



State of Oklahoma Consolidated Plan Five-Year Strategic Plan 2024-2028



OKLAHOMA
Commerce

Draft Plan Published September 2023

TABLE OF CONTENTS

2024 Community Development Block Grant (CDBG)

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

2024 Emergency Solutions Grant (ESG)

2024 HOME Investments Partnership (HOME)

2024 Housing Trust Fund (HTF)

2024 Housing Opportunities for People with Aids (HOPWA)

Executive Summary

ES-05 Executive Summary - 91.300(c), 91.320(b)

1. Introduction

The FY 2024 -2028 *State of Oklahoma Consolidated Plan* is a comprehensive planning document identifying the State's needs in housing, community, and economic development. The U. S. Department of Housing and Urban Development (HUD) requires the State to complete a Consolidated Plan to receive federal funds for the application and use of five (5) formula grant programs:

Community Development Block Grant (CDBG);

Emergency Solutions Grant (ESG);

HOME Investment Partnerships (HOME); and

Housing Opportunities for Persons with AIDS (HOPWA)

Housing Trust Fund (HTF)

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.

The Consolidated Plan approach is also the means to meet the federal submission requirements for CDBG, HOME, ESG, HOPWA, and HTF. This process replaces prior planning and submission requirements with a single document that satisfies the submission requirements of these four formula programs for the State.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The federal statutes for the five grant programs covered by the Consolidated Planning rule (CDBG, ESG, HOME, HTF and HOPWA) include a number of basic goals discussed in the Housing and Community Development Act, as amended, and the National Affordable Housing Act, as amended, which relate to major commitments and priorities of HUD. The Consolidated Plan furthers the goals of the programs by providing decent affordable housing, establishing and maintaining a suitable living environment, and expanding economic opportunities for individuals/families in Oklahoma, particularly for low- and very-low-income persons. These goals are incorporated in the State of Oklahoma Consolidated Plan:

Provide Decent Housing

- Assist homeless persons to obtain appropriate housing.
- Assist those threatened with homelessness.
- Retain the affordable housing stock.
- Make available permanent housing that is affordable to low-income Americans without discrimination.
- Increase the supply of supportive housing for persons with special needs.

Provide a Suitable Living Environment

- Improve safety and livability of neighborhoods.
- Increase access to quality facilities and services.
- Reduce isolation of income groups within an area through decentralization of housing opportunities and revitalization of deteriorating neighborhoods.
- Restore and preserve properties of special value for historical, aesthetic reasons.
- Conserve energy resources.

Expand Economic Opportunities

- Create jobs accessible to low-income persons.
- Empower low-income persons to achieve self-sufficiency to reduce generations of poverty in federally assisted public housing.

3. Evaluation of past performance

The State's evaluation of past performance comes from several different sources. First, the State's Consolidated Plan itself creates the opportunity for strategic planning and citizen participation to take place in a comprehensive context, and reduces 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.

4. Summary of citizen participation process and consultation process

The State has adopted a Citizen Participation and Consultation Plan for the Consolidated Plan. All meetings are held in fully accessible facilities. Meeting announcements are sent to media outlets, municipalities, and interested parties by way press releases, emails and other mediums throughout the state.

A summary of the activities for the development of the State's Consolidated Plan follows:

- A Public Input Session was held in September in Oklahoma City where all components were discussed. Meeting information was posted on the agency's website, and notifications were sent through press releases, emails, trainings, and the New Pioneer newsletter inviting all interested individuals to participate.
- A Public Hearing was held in November in Oklahoma City. As with the Public Input Session, the hearing was publicized through the resources mentioned above. As per HUD Citizen Participant requirements, the State accepted comments up to 30 days after the date of the formal Public Hearing.
- ESG Focus Groups are held with each of the six rural CoC and Tulsa every year to discuss ESG program changes. The CoC are required to make these Focus Groups public meetings accessible to all CoC members, collaborative partners, stakeholders, citizens, current or former clients, etc., and help meet the Citizen Participation Requirement (24 CFR 91.115) and CoC Consultation regulations (24 CFR 91.110) of the Emergency Solutions Grant Program. The purpose is to hear from members of the Continuum of Care and members of the community who do not always apply for funding to see what ideas are missing from the program. Comments received during the Focus Groups inform ODOC's ESG program and are also listed in the Consolidated Plan as public comment.

Organizations involved in the development of the Consolidated Plan include:

- Various Community Action Agencies; various sub-state planning districts/Councils of Governments; various public housing authorities and emergency shelters; Continua of Care; various state agencies; and others.

5. Summary of public comments

A summary of Public Comments taken during the Citizen Participation process is as attached under AD-25. The comment summary has been attached due to the required formatting that allows for the best viewing and understanding.

6. Summary of comments or views not accepted and the reasons for not accepting them

There were no comments or views that were not accepted in relation to Citizen Participation process.

7. Summary

The Consolidated Plan describes the State's plan for pursuing these goals in three components: Housing, Homelessness, and Non-housing Community Development. Each of these areas is arranged in a similar fashion. First, a needs assessment is provided followed by a prioritization of goals to meet the identified needs, and finally recommended strategies to address the priorities. It should be recognized, however, that the priorities and strategies are general and far-reaching in nature, thus the responsibility for fulfilling any recommendation lies not only with ODOC but also with other federal and state agencies as well as community-based non-profit organizations and the private sector. Therefore, communities and other entities are encouraged to go beyond the funding available in the CDBG, ESG, HOME, HTF and HOPWA programs by building partnerships and leveraging these combined resources in furtherance of those goals by which they are directly affected.

For example, local jurisdictions and community-based non-profit organizations, through coordination by ODOC's Office of Community Development, are integrating federal and state funded programs such as the Community Services Block Grant (CSBG), the Emergency Solutions Grant (ESG) Program, and State Appropriated Funds (SAF) to address homelessness issues. Such integration needs to continue to be explored and extended at all levels to include the coordination of as many available resources as may be appropriate and applicable.

The U.S. Department of Housing and Urban Development (HUD) issued the final rule for the Consolidated Plan in the Federal Register on February 9, 2006. The Consolidated Plan contains a Five-Year Strategic Plan developed after conducting a needs assessment and determining the priorities/strategies on housing, homelessness, and community development. In compliance with HUD's final rule, the *State of Oklahoma Consolidated Plan* serves the following separate, but integrated, functions:

- A planning document for a jurisdiction that builds on a participatory process;
- The application for formula grant programs administered by HUD's Office of Community Planning and Development;
- A strategic plan for carrying out HUD's programs; and
- An action plan that provides a basis for assessing performance.

The Annual Action Plan is completed to report what activities the State plans to undertake during the upcoming year. It identifies activities that are funded by the HUD formula grant programs of CDBG, ESG, HOME, HTF, and HOPWA, in addition to listing other actions and funds used to meet the priorities/strategies established in the Five-Year Strategic Plan. This Five-Year Strategic Plan will remain in effect until priorities and strategies have either been accomplished or amended in the annual updates.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.300(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	OKLAHOMA	
CDBG Administrator	OKLAHOMA	OK Department of Commerce / Comm Development
HOPWA Administrator	OKLAHOMA	Oklahoma Housing Finance Agency / HDT
HOME Administrator	OKLAHOMA	Oklahoma Housing Finance Agency / HDT
ESG Administrator	OKLAHOMA	OK Department of Commerce / Comm Development
HOPWA-C Administrator	OKLAHOMA	
	OKLAHOMA	Oklahoma Housing Finance Agency / HDT

Table 1 – Responsible Agencies

Narrative

The State of Oklahoma Consolidated Plan represents a collaborative effort between two state agencies: the Oklahoma Department of Commerce (ODOC) and the Oklahoma Housing Finance Agency (OHFA). ODOC is the lead agency designated to prepare the State of Oklahoma Consolidated Plan. ODOC operates the CDBG and ESG programs while also leading the development of the State Plan for Continuum of Care (CoC). The Oklahoma Housing Finance Agency (OHFA) operates the HOME, HOPWA and HTF programs.

Consolidated Plan Public Contact Information

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PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.200(I) and 91.315(I)

1. Introduction

The priorities and strategies of the plan are general and far-reaching in nature, thus the responsibility for fulfilling any recommendation lies not only with ODOC but also with other federal and state agencies as well as community-based non-profit organizations and the private sector. Therefore, communities and other entities are encouraged to go beyond the funding available in the CDBG, ESG, HOME, HOPWA and HTF programs by building partnerships and leveraging these combined resources in furtherance of those goals by which they are directly affected.

Provide a concise summary of the state’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

As a statewide public housing authority, OHFA works with assisted housing providers to ensure that they are aware of and provide housing for voucher holders in their area. OHFA also works with other PHAs to ensure that assisted housing providers are aware of their voucher holders as well. HOPWA Project Sponsors transition recipients from short term assistance into long term permanent housing solutions by coordinating with public housing and assisted housing providers.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

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.

Emergency Solutions Grant - The State facilitates Statewide Continuum of Care (CoC) meetings quarterly. These meetings are used for peer-to-peer discussions of issues relating to serving the needs of those who are homeless, Homeless Management Information System (HMIS) statewide updates, best practices of CoC Grant competitions, and statewide coordination of the Point-in-Time Count.

In the past, topics discussed by the CoC representatives needing State Agency assistance or answers were submitted to the Governor’s Interagency Council on Homelessness (GICH) for discussion and resolution. However, the GICH - a twenty-five (25) member Council that included representatives from nineteen (19) State agencies along with representatives from nonprofit direct service provider roles and others knowledgeable regarding homelessness – was dissolved in April 2023 when the Governor of

Oklahoma did not sign an Executive Order renewing the Council that had been in operation for more than 20 years.

ODOC, together with the Oklahoma CoCs, ESG sub-recipients, and former GICH members like the Department of Health, Department of Mental Health and Substance Abuse Services, local non-profits, and other community providers strive to continue to coordinate services and fill gaps in homeless services across the State of Oklahoma.

Describe consultation with the Continuum(s) of Care that serves the state in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

In addition to ODOC hosting Statewide CoC meetings throughout the year, Focus Groups are held with each of the six rural CoC and Tulsa every year to discuss ESG program changes and for the planning of the Consolidated Plan. The CoC are required to make these Focus Groups public meetings accessible to all CoC members, collaborative partners, stakeholders, citizens, current or former clients, etc., and help meet the Citizen Participation Requirement (24 CFR 91.115) and CoC Consultation regulations (24 CFR 91.110) of the Emergency Solutions Grant Program. The purpose is to hear from members of the Continuum of Care and members of the community who do not always apply for funding to see what ideas are missing from the program. Comments received during the Focus Groups inform ODOC's ESG program and are also listed in the Consolidated Plan as public comment.

Once all eight CoCs within the State of Oklahoma representing 77 counties were finally on one Homeless Management Information System (HMIS) in 2022, the Oklahoma Statewide HMIS Governance was created in 2023. It is responsible for updating the Oklahoma HMIS Standard Operating Policies and Procedures manual and communicating changes to the HMIS Lead Agencies, who then distribute them to their Contributing HMIS Organizations. Oklahoma's Statewide HMIS Governance aligns with the goal of the HMIS system, which is to provide standardized and timely information to improve access to housing and services, and strengthen our efforts to prevent, divert and end homelessness.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Oklahoma Association of Regional Councils
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Health Agency Child Welfare Agency Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Agency - Emergency Management Publicly Funded Institution/System of Care Other government - Federal Other government - State Other government - County Other government - Local Regional organization Planning organization Business Leaders Civic Leaders Business and Civic Leaders

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs HOPWA Strategy Economic Development Market Analysis Anti-poverty Strategy
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<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>As members of the Oklahoma Association of Regional Councils (OARC), our statewide network of 11 regional councils provides numerous services. Our regional councils provide a broad range of services to local governments within our multi-jurisdictional regions. Traditionally, our services have focused on planning, program management, and technical assistance related to community and economic development, infrastructure development, and resource management. We continue to maintain a leadership role on a variety of important issues such as homeland security, hazard mitigation, rural fire defense, environmental stewardship, brownfield redevelopment, transportation planning, business and workforce development, and human services like housing aid and elder care. Various state grant programs provide us with the resources and flexibility to plan and implement an array of services such as capital improvement planning and rural fire defense planning. Our regional councils serve local governments and community leaders by gathering and disseminating pertinent information. We keep local officials informed of federal and state programs, including complex environmental rules, funding opportunities, and performance requirements. We conduct, sponsor, and assist with special training workshops, town hall meetings/public hearings. We respond to information inquiries, facilitate information sharing, and maintain libraries of data, planning documents, and fundraising applications. Emergency Solutions Grant: Focus Group discussions are facilitated in connection with publicly announced Continuum of Care meetings. The purpose is to get feedback from members of the community, stakeholders, CoC members, etc. who attend the local meetings. The purpose is to hear from members of the Continuum of Care and members of the community who do not always apply for funding to see what ideas are missing from the program.</p>
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Identify any Agency Types not consulted and provide rationale for not consulting

All citizens and agencies throughout the state are granted equal access and are encouraged to provide input during the planning process.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Oklahoma Department of Commerce	The State partners with each Continuum of Care to ensure that the State Goals compliment the CoC Regional goals. The CoC members have worked hard for years to fill the gaps in needs in their service areas. The State consults with the CoCs to make sure the State Goals come from the CoC goals as well as the priorities set forth by the public, CoC partner agencies, ESG sub-recipients, etc.
All In: Federal Strategic Plan to End Homelessness	USICH	The goals overlap between the priorities set by the Continuum of Care service priorities and the Objectives of the USICH Federal Strategic Plan to Prevent Homelessness. All organizations are working to a future when no one experiences the tragedy and indignity of homelessness and everyone has a safe, stable, accessible, and affordable home.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination among the State and any units of general local government, in the implementation of the Consolidated Plan (91.315(l))

Local jurisdictions and community-based non-profit organizations, through coordination by ODOC's Office of Community Development, are integrating federal and state-funded programs such as the Community Services Block Grant (CSBG), the Emergency Solutions Grant (ESG) Program, and State Appropriated Funds (SAF) to address homelessness issues. Such integration must continue to be explored and extended at all levels to include the coordination of as many available resources as may be appropriate and applicable.

