



Consolidated Annual Performance Evaluation Report

2023 CAPER



OKLAHOMA
Commerce

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CR-05 - GOALS AND OUTCOMES

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The State continues to address the four major priorities under the Community Development Block Grant Program which are 1) Water and Wastewater Projects, 2) Economic Development, 3) Public Facilities, and 4) Planning and Capacity Building. Strategically, the State allocates approximately 60% to Water and Wastewater projects, 10% toward Economic Development, and 30% toward Public Facilities and Planning and Capacity Building. In regards to water and wastewater projects, priority is given to those communities that are experiencing severe compliance problems as determined by Consent Orders issued by the Oklahoma Department of Environmental Quality (DEQ). All CDBG funds are targeted at low to moderate-income communities across the state.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
CDBG DR		CDBG-DR: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	250000	200008	80.00%			
CDBG DR		CDBG-DR: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	150000	100045	66.70%			

CDBG DR		CDBG-DR: \$	Other	Other	0	0				
State CDBG Program	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1500000	578518	38.57%	100000	140643	140.64%
State CDBG Program	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	300000	314123	104.71%	50000	82265	164.53%
State CDBG Program	Non-Housing Community Development	CDBG: \$	Jobs created/retained	Jobs	850	810	95.29%	85	0	0.00%
State CDBG Program	Non-Housing Community Development	CDBG: \$	Other	Other	100000	136570	136.57%	30000	37449	124.83%
State ESG Program	Homeless	ESG: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	6000	4727	78.78%	1400	638	45.57%
State ESG Program	Homeless	ESG: \$	Homeless Person Overnight Shelter	Persons Assisted	25000	18130	72.52%	3500	2229	63.69%
State ESG Program	Homeless	ESG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	82				
State ESG Program	Homeless	ESG: \$	Homelessness Prevention	Persons Assisted	4500	6782	150.71%			
State ESG Program	Homeless	ESG: \$	Jobs created/retained	Jobs		0				

State HOME Program	Affordable Housing	HOME: \$	Rental units constructed	Household Housing Unit	260	204	78.46%	30	28	93.33%
State HOME Program	Affordable Housing	HOME: \$	Rental units rehabilitated	Household Housing Unit	205	135	65.85%	10	5	50.00%
State HOME Program	Affordable Housing	HOME: \$	Homeowner Housing Added	Household Housing Unit	0	0				
State HOME Program	Affordable Housing	HOME: \$	Direct Financial Assistance to Homebuyers	Households Assisted	100	80	80.00%	73	26	35.62%
State HOPWA Program	Non-Homeless Special Needs	HOPWA: \$	Housing for People with HIV/AIDS added	Household Housing Unit	400	255	63.75%			
State HOPWA Program	Non-Homeless Special Needs	HOPWA: \$	HIV/AIDS Housing Operations	Household Housing Unit	0	0		65	52	80.00%
State National Housing Trust Fund	Affordable Housing Homeless Non-Homeless Special Needs Extremely Low Income households	HTF: \$	Rental units constructed	Household Housing Unit	100	31	31.00%	50	2	4.00%

State National Housing Trust Fund	Affordable Housing Homeless Non-Homeless Special Needs Extremely Low Income households	HTF: \$	Rental units rehabilitated	Household Housing Unit	50	21	42.00%	50	39	78.00%
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Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

Under the State's CDBG program the major priorities are 1) Water and Wastewater Projects, 2) Economic Development, 3) Public Facilities, and 4) Planning and Capacity Building. Strategically, the State allocates approximately 60% to Water and Wastewater projects, 10% toward Economic Development, and 30% toward Public Facilities and Planning and Capacity Building. In regards to water and wastewater projects, priority is given to those communities that are experiencing severe compliance problems as determined by Consent Orders issued by the Oklahoma Department of Environmental Quality (DEQ). All CDBG funds are targeted at low to moderate-income communities across the state.

