: <https://okcommerce.zoomgov.com/j/1604003859>

Meeting ID: 160 400 3859

Find your local number:

<https://okcommerce.zoomgov.com/u/aeuPixRcRk>

General program information and relevant changes regarding the five (CDBG, ESG, HTF, HOME, HOPWA) programs covered under the 2025 State Plan will be presented at both the State Plan Public Input Session and Public Hearing. The U.S. Department of Housing and Urban Development (HUD) funds these programs.

To accommodate those with disabilities, a text telephone/teletypewriter (TTY) service is provided as an option. The communications assistant reads aloud the message you typed to the other party and types the other party's voiced message and background sounds, if any, to you. This service is designed for people who are Deaf, Hard of Hearing or have a Speech Disability. This relay service is available in English-to-English (800-722-0353) and Spanish-to-Spanish (800-662-4955). Further directions on using this service can be found at:

<https://hamiltonrelay.com/oklahoma/index.html>. These services can also be provided in the form of braille and audio tape upon request.

Specific translation services for other languages are also provided as needed.

If you are need of translation services or have other questions about the Consolidated Plan, please contact Kellon Dixon at 405-215-5626 or by email at kellon.dixon@okcommerce.gov.

Si necesita traducción al español, comuníquese con Jessica Izquierdo al 405-534-6814 o por correo electrónico a Jessica.Izquierdo@OKCommerce.gov.

Written comments regarding the 2025 State Consolidated Plan / Action Plan will be accepted until December 9, 2024 and can be addressed by email or phone to Linda.Goode@okcommerce.gov or 405-815-5351.

OKcommerce.gov



Oklahoma Department of Commerce
900 N Stiles Ave. Oklahoma City, OK 73104

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Kellon Dixon

From: New Pioneer Newsletter <newpioneer@marketing.okcommerce.gov>
Sent: Wednesday, September 4, 2024 1:16 PM
To: Kellon Dixon
Subject: [EXTERNAL] Main Street Award Finalists Announced and other news from the Oklahoma Department of Commerce

Categories: Red Category

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September 2024



Oklahoma Main Street Center Announces Award Finalists

The Oklahoma Main Street Center, a division within the Oklahoma Department of Commerce, announced the finalists for the program's

annual statewide awards competition, [including the finalists for Main Street Program of the Year and the Watonga Bob Shoemaker Award.](#)

[Read more](#)

Commerce Introduces New CORE Director, Heather Turner

Commerce is excited to officially introduce Heather Turner, Executive Director of the newly established CORE (Community Outreach and Revitalization Enterprise) division.

Heather earned her MBA from Oklahoma State University, is an experienced economic, business and community developer and successful multi-site, multi-city business owner.

[Watch the video](#)

Oklahoma Takes the Lead in Centennial Preparations with Bold New Route 66 Grant Awards

Commerce is thrilled to announce the latest wave of funding recipients for the Oklahoma Route 66 Grant Program, propelling the state's Route 66 Centennial preparations to new heights. Thirteen innovative projects have been selected in this second round, receiving over \$6.6 million in funding to bring new life and energy to Route 66.

[Read more](#)

Commerce Funding Commitment Helps Make New Rural Hospital a Reality

Eight years after the closing of Tillman County Memorial Hospital, the community of Frederick, Okla., came together with federal, state and local leaders to celebrate the groundbreaking of the new Memorial Health of Tillman County Critical Access Hospital.

[Read more](#)

Oklahoma Film + Music Office Certifies Two More Oklahoma Communities, One Soundstage

The Oklahoma Film + Music Office proudly announces that both Vinita and Collinsville have achieved film friendly certification after fulfilling the requirements of OF+MO's Oklahoma Film Friendly Community Program. Additionally, One Set Studio has been designated a certified soundstage for film and television production in Oklahoma per the requirements of the state's film incentive program, the Filmed in Oklahoma Act of 2021.

[Read more](#)

State Public Input & Hearing Sessions for Plan Year 2025

The 2025 State Public Input and Hearing Sessions have been scheduled for October 3, 2024, and November 7, 2024. Please visit the link below for more information on times and locations.

[Find out more](#)

Commerce Celebrates Community Revitalization - Infrastructure Project

Located in northern Oklahoma near the Kansas border, sits the Town of Braman, a recipient of a Community Development Block Grant in 2023. This grant is helping the town construct a Community Center.

[Read more](#)

Connect with us!





OKLAHOMA
Commerce

Oklahoma Department of Commerce

okcommerce.gov

900 N Stiles Ave.

Oklahoma City, OK 73104

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State Plan Public Input and Hearing Session 2025

General program information and relevant changes regarding the five (CDBG, ESG, HTF, HOME, HOPWA) programs covered under the 2025 State Plan will be presented at both the State Plan Public Input Session and Public Hearing. The U.S. Department of Housing and Urban Development (HUD) funds these programs.

Public Hearing Scheduled

Written comments regarding the 2025 State Plan will be accepted until December 9, 2024. Comments regarding the State Plan can be addressed by email or phone to linda.goode@okcommerce.gov or 405-815-5351.

State 2025 Public Input Session

Location:

Oklahoma Department of Commerce
Gallery 1-1
900 N. Stiles
Oklahoma City, OK 73104

Online Zoom Meeting Link:

<https://okcommerce.zoomgov.com/j/1610708274>

Meeting ID: 160 070 8274

Find your local number: <https://okcommerce.zoomgov.com/u/adISgSEzpR>

Date & Time:

October 3, 2024, 10 a.m.

State 2025 Public Hearing

Location:

Oklahoma Department of Commerce
Gallery 1-1
900 N. Stiles
Oklahoma City, OK 73104

Online Zoom Meeting Link:

<https://okcommerce.zoomgov.com/j/1604003859>

Meeting ID: 160 400 3859

Find your local number: <https://okcommerce.zoomgov.com/u/aeuPixRcRk>

Date & Time:

November 7, 2024, 2 p.m.

To accommodate those with disabilities, a text telephone/teletypewriter (TTY) service is provided as an option. The communications assistant reads aloud the message you typed to the other party and the types of the other party's voiced message and background sounds, if any, to you. This service is designed for people who are Deaf, Hard of Hearing or have a Speech Disability. This relay service is available in English-to-English (800-722-0353) and Spanish-to-Spanish (800-662-4955). Further instructions on how to use this service can be found at <https://hamiltonrelay.com/oklahoma/index.html>. These services can also be provided in the form of braille and audio tape upon request.

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Si necesita traducción al español, comuníquese con Jessica Izquierdo al 405-534-6814 o por correo electrónico a jessica.izquierdo@okcommerce.gov.



2025 Annual Action Plan Update

Public Input Session In-Person Sign-In Sheet

October 3, 2024, 10:00 AM

Please enter your name and contact information.

1.	No in-person attendance. 
2.	
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Public Input Session October 3, 2024

Virtual Sign-in Sheet

10:00:39 From Vicki Eggers, NODA to Everyone:

Vicki Eggers, NODA

10:00:46 From shaundra.covey to Everyone:

Shaundra Covey, Southwest Oklahoma Community Action Group, Inc.

10:00:47 From balbritton to Everyone:

Barbara Albritton, INCOG balbritton@incog.org

10:01:04 From Pam Richardson to Everyone:

Pam Richardson, Pres/CEO Volunteers of America of Oklahoma, Inc.

10:01:10 From JT Darling to Everyone:

JT Darling, INCOG, jdarling@incog.org

10:01:12 From Wanda to Everyone:

Wanda DeBruler, wanda@debrulerinc.com.

10:01:16 From Bonnie Schwartz to Everyone:

Bonnie Schwartz, Community Action Agency of OKC & OK/CN Counties, Inc.

10:01:22 From Stephen Iken to Everyone:

Stephen Iken, Southwest Oklahoma Community Action Group, Inc.

10:01:27 From Preslie Anderson to Everyone:

Preslie Anderson, INCOG, panderson@incog.org

10:01:44 From Jamie R. Wright | @jamieRwright to Everyone:

Jamie R. Wright - overcoming@jamieRwright.com

10:01:46 From Robert Meador to Everyone:

Robert Meador from CADAC

10:02:04 From MVance to Everyone:

Millie Vance

10:02:55 From Alejandra Martinez to Everyone:

Alejandra Martinez, HUD Certified Housing Counselor, Community Action Agency of Oklahoma City & Oklahoma/Canadian Counties, Inc.

10:03:06 From Kia Johnson to Everyone:

Kia Johnson, Realtor

Kjohnson@blocrealestategroup.com

10:03:17 From KWilson to Everyone:

Kevin Wilson, Muskogee County

10:03:33 From Miriam Camay to Everyone:

Miriam Camay, Yardi Systems, Miriam.camay@yardi.com

10:05:27 From KLindsey to Everyone:

Kalyn Lindsey, Housing Program Assistant VISTA

10:13:01 From Community Development to Everyone:

If you are just joining, please remember to sign in. Thank you!

10:13:29 From Jaquita Bruner to Everyone:

sign in?

10:14:46 From Marshall V to Everyone:

Replying to "sign in?"

Hi Jaquita, we're just asking attendees to give their name and organization (if they have one) here in this chat.