Emergency Solutions:

Local Units of Government are involved in the State's Consolidated Plan through their consultation with members of various Continuum of Care Networks.

Narrative (optional):

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The State has adopted a Citizen Participation and Consultation Plan for the Consolidated Plan. All public meetings will include a formal Public Input Session and a formal Public Hearing, which are held in handicap-accessible facilities. Meeting announcements are made via GovDelivery (email platform), the New Pioneer newsletter, media release, and a dedicated State Consolidated Plan webpage located on the Oklahoma Department of Commerce website.

A summary of the activities for the development of the State's Consolidated Plan follows:

- A Public Input Session was held in September in Oklahoma City where all components were discussed. Notifications were posted on the agency's website, sent via GovDelivery, media release, and meeting information was placed in the New Pioneer newsletter inviting all interested individuals to participate.
- A Public Hearing was held in November in Oklahoma City. As with the Public Input Session, the hearing was publicized through the resources mentioned above. As per HUD Citizen Participant requirements, the State accepted comments up to 30 days after the date of the formal Public Hearing.
- ESG Focus Groups are held with each of the six rural CoC and Tulsa over the summer every year to discuss ESG program changes. The ESG Focus Groups are public meetings accessible to all CoC members, collaborative partners, stakeholders, citizens, current or former clients, etc., and help meet the Citizen Participation Requirement (24 CFR 91.115) and CoC Consultation regulations (24 CFR 91.110) of the Emergency Solutions Grant Program. The purpose is to hear from members of the Continuum of Care and members of the community who do not always apply for funding to see what ideas are missing from the program. Comments received during the Focus Groups inform ODOC's ESG program and are also listed in the Consolidated Plan as public comment.

Organizations involved in the development of the Consolidated Plan include:

- Various Community Action Agencies; various sub-state planning districts/Councils of Governments; various public housing authorities and emergency shelters; Continua of Care; various state agencies; and others.

The State collected comments from attendees of the above-mentioned public meetings to identify areas of need within the state along with any program recommendations to best meet the needs of all citizens statewide.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	<p>Minorities</p> <p>Non-English Speaking - Specify other language: See attached Language Access Plan</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> <p>CAA's, UGLG's, Non-Profits</p>	See the attached Citizen Participation Plan under AD-25 (Administration)	See the attached Citizen Participation Plan under AD-25 (Administration)	See the attached Citizen Participation Plan under AD-25 (Administration)	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	New Pioneer (newsletter)	<p>Minorities</p> <p>Non-English Speaking - Specify other language: See attached Language Access Plan</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> <p>CAA's, UGLG's, Non-Profits</p>	See the attached Citizen Participation Plan under AD-25 (Administration)	See the attached Citizen Participation Plan under AD-25 (Administration)	See the attached Citizen Participation Plan under AD-25 (Administration)	https://www.okcommerce.gov/reporting-compliance/consolidated-plan/

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Internet Outreach	<p>Minorities</p> <p>Non-English Speaking - Specify other language: See attached Language Access Plan</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> <p>CAA's, UGLG's, Non-Profits</p>	See the attached Citizen Participation Plan under AD-25 (Administration)	See the attached Citizen Participation Plan under AD-25 (Administration)	See the attached Citizen Participation Plan under AD-25 (Administration)	https://www.okcommerce.gov/reporting-compliance/consolidated-plan/

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	New Pioneer (newsletter)	<p>Minorities</p> <p>Non-English Speaking - Specify other language: See attached Language Access Plan</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> <p>CAA's, UGLG's, Non-Profits</p>	See the attached Citizen Participation Plan under AD-25 (Administration)	See the attached Citizen Participation Plan under AD-25 (Administration)	See the attached Citizen Participation Plan under AD-25 (Administration)	

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The following Needs Analysis was conducted using housing data supplied by the Census Bureau to HUD and made available at www.hud.user.gov. Each year, the U.S. Department of Housing and Urban Development (HUD) receives custom tabulations of American Community Survey (ACS) data from the U.S. Census Bureau. These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low income households. The CHAS data is used by local governments to plan how to spend HUD funds, and may also be used by HUD to distribute grant funds.

The **State of Oklahoma Consolidated Plan** is a comprehensive planning document identifying the State's needs in housing, community, and economic development. The U. S. Department of Housing and Urban Development (HUD) requires the State to complete a Consolidated Plan to receive federal funds for the application and use of five (5) formula grant programs:

1. Community Development Block Grant (CDBG); 2. Emergency Solutions Grant (ESG); 3. HOME Investment Partnerships (HOME); 4. Housing Opportunities for Persons with AIDS (HOPWA) 5. Housing Trust Fund (HTF)

The Consolidated Plan describes the State's plan for pursuing these goals in three components: Housing, Homelessness, and Non-housing Community Development. Each of these areas is arranged in a similar fashion. First, a needs assessment is provided followed by a prioritization of goals to meet the identified needs, and finally recommended strategies to address the priorities. It should be recognized, however, that the priorities and strategies are general and far-reaching in nature, thus the responsibility for fulfilling any recommendation lies not only with ODOC but also with other federal and state agencies as well as community-based non-profit organizations and the private sector. Therefore, communities and other entities are encouraged to go beyond the funding available in the CDBG, ESG, HOME, HTF and HOPWA programs by building partnerships and leveraging these combined resources in furtherance of those goals by which they are directly affected.

For example, local jurisdictions and community-based non-profit organizations, through coordination by ODOC's Office of Community Development, are integrating federal and state funded programs such as the Community Services Block Grant (CSBG), the Emergency Solutions Grant (ESG) Program, and State Appropriated Funds (SAF) to address homelessness issues. Such integration needs to continue to be explored and extended at all levels to include the coordination of as many available resources as may be appropriate and applicable.

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- A planning document for a jurisdiction that builds on a participatory process;
- The application for formula grant programs administered by HUD's Office of Community Planning and Development;
- A strategic plan for carrying out HUD's programs; and
- An action plan that provides a basis for assessing performance.

NA-10 Housing Needs Assessment - 24 CFR 91.305 (a,b,c)

Summary of Housing Needs

Demographics	Base Year: 2009	Most Recent Year: 2017	% Change
Population	3,610,073	3,896,251	8%
Households	1,405,005	1,468,971	5%
Median Income	\$41,861.00	\$49,767.00	19%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2013-2017 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	180,195	181,360	259,045	152,470	695,905
Small Family Households	54,620	57,850	92,875	61,410	358,710
Large Family Households	11,545	14,815	23,805	15,085	59,175
Household contains at least one person 62-74 years of age	30,880	40,015	56,100	32,355	159,770
Household contains at least one person age 75 or older	21,220	33,615	38,455	18,540	53,375
Households with one or more children 6 years old or younger	32,550	33,395	46,430	27,015	78,640

Table 6 - Total Households Table

Data Source: 2013-2017 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	2,875	2,050	1,980	760	7,665	1,595	1,170	1,055	610	4,430
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	2,270	1,560	1,400	800	6,030	415	375	765	370	1,925
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	3,450	3,790	4,040	1,555	12,835	1,185	2,140	3,025	1,850	8,200
Housing cost burden greater than 50% of income (and none of the above problems)	62,180	21,730	3,455	490	87,855	30,980	16,910	9,125	2,115	59,130

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	12,300	40,200	32,485	4,770	89,755	12,225	20,840	31,090	13,185	77,340
Zero/negative Income (and none of the above problems)	12,830	0	0	0	12,830	8,395	0	0	0	8,395

Table 7 – Housing Problems Table

Data 2013-2017 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50-80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50-80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	70,770	29,130	10,875	3,600	114,375	34,170	20,595	13,970	4,945	73,680
Having none of four housing problems	29,580	63,820	100,035	50,845	244,280	24,450	67,815	134,165	93,075	319,505

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Household has negative income, but none of the other housing problems	12,830	0	0	0	12,830	8,395	0	0	0	8,395

Table 8 – Housing Problems 2

Data 2013-2017 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	28,430	26,420	14,065	68,915	11,755	11,850	16,005	39,610
Large Related	6,070	5,360	2,675	14,105	3,000	3,510	3,920	10,430
Elderly	12,895	12,870	6,760	32,525	19,920	17,725	13,490	51,135
Other	33,150	21,915	14,085	69,150	10,235	5,955	7,585	23,775
Total need by income	80,545	66,565	37,585	184,695	44,910	39,040	41,000	124,950

Table 9 – Cost Burden > 30%

Data 2013-2017 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	24,200	8,550	705	33,455	8,890	5,510	3,250	17,650

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Large Related	4,825	1,080	135	6,040	2,150	1,100	380	3,630
Elderly	9,300	5,370	1,785	16,455	12,875	7,645	3,580	24,100
Other	28,485	7,875	1,295	37,655	8,135	3,065	1,995	13,195
Total need by income	66,810	22,875	3,920	93,605	32,050	17,320	9,205	58,575

Table 10 – Cost Burden > 50%

Data 2013-2017 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	4,985	4,535	4,610	1,775	15,905	1,245	2,030	2,790	1,630	7,695
Multiple, unrelated family households	430	610	655	490	2,185	345	535	1,025	555	2,460
Other, non-family households	420	260	260	185	1,125	15	50	14	40	119
Total need by income	5,835	5,405	5,525	2,450	19,215	1,605	2,615	3,829	2,225	10,274

Table 11 – Crowding Information – 1/2

Data 2013-2017 CHAS
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Describe the number and type of single person households in need of housing assistance.

<p align="center">Per the chart above, 15,000+ of households are single renters. Of those single households, more than half reported income of less than 50% of AMI. \$7,000+ of households above are homeowners. Of those homeowners, approximately 60% reported income of 50% or higher. </p>

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

What are the most common housing problems?

Besides the obvious need for both ownership and rental housing, there always seems to be a large need for housing for the elderly, for those with special needs, and for the homeless. As of today, the needs of Oklahoma communities far outweigh the funding available to support sustainability.

Are any populations/household types more affected than others by these problems?

Disproportionately greater need was analyzed in relation to four dominant housing problems. The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost burden greater than 30%. Under the 0% - 30% of area medium income (AMI) the number of housing problems as a total calculates to 73%; 30% - 50% AMI calculates to 61%; 50% - 80% AMI calculates to 35%; and 80% - 100% calculates to 18% respectively. Based on HUD's definition that disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in a category as a whole, all AMI categories exhibit at least one or more classes that exceed the 10% definition. Under the 0% - 30% AMI category, the racial/ethnic classes Pacific Islander and Hispanic exceed the 10% definition. Under the 30% - 50% AMI category, the racial/ethnic classes of Black/African American, Asian, and Pacific Islander exceed the 10% definition. Under the 50% - 80% AMI category, only the racial/ethnic class of Pacific Islander exceeds the 10% definition. Under the 80% - 100% AMI category, only the racial/ethnic class of Pacific Islander exceeds the 10% definition.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Data was not collected for the "number of persons becoming homeless each year" or on the housing status of those who seek, but do not receive service.

Data was not collected separated by the categories above for the estimated number of days persons were homeless. The 2022 Emergency Solutions Grant Aggregate HMIS Data in SAGE for the time period of 4/1/22 through 3/31/23 provides the following information for the average length of time between project start date and housing move-in date: The average time it took 434 persons to move into housing was 13.74 days, with the 178 individuals without children taking an average of 14.01 days to move into housing and the 256 with children and adults taking an average of 13.65 days to move into housing.

No data is collected on the housing status of those who seek, but do not receive service.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The Oklahoma families most likely at risk are those living in public and subsidized housing. They live below the poverty line. Even those who are employed, remain vulnerable to homeless because an unexpected expense, like a medical emergency, threatens their ability to pay for their share of rent owed or utilities. A missed payment can easily lead to eviction and homeless.

Through the U.S. Department of Housing and Urban Development, Oklahoma service providers have been vested with more than 20,000 housing choice vouchers statewide. Of significance is the size of the waiting lists for public housing units and housing choice vouchers in cities across the State. These individuals are the most vulnerable to being homeless.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

1. The absence of affordable housing alternatives across some parts of the State is the largest threat to homelessness.
2. Communities must work to ensure that zoning regulations promote the development of housing types serving all income levels, including the providing of temporary and permanent housing to meet the needs of the presently homeless and those at risk for becoming the same.

Discussion

N/A.