CR-10 - RACIAL AND ETHNIC COMPOSITION OF FAMILIES ASSISTED

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG	HOME	HTF	HOPWA
White	20	71	34	33
Black or African American	0	25	17	3
Asian	1	0	0	0
American Indian or American Native	4	1	1	2
Native Hawaiian or Other Pacific Islander	1	0	0	1
Total	26	97	52	39
Hispanic	14	0	6	5
Not Hispanic	12	97	46	34

Describe the clients assisted (including the racial and/or ethnicity of clients assisted with ESG)

	HESG
American Indian, Alaska Native, or Indigenous	513
Asian or Asian American	14
Black, African American, or African	640
Hispanic/Latina/e/o	129
Middle Eastern or North African	2
Native Hawaiian or Pacific Islander	30
White	2,173
Multiracial	540
Client doesn't know	0
Client prefers not to answer	1
Data not collected	6
Total	4,048

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

Under the State CDBG program, grant recipients (units of general local government) must provide documentation of steps taken to affirmatively further fair housing regardless of the type of CDBG activity funded by ODOC/CD, for each fiscal year the grant recipient has received a CDBG contract. The local government must demonstrate that it is affirmatively furthering fair housing on a continual basis,

not merely as a requirement of spending CDBG dollars. Efforts are made to identify discriminatory housing patterns and alleviate them by working with developer, landlords, realtors, residents and government agencies. To ensure these steps are taken to affirmatively further fair housing, ODOC/CD requires the submission of at least one Fair Housing activity with the Release of Funds request, also known as the Environmental Review, in our OKGrants system. Subrecipients are also required to provide proof of furthering Fair Housing during the monitoring process. If these steps are not in compliance, ODOC/CD presents the Subrecipient with a corrective action/finding to remedy the issue and this information will also be considered when conducting Risk Assessments for future funding. The Subrecipient must provide assurances that these steps to affirmatively further fair housing will be in compliance for future projects if awarded. The month of April has also been declared as Fair Housing Month in the State of Oklahoma.

In order to achieve compliance with the Affirmative Marketing, Minority Outreach, and Fair Housing requirements at 24 CFR Parts 92.350 and 92.351, Written Agreements shall be executed between OHFA and all Program Awardees. Written Agreements shall prohibit discrimination on the basis of race, color, national origin, religion, sex, age, handicap, or familial status in connection with any activities funded with the HOME Investment Partnerships Program assistance, National Housing Trust Fund (NHTF) or HOPWA.

CR-15 - RESOURCES AND INVESTMENTS 91.520(A)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	15,136,687	7,335,275
HOME	public - federal	9,985,854	7,515,457
HOPWA	public - federal	573,661	553,929
ESG	public - federal	1,677,389	933,274
HTF	public - federal	3,066,414	3,337,249
Other	public - federal	0	

Table 3 - Resources Made Available

Narrative

Under the State CDBG program, Subrecipients are encouraged to provide Match/Leverage funds if available. Typically, but not limited to, resources may include State appropriated funds from the Rural Economic Action Plan (REAP), local funds from units of general local governments, funds from the USDA-Rural Development, and revolving loan funds from the Oklahoma Water Resources Board (OWRB).

Match/Leverage contributions must meet the definition under the federal program regulations at 24 CFR Part 92. Written, itemized documentation of all proposed Match contributions must be provided and must be in place at the time of application. Specific documentation requirements are detailed in the application, as well as documentation of the sources and amounts of commitments.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
State of Oklahoma	100	100	State Geography

Table 4 – Identify the geographic distribution and location of investments

Narrative

The State of Oklahoma does not set aside reserved dollar amounts of assistance specifically for geographic areas within the State for CDBG, HOME, ESG or HOPWA programs. Rather each of these programs has its own distribution procedures that sometimes include specific requirements for projects within the state. These programs cover all 77 Counties.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

CDBG-proposed match/leverage must be directly related to any proposed project and in place at the time of application. Some CDBG projects are awarded "points" based on verified leverage. Match/leverage may consist of cash or in-kind contributions. Cash includes other federal/state grants and loans and local capital improvement funds set aside for a specified purpose in a municipal or county budget. Cash also includes the fair market value of land, building or materials portion of infrastructure improvements. In-kind includes the value of force account labor, voluntary labor or the services and supplies provided by another entity.