10:15:11 From W. Camacho to Everyone:

William Camacho, Housing Certification Coordinator with Neighborhood Services Organization

10:15:32 From Jaquita Bruner to Everyone:

Jaquita Bruner, Bloc Real Estate Group

10:16:01 From Catholic Charities to Everyone:

Yolanda Worth, Catholic Charities of Oklahoma City

10:18:19 From Bree Long to Everyone:

Bree Long MCCAF

10:25:37 From Wanda to Everyone:

Emily, thank you all for allowing the increase to developer fee and some of the form changes!

10:31:48 From Pam Richardson to Everyone:

Thank you!

10:32:36 From Jaquita Bruner to Everyone:

Thank you all for the information and your time.

10:32:55 From KWilson to Everyone:

Thank you to the ODOC staff

10:33:32 From Robert Meador to Everyone:

Thanks everyone!

10:36:44 From balbritton to Everyone:

There had been discussion with OARC and ODOC about implementing the allowed comprehensive plan element which is included in the application guidance, but ODOC has not historically accepted or allowed those types of applications. Will that be added?

10:38:08 From balbritton to Everyone:

They are allowed, but have not been encouraged when discussed with ODOC

10:39:45 From balbritton to Everyone:

Clarification would be appreciated.

Kellon Dixon

From: Emily Myers <emily.myers@ohfa.org>
Sent: Thursday, October 24, 2024 1:45 PM
To: micheleguzmanlc@outlook.com
Cc: Chevelle Galbreath
Subject: RE: Hold on with your consolidated plan please...I have questions...

Good afternoon Michele,

We have received your comment below. I believe some of your comments may be directed at the activities that the Oklahoma Department of Commerce oversees. They also have received a copy of these comments. In case they relate to the HOME, Housing Trust Fund, or HOPWA programs, I can address them.

The homeowner rehabilitation program using HOME funds has not been shut down. That said, many of the developers we work with do not engage in this activity. The requirement to abate lead, if it is found, is set by HUD and is a condition of using federal funds.

We do not oversee the hiring or use of contractors or subcontractors in any of our developments. Funds are provided to developers on an application basis for low-income housing projects. We do require developers to submit a budget to us, and place limits on the maximum profit a developer and any contractors may receive from the project. The maximum amount of federal funding a development can receive is set by HUD.

We at OHFA do not participate in direct procurement for developers / developments. All of our procurement procedures for agency needs are set / approved by the state government, and do not utilize any federal funding set aside for development.

We do not use any of our funds for infrastructure repairs. Though some developments that receive federal funds may have a small infrastructure component, it is almost exclusively running lines from public facilities (water mains, power lines, broad band infrastructure) from the street to newly built homes.

Thank you,

Emily Myers
Housing Development Allocation Supervisor
(405) 419-8135

From: Michele Guzman <micheleguzmanlc@outlook.com>
Sent: Sunday, October 6, 2024 9:58 AM
To: Linda Goode <Linda.Goode@okcommerce.gov>
Subject: [EXTERNAL] Hold on with your consolidated plan please...I have questions...

Hi,

I have questions.

Your plan for consolidation is not limited to input from a certain jurisdiction, but the building of an area or jurisdiction is that the main objective?

I think you have missed some opportunities. For the rehab of homes, you have not taken into the consideration that the program for whole housing rehab has been shut down due to no lead based paint removal contractors.

You also don't seem to have considered the huge savings you could have in labor, with the utilization of a tiered subcontractor and contractor multilevel system implemented with technology. It would not be difficult and the savings would make housing repairs and rehab more feasible. A-LOT MORE FINANCIALLY FEASIBLE.

As for the procurement, well you have ways to lower those costs too, but none were really mentioned from what I have been reading.

Also, regarding the water infrastructure. Have you heard of trenchless pipe repair? Where no digging and lining the pipe interior with molding through inflatable tubing and other means? This might be an area to consider in the number one area of issues, I believe that was what you mentioned.

Please let me know, I am very curious what is going on with this. Plus it looks like investors are getting money, really? You can do so, so much better than that.

I see room for improvement!!!

Respectfully,
Michele Guzman
405-531-7775

Kellon Dixon

From: Emily Myers <emily.myers@ohfa.org>
Sent: Tuesday, November 12, 2024 5:08 PM
To: Alejandra Martinez
Cc: Corey Bornemann
Subject: RE: DPA Assistance Questions

Good afternoon Alejandra,

My apologies for the delay in responding to your email. I am uncertain if you had the opportunity to attend the formal input session ODOC held last week. After looking into it further, we were told that we could still make changes as long as they were not significant to the operation of the program. As such, we have recommended increasing the maximum amount a household could receive in DPA to \$18,999 with the maximum award per HOME DPA being \$250,000 per application.

I know this has been slow going. We should have updated topical guidance soon which will address the limit on loan costs.

Thank you,

Emily Myers
Housing Development Allocation Supervisor
(405) 419-8135

From: Alejandra Martinez <hcounselor@caaofokc.org>
Sent: Tuesday, November 5, 2024 10:09 AM
To: Emily Myers <emily.myers@ohfa.org>
Cc: Corey Bornemann <corey.bornemann@ohfa.org>
Subject: RE: DPA Assistance Questions

Hi Emily,

Thanks for following up on my comments made that day. I understand about any suggestions can't be considered, if possible, until 2026. What about the suggestions on paying to buy down the interest rate or increasing the limit for loan costs, is that being changed, you mentioned it at the end but you didn't mention if it was going to be changed.

Thanks!

Alejandra Martinez
HUD Certified Housing Counselor

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From: Emily Myers <emily.myers@ohfa.org>
Sent: Wednesday, October 9, 2024 8:37 AM

To: Alejandra Martinez <hcounselor@caaofokc.org>
Cc: Corey Bornemann <corey.bornemann@ohfa.org>
Subject: DPA Assistance Questions

Good morning Alejandra,

I'm following up on the comments you made at the ODOC meeting. I was informed that it is too late to suggest additional changes for the 2025 program year. As of the date and time of the ODOC presentation last week, any major changes suggested for implementation moving forward cannot be applied until the 2026 program year.

The \$14,999 DPA amount is stated in our application, so we are not able to change that number until 2026. Additionally, we are hemmed in by HUDs requirements such as the home purchase price may not exceed 95% of Average Median Home Costs, and the buyer's income may not exceed 80% of Average Median Income.

The actual ratios (front end, back end, etc.) and some of the things DPA can be used for, however, appear to only be referenced in our topical guidance so we could make changes to this internally without having to go through the formal input sessions.

The emails I have located from past discussions revolve around allowing the interest rate to be bought down, allowing more of the lender's fees to be paid with DPA, and allowing broker's fees to be paid with DPA. Please advise if there are other changes you would like to see addressed or made.

I will continue to look into this to see if there is anything we can do that will help you and the homebuyers you assist.

Thank you,



Follow OHFA on Social Media



Emily Myers

Housing Development Allocation Supervisor
(405) 419-8135
emily.myers@ohfa.org

100 N.W. 63rd St.
Oklahoma City, OK 73116
P.O. Box 26720
Oklahoma City, OK 73126

Kellon Dixon

From: Sommer Terry
Sent: Tuesday, January 14, 2025 1:10 PM
To: Kellon Dixon
Subject: FW: [EXTERNAL] Courtesy Copy: October Highlights: Route 66 Video Series, Main Street Awards and More

From: Oklahoma Department of Commerce <info@marketing.okcommerce.gov>
Date: Monday, October 7, 2024 at 3:00 PM
To: Sommer Terry <Sommer.Terry@okcommerce.gov>
Subject: [EXTERNAL] Courtesy Copy: October Highlights: Route 66 Video Series, Main Street Awards and More

This is a courtesy copy of an email bulletin sent by Stefanie Appleton.

This bulletin was sent to the following groups of people:

Subscribers of New Pioneer (23398 recipients)

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October 2024



Commerce Launches Video Series Celebrating Community Revitalization Along Route 66

Commerce is pleased to unveil a new video series highlighting communities along Route 66. In anticipation of the Route 66 Centennial celebration in 2026, the series aims to showcase the positive impact of the revitalization efforts in towns and cities along the historic highway.

[Watch the series](#)

[Read the stories](#)

Oklahoma Main Street Announces Award Winners

The Oklahoma Main Street Center announced the winners of the program's annual statewide awards competition during the 34th annual Main Street Awards Banquet in Oklahoma City.

[Read more](#)

Commerce Announces "All in for Oklahoma" Quarterly Community Virtual Meetings

Join Commerce leadership for a new quarterly virtual meeting series. "All in for Oklahoma" will allow local community and economic development leaders to hear from Commerce leadership about timely resources and programs.

[Find out more](#)

Commerce Awarded Grant to Grow Export Opportunities for Oklahoma Companies

Commerce has been awarded \$290,000 in competitive grant funding from the U.S. Small Business Administration's State Trade Expansion Program grant program to help companies increase their exporting capabilities.

[Read more](#)

Cherokee Nation Celebrates Expansion of Cherokee Film Studios

Cherokee Nation and its businesses celebrated with a ribbon-cutting ceremony to commemorate the addition of a second soundstage and more to Cherokee Film Studios in Owasso.