NA-15 Disproportionately Greater Need: Housing Problems - 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

The following Needs Analysis (Disproportionally Greater Need: Housing Problems) was conducted using housing data supplied by the Census Bureau to HUD and made available at www.hud.user.gov. Each year, the U.S. Department of Housing and Urban Development (HUD) receives custom tabulations of American Community Survey (ACS) data from the U.S. Census Bureau. These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrates the extent of housing problems and housing needs, particularly for low-income households. The CHAS data is used by local governments to plan how to spend HUD funds, and may also be used by HUD to distribute grant funds. Disproportionately greater need exists when the percentage of person in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in category as a whole.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	129,703	29,751	21,549
White	77,583	19,777	13,275
Black / African American	19,396	3,294	3,523
Asian	2,454	205	562
American Indian, Alaska Native	10,822	2,790	1,671
Pacific Islander	82	4	4
Hispanic	11,305	1,653	1,382

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data 2013-2017 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	111,021	70,816	0
White	68,814	50,164	0
Black / African American	13,320	4,972	0
Asian	1,684	771	0
American Indian, Alaska Native	7,703	5,940	0
Pacific Islander	115	12	0
Hispanic	13,204	5,533	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data 2013-2017 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	88,643	170,743	0
White	60,606	119,550	0
Black / African American	8,712	13,104	0
Asian	1,776	2,075	0
American Indian, Alaska Native	5,194	11,874	0
Pacific Islander	253	128	0
Hispanic	7,660	14,738	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data 2013-2017 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	26,796	125,993	0
White	19,177	90,951	0
Black / African American	2,026	8,097	0
Asian	547	1,902	0
American Indian, Alaska Native	1,633	8,240	0
Pacific Islander	55	117	0
Hispanic	1,889	10,219	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data 2013-2017 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

Disproportionately greater need was analyzed in relation to four dominant housing problems. The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost burden greater than 30%. Under the 0% - 30% of area medium income (AMI) the number of housing problems as a total calculates to 73%; 30% - 50% AMI calculates to 61%; 50% - 80% AMI calculates to 35%; and 80% - 100% calculates to 18% respectively. Based on HUD's definition that disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in a category as a whole, all AMI categories exhibit at least one or more classes that exceed the 10% definition. Under the 0% - 30% AMI category, the racial/ethnic classes Pacific Islander and Hispanic exceed the 10% definition. Under the 30% - 50% AMI category, the racial/ethnic classes of Black/African American, Asian, and Pacific Islander exceed the 10% definition. Under the 50% - 80% AMI category, only the racial/ethnic class of Pacific Islander exceeds the 10% definition. Under the 80% - 100% AMI category, only the racial/ethnic class of Pacific Islander exceeds the 10% definition.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.305(b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

The following Needs Analysis (Disproportionately Greater Need: Severe Housing Problems) was conducted using housing data supplied by the Census Bureau to HUD and made available at www.hud.user.gov. Each year, the U.S. Department of Housing and Urban Development (HUD) receives custom tabulations of American Community Survey (ACS) data from the U.S. Census Bureau. These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low income households. The CHAS data is used by local governments to plan how to spend HUD funds, and may also be used by HUD to distribute grant funds. Disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in category as a whole.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	105,191	54,287	21,549
White	62,589	34,934	13,275
Black / African American	15,951	6,721	3,523
Asian	2,172	487	562
American Indian, Alaska Native	8,540	5,103	1,671
Pacific Islander	82	4	4
Hispanic	9,583	3,350	1,382

Table 17 – Severe Housing Problems 0 - 30% AMI

Data 2013-2017 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	50,057	131,815	0
White	31,469	87,596	0
Black / African American	5,988	12,310	0
Asian	924	1,532	0
American Indian, Alaska Native	3,399	10,245	0
Pacific Islander	82	43	0
Hispanic	5,497	13,241	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data 2013-2017 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	25,177	234,225	0
White	17,100	162,909	0
Black / African American	1,737	20,071	0
Asian	616	3,239	0
American Indian, Alaska Native	1,450	15,552	0
Pacific Islander	211	173	0
Hispanic	3,019	19,367	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data 2013-2017 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	8,740	143,994	0
White	5,695	104,393	0
Black / African American	539	9,591	0
Asian	188	2,258	0
American Indian, Alaska Native	675	9,186	0
Pacific Islander	0	172	0
Hispanic	1,165	10,919	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data 2013-2017 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

Disproportionately greater need was analyzed in relation to four dominant housing problems. The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost burden greater than 50%. Under the 0% - 30% of area medium income (AMI) the number of housing problems as a total calculates to 59%; 30% - 50% AMI calculates to 27%; 50% - 80% AMI calculates to 10%; and 80% - 100% calculates to 6% respectively. Based on HUD's definition that disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in a category as a whole, all AMI categories exhibit at least one or more classes that exceed the 10% definition. Under the 0% - 30% AMI category, the racial/ethnic classes of Pacific Islander exceeds the 10% definition. Under the 30% - 50% AMI category, the racial/ethnic class of Pacific Islander exceeds the 10% definition. Under the 50% - 80% racial/ethnic class exceeds the 10% definition although both the racial/ethnic classes of Asian and Pacific Island fall just under the 10% cutoff.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	1,091,652	197,060	158,040	22,986
White	824,659	130,913	101,265	14,008
Black / African American	60,365	21,103	21,709	3,692
Asian	16,598	3,498	2,653	807
American Indian, Alaska Native	66,410	12,812	10,952	1,823
Pacific Islander	836	227	112	4
Hispanic	67,445	17,186	12,306	1,592

Table 21 – Greater Need: Housing Cost Burdens AMI

Data 2013-2017 CHAS
Source:

Discussion

Disproportionately greater need was analyzed in relation to housing cost burden. Under the 30% of area medium income (AMI) the number of housing cost burden as a total calculates to 73%; 30% -50% AMI calculates to 14%; greater than 50% AMI calculates to 11%; and No Negative Income Impact calculates to 1% respectively. Based on HUD's definition that disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in category as a whole, only the 30% - 50% AMI and 80% - 100% AMI categories exhibit racial classes that exceed the 10% definition. Under the 30% - 50% AMI category, the racial class of Pacific Islander exceeds the 10% definition. Under the greater than 50% AMI category, only the racial class of Black / African American exceeds the 10% definition.

NA-30 Disproportionately Greater Need: Discussion – 91.305 (b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

In terms of housing related greater need, black/African Americans, Pacific Islanders, and Hispanics show an overall disproportionately greater need in the earlier identified income levels.

If they have needs not identified above, what are those needs?

As identified earlier, the four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost burden greater than 30%/50%.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

As stated earlier, the Consolidated Plan incorporates five (5) HUD funded programs, CDBG, ESG, HOME, HTF and HOPWA. These programs focus primarily in the less urban towns and rural unincorporated areas of the state therefore specific neighborhoods are not relevant to this discussion. The "Entitlement" areas within the state would see more relevance in regard to neighborhood impact. According to U.S. Census data in terms of racial demographics, whites comprise 72.2%; American Indian/Native Americans comprise 8.6%; and black/African Americans round out the leading state racial demographics at 7.4%. As classified by the US Census as an ethnicity, Hispanics comprise 8.9% of the total state population.

NA-35 Public Housing – (Optional)

Introduction

Public housing units in the State of Oklahoma range in condition from excellent to fair. There are no plans at this time to use HOME funds to assist public authorities.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	167	12,462	23,128	8	22,394	110	189	175

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	
# Homeless at admission	0	14	40	122	0	117	5		0

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
# of Elderly Program Participants (>62)	0	21	3,456	3,750	1	3,663	20	1
# of Disabled Families	0	42	2,848	7,778	7	7,445	38	18
# of Families requesting accessibility features	0	167	12,462	23,128	8	22,394	110	189
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	106	7,814	10,217	6	9,832	57	99	104
Black/African American	0	48	3,496	11,441	2	11,144	50	64	62
Asian	0	3	111	162	0	153	1	3	0
American Indian/Alaska Native	0	10	1,015	1,289	0	1,246	2	23	9

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Pacific Islander	0	0	26	19	0	19	0	0	0
Other	0	0	0	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	7	957	1,116	0	1,084	1	14	5
Not Hispanic	0	160	11,505	22,012	8	21,310	109	175	170
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

The State of Oklahoma has a large number of public housing authorities within its jurisdiction, with the full spectrum of needs. There is a priority given for disabled households by most of these PHAs, and a large need for accessible units.

What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

The State of Oklahoma has a large number of public housing authorities within its jurisdiction, with the full spectrum of needs. There is a priority given for disabled households by most of these PHAs, and a large need for accessible units.

How do these needs compare to the housing needs of the population at large

The needs of these tenants are similar to the population at large.

Discussion:

Due to the very limited amount of funding available, HOME program funds will not be used to assist public housing authorities.

NA-40 Homeless Needs Assessment – 91.305(c)

Introduction:

The following data comes from the 2023 Point in Time Count and the 2022 Emergency Solutions Grant Aggregate HMIS Data in SAGE. All data is for six non-entitlement ESG CoCs and excludes data for Oklahoma City and Tulsa. While the data provides basic information to be used and extrapolated, it is by no means a scientifically exact number. NOTE: Per HUD requirement, additional CDBG DR specific Needs were added to this Five-Year Consolidated Plan.

CDBG DR Homeless Needs

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

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

Indicate if the homeless population is: All Rural Homeless

Rural Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	122	243	1,863	0	545	0
Persons in Households with Only Children	9	19	210	0	43	0
Persons in Households with Only Adults	897	817	2,447	0	512	0
Chronically Homeless Individuals	345	174	2,920	0	0	0
Chronically Homeless Families	16	39	352	0	0	0
Veterans	36	39	128	0	0	0
Unaccompanied Youth	70	123	495	0	0	0
Persons with HIV	0	0	5	0	0	0

Table 26 - Homeless Needs Assessment

Data Source Comments:

For persons in rural areas who are homeless or at risk of homelessness, describe the nature and extent of unsheltered and sheltered homelessness with the jurisdiction:

According to research, rural homelessness is primarily the result of poverty and the need for affordable housing. Fewer resources, such as employment, financial assistance and transportation spread over a larger geographic area makes it difficult to receive services needed to achieve a level of self-sufficiency to maintain housing.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Data was not collected for the "number of persons becoming homeless each year" or on the housing status of those who seek, but do not receive service.

Data was not collected separated by the categories above for the estimated number of days persons were homeless. The 2022 Emergency Solutions Grant Aggregate HMIS Data in SAGE for the time period of 4/1/22 through 3/31/23 provides the following information for the average length of time between project start date and housing move-in date: The average time it took 434 persons to move into housing was 13.74 days, with the 178 individuals without children taking an average of 14.01 days to move into housing and the 256 with children and adults taking an average of 13.65 days to move into housing.

No data is collected on the housing status of those who seek, but do not receive service.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	726	701
Black or African American	153	118
Asian	4	4
American Indian or Alaska Native	175	193
Pacific Islander	2	3
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	60	136
Not Hispanic	1,000	883

Data Source

Comments:

Data obtained from the 2023 PIT.

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Based on the 2022 Emergency Solutions Grant Aggregate HMIS Data in SAGE for the time period of 4/1/22 through 3/31/23, approximately 1863 households with adults and children needed housing assistance.

There is no data on the number of families of veterans in need of housing assistance, but per the 2023 PIT data, a total of 75 veterans were homeless.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

The nature and extent of homelessness by racial and ethnic group per the 2023 PIT data:

Of 1060 Sheltered Individuals - 68.39% were white, 14.46% were Black, African American, or African; 0.40% were Asian or Asian American; 16.55% were American Indian, Alaska Native, or Indigenous; 0.02% were Native Hawaiian or Pacific Islander. 94.34% identified as non-Hispanic/non-Latino while 5.66% identified as Hispanic/Latino.

Of 1019 Unsheltered Individuals - 68.74% were white, 11.61% were Black, African American, or African; 0.41% were Asian or Asian American; 18.94% were American Indian, Alaska Native, or Indigenous; 0.31% were Native Hawaiian or Pacific Islander. 86.65% identified as non-Hispanic/non-Latino while 13.35% identified as Hispanic/Latino.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

According to research, rural homelessness is primarily the result of poverty and the need for affordable housing. Fewer resources, such as employment, financial assistance and transportation spread over a larger geographic area makes it difficult to receive services needed to achieve a level of self-sufficiency to maintain housing.

Discussion:

Not Applicable.

NA-45 Non-Homeless Special Needs Assessment – 91.305 (b,d)

Introduction

Due to the complexity and textbox size limitations, the special needs portion of the HOPWA Program can be found in the Program Description/One Year Action Plan which is included in this Consolidated Plan.

HOPWA

Current HOPWA formula use:	
Cumulative cases of AIDS reported	0
Area incidence of AIDS	0
Rate per population	0
Number of new cases prior year (3 years of data)	0
Rate per population (3 years of data)	0
Current HIV surveillance data:	
Number of Persons living with HIV (PLWH)	615
Area Prevalence (PLWH per population)	525
Number of new HIV cases reported last year	0

Table 27 – HOPWA Data

Data Source: CDC HIV Surveillance

HIV Housing Need (HOPWA Grantees Only)

Type of HOPWA Assistance	Estimates of Unmet Need
Tenant based rental assistance	0
Short-term Rent, Mortgage, and Utility	0
Facility Based Housing (Permanent, short-term or transitional)	0

Table 28 – HIV Housing Need

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

Describe the characteristics of special needs populations in your community:

Due to the complexity and textbox size limitations, the special needs portion of the HOPWA Program can be found in the Program Description/One Year Action Plan which is included in this Consolidated Plan.

What are the housing and supportive service needs of these populations and how are these needs determined?