ESG - proposed match/leverage is provided by the subrecipients in the form of In-kind services, volunteer labor and community donations. Leverage may also be provided through private foundation grants or qualifying federal funding. Points are awarded during the application scoring process to those applicants who can show they have match/leverage through various community resources. Subrecipients are required to track all match/leverage and spend match/leverage funds using the same regulations used to spend the actual grant funds.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	4,089,257
2. Match contributed during current Federal fiscal year	16,199,850
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	20,289,107
4. Match liability for current Federal fiscal year	765,934
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	19,523,173

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
22-1700	05/08/2024	0	0	199,850	0	0	0	199,850
23-1730	03/06/2024	15,000,000	0	0	0	0	0	1,500,000
23-1740	05/09/2024	1,000,000	0	0	0	0	0	1,000,000

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at begin-ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
7,640	269,966	263,689	0	13,918

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	10,377,041	71,456	0	19,290	110,354	10,175,941
Number	31	5	0	1	3	22
Sub-Contracts						
Number	54	2	0	0	7	45
Dollar Amount	3,722,767	124,560	0	0	370,000	3,228,207
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	10,377,041	879,511	9,497,530			
Number	31	1	30			
Sub-Contracts						
Number	56	0	56			
Dollar Amount	3,722,767	0	3,722,767			

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition

Parcels Acquired	0	0			
Businesses Displaced	0	0			
Nonprofit Organizations Displaced	0	0			
Households Temporarily Relocated, not Displaced	0	0			
Households Displaced	Total	Minority Property Enterprises			White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	
Number	0	0	0	0	0
Cost	0	0	0	0	0

Table 10 – Relocation and Real Property Acquisition

CR-20 - AFFORDABLE HOUSING 91.520(B)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	0	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	0	0

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	30	20
Number of households supported through Rehab of Existing Units	20	15
Number of households supported through Acquisition of Existing Units	30	17
Total	80	52

Table 12 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

Under the States CDBG program no affordable housing projects have been funded. The State's HOME program biggest challenge is not enough funds to support the housing needs of the State. The HOME program awards are based on the area with the biggest need. The HOME program continues to face the biggest challenge in the State, a need for more rental housing. Also the challenges with the pandemic slowed production down with delays in receiving supplies/materials.

Discuss how these outcomes will impact future annual action plans.

Under the States CDBG program no affordable housing projects have been funded. In the future, the State's HOME program will continue to award funds where there is the greatest need. A majority of the allocation will continue to be used on Rental housing. If that need changes, the State will change it's future plans accordingly.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual	HTF Actual
Extremely Low-income	0	12	41
Low-income	0	42	
Moderate-income	0	5	
Total	0	59	

Table 13 – Number of Households Served

Narrative Information

HTF funds that OHFA received in 2023 will be used to provide housing for Extremely Low-Income families or families at or below the Poverty Line, whichever is greater.

CR-25 - HOMELESS AND OTHER SPECIAL NEEDS 91.220(D, E); 91.320(D, E); 91.520(C)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

The State program funds a variety of organizations whose programs meet key needs of their Continuum of Care Action Plans and communities. Points are awarded during the application scoring process to applicants who describe the services they provide regarding reaching out to the homeless in their service areas. Then, the State evaluates each Organization's success beginning with program descriptions submitted in grant applications through generating contracts and then monitoring the program to ensure the steps described in the application and contract were successful and performance measures met.

Addressing the emergency shelter and transitional housing needs of homeless persons

The State program funds a variety of organizations whose programs meet key needs of their Continuum of Care Action Plans and communities. Points are awarded during the application scoring process to applicants who describe the services they provide regarding emergency shelter services in their service areas. Then, the State evaluates each Organization's success beginning with program descriptions submitted in grant applications through generating contracts and then monitoring the program to ensure the steps described in the application and contract were successful and performance measures were met.

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

The State program funds a variety of organizations whose programs meet key needs of their Continuum of Care Action Plans and communities. Points are awarded during the application scoring process to applicants who describe the partnerships and collaborations they have with mainstream and local resources to not duplicate and expand services they provide to the low-income and families avoiding homelessness in their service areas. Then the State evaluates each Organization's success beginning with program descriptions submitted in grant applications through generating contracts and then monitoring the program to ensure the steps described in the application and contract were successful

and performance measures were met.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The State of Oklahoma makes available a percentage of its HOME program funds to be paired with Continuum of Care funding. The state works closely with HUD CoC staff to make these projects work.