[Read more](#)

National Energy Awareness Month | October

October is National Energy Awareness Month, and October 30 is designated as National Weatherization Day. Commerce administers the Oklahoma Weatherization Assistance Program, funded by the Oklahoma Department of Human Services and the U.S. Department of Energy.

[Find out more](#)

State Public Hearing Session for Plan Year 2025

The 2025 State Public Hearing Session has been scheduled for November 7, 2024. Please visit the link below for more information on times and locations.

[Find out more](#)

Updates on HOME and HERRA Rebates

Commerce is pleased to announce an update on the forthcoming U.S. Department of Energy HOME & HERRA rebate programs. **A solicitation to procure a contractor (or team of contractors) is available until October 11, 2024, at 1 p.m. (CST).**

- Home Efficiency Rebates Section 50121 of the Inflation Reduction Act (HOME rebate):
<https://www.energy.gov/scep/home-energy-rebates-programs>
- Home Electrification and Appliance Rebate Program Section 50122 of the Inflation Reduction Act (HERRA rebate):
<https://www.energy.gov/scep/home-electrification-and-appliance-rebates>

Questions regarding the solicitation must be submitted to the Office of Management and Enterprise Services (OMES). [Review and bid on this event.](#)

General rebate inquiries: energyprograms@okcommerce.gov

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Oklahoma Department of Commerce
okcommerce.gov
900 N Stiles Ave.
Oklahoma City, OK 73104

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2025 Annual Action Plan Update

Public Hearing Session In-Person Sign-In Sheet

November 7, 2024, 2:00 PM

Please enter your name and contact information.

1.	Kirk MARTIN	kirk.martin@broadband.ok.gov
2.	Marshall Vogts	marshall.vogts@okcommerce.gov
3.		
4.		
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Public Hearing Session November 7, 2024

Virtual Sign-in Sheet

14:01:30 From Jessica Izquierdo to Everyone:

Jessica Izquierdo, Oklahoma Department of Commerce

14:01:35 From Traci Jinkens, The Salvation Army to Everyone:

Traci Jinkens, The Salvation Army

14:01:39 From Kate Stanford to Everyone:

Hi there. Kate Stanford, Guidehouse's State & Local Government Practice

14:01:43 From Kim to Everyone:

Rob Meador, CADC

14:01:51 From Emily Myers to Everyone:

Emily Myers, OHFA

14:01:52 From Kim to Everyone:

Mike Biggers, CDSA

14:01:53 From Edith McKinley to Everyone:

Edith McKinley, Oklahoma Department of Commerce.

14:02:08 From Danielle Billups to Everyone:

Danielle Billups, OHFA

14:02:13 From Kim to Everyone:

Matt Hazleton, CAA of OKC

14:02:18 From Charlotte Conant to Everyone:

Charlotte Conant, ODOC

14:02:19 From Mike Sexton to Everyone:

Mike Sexton, Commerce

14:02:20 From Kim to Everyone:

Willie Walden, CAA of OKC

14:02:32 From Kim to Everyone:

Derall Ledford, CADC

14:03:51 From Miriam Camay to Everyone:

Miriam Camay, Yardi Systems

14:32:31 From Five Tool Management to Everyone:

Leslie Wilbourn

14:33:23 From Kate Stanford to Everyone:

Thank you!

14:33:31 From Miriam Camay to Everyone:

Thank you for this meeting.

14:33:46 From Bree Long to Everyone:

BRee Long, MCCAF

Kellon Dixon

From: Kirk Martin
Sent: Friday, December 13, 2024 4:23 PM
To: Kellon Dixon
Subject: FW: verbiage for Commerce
Attachments: RE: Broadband Needs of LMI Households

Kellon,

See below for suggested language for the ConPlan. I hope this is helpful.

Merry Christmas to you and your family!

Kirk

Kirk Martin | Deputy Director
Oklahoma Broadband Office
405-431-9237

From: Nicholas Camper <Nicholas.Camper@broadband.ok.gov>
Sent: Friday, December 13, 2024 3:42 PM
To: Kirk Martin <Kirk.Martin@broadband.ok.gov>
Cc: Nat Barrack <Nat.Barrack@broadband.ok.gov>; Seth Pinnoo <Seth.Pinnoo@broadband.ok.gov>
Subject: Re: verbiage for Commerce

Kirk, sorry for taking all week, literally.

Thank you Nat and Seth for helping gather this information.

1. Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

While the number of Oklahoma homes and businesses with broadband service has seen a significant increase in 2024, lack of connectivity is more pronounced in moderate and low-income areas. For instance, seven counties with a majority of household incomes being \$50,000 or less also happen to have a connectivity rate of less than 60% (well under the state average of 88%). Additionally, the specific need for wired connections, particularly using technologies like fiber optic, remains important as ever. While service provided by legacy cable and wireless technologies meet the current 100/20Mbps standard for broadband, these technologies have hard ceilings for the maximum speed. That's why grant programs being administered by the Oklahoma Broadband Office incentivize deployments using futureproof, primarily wired technologies like fiber.

2. Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

Unsurprisingly, broadband consumers tend to benefit from increased competition in the form of lower prices. However two points stick out as surprising: 1) Of the seven counties with less than 60% coverage, the FCC reported them all having five or more internet service providers within the county. 2) A recent U.S. Bureau of Labor Statistics Consumer Price Index data that revealed that the average consumer pays 7.8% less for broadband services in 2024 than 2021, when adjusted for inflation. This is likely the result of an unprecedented increase in broadband investment, and by extension competition.

Nick Camper | Director of Engagement

Oklahoma Broadband Office

Cell | 405-312-2056

nicholas.camper@broadband.ok.gov

broadband.ok.gov



From: Kirk Martin <Kirk.Martin@broadband.ok.gov>
Sent: Monday, December 9, 2024 11:17 AM
To: Nicholas Camper <Nicholas.Camper@broadband.ok.gov>
Subject: RE: verbiage for Commerce

Sounds good, thank you.

Kirk Martin | Deputy Director

Oklahoma Broadband Office

405-431-9237

From: Nicholas Camper <Nicholas.Camper@broadband.ok.gov>
Sent: Monday, December 9, 2024 10:56 AM
To: Kirk Martin <Kirk.Martin@broadband.ok.gov>
Subject: Re: verbiage for Commerce

I can work with Seth and see what we can come up with for #2.

I'll get back to you with an answer in the next few days.

Nick Camper | Director of Engagement

Oklahoma Broadband Office

Cell | 405-312-2056

nicholas.camper@broadband.ok.gov

broadband.ok.gov



From: Kirk Martin <Kirk.Martin@broadband.ok.gov>

Sent: Monday, December 9, 2024 10:37 AM

To: Nicholas Camper <Nicholas.Camper@broadband.ok.gov>

Subject: verbiage for Commerce

A former coworker of mine from Commerce made this request:

Hi Kirk,

As a requirement of the State Plan, we are required to seek consultation with internet service providers and/or the local broadband office regarding broadband needs across Oklahoma, specifically those that impact housing occupied by **low- and moderate-income households**. Can you provide any guidance on the following?

1. Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.
2. Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

Please have your team provide a response this week. I'm happy to work with you all on this. It will go in ODOC's State Consolidated Plan, which goes to HUD and covers 5 federally-funded program.

Thank you!

Kirk

Kirk Martin | Deputy Director

Oklahoma Broadband Office

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broadband.ok.gov



OKLAHOMA
Broadband Office



Public Comments Received for the 2025 Annual Action Plan Update

Attachment A

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ODOC Comments

CDBG

Comment

There had been discussion with OARC and ODOC about implementing the allowed comprehensive plan element which is included in the application guidance, but ODOC has not historically accepted or allowed.

They are allowed, but have not been encouraged when discussed with ODOC

-Barbara Albritton

ODOC Response:

Comprehensive plans are an eligible activity in the CDBG CIP program.

ESG

Comment

No comments were received for the ESG Program.

OHFA Comments

HOME

We appreciate the opportunity to review and provide feedback on the online draft plans. Below are our comments:

Support for Proposed Changes

We support most of the proposed changes to the HOME program, including:

- Increasing the soft costs;
- Raising the maximum grant awards for Down Payment Assistance (DPA), Homebuyer, and Rental activities;
- Using HOME funds as a 16-year cash flow loan;
- Decoupling HOME funding from Low-Income Housing Tax Credits (LIHTC); and
- Requiring Fair Housing training for rental property managers.

These adjustments align with the program's goals and address current needs effectively.

Need for Guidance on Statutory Changes

We encourage the State to provide clear guidance on statutory changes promptly. Several recent new construction projects are at a standstill, awaiting procedures or applicability for Build America, Buy America (BABA), and the 2021 International Energy Conservation Code (IECC). Timely direction on these issues is critical for advancing these projects.

Concerns About Co-Funding Policy

We are concerned about the proposed policy shift allowing projects to be co-funded with other participating jurisdictions (PJs). While co-funding is permitted under the regulations, the Consolidated Plan's purpose is to solicit public input on fund use and allocation.