Due to the complexity and textbox size limitations, the special needs portion of the HOPWA Program can be found in the Program Description/One Year Action Plan which is included in this Consolidated Plan.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

The Lawton MSA has the most total cumulative HIV/AIDS cases with 339 cases reported. The remainder of the cases or 1,615 are scattered throughout the remaining portion of rural Oklahoma and are not a part of a metropolitan statistical area.

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

Discussion:

NA-50 Non-Housing Community Development Needs - 91.315 (f)

Describe the jurisdiction's need for Public Facilities:

Based on public input sessions water and wastewater infrastructure projects are considered the number one priority in Oklahoma for public facilities and improvements. This is primarily due to the significant cost of infrastructure projects. CDBG infrastructure projects impact public health and safety such as providing quality drinking water, supporting water treatment facilities, and producing sufficient wastewater collection. In conclusion, CDBG funding helps to strengthen and maintain communities around the state.

How were these needs determined?

The State's infrastructure needs are primarily determined by comments obtained from public input sessions. In addition, ODOC attends and provides input at the Funding Agency Coordinating Team (FACT) meetings throughout the year. The purpose of these meetings is to obtain information from communities around the state and provide solutions to infrastructure needs through coordination and collaboration between several different agencies. The FACT meetings are hosted by the Oklahoma Rural Water Association (OWRA) and include other surrounding agencies such as the Department of Environmental Quality (DEQ), Oklahoma Water Resource Board (OWRB), Indian Health Service (HIS), and several others.

CDBG Disaster Recovery (2022) Infrastructure and Economic Needs Assessment.

Infrastructure

The infrastructure conditions in the impacted counties before the disaster (May 2022) consisted of many state and local roads and highways crossing predominately rural areas. The primary damage from the event is due to roads and bridges impacted by high flooding. Many areas also saw an impact on energy infrastructure due to high winds and tornadoes. Most residents of Seminole County had no power service for more than seven days after the disaster. The Muscogee (Creek) Nation saw extensive road damage because of flooding. Muskogee County had multiple closed highways due to flooding.

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

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

Economic Revitalization

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

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

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

For detailed information on this assessment please review the 2022 DR Action Plan at <https://www.okcommerce.gov/cdbg-disaster-recovery-2022/>

Describe the jurisdiction's need for Public Improvements:

Based on public input sessions water and wastewater infrastructure projects are considered the number one priority in Oklahoma for public facilities and improvements. This is primarily due to the significant cost of infrastructure projects. CDBG infrastructure projects impact public health and safety such as providing quality drinking water, supporting water treatment facilities, and producing sufficient wastewater collection. In conclusion, CDBG funding helps to strengthen and maintain communities around the state.

How were these needs determined?

The State's infrastructure needs are primarily determined by comments obtained from public input sessions. In addition, ODOC attends and provides input at the Funding Agency Coordinating Team (FACT) meetings throughout the year. The purpose of these meetings is to obtain information from communities around the state and provide solutions to infrastructure needs through coordination and

collaboration between several different agencies. The FACT meetings are hosted by the Oklahoma Rural Water Association (OWRA) and include other surrounding agencies such as the Department of Environmental Quality (DEQ), Oklahoma Water Resource Board (OWRB), Indian Health Service (HIS), and several others.

Describe the jurisdiction's need for Public Services:

Based on public input sessions water and wastewater infrastructure projects are considered the number one priority in Oklahoma for public facilities and improvements. This is primarily due to the significant cost of infrastructure projects. CDBG infrastructure projects impact public health and safety such as providing quality drinking water, supporting water treatment facilities, and producing sufficient wastewater collection.

However, the COVID pandemic caused a significant increase in the need for public services such as utility assistance, rental/mortgage assistance, mental health assistance, and others. Even after the pandemic, there continues to be a need for public services to combat homelessness around the state.

In 2021, the Oklahoma Department of Commerce provided funds to communities across the state for COVID recovery needs using CARES Act funding from HUD. CDBG-CV dollars were used to help primarily low-to moderate income individuals with public service needs. Furthermore, this also demonstrates a necessity for additional funding to support housing needs across the state.

For additional information on CDBG-CV, please visit <https://www.okcommerce.gov/reporting-compliance/cdbg-covid-19/>

How were these needs determined?

Based on public input sessions water and wastewater infrastructure projects are considered the number one priority in Oklahoma for public facilities and improvements. This is primarily due to the significant cost of infrastructure projects. CDBG infrastructure projects impact public health and safety such as providing quality drinking water, supporting water treatment facilities, and producing sufficient wastewater collection.

However, the COVID pandemic caused a significant increase in the need for public services such as utility assistance, rental/mortgage assistance, mental health assistance, and others. Even after the pandemic, there continues to be a need for public services to combat homelessness around the state.

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For additional information on CDBG-CV, please visit <https://www.okcommerce.gov/reporting-compliance/cdbg-covid-19/>

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The State of Oklahoma Consolidated Plan is a comprehensive planning document identifying the State's needs in housing, community, and economic development. The U. S. Department of Housing and Urban Development (HUD) requires the State to complete a Consolidated Plan to receive federal funds for the application and use of five (5) formula grant programs as shown below:

1. Community Development Block Grant (CDBG);
2. Emergency Solutions Grant (ESG);
3. HOME Investment Partnerships (HOME); and
4. Housing Opportunities for Persons with AIDS (HOPWA)
5. Housing Trust Fund (HTF)

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.

The Consolidated Plan describes the State's plan for pursuing these goals in three components: Housing, Homelessness, and Non-housing Community Development. First, a needs assessment is provided followed by a prioritization of goals to meet the identified needs, and finally recommended strategies to address the priorities. It should be recognized, however, that the priorities and strategies are general and far-reaching in nature, thus the responsibility for fulfilling any recommendation lies not only with ODOC but also with other federal and state agencies as well as community-based non-profit organizations and the private sector. Therefore, communities and other entities are encouraged to go beyond the funding available in the CDBG, ESG, HOME, HTF, and HOPWA programs by building partnerships and leveraging these combined resources in furtherance of those goals by which they are directly affected.

For example, local jurisdictions and community-based non-profit organizations, through coordination by ODOC's Office of Community Development, are integrating federal and state-funded programs such as the Community Services Block Grant (CSBG), the Emergency Solutions Grant (ESG) Program, and State Appropriated Funds (SAF), and other programs to address homelessness issues. Such integration needs to continue to be explored and extended at all levels to include the coordination of as many available resources as may be appropriate and applicable. The COVID (2020) pandemic caused severe increases in homelessness and housing needs. As of today, the needs of Oklahoma communities far outweigh the funding available to support sustainability.

The Consolidated Plan contains a Five-Year Strategic Plan developed after conducting a needs assessment and determining the priorities/strategies on housing, homelessness, and community development. In compliance with HUD's final rule, the State of Oklahoma Consolidated Plan serves the following separate, but integrated, functions:

- A planning document for a jurisdiction that builds on a participatory process;
- The application for formula grant programs administered by HUD's Office of Community Planning and Development;
- A strategic plan for carrying out HUD's programs; and
- An action plan that provides a basis for assessing performance.

MA-10 Number of Housing Units – 91.310(a)

Introduction

The following Market Analysis was conducted using housing data supplied by the Census Bureau and HUD.

CDBG DR Housing Analysis

Please see the DR19 and DR22 Action Plans (attached) for detailed information on housing analysis.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	1,244,930	73%
1-unit, attached structure	33,936	2%
2-4 units	79,578	5%
5-19 units	124,956	7%
20 or more units	63,788	4%
Mobile Home, boat, RV, van, etc	165,653	10%
Total	1,712,841	100%

Table 29 – Residential Properties by Unit Number

Data Source: 2013-2017 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	3,551	0%	19,827	4%
1 bedroom	16,481	2%	103,574	21%
2 bedrooms	153,493	16%	180,567	36%
3 or more bedrooms	790,941	82%	200,537	40%
Total	964,466	100%	504,505	101%

Table 30 – Unit Size by Tenure

Data Source: 2013-2017 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Depending on the program, targeting can vary as to income level and type of person(s) served.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

Although an exact number is difficult to determine, data has shown that typically more units of affordable housing are lost each year than gained.

Does the availability of housing units meet the needs of the population?

Historically, there has usually been a lack of affordable housing units to meet the need. The COVID (2020) pandemic caused severe increases in homelessness and housing needs. As of today, the needs of Oklahoma communities far outweigh the funding available to support sustainability.

Describe the need for specific types of housing:

Besides the obvious need for both ownership and rental housing, there always seems to be a large need for housing for the elderly, for those with special needs, and for the homeless. As of today, the needs of Oklahoma communities far outweigh the funding available to support sustainability.

Discussion

MA-15 Cost of Housing – 91.310(a)

Introduction

The following Market Analysis was conducted using housing data supplied by the Census Bureau and provided by HUD.

Per HUD requirement, additional CDBG DR specific Housing requirements were added to this Five Year Consolidated Plan.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2017	% Change
Median Home Value	98,800	125,800	27%
Median Contract Rent	455	592	30%

Table 31 – Cost of Housing

Data Source: 2000 Census (Base Year), 2013-2017 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	198,125	39.3%
\$500-999	257,559	51.0%
\$1,000-1,499	36,847	7.3%
\$1,500-1,999	7,302	1.5%
\$2,000 or more	4,672	0.9%
Total	504,505	100.0%

Table 32 - Rent Paid

Data Source: 2013-2017 ACS

CDBG DR Housing Costs

There are approximately 62 HUD-assisted multi-family properties in the disaster-impacted areas. ODOC reached out to local governments and twelve local public housing authorities (PHAs) on July 13, 2023, and August 24, 2023, and received no reports of damage from the disaster to date. Please review the 2022 Disaster Recovery Unmet Needs Assessment for additional details.

Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	38,985	No Data
50% HAMFI	145,895	109,495
80% HAMFI	329,745	267,545

Number of Units affordable to Households earning	Renter	Owner
100% HAMFI	No Data	372,940
Total	514,625	749,980

Table 33 – Housing Affordability

Data Source: 2013-2017 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	0	0	0	0	0
High HOME Rent	0	0	0	0	0
Low HOME Rent	0	0	0	0	0

Table 34 – Monthly Rent

Data Source Comments:

Is there sufficient housing for households at all income levels?

As one might expect, the availability of affordable housing is lowest for those at the lowest income levels, particularly those earning less than 30% AMI.

How is affordability of housing likely to change considering changes to home values and/or rents?

As house prices and rental rates continue to rise, the affordability of housing will decrease and more people will find it increasingly more difficult to find price-appropriate housing.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

Our average, HOME/FMRs are slightly below Area Median Rents, so the production/preservation of affordable housing will remain important.

Discussion

MA-20 Condition of Housing – 91.310(a)

Introduction:

The following Market Analysis was conducted using housing data supplied by the Census Bureau and provided by HUD. Per HUD requirement, additional CDBG DR specific Housing requirements were added to this Five-Year Consolidated Plan.

Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":

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

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

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	175,644	18%	198,267	39%
With two selected Conditions	5,104	1%	13,605	3%
With three selected Conditions	323	0%	330	0%
With four selected Conditions	34	0%	34	0%
No selected Conditions	783,361	81%	292,269	58%
Total	964,466	100%	504,505	100%

Table 35 - Condition of Units

Data Source: 2013-2017 ACS

CDBG DR Housing Conditions

There are approximately 62 HUD-assisted multi-family properties in the disaster-impacted areas. ODOC reached out to local governments and twelve local public housing authorities (PHAs) on July 13, 2023, and August 24, 2023, and received no reports of damage from the disaster to date. Please review the 2022 Disaster Recovery Unmet Needs Assessment for additional details

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	209,969	22%	76,652	15%

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
1980-1999	263,131	27%	136,552	27%
1950-1979	378,952	39%	221,550	44%
Before 1950	112,414	12%	69,751	14%
Total	964,466	100%	504,505	100%

Table 36 – Year Unit Built

Data Source: 2013-2017 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	491,366	51%	291,301	58%
Housing Units build before 1980 with children present	119,820	12%	76,465	15%

Table 37 – Risk of Lead-Based Paint

Data Source: 2013-2017 ACS (Total Units) 2013-2017 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 38 - Vacant Units

Data Source: 2005-2009 CHAS

Need for Owner and Rental Rehabilitation

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Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

Discussion:

The preceding segment of the Market Analysis was conducted using housing data supplied by the Census Bureau and provided by HUD as part of the IDIS Consolidated Plan template.

MA-25 Public and Assisted Housing – (Optional)

Introduction:

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	151	13,089	24,334	165	19,370	719	1,750	2,134
# of accessible units			281						
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 39 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The number and physical condition of public housing units is an ever-changing statistic, thus to address both quantity and quality would be challenging and potentially inaccurate and useless.

Describe the Restoration and Revitalization Needs of public housing units in the jurisdiction:

Since each of numerous public housing agencies will have differing restoration and revitalization needs, it would be near to impossible to generalize or summarize as to those needs.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

Each of many public housing agencies located across the State will employ differing strategies for improving the living environment of public housing residents depending upon the particular characteristics of that jurisdiction, so it is difficult at best to catalog, generalize, or summarize those strategies.

Discussion:

MA-30 Homeless Facilities – 91.310(b)

Introduction

This section is relevant to the Emergency Solutions Grant (ESG).

Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	979	132	204	65	0
Households with Only Adults	1,743	132	344	1,417	0
Chronically Homeless Households	0	132	0	736	0
Veterans	53	132	90	699	0
Unaccompanied Youth	153	132	139	49	0

Table 40 - Facilities Targeted to Homeless Persons

Data Source Comments: Data Source Comments: Totals based off 2023 Housing Inventory County

Totals basedd off 2023 Housing Inventory Chart

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

The State requires that each ESG subrecipient must coordinate and integrate wherever possible ESG-funded activities with mainstream housing, health, mental health, social services, employment, education and youth programs for which families and individuals at risk of homelessness and homeless individuals and families may be eligible. Having a formal policy in place coordinating the development and management of such agreements is also required.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

The Governor's Interagency Council on Homelessness (GICH) was created to promote collaborations among stakeholders and to develop and implement strategies to improve access to services, mainstream resources, and to develop affordable, permanent housing to address Oklahoma's homeless population. The GICH consisted of twenty-five (25) members of which nineteen (19) were State Agencies with knowledge of the subject of homelessness. Before GICH was dissolved in April 2023, these agencies worked with each other through the GICH and with the CoC's to make sure their services were available through or in partnership with the service providers.

Now ODOC, together with the Oklahoma CoCs, ESG sub-recipients, and former GICH members strive to continue to coordinate services and fill gaps in homeless services across the State of Oklahoma, particularly with chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth.

MA-35 Special Needs Facilities and Services – 91.310(c)

Introduction

The State requires that each ESG subrecipient must coordinate and integrate wherever possible ESG-funded activities with mainstream housing, health, mental health, social services, employment, education and youth programs for which families and individuals at risk of homelessness and homeless individuals and families may be eligible. Having a formal policy in place coordinating the development and management of such agreements is also required.

The Governor's Interagency Council on Homelessness (GICH) was created to promote collaborations among stakeholders and to develop and implement strategies to improve access to services, mainstream resources, and to develop affordable, permanent housing to address Oklahoma's homeless population. The GICH consisted of twenty-five (25) members of which nineteen (19) were State Agencies with knowledge of the subject of homelessness. Before GICH was dissolved in April 2023, these agencies worked with each other through the GICH and with the CoC's to make sure their services were available through or in partnership with the service providers.

Now ODOC, together with the Oklahoma CoCs, ESG sub-recipients, and former GICH members strive to continue to coordinate services and fill gaps in homeless services across the State of Oklahoma, particularly with chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth.

HOPWA Assistance Baseline Table

Type of HOWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
TBRA	0
PH in facilities	0
STRMU	0
ST or TH facilities	0
PH placement	0

Table 41 – HOPWA Assistance Baseline

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

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

Emergency Solutions: Each subrecipient is required to have a discharge plan so persons are not released back into homelessness. Available resources are coordinated and shared at the Continuum of Care Network level.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

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PLAN_SECTION_ID=[1350402000]>

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

The SSI/SSDI Outreach, Access and Recovery (SOAR) Technical Assistance Initiative: The focus of this initiative is to increase access to SSI and SSDI for homeless people with mental illnesses and/or co-occurring substance use disorders. Members of the GICH participated in an in-State Forum to develop a plan for systems change related to access to SSI and SSDI for homeless persons. Training to local stakeholders has taken place and data is being collected to track the success of the initiative. Since the beginning of the SOAR Initiative, 905 case managers and other types of field workers have received this training.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

N/A

MA-40 Barriers to Affordable Housing – 91.310(d)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Lack of knowledge and lack of local understanding typically serve as the largest barriers to affordable housing. OHFA constantly works with municipalities and citizen interest groups to educate them as to what affordable housing is and is not. For those cities and individuals that are interested in knowing what they can do to further their affordable housing efforts, OHFA acts in an advisory capacity to make them aware of how negative public policy (including tax policy, land use controls, zoning ordinances, building codes, fees and charges, and growth limits) can be altered in their favor.

In 2018 OHFA conducted a separate statewide survey for an update to the State's Analysis of Impediments to Fair Housing Choice. 85 stakeholders responded to this survey. The survey did not ask about the greatest housing need, but instead asked about the State's most significant impediment to Fair Housing choice. Surprisingly, the most frequently cited impediment to Fair Housing choice was not age, gender or racial discrimination, but a lack of affordable rental housing.

MA-45 Non-Housing Community Development Assets -91.315(f)

Introduction

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, policy makers, 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.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	40,484	37,762	7	8	1
Arts, Entertainment, Accommodations	77,956	57,557	13	13	0
Construction	44,699	37,267	7	8	1
Education and Health Care Services	103,994	70,081	17	16	-1
Finance, Insurance, and Real Estate	35,460	23,344	6	5	-1
Information	8,785	5,374	1	1	0
Manufacturing	82,012	71,382	14	16	2
Other Services	18,280	13,797	3	3	0
Professional, Scientific, Management Services	40,010	23,532	7	5	-2
Public Administration	0	0	0	0	0
Retail Trade	90,966	66,773	15	15	0
Transportation and Warehousing	26,900	22,009	4	5	1
Wholesale Trade	28,890	18,991	5	4	-1
Total	598,436	447,869	--	--	--

Table 42- Business Activity

Data Source: 2013-2017 ACS (Workers), 2017 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	947,146
Civilian Employed Population 16 years and over	890,281
Unemployment Rate	5.92
Unemployment Rate for Ages 16-24	16.40
Unemployment Rate for Ages 25-65	3.40

Table 43 - Labor Force

Data Source: 2013-2017 ACS

Occupations by Sector	Number of People
Management, business and financial	170,907
Farming, fisheries and forestry occupations	33,546
Service	95,211
Sales and office	204,158
Construction, extraction, maintenance and repair	113,609
Production, transportation and material moving	61,726

Table 44 – Occupations by Sector

Data Source: 2013-2017 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	586,628	69%
30-59 Minutes	208,530	25%
60 or More Minutes	51,306	6%
Total	846,464	100%

Table 45 - Travel Time

Data Source: 2013-2017 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	60,286	5,725	59,439

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
High school graduate (includes equivalency)	239,580	15,022	120,442
Some college or Associate's degree	235,119	11,227	88,285
Bachelor's degree or higher	176,398	3,348	35,205

Table 46 - Educational Attainment by Employment Status

Data Source: 2013-2017 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	3,546	6,526	8,364	19,810	22,374
9th to 12th grade, no diploma	31,295	22,399	20,962	48,325	38,339
High school graduate, GED, or alternative	71,027	89,012	83,519	202,681	132,841
Some college, no degree	72,378	66,695	59,908	122,405	75,920
Associate's degree	10,616	22,564	22,401	42,420	17,436
Bachelor's degree	9,978	40,728	39,905	72,891	37,942
Graduate or professional degree	591	10,935	15,945	36,541	26,530

Table 47 - Educational Attainment by Age

Data Source: 2013-2017 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	17,766,965
High school graduate (includes equivalency)	28,834,675
Some college or Associate's degree	31,359,390
Bachelor's degree	35,168,785
Graduate or professional degree	29,894,510

Table 48 – Median Earnings in the Past 12 Months

Data Source: 2013-2017 ACS

Based on the Business Activity table above, what are the major employment sectors within the state?

Based on the Business Activity data table provided by HUD, the top three employment sectors in the state are comprised of the following in terms of shares of jobs within the State:

1. Education and Health Care Services - 27%
2. Retail Trade - 14%
3. Arts, Entertainment, Accommodations - 12%

Describe the workforce and infrastructure needs of business in the state.

Regarding the area of non-housing community development, adequate infrastructure lies at the core of interstate commerce. The status of and availability of infrastructure is key to maintaining current business/industry and recruiting new business/industry to the State. The current state infrastructure is aging and is in need of repair or expansion to meet the demands of a growing population. The CDBG program focuses on serving this need through various road/street and water/wastewater projects throughout the rural regions of the State. Additionally, the CDBG program incorporates an economic component (Economic Development Infrastructure Financing - EDIF) which targets job creation by providing funding to publicly owned infrastructure projects tied directly to businesses.

Describe any major changes that may have an economic impact, such as planned public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

As previously stated, 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, policy makers, 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.

How do the skills and education of the current workforce correspond to employment opportunities in the state?

There is a direct correlation in areas associated with workforce skill and education in regard to attracting businesses/industries which provide higher paying jobs. For example, technology based industries require a skilled and well educated workforce and are able to provide comparably higher wages. Higher wage jobs translate into increased economic stability. Additionally, as shown in the educational table, unemployment levels directly correspond to educational attainment. Unemployment levels are consecutively lower across all age groups for those who have attained a minimum of a high school education and above.

Describe current workforce training initiatives supported by the state. Describe how these efforts will support the state's Consolidated Plan.

The State has a very active workforce component centered at the Oklahoma Department of Commerce. Ultimately, job training and increased educational training opportunities translate into attracting new business as well as filling current worker shortages in the current markets.

Describe any other state efforts to support economic growth.

The State of Oklahoma as with other states works to support economic growth through a variety of state and federally programs designed to promote existing businesses along with attracting new businesses from outside the state. As previously mentioned, the CDBG program incorporates an economic component (Economic Development Infrastructure Financing - EDIF) which targets job creation by providing funding to publicly owned infrastructure projects tied directly to businesses.

Discussion

The State CDBG program is the primary funding mechanism regarding non-housing community development out of the four programs (ESG, CDBG, HOME, and HOPWA) covered under the Consolidated Plan. The primary obstacle to meeting the non-housing community development underserved needs is the lack of adequate program funding at the federal level. Annual program funding levels have been steadily declining for the State's CDBG program since FY 2010. This trend is expected to continue throughout the duration of this Consolidated Plan cycle.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

From the information we have at this time, it appears that households with multiple housing problems are distributed throughout the State of Oklahoma and not concentrated in one area. Concentrated would be defined as an area where households with multiple housing problems are more than ten percent greater than the statewide average.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

From the information we have at this time, racial and ethnic minorities seem to be slightly concentrated in the urban areas as opposed to the rural areas. Low-income families are distributed throughout the State and not concentrated in any distinct areas. Concentrated would be defined as an area where racial and ethnic minorities or low-income families make up a percentage of the population more than ten percent greater than the statewide average.

What are the characteristics of the market in these areas/neighborhoods?

The market is characterized by high rates of turnover, a high percentage of rental units as opposed to homeownership units, an older housing stock, generally lower rents and more substandard housing units.

Are there any community assets in these areas/neighborhoods?

The areas have a good number of parks and recreation areas throughout the State. Naturally, neighborhood parks would be centered more in the urban areas of the state. There are also many older buildings that are structurally sound and would be good candidates for conversion to rental housing units.

Are there other strategic opportunities in any of these areas?

The areas are close to ongoing downtown revitalization efforts that will make them more attractive for housing investment and improvement.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

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

Evidence suggests that broadband service substantially impacts the quality of life for households, including access to vital resources for educational needs, employment opportunities, and other important necessities to create sustainability. This is critically important for members of low-income households and neighborhoods with limited access to broadband services. To remedy this issue, the Oklahoma Broadband Office (OBO) was established to produce affordable broadband services throughout the State of Oklahoma to unserved and underserved beneficiaries. Approximately \$1.3 billion has been invested through federal and state dollars to ensure 95% accessibility to high-speed internet services by June 2028.

To learn more about this initiative, citizens can contact the Oklahoma Broadband Office or visit <https://oklahoma.gov/broadband.html>.

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

To sustain affordability in broadband services, there must be coordination between internet service providers (ISPs) across the state. As part of the initiative for service expansion, the Oklahoma Broadband Office (OBO) works with service providers around the state to ensure internet services will be provided at an affordable price for unserved and underserved communities.

To learn more about this initiative, citizens can contact the Oklahoma Broadband Office or visit <https://oklahoma.gov/broadband.html>.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

The Oklahoma State Hazard Mitigation Plan identified eleven (11) natural disasters and hazards around the state, including dam failure, drought, earthquakes, extreme heat, floods, severe storms, high winds, soil hazards, tornados, wildfires, winter storms, and landslides. Of these, flooding was determined to be the most probable to occur and has the highest risk hazard. Currently, the Oklahoma Water Resources Board is using CDBG-DR funding to produce more detailed floodplain maps to help mitigate risks and guide future decisions.

For more information on the Oklahoma State Hazard Mitigation Plan visit <https://oklahoma.gov/content/dam/ok/en/oem/documents/2019-oklahoma-state-hm-plan.pdf>.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Disasters can substantially impact low—and moderate-income households due to limited resources to resolve issues created by flooding and other hazards. CDBG-DR funding is intended to help provide support to disaster victims, especially those considered to be low—and moderate-income individuals. Due to text constraints, please review the 2019 and 2022 unmet needs analysis attached to this Consolidated Plan or visit the OKCommerce website for more details.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The **State of Oklahoma Consolidated Plan** is a comprehensive planning document identifying the State's needs in housing, community, and economic development. The U. S. Department of Housing and Urban Development (HUD) requires the State to complete a Consolidated Plan to receive federal funds for the application and use of five (5) formula grant programs:

- 1. Community Development Block Grant (CDBG);**
- 2. Emergency Solutions Grant (ESG);**
- 3. HOME Investment Partnerships (HOME); and**
- 4. Housing Opportunities for Persons with AIDS (HOPWA)**
- 5. Housing Trust Fund (HTF)**

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.