There are two HOPWA Project Sponsors that coordinate services with COC to meet the needs of all categories of homelessness individuals that meet the eligibility criteria under the HOPWA Program guidelines.

The State of Oklahoma encourages the pairing of Housing Trust Fund monies with Continuum of Care funding.

ESG: The State program funds a variety of organizations whose programs meet key needs of their Continuum of Care Action Plans and communities. Points are awarded during the application scoring process to applicants who describe the partnerships and collaborations they have with mainstream and local resources to not duplicate and expand services they provide to the low-income and families avoiding homelessness in their service areas. Then the State evaluates each Organization's success beginning with program descriptions submitted in grant applications through generating contracts and then monitoring the program to ensure the steps described in the application and contract were successful and performance measures were met.

CR-30 - PUBLIC HOUSING 91.220(H); 91.320(J)

Actions taken to address the needs of public housing

OHFA is itself a public housing agency that administers the Section 8 Housing Choice Voucher Program on a Statewide basis. OHFA also monitors the needs and activities of the other public housing agencies in the State of Oklahoma.

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

Efforts to collaborate more extensively with PHAs within the State of Oklahoma are underway. There are a total of 104 PHAs and 99 currently fall within the jurisdiction of the State Consolidated Plan. The five remaining public housing agencies – located in Norman, Lawton, Tulsa, Oklahoma City, and Shawnee – fall under other participating jurisdictions.

PHAs in Oklahoma provide resident involvement and awareness activities in connection with property management and asset-building through homeownership. This is accomplished through such activities as:

- Having housing authority residents serve on each PHA's Board of Commissioners.
- Affording residents notice and comment periods concerning proposed policy changes governing property operations.
- Affording residents input and comment processes regarding resource use.

Additionally, the Residents Initiative Network of Oklahoma is a proposed initiative that will offer a statewide program to train PHA residents in:

- Accessing and utilizing the citizen participation processes offered by the Authorities;
- Resident rights, duties and responsibilities; and
- Transitioning from rental to homeownership. Various PHAs within the State promote homeownership to their resident base.

Homeownership fairs, credit counseling, and direct contact with mortgage lenders and credit reporting services are examples of homeownership resident initiatives. On a limited basis, some PHAs develop their own single-family units and work to transition residents into ownership.

Actions taken to provide assistance to troubled PHAs

If any public housing authorities are designated as "troubled" during the Program Year, OHFA will work with HUD to address the various problems they are facing. OHFA will work closely with HUD to provide technical assistance and oversight where necessary.

It is not anticipated that any HOME funds will be used to help troubled public housing authorities. The State of Oklahoma has not appropriated funds for this purpose, nor has it authorized OHFA to assume the federal government's role of subsidizing the operations of public housing agencies.

CR-35 - OTHER ACTIONS 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

With regard to the CDBG and ESG programs ODOC/CD does not have jurisdictional authority to affect broad-based changes to a community's local ordinances. Additionally, from a statewide perspective the State Legislature is responsible for creating laws and regulations that may govern tax policies, fees and basic building codes, etc.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

The obstacles to meeting underserved needs in the State are mainly related to 1) lack of adequate funding, 2) complexity in coordinating resources, and 3) staff capacity.

The State's strategy to overcome existing deficiencies in its housing and community institutional structure is based on education, outreach, and comprehensive planning. Consumers, providers, financiers, policymakers, advocates, and communities can benefit from increased cross-sector communication, dialogue, and education in understanding that economic factors are inextricably linked with meaningful solutions to the housing and community development needs and improved quality of life among the lower-income population. However, the State will continue to exhaust all resources to assist the needs of Oklahomans across the state.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

HOME and NHTF Awardees must comply with:

- Requirements for Notification, Evaluation and Reduction of Lead-Based Paint Hazards in Federally Owned Residential Property and Housing Receiving Federal Assistance; Final Rule (24 CFR Part 35, et al.), and
- Oklahoma Lead-based Paint Management Act, 27A O.S. Supp 1994, Section 2-12-101 et seq., as amended.
- Pamphlet: Protect Your Family From Lead In Your Home
- Summary of Lead-Based Paint Requirements by Activity
- Lead Safe Housing Rule
- The Renovation, Repair & Painting Rule
- Pamphlet: Renovate Right; Important Lead Hazard Information for Families, Child Care Providers and Schools

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

Within the CDBG program, ODOC/CD allows for Economic Development Infrastructure Financing (EDIF) projects. This program provides funding for communities to undertake publicly owned infrastructure to support a business that is expanding and committed to creating new jobs. At least 51% of the jobs created must be offered to persons who are of low to moderate income. ODOC/CD has implemented an additional requirement which requires that the average of all jobs created must be at least 110% of the average county wage. Therefore, under this program low income persons/families are being hired into a better, higher paying job, which is usually higher than the average county wage.

The State of Oklahoma is committed to allocating appropriate resources with the goal of allowing its citizens the opportunity to reach self-sufficiency.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

Under the State's CDBG program, the majority of funding goes to small rural communities who lack the administrative capacity to implement a CDBG project without help. Over the years, ODOC/CD has developed a strong relationship with all 11 designated Councils of Government (COG). These regionally based organizations provide much-needed administrative knowledge of the CDBG program to our rural communities. Additionally, ODOC/CD requires all individuals who administer grants for a fee must be certified as CDBG grant administrator. A list of these certified grant administrators can be located at <https://www.okcommerce.gov/community-development/local-governments-edos/community-development-block-grant-programs/>.

In addition, CDBG Continuing Education courses are offered in April and October of each calendar year where grant administrators receive policy updates and other pertinent information to administer CDBG projects.

Lastly, a CDBG Certification Class is held at the end of each year in December for anyone interested in becoming a CDBG grant administrator or needing re-certification.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

Under the current CDBG program housing projects are not funded. Therefore, no real coordination exists between public and private housing and social service agencies regarding the CDBG program at this time. However, the State will continue to exhaust all resources to assist the needs of Oklahomans across the state.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

Under the State CDBG program grant recipients (units of general local government) must provide documentation of steps taken to affirmatively further fair housing regardless of the type of CDBG

activity funded by ODOC/CD, for each fiscal year the grant recipient has received a CDBG contract. The local government must demonstrate that it is affirmatively furthering fair housing on a continual basis, not merely as a requirement of spending CDBG dollars. Efforts are made to identify discriminatory housing patterns and alleviate them by working with developer, landlords, realtors, residents and government agencies. To ensure these steps are taken to affirmatively further fair housing, ODOC/CD requires the submission of at least one Fair Housing activity with the Release of Funds request, also known as the Environmental Review, in our OKGrants system. Subrecipients are also required to provide proof of furthering Fair Housing during the monitoring process. If these steps are not in compliance, ODOC/CD presents the Subrecipient with a corrective action/finding to remedy the issue and this information will also be considered when conducting Risk Assessments for future funding. The Subrecipient must provide assurances that these steps to affirmatively further fair housing will be in compliance for future projects if awarded.

CR-40 - MONITORING 91.220 AND 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements.

As the State's ongoing responsibilities for the administration of the CDBG, HOME, HOPWA, ESG and HTF programs, ODOC/OFHA conducts comprehensive monitoring reviews of projects as needed. These reviews ensure that projects are carried out efficiently, effectively and in compliance with applicable Federal and State regulations. The State's monitoring process includes, but is not limited to, an onsite or desk- monitored review of project progress, national objectives, eligible uses, fair housing, equal opportunity, environmental review, labor standards, procurement, and financial management. This monitoring process is described in our policies and procedures manual which highlights the entire procedure from notifying the subrecipient of the monitoring to exit interviews. In the event a subrecipient requires corrective action, that information is included in a formal letter and the subrecipient must make assurances that compliance measures will be adhered to for future projects. In most cases, a subrecipient will not be allowed to reapply for other set asides if there is a corrective action/s pending and the current project has not been closed.

ODOC/CD also conducts a Risk Assessment review after awards have been decided to determine the level of monitoring needed. Each Risk Assessment is based on a point system that identifies whether the Subrecipient will require an on-site monitoring, Technical Assistance, and in some cases, both monitoring and Technical Assistance.