With the recent rise in nonprofits and Community Housing Development Organizations (CHDOs) seeking HOME funds, the State already faces an overdemand for limited resources. Allowing PJs with direct HOME allocations to access State funds further reduces funding for rural and metro cities such as Shawnee, Edmond, and Mustang.

We oppose co-funding projects in other PJ areas as currently written. However, if uncommitted funds remain after multiple rounds of funding opportunities are given to non-PJ areas, co-funding such projects could be justified to ensure the timely commitment of resources.

Transparency on Program Income and Returns

The draft plan needs to detail or estimate anticipated program income. Based on conversations with the accounting department, approximately \$180,000 of this year's funding came from program income. Furthermore, nonprofits conducting homeownership development activities are expected to generate significant program income, with one organization estimating \$400,000 to \$600,000 in 2025.

The State also has older HOME-funded projects tied to LIHTC developments. The anticipated payments and timelines for these loans need to be clarified.

We understand that the State can accumulate program income to fund larger projects. To encourage program income generation, we request:

1. Awarding points to projects that generate program income.
2. Allowing nonprofits generating program income priority access to these funds that do not require a HOME match.

Program income benefits the State by enabling the reuse of limited grant resources.

Clarity on Fund Reallocation

We urge the State to increase transparency in reallocating returned or de-obligated funds. Key questions include:

- Who is returning funds?
- Should returned funds be reallocated to their original set-aside or follow the current plan's allocations?

As of September's tracking report, the 2024 funding balance shows over \$6.6M in carryover/de-obligated/returned/recaptured funds under the CHDO set-aside. In the current format, looking at the funding balance report, potential applicants may not understand that funds are available for all activities even if the balances appear negative within the set-asides. The reallocation of funds, as seen on the November meeting exhibit, occurs at staff discretion without clear guidelines.

Recommendation for Stakeholder Engagement

We recommend that OHFA convene roundtable discussions with awardees beginning in 2025 to strengthen program outcomes. This would be especially beneficial as many stakeholders—including OHFA staff, resource users, and local community leaders—are new to the program.

Thank you for the opportunity to provide input. We appreciate your consideration of these comments to refine the HOME program and its administration.

Sincerely,

-Wanda DeBruler
DeBruler, Inc.

OHFA Response:

Thank you for your comments. We will consider them while making changes to the HOME program for the 2025 program year.

Comment

Your plan for consolidation is not limited to input from a certain jurisdiction, but the building of an area of jurisdiction is that the main objective?

I think you have missed some opportunities. For the rehab of homes, you have not taken into the consideration that the program for whole housing rehab has been shut down due to no lead based paint removal contractors.

You also don't seem to have considered the huge savings you could have in labor, with the utilization of a tiered subcontractor and contractor multilevel system implemented with technology. It would not be difficult and the savings would make housing repairs and rehab more feasible. A-LOT MORE FINANCIALLY FEASIBLE.

As for the procurement, well you have ways to lower those costs too, but none were really mentioned from what I have been reading.

Also, regarding the water infrastructure. Have you heard of trenchless pipe repair? Where no digging and lining the pipe interior with molding through inflatable tubing and other means? This might be an area to consider in the number one area of issues, I believe that was what you mentioned.

Please let me know, I am very curious what is going on with this. Plus it looks like investors are getting money, really? You can do so, so much better than that.

I see room for improvement!!!

-Michele Guzman

OHFA Response:

We have received your comment below. I believe some of your comments may be directed at the activities that the Oklahoma Department of Commerce oversees. They also have received a copy of these comments. In case they relate to the HOME, Housing Trust Fund, or HOPWA programs, I can address them.

The homeowner rehabilitation program using HOME funds has not been shut down. That said, many of

the developers we work with do not engage in this activity. The requirement to abate lead, if it is found, is set by HUD and is a condition of using federal funds. We do not oversee the hiring or use of contractors or subcontractors in any of our developments. Funds are provided to developers on an application basis for low-income housing projects. We do require developers to submit a budget to us, and place limits on the maximum profit a developer and any contractors may receive from the project. The maximum amount of federal funding a development can receive is set by HUD.

We at OHFA do not participate in direct procurement for developers / developments. All of our procurement procedures for agency needs are set / approved by the state government, and do not utilize any federal funding set aside for development.

We do not use any of our funds for infrastructure repairs. Though some developments that receive federal funds may have a small infrastructure component, it is almost exclusively running lines from public facilities (water mains, power lines, broad band infrastructure) from the street to newly built homes.

Comment

SUPPORT AND RECOMMENDATIONS FOR HOME PROGRAM PROPOSED CHANGES

On behalf of Midwest Housing Equity Group, Inc., I submit the following comments on the proposed changes to the HOME program and offer additional comments and feedback.

ITEMS OF SUPPORT

I strongly support the following proposed changes:

- Increasing allowable soft costs.
- Raising maximum grant awards for Down Payment Assistance (DPA), Homebuyer, and Rental activities.
- Using HOME funds as a 16-year cash flow loan.
- Requiring Fair Housing training for rental property managers.

These changes align with the program's objectives and enhance its ability to meet evolving housing challenges in Oklahoma.

STATUTORY CHANGE GUIDANCE NEEDED FOR ALL PARTIES

I urge OHFA and/or Commerce to provide timely and clear guidance on implementing statutory requirements, particularly for Build America, Buy

America (BABA) and the 2021 International Energy Conservation Code (IECC). Delays in clarifying these standards have stalled multiple awards. **Prompt guidance is essential to advancing these initiatives without further interruption.**

NON-SUPPORT FOR PROPOSED CO-FUNDING POLICY

While we recognize that co-funding with other Participating Jurisdictions (PJs) is allowed by HUD, our comments both written and in person at the September 2024 OHFA Board of Trustees' meeting remain unchanged. HOME Funds remain the only source of funding for smaller communities. PJs have access to other funding sources such as MAPS, LIHTC, HOME, etc. **Of special concern is that this change is suggested despite the public outcry at the September Board Meeting from all but one entity. And the fact that this was not included in the public hearings/input sessions in August.**

The purpose of Oklahoma's Consolidated Plan is designed to reflect public input on fund use and distribution. Only one organization, to my knowledge, supported moving funding from rural to urban. This organization has received over \$55M of funding from other sources and has access to their local PJ HOME Funds.

We are already seeing a shift with more competition from nonprofits and CHDOs for the limited HOME Funds. Allowing PJs with direct HOME allocations to access State HOME funds further limits resources available to rural and metro cities.

We strongly oppose the current proposal to co-fund developments in other PJ areas. I am disappointed that this proposal resurfaced without being discussed at the public hearings or public input sessions.

TRANSPARENCY ON PROGRAM INCOME AND RETURNS

The draft plan lacks detail on anticipated Program Income. With an expected \$400,000-\$600,000 in 2025 of Program Income through Homeownership development activities, this source of funding should be addressed more clearly.

To encourage program income generation, organizations that generate program income should be awarded points and priority access to the program income funds that do not require a HOME Match. Program Income generated by homeownership activities should be allocated first to the same activity and then filtered towards other activities barring no applications.

Entities that can recirculate these limited resources multiple times provide greater impact to the State and produce more housing units. A win for low- income households.

FUND REALLOCATION

More information on reallocating returned or de-obligated funds needs to be provided. The public and program participants should know who is returning funds, similar to LIHTC funds being returned. How are returned funds reallocated? Are they being returned to their original set aside or do they follow current allocation splits? Do entities that return funds have a penalty for not completing their activity? Additional public comment on this may be warranted.

Clear reallocation guidelines would ensure all stakeholders have an equal opportunity to access

resources.

Thank you for your consideration.

Sincerely,

-Andrea Frymire
Midwest Housing Group

OHFA Response:

Thank you for your comments. We will consider them while making changes to the HOME program for the 2025 program year.

Comment

Please find my following comments on the HOME program:

1. I would like to see training and guidance on program changes, i.e. BABA, Energy, before they go into effect. Compliance is important for our organization and the risk of repayment of funds would be detrimental to smaller organizations.
2. I am concerned about the lost of funds of the rural areas of the state if indeed OHFA opens up the funds to other metro areas. Metro areas have other resources of funds that are not available in the rural areas of Oklahoma. Also, I have a concern that organizations outside of our state PJ do not have good track records and I would hate for our state PJ to be penalized because of outside problematic organizations.
3. I would like to have a planned meeting of other CHDO's and Non-Profits to discuss with OHFA changes, problems, and opportunities. I know in the past this has been in place, however, with the changes in staffing at OHFA and the grantees I think it would be advantageous to OHFA and the grantees.

Thank you for this opportunity to express our gratitude and support,

-Sharon Wise
Native American Housing Services, Inc.

OHFA Response:

1. As for training, I understand that compliance is very important. I'd like to assure you that we are not hoarding information. Often HUD releases program updates with little to no implementation guidance. We work diligently to tap into the sources available to us and are frequently left to interpret what compliance means as we go. Though the trainings we have provided over the last couple of months may seem light on details, it is not from a lack of effort.

Likewise, developers frequently have more practical questions that we do not think to ask when probing for a compliance solution. Please never hesitate to reach out. If you have a question, it's likely that others do to.