The Consolidated Plan describes the State's plan for pursuing these goals in three components: Housing, Homelessness, and Non-housing Community Development. Each of these areas is arranged in a similar fashion. First, a needs assessment is provided followed by a prioritization of goals to meet the identified needs, and finally recommended strategies to address the priorities. It should be recognized, however, that the priorities and strategies are general and far-reaching in nature, thus the responsibility for fulfilling any recommendation lies not only with ODOC but also with other federal and state agencies as well as community-based non-profit organizations and the private sector. Therefore, communities and other entities are encouraged to go beyond the funding available in the CDBG, ESG, HOME, HTF and HOPWA programs by building partnerships and leveraging these combined resources in furtherance of those goals by which they are directly affected.

For example, local jurisdictions and community-based non-profit organizations, through coordination by ODOC's Office of Community Development, are integrating federal and state-funded programs such as the Community Services Block Grant (CSBG), the Emergency Solutions Grant (ESG) Program, and State Appropriated Funds (SAF) to address homelessness issues. Such integration needs to continue to be explored and extended at all levels to include the coordination of as many available resources as may be appropriate and applicable.

The U.S. Department of Housing and Urban Development (HUD) issued the final rule for the Consolidated Plan in the Federal Register on February 9, 2006. The Consolidated Plan contains a Five-Year Strategic Plan developed after conducting a needs assessment and determining the priorities/strategies on housing, homelessness, and community development. In compliance with HUD's final rule, the State of Oklahoma Consolidated Plan serves the following separate, but integrated, functions:

- A planning document for a jurisdiction that builds on a participatory process;
- The application for formula grant programs administered by HUD's Office of Community Planning and Development;
- A strategic plan for carrying out HUD's programs; and
- An action plan that provides a basis for assessing performance.

SP-10 Geographic Priorities – 91.315(a)(1)

Geographic Area

Table 49 - Geographic Priority Areas

1	Area Name:	State of Oklahoma
	Area Type:	State Geography
	Other Target Area Description:	State Geography
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	The five HUD programs covered under the State Consolidated Plan (CDBG, ESG, HOME, HTF and HOPWA) operate within the jurisdiction of the State of Oklahoma and no specific geographic neighborhood boundaries are targeted.
	Include specific housing and commercial characteristics of this target area.	N/A
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Based on public input sessions water and wastewater infrastructure projects are considered the number one priority in Oklahoma for public facilities and improvements. This is primarily due to the significant cost of infrastructure projects. CDBG infrastructure projects impact public health and safety such as providing quality drinking water, supporting water treatment facilities, and producing sufficient wastewater collection. The five HUD programs covered under the State Consolidated Plan (CDBG, ESG, HOME, HTF, and HOPWA) operate within the jurisdiction of the State of Oklahoma and no specific geographic neighborhood boundaries are targeted.
	Identify the needs in this target area.	See the needs assessment provided by ODOC and OHFA.

	<p>What are the opportunities for improvement in this target area?</p>	<p>The COVID pandemic caused a significant increase in the need for public services such as utility assistance, rental/mortgage assistance, mental health assistance, and others. Even after the pandemic, there continues to be a need for public services to combat homelessness around the state.</p> <p>In 2021, the Oklahoma Department of Commerce provided funds to communities across the state for COVID recovery needs using CARES Act funding from HUD. CDBG-CV dollars were used to help primarily low-to moderate-income individuals with public service needs. Furthermore, this also demonstrates a necessity for additional funding to support housing needs across the state.</p>
	<p>Are there barriers to improvement in this target area?</p>	<p>The State of Oklahoma has a limited supply of funding to support additional affordable housing. To address this issue, the State will need additional funding to support housing needs.</p>

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The State of Oklahoma has not set aside or reserved dollar amounts of assistance specifically for geographic areas within the State for the CDBG, ESG, HOME, HTF or HOPWA programs. Rather, each of these programs has its own distribution procedures that sometimes include specific requirements for projects in certain areas within the State and its (77) seventy-seven counties.

The selection of the CDBG projects is usually a competitive process with the exception of CDBG Small Cities, CDBG Rural Economic Action Plan (REAP), CDBG Economic Development Infrastructure Financing (EDIF), and CDBG Capital Improvement Planning (CIP).

The ESG program is a competitive program. Funds are allocated to each of the seven (7) rural Continuum of Care (CoC) regions based on a formula involving population, median income, unemployment and overcrowded housing. Competition for funding takes place within each of the CoC regional service areas. The eligible applicants are units of general local government and nonprofits. The ESG applications are taken on an annual basis.

SP-25 Priority Needs – 91.315(a)(2)

Priority Needs

Table 50 – Priority Needs Summary

1	Priority Need Name	State CDBG Program
	Priority Level	High
	Population	Low Moderate Non-housing Community Development
	Geographic Areas Affected	State Geography
	Associated Goals	State CDBG Program
	Description	<p>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 as a result of these improvements. CDBG funds are provided by the federal government (U.S. Department of Housing and Urban Development) and managed by the Oklahoma Department of Commerce to help ensure Oklahoma’s most critical needs are addressed.</p> <p>Based on public input sessions water and wastewater infrastructure projects are considered the number one priority in Oklahoma for public facilities and improvements. This is primarily due to the significant cost of infrastructure projects. CDBG infrastructure projects impact public health and safety such as providing quality drinking water, supporting water treatment facilities, and producing sufficient wastewater collection.</p>

	Basis for Relative Priority	<p>The primary National Objective of the State’s CDBG program is the development of viable urban communities, by providing decent housing and a suitable living environment, and expanding economic opportunities, principally for persons of low income.</p> <p>The use of the “benefit to low and moderate income-persons” CDBG National Objective is considered a funding priority under the State’s CDBG Program and is treated as such under the State’s individual CDBG set-asides. All project proposals submitted for funding through the State’s CDBG Program must document the achievement of the low and moderate-income National Objective as delineated in 24 CFR §570.483 (Criteria for National Objectives).</p> <p>It is estimated that, at a minimum, 95% of funds will be utilized on projects that meet the primary national objective of benefit to low- and moderate-income persons. Each state administering the CDBG program is allowed the flexibility of determining its priorities from the range of eligible activities under Section 105(a) of the Housing and Community Development Act. To formulate the State’s CDBG program, views on priorities are requested and received from the public, municipalities, and counties through written surveys, public hearings and written comments on proposed plans.</p> <p>Based on public input sessions water and wastewater infrastructure projects are considered the number one priority in Oklahoma for public facilities and improvements. This is primarily due to the significant cost of infrastructure projects. CDBG infrastructure projects impact public health and safety such as providing quality drinking water, supporting water treatment facilities, and producing sufficient wastewater collection.</p>
2	Priority Need Name	State ESG Program
	Priority Level	High
	Population	<p>Extremely Low</p> <p>Rural</p> <p>Chronic Homelessness</p> <p>Elderly</p> <p>Frail Elderly</p> <p>Persons with Mental Disabilities</p> <p>Persons with Physical Disabilities</p> <p>Persons with Developmental Disabilities</p> <p>Persons with Alcohol or Other Addictions</p> <p>Persons with HIV/AIDS and their Families</p> <p>Victims of Domestic Violence</p>

	Geographic Areas Affected	State Geography
	Associated Goals	State ESG Program
	Description	TBD
	Basis for Relative Priority	TBD
3	Priority Need Name	State HOME Program
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence

	Geographic Areas Affected	State Geography
	Associated Goals	State HOME Program
	Description	TBD
	Basis for Relative Priority	
4	Priority Need Name	State HOPWA Program
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	State Geography
	Associated Goals	State HOPWA

	Description	<p>The Program Description and One Year Action Plan (AP) set out a description of all activities the State of Oklahoma will perform with HOPWA Program Funds. The funds will be used to address the priorities outlined in the AP including rental assistance, short term rent, mortgage, utility assistance, and various other supportive services. The Program Description further describes efforts to prevent homelessness and addresses housing needs of persons who are homeless. In addition, the AP outlines specific goals, objectives, and priorities to meet underserved needs.</p> <p>The AP establishes annual HOPWA output goals for the planned number of households to be assisted during the year with all services. The outputs can be used as a resource to measure assessment of client outcomes for achieving housing stability, reducing the risk of homelessness and to improve access to care. The AP further describes how funding has been allocated geographically and the rationale for the allocations and priorities. The information in the plan includes the name of each project sponsor and addresses information with reference to organizational structure.</p> <p>Monitoring requirements are outlined in the Program Description, AP, and the attached Invitation to Bid. Requirements include annual audits and specific measurement of outputs to monitor progress of project sponsors activities to ensure compliance with not only HOPWA rules and regulations, but performance goals as well. Other resources that are reasonably expected to be available are further identified and outlined in the Program Description and AP.</p>
	Basis for Relative Priority	<p>The HOPWA Action Plan (AP) establishes annual HOPWA output goals for the planned number of households to be assisted during the year with all services. The outputs can be used as a resource to measure assessment of client outcomes for achieving housing stability, reducing the risk of homelessness and to improve access to care. The AP further describes how funding has been allocated geographically and the rationale for the allocations and priorities. The information in the plan includes the name of each project sponsor and addresses information with reference to organizational structure.</p> <p>Monitoring requirements are outlined in the Program Description, AP, and the attached Invitation to Bid. Requirements include annual audits and specific measurement of outputs to monitor progress of project sponsors activities to ensure compliance with not only HOPWA rules and regulations, but performance goals as well. Other resources that are reasonably expected to be available are further identified and outlined in the Program Description and AP.</p>
	5	
	Priority Need Name	State Housing Trust Fund
	Priority Level	High

	Population	Extremely Low Low Large Families Families with Children Elderly
	Geographic Areas Affected	State Geography
	Associated Goals	State Housing Trust Fund
	Description	<div>The Oklahoma Housing Finance Agency (OHFA) has been designated by the Governor of the State of Oklahoma as the administering agency for the National Housing Trust Fund (HTF) for the State of Oklahoma.</div>
	Basis for Relative Priority	Priority for HTF funding is based on the priorities required in the 24 CFR Part 93, the HTF Interim Rule

Narrative (Optional)

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 as a result of these improvements.

The primary National Objective of the State's CDBG program is the development of viable urban communities, by providing decent housing and a suitable living environment and expanding economic opportunities, principally for persons of low income.

OHFA operates the HOPWA Program. HOPWA funds are distributed statewide through an Invitation to Bid process. Proposals are selected based upon inventiveness, community support, and must contain evidence of cooperation and collaboration with a network of public and private agencies. Currently two Project Sponsors administer the program with one being located in the Oklahoma City area and one in the Tulsa area. These two locations serve as hubs for the program and provide both office and mobile HOPWA related services throughout the state.

HOPWA recipients are eligible to receive any HOPWA eligible activity under the following categories:

- Short term rent, mortgage, or utility assistance
- Long term rent assistance
- Supportive Services

Major barriers in providing needed services are as follows:

- Lack of availability of rental units in non MSA areas
- Lack of affordable units
- Condition of the housing stock that is available
- Client health and level of poverty

All eligible HOPWA Program activities have been made available to HOPWA eligible clients to meet the wide variety of client needs within each community and those communities differ as you travel from one corner of the state to the next.

SP-30 Influence of Market Conditions – 91.315(b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	
TBRA for Non-Homeless Special Needs	TBRA for non-homeless special needs will be used for underserved groups of individuals and/or households with special needs, and for whom the available rental housing rents and utilities are significantly in excess of thirty percent of their income.
New Unit Production	
Rehabilitation	Rehabilitation will be used in markets where there are significant numbers of eligible low-income households requiring rental housing, and an adequate stock of vacant housing units that could be rehabilitated and made into decent, safe and sanitary housing without an excessive use of funds. Rehab may be used for homeownership housing if there is a proven market and need for the units.
Acquisition, including preservation	

Table 51 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.315(a)(4), 91.320(c)(1,2)

Introduction

The State of Oklahoma annually receives federal funding from HUD for the five formula grant programs of CDBG, ESG, HOME, HTF and HOPWA. Due to complexity and textbox narrative size limitations, detailed program descriptions and funding allocation amounts can be found in the attached State Plans.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	13,963,452	1,000,000	0	14,963,452	55,853,808	The CDBG Program spends 100% of its annual allocation and does not have any carry over funds from the prior year. Program Income as listed and residual funds returned from CDBG projects which were completed and had remaining funds at contract close out account for additional funds beyond annual allocation. Returned program funds are not common and cannot be predicted or anticipated. Once received, these funds are then reallocated as soon as possible for new CDBG projects. Only the CDBG REAP set-aside requires match as part of the application. This match is 1:1 with the amount of CDBG funds requested.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	8,108,903	0	0	8,108,903	32,435,612	Since the HOME allocation is based on a formula, its hard to estimate the expected amount available for the remainder of the Con Plan year. We anticipated receiving an annual allocation of 7 million for the next 4 years.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	598,558	0	0	598,558	2,394,232	The total expected amount available includes five years of HOPWA funding plus program income, and prior year resources that include contributions from organizations such as United Way, Ray White, and various other contributors and fundraisers. It is important to note that these funds (prior year resources) are used mainly to leverage the HOPWA funds and not to actually carry out additional HOPWA eligible services. i.e. Ryan White funding is used in the calculation. However, only a small amount of those funds would be used to provide transportation to a very small amount of HOPWA clients.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	1,699,610	0	0	1,699,610	6,798,440	Each sub-recipient is required to provide and track "dollar-for-dollar" match to spend on eligible ESG activities during the Program period.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	3,144,833	0	0	3,144,833	12,579,333	Each subrecipient is required to provide and track "dollar-for-dollar" match to spend on eligible Emergency Solution activities during the Program period.