CITIZEN PARTICIPATION PLAN 91.105(D); 91.115(D)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The State has adopted a citizen participation plan and consultation process for the Consolidated Plan and CAPER/PER. Because our programs cover the entire State, ODOC/CD coordinates with our in-house marketing division to provide announcements and reasonable notice to Oklahoma citizens. These notifications are sent primarily through the New Pioneer and GovDelivery but may also include media releases and social media content where appropriate. The New Pioneer is ODOC's Community Development newsletter that reaches all 600 communities, 77 Counties, Community Action Agencies, Public Housing Authorities, Council of Governments, and other State agencies. Like the New Pioneer, GovDelivery notification services are used to send direct messages to community partners. Included in these notifications are web links to virtual meetings, public hearing dates, performance reports and other information which is also posted to our website at www.OKCommerce.gov. The OKCommerce

website also provides the option to translate web data information into several languages such as Spanish, Italian, French, Japanese, German and Vietnamese.

Furthermore, a Language Access Plan (LAP) was developed to determine the need of translation services in Oklahoma. Based on data collected from this study, ODOC/CD provides translation services as needed. For more information on this study, please visit <https://www.okcommerce.gov/wp-content/uploads/Language-Access-Plan.pdf>.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

To accommodate the increase in construction costs and larger projects in general, ODOC/CD changed grant maximums for Water and Wastewater projects from \$450,000 to \$600,000 in 2022.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-50 - HOME 24 CFR 91.520(D)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in 24 CFR §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

OHFA will verify that the Awardee of a low-income housing Project is maintaining records for each qualified low-income unit in the Project. These records must show, for each year in the compliance period, the information required by the record-keeping provisions contained in the HOME Regulations, incorporated herein by reference.

OHFA will verify that the records documenting compliance with the HOME Regulations for each year as described in Paragraph A above are retained for the entire affordability period.

OHFA will conduct construction inspections in order to ensure that HOME funds are not being drawn down for work that has not been completed, work that has not been done according to the specifications of the Written Agreement, or costs that are ineligible for HOME funding.

OHFA will inspect one hundred percent (100%) of the HOME Written Agreements as prescribed by HUD regulations and will inspect the low-income certification, the documentation the Awardee has received to support that certification, the rent records for Rental Projects and the home valuation limits for Homebuyer Projects.

OHFA inspected over 120 written agreements during program year 2023 that represent over 500 units. The detail listing of all the contracts and the corresponding findings can be found on the monitoring list spreadsheet that is available for review.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 24 CFR 91.520(e) and 24 CFR 92.351(a)

In order to achieve compliance with the Affirmative Marketing, Minority Outreach, and Fair Housing requirements at 24 CFR Parts 92.350 and 92.351, Written Agreements shall be executed between OHFA and all Program Awardees. Written Agreements shall prohibit discrimination on the basis of race, color, national origin, religion, sex, age, handicap, or familial status in connection with any activities funded with HOME Investment Partnerships Program assistance.

Refer to IDIS reports to describe the amount and use of program income for projects,

including the number of projects and owner and tenant characteristics

OHFA has received approximately \$269,966 of program income during 2023. Most of the program income generated is from projects combined with LIHTC funds. The \$269,966 of program income was generated by approx 15-20 developments. The program income is used before any new HOME funds are drawdown. OHFA maintains a program income re-use log that shows the activities that uses program income.

**Describe other actions taken to foster and maintain affordable housing. 24 CFR 91.220(k)
(STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 24 CFR 91.320(j)**

Oklahoma has a thorough network of public and private nonprofit organizations that delivers housing and supportive service needs. Many federal as well as State resources are provided through these entities directly to populations with supportive needs.

To attract and incorporate the programs and products offered through the supportive services network with the provision of affordable housing, many public intervention and private affordable housing resource providers encourage the use of development partnerships in their project selection systems. The State intends to continue its coordination of appropriate supportive services with its affordable housing activities through the use of funding selection methodologies.