2. Any applicant, who is receiving HOME funds from another PJ in the state can apply for and potentially receive OHFA HOME funding according to HUD. These HOME funds granted by OHFA must be in conjunction with another PJ's investment. In this specific instance, applicants can apply for any of OHFA's allowable HOME activities as long as they are the same activity that the other PJ is providing funding for. (i.e. New Construction with New construction, not New Construction with Down Payment Assistance) The HOME maximum per unit investment limits still apply to total HOME funds received regardless of the allocating PJ. Each PJ would need to have its own written agreement, environmental, and period of affordability. The developer would need to comply with each PJ's rules and regulations.

There is some additional paperwork with this structure, but it is exclusively between OHFA, the other PJ, and HUD and is project specific. We do not advertise this structure as we would like OHFA's HOME funds to be primarily used outside of other PJ's jurisdictions. While we do not disallow this structure as it is permitted by HUD, OHFA always reserves the right to be more restrictive.

3. We have already discussed round table meetings and do plan on implementing them in 2025. Dates have not been set at this time, but we anticipate the first meeting will likely occur in March. We intend for these meetings to be quarterly (2 in person and 2 via zoom to encourage attendance for further out awardees). These meetings will not be a totally free discussion space. We intend to collect comments from individuals who plan on attending in advance and having more of a guided discussion in order to ensure that the round tables are timely and productive.



Oklahoma's Language Access Plan

March 31, 2025



OKLAHOMA
Commerce

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1. Introduction

1.1 Purpose and Audience

The Oklahoma Department of Commerce Community oversees the development and administration of over a dozen federally funded programs. These programs benefit the lives of thousands of Oklahomans annually. However, not all individuals are aware of these programs or how to access them. For Limited English Proficient (LEP) populations, accessing these programs and services, many of which they are eligible for, presents significant challenges due to linguistic barriers.

In response to the presence of LEP individuals within Oklahoma, ODOC developed a Language Access Plan (LAP). The LAP has two primary objectives. First, it establishes the level of language assistance measures that ODOC and its subrecipients will provide to ensure that all Oklahomans, irrespective of their level of English proficiency, have equal access and benefit from the diverse range of federally funded programs and projects that improve the quality of life for Oklahomans. Second, it complies with Title VI of the Civil Rights Act and Executive Order 13166. Title VI mandates that recipients of federal funds, including ODOC and its subrecipients, implement reasonable measures to guarantee equal access to federally funded programs, projects, and activities.

1.2 Update Frequency

The LAP comprises multiple sections that require periodic updates. These updates are crucial because they ensure the effectiveness of the LAP for ODOC/CD, its subrecipients, and, more importantly, the limited English-proficient citizens of Oklahoma.

Table 1: LAP update frequency

Component	Required Update
Factor 1	March 30th every 5 years
Factor 2	March 30th every year
Factor 3	March 30th every year
Factor 4	March 30th every year
Actions Based on the Four Factor Analysis	March 30th every year
Vital Documents	March 30th every year
Outreach to LEP individuals	March 30th every year

Factor 1 is updated every five years because the American Community Survey publishes incomplete data profiles for populations under 65,000¹.

¹ See: https://www.census.gov/content/dam/Census/library/publications/2020/acs/acs_geography_handbook_2020_ch01.pdf

2 Language Access Plan Policies

The Oklahoma Department of Commerce policy will provide meaningful access to all LEP individuals seeking services, programs, or benefits, regardless of their ability to communicate in English. This policy ensures that language barriers do not prevent equal opportunity to participate in or benefit from federally funded activities.

2.1 Principles

1. **Equal Access:** LEP individuals will be provided access to services equivalent to English-speaking individuals.
2. **Non-Discrimination:** Services will be delivered in compliance with Title VI, prohibiting discrimination based on national origin.
3. **Effective Communication:** To ensure meaningful participation, language assistance services will be timely, accurate, and culturally appropriate.
4. **Proactive Measures:** Programs and departments will implement proactive measures to identify and address the language needs of LEP individuals.

2.2 Language Assistance Policies

1. **Written Translations of Vital Documents:** ODOC and its subrecipients are required to provide written translations of vital documents in its federally funded programs when the number of LEP individuals in any language exceeds 1,000 persons or greater than or equal to 5% of the population in the market area.
2. **Oral Interpretation Services:** OODOC and its subrecipients must provide oral interpretation services for its federally funded programs.
3. **Language Assistance Logbook:** ODOC and its subrecipients must maintain a detailed logbook of all translation and interpretation service requests, including the date, type of service, language requested, and outcome.
4. **Quarterly Performance Report:** Subrecipients must submit metrics on translation and interpretation requests, including descriptions of the requests, languages served, and outcomes, as part of their Quarterly Performance Reports.

- 5. Annual Evaluation of Vital Documents:** Every year, ODOC and its subrecipients must evaluate current and any new vital documents to ensure they are updated and translated appropriately based on the needs of LEP individuals.

3 Procedures

3.1 Translation of Vital Documents

1. Process for Identifying Vital Documents

- a. Using *Table 1: Vital Documents* on the next page, staff must determine which documents are vital for their program.
- b. Use the table's indicators to identify the required language for vital documents. Green circles indicate that the vital document must be translated by default if the program, benefit, or service operates in an eligible market area exceeding HUD's Safe Harbor Thresholds. Black triangles indicate that the vital document will be translated upon request and only to the extent necessary to assist the LEP individual.
- c. On the first business day of December, subrecipients must review their program documentation and identify any new vital documents. New vital documents must be sent to ODOC no later than December 31st. The ODOC will review the documentation and translate it by March of the following year, if necessary.

2. Assess Language Needs

- a. Staff must use [ODOC's LEP Online Map](#) to determine the number and proportion of LEP Chinese, Spanish, and Vietnamese individuals in their market area. The online map uses the most recent US Census ACS data.
- b. Using the indicators in *Table 1* If the numbers exceed HUD's safe harbor threshold of 1,000 individuals or greater than or equal to 5% of the population, then vital documents must be translated.

Table 1: Vital Documents

Document Type	Required to Translate	CH	SP	VI
Applications for services or benefits	ODOC and subrecipients	●	●	●
Beneficiary letters	ODOC and subrecipients	●	●	●
CDBG Action Plan	ODOC	▲	▲	▲
CDBG-DR Action Plan	ODOC	▲	●	▲
Complaint forms	ODOC and subrecipients	●	●	●
Consent forms	Subrecipients	●	●	●
Documents requiring a response from the recipient	Subrecipients	●	●	●
Health and safety warnings	Subrecipients	●	●	●
Information on eligibility requirements	ODOC and subrecipients	●	●	●
Instructions on how to access services	ODOC and subrecipients	●	●	●
Notice of denials, reductions, or terminations	ODOC and subrecipients	●	●	●
Notices of rights and responsibilities	ODOC and subrecipients	●	●	●
Program flyers, materials, social media posts	ODOC and subrecipients	●	●	●
Public Notices	ODOC and subrecipients	●	●	●



Translations are available by default when the program, project, or activity is in an eligible market area exceeding safe harbor thresholds (see Table 2).



Translations are available upon request. ODOC and its subrecipients may use interpreters and document translations only to the extent required to assist LEP individuals.

3.2 Subrecipient Instructions for Requesting Interpretation Services

The Oklahoma Department of Commerce (ODOC) has contracted with Language Associates to provide over-the-phone interpretation services for our subrecipients. This service is only for Limited English Proficient (LEP) clients. Unauthorized use of this service may result in the subrecipient being billed at 1.5x the invoice amount in addition to a finding when the monitoring is conducted.

Need interpretation Monday–Friday, 8 am – 5 pm Central Time?

1. Call 405-946-1624.
2. At the automated prompt, dial ‘0’.
3. Tell Language Associates staff the language for which interpretation is needed.
4. After receiving the interpretation service, inform Language Associates to bill ODOC at “Accounts_Payable@Okcommerce.gov.” Provide your full name, agency, and the grant program the service was needed for (e.g., CDBG-CV, ESG, Wx, etc.).
5. Send a brief email to the ODOC staff member you work with describing the interpretation services, including the approximate length of the call.
6. (ODOC Staff Instruction): Fill out the LAP Interpretation and Translation workbook located at:

I:\CommDev\Translation and Interpretation\LAP Interpretation and Translation.xlsx