Table 52 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The State of Oklahoma annually receives federal funding from HUD for the five formula grant programs of CDBG, ESG, HOME, HTF and HOPWA. Due to complexity and textbox narrative size limitations, detailed program descriptions and funding allocation amounts can be found in the attached State Plans.

If appropriate, describe publically owned land or property located within the state that may be used to address the needs identified in the plan

Not Applicable.

Discussion

The Community Development Block Grant Disaster Recovery Program (CDBG-DR 2019 & 2022) grants are intended to support communities affected by the DR-4438, DR- 4657, and DR-4670 disasters. For additional information please visit <https://www.okcommerce.gov/community-development/local-governments-edos/community-development-block-grant-programs/>

SP-40 Institutional Delivery Structure – 91.315(k)

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
	Other	Economic Development	State

Table 53 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The primary obstacle to meeting under-served needs is the lack of adequate funding. There are some obstacles with regard to the State's ability to coordinate resources in the most efficient and effective manner. The need for services and supportive services have never been completely met and now that there is not enough housing stock and the housing available is increasingly no longer affordable, an exponentially larger amount of funding is needed to not only support the needs of the homeless and low-income, but to also hire more Federal, state, and city employees to manage grant funds, as well as more social workers, case managers, and housing navigators. Increased funding is also needed to provide specialized training they need to effectively carry out their jobs.

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. At a national level, passing legislation in line with the Council of State Community Development Agencies (COSCDA) 2024 Advocacy Priorities would provide more funding for subrecipients to meet more needs and allow the State to more efficiently and effectively coordinate resources.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance		X	
Mortgage Assistance	X		X
Rental Assistance	X	X	X
Utilities Assistance	X	X	X

Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics	X		
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care		X	
Education		X	
Employment and Employment Training		X	
Healthcare			
HIV/AIDS		X	X
Life Skills		X	
Mental Health Counseling	X	X	X
Transportation	X	X	X
Other			

Table 54 - Homeless Prevention Services Summary

Describe the extent to which services targeted to homeless person and persons with HIV and mainstream services, such as health, mental health and employment services are made available to and used by homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth) and persons with HIV within the jurisdiction

Emergency Solutions Grant: The State requires that each ESG subrecipient must coordinate and integrate wherever possible ESG-funded activities with mainstream housing, health, mental health, social services, employment, education, and youth programs for which families and individuals at risk of homelessness and homeless individuals and families may be eligible. Having a formal policy in place coordinating the development and management of such agreements is also required.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

With respect to the services targeted to persons with HIV, all the services are made available through assistance with transportation, private transportation, or mobile service delivery with HOPWA Funds and other resources. A more detailed description can be found in the Program Descriptions/One Year Action Plans which are included in this Consolidated Plan.

Emergency Solutions Grant: The strength in services is through the collaborations of the Continua of Care. As the governance of the CoC's become stronger and partnerships become stronger, the service will be stronger. Gaps are decreased also with formal agreement policies that also decrease duplication of services.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

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.

Emergency Solutions Grant: The State requires each subrecipient to work within their CoC and participate in the Centralized/Coordinated Assessment. The State is incorporating CoC governance regulations into the Emergency Solutions program to decrease gaps with the programs.

SP-45 Goals Summary – 91.315(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	State CDBG Program	2024	2028	Non-Housing Community Development	State of Oklahoma	State CDBG Program	CDBG: \$13,963,452	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 500000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 300000 Households Assisted Jobs created/retained: 850 Jobs Other: 100000 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	State ESG Program	2024	2028	Homeless	State of Oklahoma	State ESG Program	ESG: \$1,699,610	Tenant-based rental assistance / Rapid Rehousing: 1500 Households Assisted Homeless Person Overnight Shelter: 8000 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 0 Beds Homelessness Prevention: 4000 Persons Assisted
3	State HOME Program	2024	2028	Affordable Housing Public Housing	State of Oklahoma	State HOME Program	HOME: \$8,108,903	Rental units constructed: 260 Household Housing Unit Rental units rehabilitated: 205 Household Housing Unit Homeowner Housing Added: 365 Household Housing Unit Direct Financial Assistance to Homebuyers: 855 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	State HOPWA	2024	2028	Affordable Housing Public Housing	State of Oklahoma	State HOPWA Program	HOPWA: \$598,558	Housing for People with HIV/AIDS added: 425 Household Housing Unit
5	State Housing Trust Fund	2024	2028	Affordable Housing Public Housing	State of Oklahoma	State Housing Trust Fund	HTF: \$3,144,833	Rental units constructed: 100 Household Housing Unit Rental units rehabilitated: 185 Household Housing Unit

Table 55 – Goals Summary

Goal Descriptions

1	Goal Name	State CDBG Program
	Goal Description	<p>ODOC/CD goals are consistent with and mirror the HUD goals identified in Title 1 of the Housing and Community Development Act of 1974 (as amended):</p> <p><u>Decent Housing.</u> Covers a wide range of housing activities. The objective focuses on housing activities whose purpose is to meet individual family or community housing needs. It does not include programs where housing is an element of a larger effort to make community-wide improvements.</p> <p><u>A suitable living environment.</u> Relates to activities that are designed to benefit communities, families, or individuals by addressing issues in their living environment. This objective is related to activities that are intended to address a wide range of issues (physical infrastructure, health care, elderly, etc.) faced by low and moderate income persons.</p> <p><u>Expanded economic opportunity.</u> Applies to activities related to economic development, commercial revitalization, job creation and/or job retention.</p> <p>Beginning in 2007, HUD required each CDBG-funded activity to be identified as addressing at least one of the following goals and one of the following outcomes:</p> <p><u>Availability/Accessibility</u> applies to activities that make services, infrastructure, public facilities, public services, etc available or accessible to low and moderate income persons.</p> <p><u>Affordability</u> applies to activities that provide affordability in a variety of ways to low and moderate income people. Affordability is an appropriate objective outcome whenever an activity is lowering the cost, improving the quality, or increasing the affordability of a product or service to benefit a low-income household.</p> <p><u>Sustainability</u> applies to activities that are aimed at improving communities or neighborhoods, helping to them more livable or viable. Generally, this outcome focuses on a specific geographic area with numerous activities being undertaken simultaneously.</p>

2	Goal Name	State ESG Program
	Goal Description	ODOC, together with the Oklahoma CoCs, ESG sub-recipients, and former GICH members like the Department of Health, Department of Mental Health and Substance Abuse Services, local non-profits, and other community providers coordinate services and fill gaps in homeless services across the State of Oklahoma. The goals overlap between the priorities set by the Continua of Care service priorities and the Objectives of the USICH Federal Strategic Plan to Prevent Homelessness. All organizations are working toward a future where no one experiences the tragedy and indignity of homelessness—and everyone has a safe, stable, accessible, and affordable home.
3	Goal Name	State HOME Program
	Goal Description	TBD
4	Goal Name	State HOPWA
	Goal Description	TBD
5	Goal Name	State Housing Trust Fund
	Goal Description	TBD

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

Emergency Solutions: Based on a historical analysis of services, an estimated 1,500 households will be provided housing over the next 5 years.

Historically HOME funds have served 53 rental families, 171 homebuyers, and 113 homeowners annually. HOME funds are estimated to serve the following families per income categories. This is an annual estimate. Over the next 5 years' HOME estimates serving the following families.

The primary goal of the HTF is to preserve and increase the supply of decent, safe, and sanitary affordable housing for individuals and families whose incomes do not exceed thirty percent (30%) of Area Median Income, or the Poverty Level, whichever is greater. OHFA estimates serving 57 families annually with NHTF for a total of 285 families over the 5-year Consolidated Plan term.

SP-50 Public Housing Accessibility and Involvement – 91.315(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Totals Number of Units

The number and physical condition of public housing units is an ever-changing statistic, thus to address both quantity and quality would be challenging and potentially inaccurate and unuseful.

Activities to Increase Resident Involvements

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.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the 'troubled' designation

N/A

SP-55 Barriers to affordable housing – 91.315(h)

Barriers to Affordable Housing

Lack of knowledge and lack of local understanding typically serve as the largest barriers to affordable housing. OHFA constantly works with municipalities and citizen interest groups to educate them as to what affordable housing is and is not. For those cities and individuals that are interested in knowing what they can do to further their affordable housing efforts, OHFA acts in an advisory capacity to make them aware of how negative public policy (including tax policy, land use controls, zoning ordinances, building codes, fees and charges, and growth limits) can be altered in their favor.

In 2018 OHFA conducted a separate statewide survey for an update to the State's Analysis of Impediments to Fair Housing Choice. 85 stakeholders responded to this survey. The survey did not ask about the greatest housing need, but instead asked about the State's most significant impediment to Fair Housing choice. Surprisingly, the most frequently cited impediment to Fair Housing choice was not age, gender or racial discrimination, but a lack of affordable rental housing.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Although the economy has mostly recovered from the recession that began in 2008, lending standards remain fairly strict, making it more difficult to obtain home loans. In addition, while the unemployment level is historically low, incomes haven't risen enough to keep pace with rising housing costs. These conditions have driven more families into rental housing, especially low-income families. In addition, younger families, especially those of the Millennial Generation, seem less inclined to view homeownership as a way to build wealth and stability, leading them to stay as renter households longer. Thus they are occupying units that would otherwise be available for rent to low-income families.

OHFA will continue with its strong emphasis on creating new affordable rental units and rehabilitating existing rental units with its HOME and HTF funds and with Affordable Housing Tax Credits.

SP-60 Homelessness Strategy – 91.315(d)

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

State subrecipients have a plan or partnership within the local Continuum of Care to address Outreach in their service area without creating unnecessary duplication of services.

Addressing the emergency and transitional housing needs of homeless persons

Staff from the Department of Mental Health and Substance Abuse Service are continuing to educate State Agencies and service providers of the importance of the “Housing First” strategy. A Housing First approach seeks to assist person(s)/family(ies) to exit homelessness as quickly as possible by placing them in permanent housing with appropriate supports. This approach assumes the factors contributing to a household’s homelessness can best be remedied once the household is housed. For most, the "Housing First" model seeks long--term self--sufficiency, promoted through supportive services where housing and supportive services are combined. Even with the Housing First model, we recognize there will still be a need for emergency shelters and interim housing for stabilizing selected persons before placement in permanent supportive housing.

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.

Per the 2023 OHFA/HUD HOME-ARP study, the areas of highest need throughout the State of Oklahoma are:

1. Development of Affordable Rental Housing
2. Tenant-based Rental Assistance
3. Supportive Services
4. Acquisition/Development of Non-Congregate Shelters
5. Non-Profit Capacity Building and Operation

The lack of affordable, habitable rental housing has increased the amount of time individuals and families experience homelessness and the limited amount of funding available for tenant-based rental assistance and supportive services has decreased the ability of homeless service providers to prevent individuals and families from becoming homeless as well as hiring and retaining case managers and housing counselors to provide supportive services that help them to make the transition to permanent housing and independent living.

Former GICH members, Continuum of Care members, and Emergency Solutions Grant agencies work daily with very limited resources to help homeless persons make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitate access for homeless individuals and families to affordable housing units, and prevent individuals and families who were recently homeless from becoming homeless again while advocating for more funding and resources to make it all happen.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

The former GICH members have been diligently working with stakeholders to educate and improve processes so that no one is discharged into homelessness. Former GICH members, as well as CoC and ESG subrecipients collaborate to improve housing resources and services for unaccompanied youth. ODOC, former GICH members, and the CoC/ESG networks are working with Oklahoma Housing Finance Agency as well as other partners and funders to bring in more affordable housing projects in the State. Agencies like ODMHSAS and OHFA with the collaboration efforts of the former GICH, ODOC, and the CoC/ESG networks will continue to improve capacity to bring in more housing and services over the next five-years.

SP-65 Lead based paint Hazards – 91.315(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

Subrecipients are required to follow state and federal regulations which prohibit the use of lead-based paint (LBP). Subrecipients are relied upon to advise households receiving federal assistance of all the applicable hazards involving lead-based paint. Every purchaser of any resident built prior to 1978 is notified that such property may present exposure to lead-based paint that may place young children a risk of developing lead poisoning. The purchaser will be given the HUD-approved pamphlet Protect Your Family from Lead in Your HOME. The seller of any resident built prior to 1978 is to provide to the buyer any information on lead-based paint hazards from risk assessments or inspections. Both the seller and buyer must sign the disclosure form before the house is sold and/purchased that all parties have agreed to the LBP regulations.

The HOME and NHTF applicants are required to certify that all units in a Project assisted with HOME and HTF comply with 24 CFR Part 35 regarding the lead-based paint requirements for HUD-assisted housing. Also in our HOME Implementation Manual we have a dedicated section to LBP. The Implementation Manual is available online at www.ohfa.org. During HOME and HTF monitoring visits, Staff check each unit to determine if the LBP requirements were met. The Monitoring Staff is check to make sure that the buyers of houses built prior to 1978 are given the LBP pamphlet and made aware of the dangers of LBP.

How are the actions listed above integrated into housing policies and procedures?

All HOME Grantees must ensure that all housing assisted with HOME funds must comply with the Lead-Based Paint Regulations at 24 CFR Part 35 and Asbestos Regulations at 40 CFR Part 61, Subpart M as stated in the HOME written agreements.