CR-55 - HOPWA 91.520(E)

Identify the number of individuals assisted and the types of assistance provided

Table for report on the one-year goals for the number of households provided housing through the use of HOPWA activities for: short-term rent, mortgage, and utility assistance payments to prevent homelessness of the individual or family; tenant-based rental assistance; and units provided in housing facilities developed, leased, or operated with HOPWA funds.

Number of Households Served Through:	One-year Goal	Actual
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	50	35
Tenant-based rental assistance	10	12
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	5	5

Table 14 – HOPWA Number of Households Served

Narrative

All HTF funds that OHFA receives in 2023 will be used to provide housing for Extremely Low Income families or families at or below the Poverty Line, whichever is greater. In accordance with 24 CFR Part 93, OHFA will allocate 10% of its grant to program planning and administration costs (\$306,641.42); up to one third for funding operating cost reserves; the balance of the grant will provide capital funding for new construction or rehabilitation of rental housing units.

CR-56 - HTF 91.520(H)

Describe the extent to which the grantee complied with its approved HTF allocation plan and the requirements of 24 CFR part 93.

All HTF funds that OHFA receives in 2023 will be used to provide housing for Extremely Low Income families or families at or below the Poverty Line, whichever is greater. In accordance with 24 CFR Part 93, OHFA will allocate 10% of its grant to program planning and administration costs (\$973,585.40); up to one third for funding operating cost reserves; the balance of the grant will provide capital funding for new construction or rehabilitation of rental housing units.

Tenure Type	0 – 30% AMI	0% of 30+ to poverty line (when poverty line is higher than 30% AMI)	% of the higher of 30+ AMI or poverty line to 50% AMI	Total Occupied Units	Units Completed, Not Occupied	Total Completed Units
Rental	41	0	0	41	0	41
Homebuyer	0	0	0	0	0	0

Table 15 - CR-56 HTF Units in HTF activities completed during the period

CR-58 – SECTION 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	4	0	0	0	0
Total Labor Hours	5,637				
Total Section 3 Worker Hours	91				
Total Targeted Section 3 Worker Hours	0				

Table 15 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	2				
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	2				
Direct, on-the job training (including apprenticeships).					
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.					
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).					
Outreach efforts to identify and secure bids from Section 3 business concerns.	2				
Technical assistance to help Section 3 business concerns understand and bid on contracts.	3				
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	1				
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.					
Held one or more job fairs.					
Provided or connected residents with supportive services that can provide direct services or referrals.					
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.					
Assisted residents with finding child care.					
Assisted residents to apply for, or attend community college or a four year educational institution.					
Assisted residents to apply for, or attend vocational/technical training.					
Assisted residents to obtain financial literacy training and/or coaching.					
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.					
Provided or connected residents with training on computer use or online technologies.					
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.					
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.					
Other.	1				

Table 16 – Qualitative Efforts - Number of Activities by Program

Narrative

Section 3 requirements apply to HUD-assisted public construction projects (as well as housing rehabilitation or housing construction) when the total amount of assistance to the project exceeds \$200,000, and the assistance is committed on or after July 1, 2021 (i.e., PY 2021 grants and beyond). Section 3 requirements do not apply to material supply contracts. ODOC/CD has developed a Section 3 policy requiring that Subrecipients maintain documentation of any efforts made by the Subrecipients and its Contractors to meet Section 3 benchmarks and assist low- and very low-income persons with employment and training opportunities.

As applicable, documentation may include but is not limited to:

- a. Copies of direct mail solicitations;
- b. Email and Internet outreach efforts;
- c. Formal advertisements;
- d. Flyers or brochures about meetings;
- e. Sign-in lists from job fairs and other public meetings;
- f. Agendas and/or meeting notes from meetings with Contractors;
- g. Other documentation, as appropriate.

ODOC will monitor subrecipient compliance with Section 3 requirements as part of the grant closeout process. If ODOC issues a Finding for non-compliance with Section 3, the Subrecipient could be at risk of being awarded future grants. The Subrecipient shall submit, with grant contract closeout documents, a FINAL "Section 3 Total Worker Hours Closeout Reporting Form" and supporting documentation for quantitative efforts as applicable. ODOC/CD will provide technical assistance regarding Section 3 procedures and reporting requirements upon request