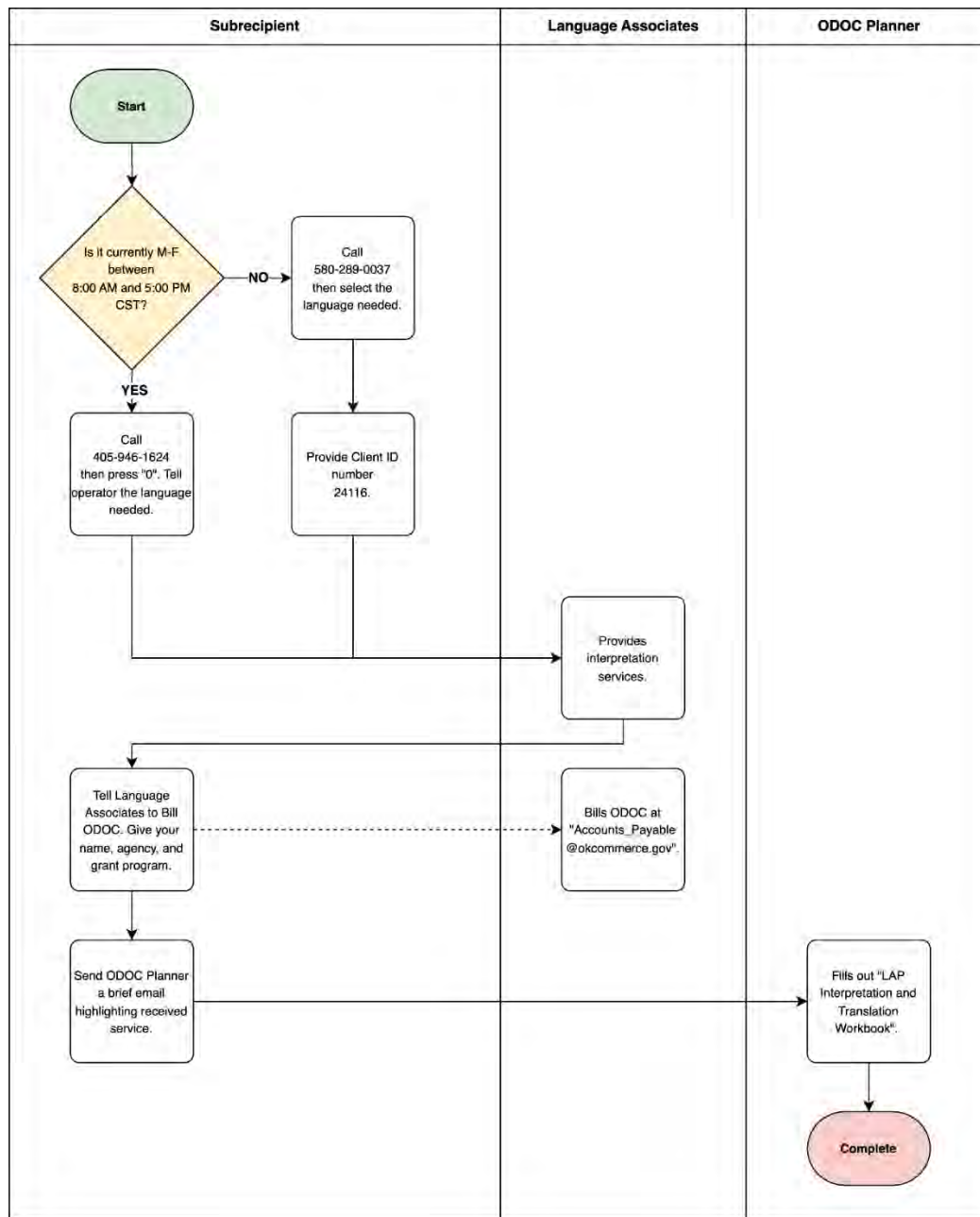
Need interpretation Monday–Friday, 5 pm – 8 am, weekends, or holidays?

1. Call 580-289-0037.
2. Select the language for which interpretation is needed.
3. The Client ID is 24116.
4. After receiving the service, inform Language Associates to bill ODOC at “Accounts_Payable@Okcommerce.gov.” Provide your full name, agency, and the grant program for which the service was needed (e.g., CDBG-CV, ESG, Wx, etc.).

5. Send a brief email to the ODOC staff member you work with describing the interpretation services, including the approximate length of the call.
6. (ODOC Staff Instruction): Fill out the LAP Interpretation and Translation workbook located at:

I:\CommDev\Translation and Interpretation\LAP Interpretation and Translation.xlsx

Diagram of Process



3.3 Subrecipient Instructions for Requesting Translation Services

1. Identify the potential vital document that needs to be translated.
2. Send the document to the ODOC Planner you work closely with on the program. They will evaluate whether the document meets the definition of a vital document as defined in ODOC's Language Access Plan.
3. If ODOC staff determines the document to be vital, Language Associates will translate it. This process can take time, depending on the length and complexity of the document and their current workload. Once ODOC staff receive the translation, it will be sent to you.
4. (ODOC Staff Instruction): Fill out the LAP Interpretation and Translation workbook located at:
I:\CommDev\Translation and Interpretation\LAP Interpretation and Translation.xlsx

4 Appendix 1

4.1 Four Factor Analysis

Introduction

The Four Factor Analysis is a tool developed by HUD to assess and meet the needs of individuals with Limited English Proficiency (LEP). It is commonly used to evaluate language assistance requirements across different federally funded programs, ensuring compliance with Title VI of the Civil Rights Act of 1964.,

The U.S. Census Bureau collects data on English language proficiency through the American Community Survey (ACS), an ongoing national survey of individuals aged five and older. Respondents are asked whether they speak a language other than English at home and, if so, how well they speak English, selecting from four self-reported categories: “very well,” “well,” “not well,” or “not at all.” Individuals who speak a language other than English and report speaking English less than “very well” are classified as Limited English Proficient (LEP). To support its Title VI compliance and Language Access Planning, the Oklahoma Department of Corrections (ODOC) conducted a detailed analysis of ACS Table C16001: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over. This table offers a streamlined summary of major language groups and their English proficiency levels. ODOC used this data to perform a thorough Factor 1 analysis, quantifying the number and proportion of LEP individuals likely to encounter its programs, services, or activities across the state.

Factor 1: Number and proportion of LEP individuals

Factor 1 requires ODOC/CD to assess the number and proportion of LEP individuals in the State’s population to be served by the agency’s federally funded programs, projects, or activities. The Federal Register Notice from January 22, 2007² outlines the “safe harbor” thresholds for written translation based on the number or proportion of LEP individuals in the eligible market

² Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons. 72 Fed. Reg. 2732 (Jan. 22, 2007).
https://www.lep.gov/sites/lep/files/resources/HUD_guidance_Jan07.pdf

area³. This information is summarized in Table 1 below. Safe harbor thresholds, detailed in VI(B)(3) of the notice, describe grantee activities that meet HUD's criteria for making reasonable efforts to provide written language assistance, protecting against findings of noncompliance.

Table 2: Safe Harbor Thresholds

Size of Language Group	Recommended Provision of Written Language Assistance
1,000 or more in the eligible population in the market area or among current beneficiaries	Translated vital documents
More than 5% of the eligible population or beneficiaries <i>and</i> more than 50 in number	Translated vital documents
More than 5% of the eligible population or beneficiaries <i>and</i> 50 or less in number	Translated written notice of right to receive free oral interpretation of documents.
5% or less of the eligible population or beneficiaries and less than 1,000 in number	No written translation is required.

According to HUD's guidance, safe harbor thresholds apply to the translation of documents and do not apply for oral interpretation. ODOC/CD and its subrecipients will always provide oral interpretation no matter how few LEP individuals there are in the eligible market area. The term

³ As Table 2 in this document demonstrates, recipients of federal funds are required to assess the number and proportion of LEP individuals within the "market area". From 72 FR 2740: "One factor in determining what language services recipients should provide is the number or proportion of LEP persons from a particular language group served or encountered in the eligible service population. The greater the number or proportion of these LEP persons, the more likely language services are needed. Ordinarily, persons "eligible to be served, or likely to be directly affected, by" a recipient's program or activity are those who are served or encountered in the eligible service population. This population will be program-specific and includes persons who are in the geographic area that have been approved by HUD as the recipient's jurisdiction or service area."

“market area” is project, activity, or program specific. When there is a greater number or proportion of LEP individuals in a market area, the need for translation of vital documents becomes greater. What follows is an analysis of U.S. American Community Survey (ACS) data.

As Table 3 and Figure 1 demonstrate, Spanish is the most predominant language in Oklahoma besides English. Additionally, Spanish speakers are the greatest number and proportion of LEP speakers compared to any other language. Besides Spanish, “Other Asian languages” are the next most spoken linguistic group in Oklahoma. It is important to note that Oklahoma also has large numbers of Vietnamese and Chinese speakers (16,752 and 9,806 respectively), and both populations have a considerable proportion of speakers who are LEP (57% and 49% respectively).

1.1.1 LEP in 77 Counties

While statewide data provides a useful picture of the predominate languages in the state for ODOC/CD’s HUD funded programs, understanding LEP populations at the county level is more valuable for the agencies carrying out the program. In most circumstances, the State acts as a pass-through agency, and the grants are awarded to county or municipal governments.

As highlighted in section 1.5, the ACS is a survey of a portion of the population, meaning each estimate for the number of language speakers and LEP speakers within each linguistic group has a margin of error. This margin of error indicates the range, with a 90% certainty, on where the true value lies. Small estimates and a high margin of error can indicate that there is less confidence in the reported values. This LAP considers the margin of error when evaluating Factor 1. Due to table size limitations in this LAP, it is not appropriate to include county estimates and MOE (67 pages), or census tract estimates and MOE (147 pages). ODOC will provide this information to each subrecipient during the application phase in .csv and .shp file formats. *ODOC/CD strongly encourages subrecipients to consider the margin of error especially when the estimate is close to exceeding the safe harbor threshold* (Table 2). Ideally, the subrecipient should err on the side of caution in such scenarios and translate vital documents.

The ACS does not provide granular data on some language groups to protect the identity of individuals within small language groups. For a county-by-county analysis of language groups, certain language groups have been aggregated. The largest impact of this aggregation for this analysis is that Native North American languages are grouped into a category labeled “Other

and unspecified languages,” which includes native languages from around the world, and comprises at least 877 languages. This limits the ability for ODOC/CD to conduct a useful analysis of Native American LEP speakers at the county level. Because of the large numbers of language groups included in the aggregate categories, and the impossibility of determining the true number or the proportion of LEP individuals within specific languages, such language groups have been excluded from the county level language analysis.

1.1.1.1 Counties

There are 23 counties that exceed the safe harbor threshold number and or threshold of Spanish LEP individuals, 4 counties that exceed the number of Vietnamese LEP individuals, and 3 counties that exceed the number of Chinese LEP individuals (Table 4).

Table 3: Counties that Exceed or Equal 1,000 LEP Individuals

Safe Harbor Threshold	Spanish LEP Estimates	Vietnamese LEP Estimates	Chinese LEP Estimates
1,000 or more in the eligible population in the market area or among current beneficiaries.	Jackson (733 ± 238) Marshall (887 ± 128) McClain (896 ± 186) Caddo (1062 ± 167) Le Flore (1118 ± 149) Wagoner (1227 ± 161) Comanche (1495 ± 294) Custer (1413 ± 406) Garfield (1821 ± 434) Canadian (2310 ± 469) Texas (3466 ± 481) Cleveland (4166 ± 634) Tulsa (24919 ± 885) Oklahoma (39054 ± 1846)	Canadian (1129 ± 374) Tulsa (1832 ± 339) Cleveland (1853 ± 370) Oklahoma (3736 ± 515)	Payne (820 ± 353) Cleveland (950 ± 336) Oklahoma (1193 ± 347)
More than 5% of the eligible population or beneficiaries and more than 50 in number	Beaver (9.58%) Blaine (5.60%) Custer (5.30%) Harper (9.73%) Love (5.54%) Marshall (6.15%) Oklahoma (5.32%) Texas (17.59%) Tillman (7.94%)	No counties	No counties

If a subrecipient proposes a federally funded program, project, or activity that crosses multiple counties, the estimates and the upper band of the MOE should be summed when evaluating

Factor 1.

1.1.1.2 Census Tracts

Spanish is the only language where there are census tracts that equal or exceed 1,000 LEP individuals. There are no census tracts that equal or exceed 1,000 Vietnamese or Chinese LEP individuals.

Table 4: Census Tracts that Exceed or Equal 1,000 Spanish LEP Individuals

GEOID	Census Tract	Spanish LEP Estimates
40143001400	Census Tract 14, Tulsa County, Oklahoma	806 ± 222
40143000400	Census Tract 4, Tulsa County, Oklahoma	828 ± 225
40039950800	Census Tract 9508, Custer County, Oklahoma	745 ± 312
40109106914	Census Tract 1069.14, Oklahoma County, Oklahoma	807 ± 318
40109104500	Census Tract 1045, Oklahoma County, Oklahoma	956 ± 199
40109105600	Census Tract 1056, Oklahoma County, Oklahoma	829 ± 336
40109104900	Census Tract 1049, Oklahoma County, Oklahoma	827 ± 340
40109106917	Census Tract 1069.17, Oklahoma County, Oklahoma	748 ± 439
40143001600	Census Tract 16, Tulsa County, Oklahoma	1004 ± 246
40143007306	Census Tract 73.06, Tulsa County, Oklahoma	1068 ± 233
40109103900	Census Tract 1039, Oklahoma County, Oklahoma	1010 ± 427
40109107001	Census Tract 1070.01, Oklahoma County, Oklahoma	1171 ± 339
40109106916	Census Tract 1069.16, Oklahoma County, Oklahoma	1012 ± 571
40143009006	Census Tract 90.06, Tulsa County, Oklahoma	1329 ± 347
40109106303	Census Tract 1063.03, Oklahoma County, Oklahoma	871 ± 814
40109104400	Census Tract 1044, Oklahoma County, Oklahoma	1282 ± 506
40139950800	Census Tract 9508, Texas County, Oklahoma	1564 ± 451

If a subrecipient proposes a federally funded program, project, or activity that crosses multiple census tracts, the estimates and the upper band of the MOE should be summed when evaluating Factor 1.

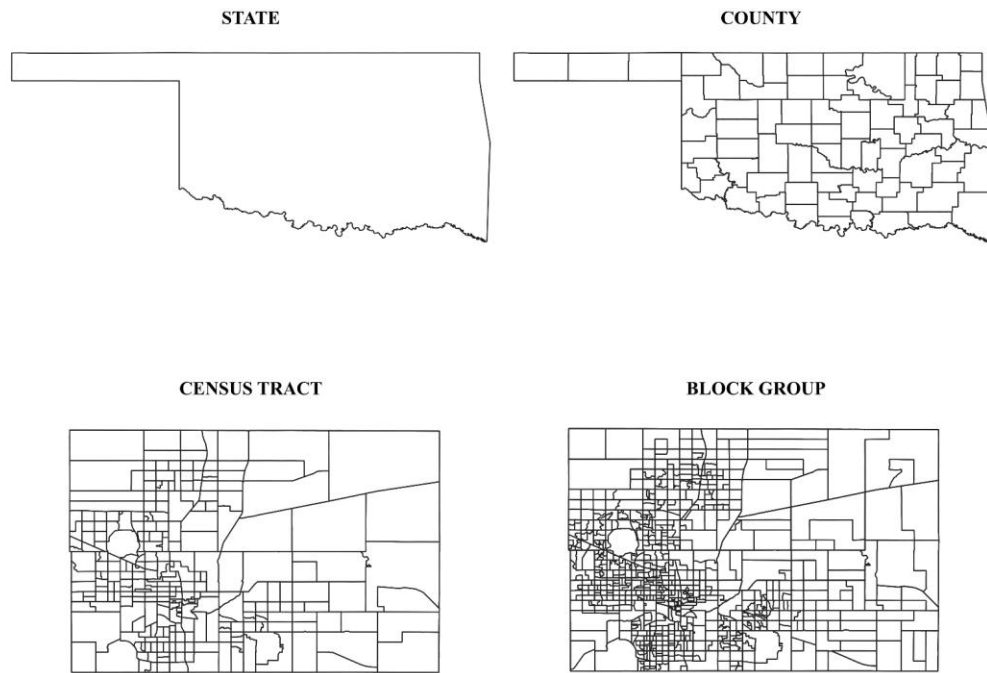
1.1.1.3 Block Groups that Exceed or Equal 1,000 LEP Individuals

Block groups have not been fully analyzed by ODOC at this time. This data will be made available in a future update to the LAP.

1.1.2 Market Area

The market area refers to the specific geographical region where a federally funded program, project, or activity will occur (2740 FRN from January 22, 2007⁴). At the time of application, ODOC's subrecipients are required to describe the location of their program, project, or activity. To assess a proposal's market area, and therefore gain an understanding of the number or proportion of LEP speakers, ODOC staff utilizes four market area categories that are derived from census data. These categories are: (1) State; (2) County; (3) Census Tracts; and (4) Block Groups, as illustrated in Figure 2 below.

⁴ 72 FR 2736: "According to the table, HUD would expect translations of vital documents to be provided when the eligible LEP population in the market area or the current beneficiaries exceeds 1,000 persons or if it exceeds 5 percent of the eligible population or beneficiaries along with more than 50 persons."



If the federally funded program, project, or activity is eligible to Oklahomans countywide, then the Market Area is defined as the County. In such cases, ACS LEP estimates, to include the upper band of the margin of error, are used to determine the number and proportion of LEP individuals.

If the federally funded program, project, or activity is eligible to Oklahomans at the census tract level, then the Market Area is defined as the census tract. In such cases, ACS LEP estimates, to include the upper band of the margin of error, are used to determine the number and proportion of LEP individuals.

If the federally funded program, project, or activity is eligible to Oklahomans at the block group level, then the Market Area is defined as the census tract. In such cases, ACS LEP

estimates, to include the upper band of the margin of error, are used to determine the number and proportion of LEP individuals.

In cases where the federally program, project, or activity is at a smaller geography (e.g., census tract or block group), but where LEP data at that geographic level is absent, ODOC/CD will utilize the LEP estimates, to include the upper band of the margin of error, at the next highest available geography.

1.1.3 Factor 1 Summary

- A. Spanish ranks as the second most prevalent language in Oklahoma. In 23 out of 77 counties, the Spanish LEP population surpasses the safe harbor thresholds. In these 23 counties, the LEP population either has over 1,000 individuals or more than 5% of the LEP speakers within the language group.
- B. Vietnamese is the third most common language in the state. This language group has a high proportion of LEP speakers (57%). 89% of the Vietnamese speaking population is concentrated in Canadian, Cleveland, Oklahoma, and Tulsa Counties.
- C. Native languages are the fourth most common language spoken in Oklahoma. This grouping includes Cherokee, Chickasaw, and Muskogee, among others. It does not have a high proportion of LEP speakers (14%) at the language group level. Data at the county level for this group is unavailable.
- D. Chinese is the fifth most common language in the state. This language group has a high proportion of LEP speakers (49%). Cleveland, Oklahoma, and Tulsa Counties represent 79% of the Chinese speaking population.

1.2 Factor 2: Frequency of LEP Interaction

The second factor in the Four Factor Analysis requires ODOC/CD to assess the frequency of interaction with LEP individuals across its diverse federally funded programs. ODOC/CD assessed the level of historic interaction with LEP individuals at the agency level in addition to

the anticipated level of subrecipient interaction with LEP individuals. This information is summarized in Table 6 below. It is important to note that infrequent interactions with LEP individuals does not correlate to the need for language assistance in the first place. Lower interaction frequencies could be explained in part by the lack of materials and outreach to LEP populations to begin with.

Table 5: Anticipated LEP Interaction

Program	Anticipated ODOC/CD Interaction with LEP	Anticipated Subrecipient Interaction with LEP
CDBG	Low	Low
CDBGDR	Low	High
CSBG	Low	High
SEP	Low	Low
BSEP	Low	Low
BWAP	Low	Medium
WAP	Low	Medium
LIHEAP	Low	High
IREC	Low	Low
PDP	Low	High
PREP	Low	Low
CAA	Low	High
CAAHS	Low	High
CENA	Low	Medium
ESG	Low	High
SS	Low	Low
REAP	Low	Low
CDBGCR	Low	Medium
ESGCR	Low	High
ARPA	Low	High

As a state agency, ODOC/CD rarely interacts directly with LEP individuals since the primary role of the agency is to develop, allocate funds, and oversee federally funded programs,

projects, and activities. It is the agency's subrecipients, usually units of general local government, that encounter day-to-day interactions with LEP individuals.

Based on the analysis found in Factor 1, it is reasonable to assume that ODOC/CD's subrecipients (those entities directly responsible for working with beneficiaries) would have a greater probability of contact with LEP individuals. Overall, subrecipients are likely to encounter Spanish LEP individuals throughout the State of Oklahoma (Table 2 and Figure 3).

1.2.1 Factor 2 Summary

- E. ODOC/CD operates numerous programs in all 77 counties in Oklahoma. It is reasonable to expect that ODOC/CD's subrecipients will encounter Spanish speaking LEP individuals throughout the state.
- F. Individual level programs, such as housing rehabilitation or buyouts, are more likely to encounter LEP individuals. Public facilities and infrastructure programs serve area-wide populations are less likely to encounter LEP individuals.
- G. In a future update to the LAP, ODOC/CD will require subrecipients to provide annual updates to the level of interaction with LEP populations.

1.3 Factor 3: Importance of the service, information, program, and/or activity

The third factor in the Four Factor Analysis requires ODOC/CD to assess the importance of its federally funded programs and activities.

ODOC/CD plays a crucial role in enhancing the lives of thousands of Oklahoma annually across all 77 counties in the state. Through a diverse range of federally funded programs, ODOC/CD improves housing, infrastructure, and social service programs. Annually representing

over \$40M in investments benefiting 10K+ in direct beneficiaries, ODOC/CD provides vital programs and services that directly impact and improve the quality of life for Oklahomans.

1.3.1 ODOC/CD Administered Programs

The following programs are federally funded and administered by ODOC/CD:

CAA: Anti-poverty funds for CAA's. Used like CSBG. Over the past five years, CAA has had \$345,193 in expenditures. The number of beneficiaries served in this program is totaled in the CAA program.

CAAHS: Funds for CAA's with or sponsoring a federally funded Head Start program. Used for program enhancement. Over the past five years, CAAHS has had \$1,727,331 in expenditures towards 11,531 beneficiaries.

CDBG: The Community Development Block Grant (CDBG) program enables rural Oklahoma communities to finance a variety of public infrastructure and economic improvements and helps promote job growth because of these improvements. Over the past five years, CDBG has had \$60,000,000 in expenditures towards 103,761 beneficiaries.

CDBGCR: The Community Development Block Grant Coronavirus Relief Program (CDBG-CV) grants are a flexible source of assistance for addressing the health and economic challenges brought on by the coronavirus pandemic. Over the past three years, CDBGCR has had \$3,448,623 in expenditures towards 11,075 beneficiaries.

CDBGDR: The Community Development Block Grant Disaster Recovery (CDBG-DR) program addresses long-term recovery efforts for housing and infrastructure damaged by natural disasters. Over the past five years, CDBG-DR has had \$90,000,000 in expenditures.

CENA: Over the past five years, CENA has \$9,364,030 in expenditures towards 113,340 beneficiaries.

CSBG: Federally funded anti-poverty program. Funds support Community Action Agencies. Over the past five years, CSBG has had \$ 8,649,837 in expenditures towards 67,992 beneficiaries.

ESG: The Emergency Solutions Grant program is a component of the State’s Continuum of Care system designed to alleviate homelessness in Oklahoma. ESG programs enable homeless individuals and families to move toward independent living by providing emergency housing, supportive services, and housing assistance. Over the past five years, ESG has had \$9,168,139.20 in expenditures towards 18,136 beneficiaries.

ESGCR: The CARES Act appropriated \$4 billion through the Emergency Solutions Grants (ESG) Program “to prevent, prepare for, and respond to coronavirus, among individuals and families who are homeless or receiving homeless assistance and to support additional homeless assistance and homelessness prevention activities to mitigate the impacts created by coronavirus under the Emergency Solutions Grants program (42 U.S.C. 11371).” Over the last three years, ESGCR has had \$17,210,003.81 in expenditures towards 13,973 beneficiaries.

LIHEAP: ODOC partners with the Department of Human Services to provide Weatherization Assistance Program assists low-income households – particularly the elderly, people with disabilities, and families with children – in meeting their home energy needs. Over the last five years, LIHEAP has had \$1,499,239 in expenditures towards 648 beneficiaries.

PDP: Over the last three years, PDP has had \$2,979,907 in expenditures towards 6,027 beneficiaries.

REAP: Over the past five years, REAP has had \$61,049,875 in expenditures.

WAP: The U.S. Department of Energy (DOE) Weatherization Assistance Program (WAP) reduces energy costs for low-income households by increasing the energy efficiency of their homes, while ensuring their health and safety. Over the last five years, WAP has had \$2,070,007.27 in expenditures towards 7,760 beneficiaries.

1.3.2 Factor 3 Summary

The number of federally funded programs that ODOC/CD administers clearly demonstrates the crucial role the agency has in shaping the lives of thousands of Oklahomans. With programs, projects, and activities in all 77 counties in the state, the positive impact on human lives and the built environment is profound. Since a large number of Oklahoman's interact with these programs, it is expected that in a diverse and multicultural state such as Oklahoma that LEP populations will be encountered.

1.4 Factor 4: Resources, financial and human, available to the recipient

Factor 4 requires ODOC/CD to assess the resources that are available to the agency and its subrecipients. ODOC/CD has a wide range of resources, both financial and staff, to provide language assistance to LEP individuals. ODOC/CD uses a portion of its administration funds towards translating vital documents and providing oral interpretation services. Additionally, ODOC/CD has two bilingual (English/Spanish) staff members available for LEP assistance⁵. Other forms of language assistance offered by ODOC/CD include:

6. ODOC/CD has hired a vendor, Language Associates⁶, capable of providing in-person, telephone, and video interpretation services in many different languages including but not limited to: *Spanish, Vietnamese, Mandarin Chinese, Amharic, Cantonese, Italian, Korean, Russian, Ukrainian, Japanese, Urdu, Hindi, Farsi, Bengali, Malayalam, Laotian, German, French, Polish, Taiwanese, Gujarati, Punjabi, Marathi, Arabic, Hebrew, Portuguese, Turkish, Serbo-Croatian, Dutch, Tamil, Kickapoo, Hungarian, Tagalog, and Czech.*

⁵ Bilingual (English/Spanish) ODOC/CD staff are available by request with at least five (5) days of advance notice. Please contact Jade Shain (Jade.Shain@okcommerce.gov) or Jessica Izquierdo (Jessica.Izquierdo@okcommerce.gov) for assistance. For immediate assistance, contact Language Associates by calling 405-946-1624 or by visiting their website at <http://www.languageassociates.net/>

⁶ Language Associates is ODOC/CD's vendor for interpretation and translation services. They can be contacted at 405-946-1624 or by visiting their website at <http://www.languageassociates.net/>

7. Written translation of vital documents (section 3.2) in the languages described above;
8. Notifications in program policies and procedures about the availability of other languages and requests for services; and
9. Website content translated into several different languages.

ODOC/CD's subrecipients have varied resources. Some have a part-time grant administrator. Others, being larger, employ several full-time staff. There is a limit to grant funds used for administrative tasks, including translation. ODOC/CD recognizes the limitations of many subrecipients.

1.4.1 Factor 4 Summary

ODOC/CD has the financial and human resources to provide meaningful access to all federally funded programs. Since ODOC/CD works with hundreds of different subrecipients annually, the level of assistance those entities can provide varies.