Subrecipients are relied upon to advise households receiving federal assistance of all the applicable hazards involving lead-based paint as indicated above. All subrecipients are subject to monitoring as outlined in the MONITORING section of this Consolidated Plan. If LBP is found, a Grantee can chose to select another unit or comply with 24 CFR Part 35 as described above.

Also, the HOME Implementation Manual has a dedicated section to LBP. The Implementation Manual is available online at www.ohfa.org to all Grantees. During HOME and HTF monitoring visits, Staff check each unit to determine if the LBP requirements were met. The Monitoring Staff checks to ensure that the buyers of houses built prior to 1978 are given the LBP pamphlet and made aware of the dangers of LBP. Staff is aware of the danger of LBP and makes every attempt to notify ALL Grantees of the risk of LBP during application training meetings and input sessions that are held throughout the year.

SP-70 Anti-Poverty Strategy – 91.315(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

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

Two agencies of the State government are primarily identified for administering these programs: the Department of Human Services (DHS) and ODOC. It is clear, however, that many State agencies provide support for low-income clientele, including the Department of Education, the Department of Health, the Department of Mental Health and Substance Abuse, and the Department of Veterans Affairs.

Additionally, a wide range of nonprofit service providers offer various forms of assistance to those in need within their respective local service areas. Included in this group are such organizations as the American Red Cross, the Salvation Army, United Way-sponsored agencies, Community Action Agencies (CAAs), and churches of all denominations.

An excellent example of coordinated service delivery of aid to those living in impoverished conditions is the network of CAAs. The primary purpose of the 20 designated CAAs (whose service areas encompass the entire State of Oklahoma) is to advocate for the reduction of the causes, conditions, and effects of poverty, and to provide social and economic opportunities that foster self-sufficiency for low-income persons, including the elderly and disabled.

CAAs use funding from a variety of sources including the Community Services Block Grant (CSBG) program, various Stewart B. McKinney program funds, State Appropriated Funds, and the Emergency Solutions Grant program. Related services include:

- housing
- counseling
- rental assistance
- homeless shelters
- education and employment counseling
- prescription assistance
- rent and utility deposits
- payment of daycare costs

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

The CAAs address their goal by helping eligible clients in the following ways:

- Securing and maintaining meaningful employment, training, work experience, and unsubsidized employment
- Attaining an adequate education
- Making better use of available income
- Obtaining and maintaining adequate housing and suitable living environments
- Removing obstacles and solving personal problems that block the achievement of self-sufficiency
- Increasing physical health through nutrition provision, education, and prescription assistance
- Obtaining emergency assistance and conservation through weatherization services

The major accomplishments of the CAAs include:

- Approximately 14,700 children participate in the CAA-sponsored Head Start and Early Head Start Programs each year.
- More than 9,000 individuals housed in emergency shelters.
- Eligible Oklahomans received an estimated 2,499 prescriptions saving about \$1,500/annually per client.
- Providing services and assistance to 64,655 individuals and 38,844 families.

SP-80 Monitoring – 91.330

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

Monitoring procedures have been established that comply with HUD regulations and requirements. ODOC monitors the CDBG and ESG programs, while OHFA monitors the HOME, HTF and HOPWA programs. Both ODOC and OHFA have developed and implemented a detailed programmatic and financial monitoring strategy for the CDBG, ESG, HOME, HTF and HOPWA programs. This monitoring strategy provides a mechanism for early problem recognition and resolution for all open projects and projects still subject to the program's term of affordability as required. The monitoring strategy is set forth in greater detail in the annual action plans referenced to each individual program.

Expected Resources

AP-15 Expected Resources – 91.320(c)(1,2)

Introduction

The State of Oklahoma annually receives federal funding from HUD for the five formula grant programs of CDBG, ESG, HOME, HTF and HOPWA. Due to complexity and textbox narrative size limitations, detailed program descriptions and funding allocation amounts can be found in the

attached State Plans.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	13,963,452	1,000,000	0	14,963,452	55,853,808	The CDBG Program spends 100% of its annual allocation and does not have any carry over funds from the prior year. Program Income as listed and residual funds returned from CDBG projects which were completed and had remaining funds at contract close out account for additional funds beyond annual allocation. Returned program funds are not common and cannot be predicted or anticipated. Once received, these funds are then reallocated as soon as possible for new CDBG projects. Only the CDBG REAP set-aside requires match as part of the application. This match is 1:1 with the amount of CDBG funds requested.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	8,108,903	0	0	8,108,903	32,435,612	Since the HOME allocation is based on a formula, its hard to estimate the expected amount available for the remainder of the Con Plan year. We anticipated receiving an annual allocation of 7 million for the next 4 years.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	598,558	0	0	598,558	2,394,232	The total expected amount available includes five years of HOPWA funding plus program income, and prior year resources that include contributions from organizations such as United Way, Ray White, and various other contributors and fundraisers. It is important to note that these funds (prior year resources) are used mainly to leverage the HOPWA funds and not to actually carry out additional HOPWA eligible services. i.e. Ryan White funding is used in the calculation. However, only a small amount of those funds would be used to provide transportation to a very small amount of HOPWA clients.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	1,699,610	0	0	1,699,610	6,798,440	Each sub-recipient is required to provide and track "dollar-for-dollar" match to spend on eligible ESG activities during the Program period.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	3,144,833	0	0	3,144,833	12,579,333	Each subrecipient is required to provide and track "dollar-for-dollar" match to spend on eligible Emergency Solution activities during the Program period.

Table 56 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The State of Oklahoma annually receives federal funding from HUD for the five formula grant programs of CDBG, ESG, HOME, HTF and HOPWA. Due to complexity and textbox narrative size limitations, detailed program descriptions and funding allocation amounts can be found in the attached State Plans.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Not Applicable.

Discussion

The Community Development Block Grant Disaster Recovery Program (CDBG-DR 2019 & 2022) grants are intended to support communities affected by the DR-4438, DR- 4657, and DR-4670 disasters. For additional information please visit <https://www.okcommerce.gov/community-development/local-governments-edos/community-development-block-grant-programs/>

Annual Goals and Objectives

AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	State CDBG Program	2024	2028	Non-Housing Community Development	State of Oklahoma	State CDBG Program	CDBG: \$13,963,452	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 100000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 60000 Households Assisted Jobs created/retained: 170 Jobs Other: 2000 Other
2	State ESG Program	2024	2028	Homeless	State of Oklahoma	State ESG Program	ESG: \$1,699,610	Tenant-based rental assistance / Rapid Rehousing: 300 Households Assisted Homeless Person Overnight Shelter: 1600 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 0 Beds Homelessness Prevention: 800 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	State HOME Program	2024	2028	Affordable Housing Public Housing		State HOME Program	HOME: \$8,108,903	Rental units constructed: 52 Household Housing Unit Rental units rehabilitated: 41 Household Housing Unit Homeowner Housing Added: 73 Household Housing Unit Direct Financial Assistance to Homebuyers: 171 Households Assisted
4	State HOPWA	2024	2028	Affordable Housing Public Housing		State HOPWA Program	HOPWA: \$598,558	Housing for People with HIV/AIDS added: 85 Household Housing Unit
5	State Housing Trust Fund	2024	2028	Affordable Housing Public Housing			HTF: \$3,144,833	Rental units constructed: 30 Household Housing Unit Rental units rehabilitated: 27 Household Housing Unit

Table 57 – Goals Summary

Goal Descriptions

1	Goal Name	State CDBG Program
	Goal Description	<p>ODOC/CD goals are consistent with and mirror the HUD goals identified in Title 1 of the Housing and Community Development Act of 1974 (as amended):</p> <p><u>Decent Housing.</u> Covers a wide range of housing activities. The objective focuses on housing activities whose purpose is to meet individual family or community housing needs. It does not include programs where housing is an element of a larger effort to make community-wide improvements.</p> <p><u>A suitable living environment.</u> Relates to activities that are designed to benefit communities, families, or individuals by addressing issues in their living environment. This objective is related to activities that are intended to address a wide range of issues (physical infrastructure, health care, elderly, etc.) faced by low and moderate income persons.</p> <p><u>Expanded economic opportunity.</u> Applies to activities related to economic development, commercial revitalization, job creation and/or job retention.</p> <p>Beginning in 2007, HUD required each CDBG-funded activity to be identified as addressing at least one of the following goals and one of the following outcomes:</p> <p><u>Availability/Accessibility</u> applies to activities that make services, infrastructure, public facilities, public services, etc available or accessible to low and moderate income persons.</p> <p><u>Affordability</u> applies to activities that provide affordability in a variety of ways to low and moderate income people. Affordability is an appropriate objective outcome whenever an activity is lowering the cost, improving the quality, or increasing the affordability of a product or service to benefit a low-income household.</p> <p><u>Sustainability</u> applies to activities that are aimed at improving communities or neighborhoods, helping to them more livable or viable. Generally, this outcome focuses on a specific geographic area with numerous activities being undertaken simultaneously.</p>

2	Goal Name	State ESG Program
	Goal Description	ODOC, together with the Oklahoma CoCs, ESG sub-recipients, and former GICH members like the Department of Health, Department of Mental Health and Substance Abuse Services, local non-profits, and other community providers coordinate services and fill gaps in homeless services across the State of Oklahoma. The goals overlap between the priorities set by the Continua of Care service priorities and the Objectives of the USICH Federal Strategic Plan to Prevent Homelessness. All organizations are working toward a future where no one experiences the tragedy and indignity of homelessness—and everyone has a safe, stable, accessible, and affordable home.
3	Goal Name	State HOME Program
	Goal Description	
4	Goal Name	State HOPWA
	Goal Description	
5	Goal Name	State Housing Trust Fund
	Goal Description	

AP-25 Allocation Priorities – 91.320(d)

Introduction:

The State of Oklahoma annually receives federal funding from HUD for the five formula grant programs of CDBG, ESG, HOME, HTF and HOPWA. Due to complexity and textbox narrative size limitations, detailed program descriptions and funding allocation amounts can be found in the Program Descriptions / One-Year Action Plans, which are included in this Consolidated Plan.

Funding Allocation Priorities

	State CDBG Program (%)	State ESG Program (%)	State HOME Program (%)	State HOPWA (%)	State Housing Trust Fund (%)	Total (%)
CDBG	100	0	0	0	0	100
HOME	0	0	100	0	0	100
HOPWA	0	0	0	100	0	100
ESG	0	100	0	0	0	100
HTF	0	0	0	0	100	100

Table 58 – Funding Allocation Priorities

Reason for Allocation Priorities

As stated previously, the State of Oklahoma annually receives federal funding from HUD for the five formula grant programs of CDBG, ESG, HOME, HTF and HOPWA. Each of the five formula grant programs independently sets its own allocation priorities based on feedback during the Citizen Participation phase of the Consolidated Plan. Detailed program descriptions and funding allocation amounts can be found in the Program Descriptions / One-Year Action Plans, which are included in this Consolidated Plan.

How will the proposed distribution of funds will address the priority needs and specific objectives described in the Consolidated Plan?

The State of Oklahoma annually receives federal funding from HUD for the five formula grant programs of CDBG, ESG, HOME, HTF and HOPWA. Due to complexity and textbox narrative size limitations, detailed program distribution descriptions and funding allocation amounts can be found in the Program Descriptions / One-Year Action Plans, which are included in this Consolidated Plan. Each of the four formula grant

programs independently sets its own allocation priorities based on feedback during the Citizen Participation phase of the Consolidated Plan.

AP-30 Methods of Distribution – 91.320(d)&(k)

Introduction:

The State of Oklahoma has not set aside or reserved dollar amounts of assistance specifically for geographic areas within the State for the CDBG, ESG, HOME, HTF and HOPWA programs. Rather, each of these programs has its own method of distribution procedures that sometimes include specific requirements for projects in certain areas within the State. All seventy-seven (77) Oklahoma counties that are eligible to benefit from the CDBG, ESG, HOME, HTF and HOPWA programs.

Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provide summary information in this textbox section. As identified earlier, the State E-Consolidated Plan encompasses a majority of the state (Geographic Distribution) and includes four HUD funded programs comprised of the CDBG, ESG, HOME, HTF and HOPWA programs. Given the large geographic distribution and the program specific components contained within the State's programs, complete detail cannot be provided in this textbox section. Detailed State Action Plans have been uploaded in the Appendix of this HUD E-Consolidated Plan. The State Action Plans can also be viewed on the Oklahoma Department of Commerce website located at: <http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/>

Distribution Methods

Table 59 - Distribution Methods by State Program

1	State Program Name:	State of Oklahoma Non-Entitlement Program (CDBG, ESG, HOME, HOPWA, HTF)
	Funding Sources:	CDBG HOPWA HOME ESG HTF

<p>Describe the state program addressed by the Method of Distribution.</p>	<p>Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provide summary information in this textbox section. As identified earlier, the State E-Consolidated Plan encompasses a majority of the state (Geographic Distribution) and includes five HUD funded programs comprised of the CDBG, ESG, HOME, HTF and HOPWA programs. Given the large geographic distribution and the program specific components contained within the State's programs, complete detail cannot be provided in this textbox section. Detailed State Action Plans have been uploaded in the Appendix of this HUD E-Consolidated Plan. The State Action Plans can also be viewed on the Oklahoma Department of Commerce website located at: http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/</p>
<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provide summary information in this textbox section. As identified earlier, the State E-Consolidated Plan encompasses a majority of the state (Geographic Distribution) and includes five HUD funded programs comprised of the CDBG, ESG, HOME, HTF and HOPWA programs. Given the large geographic distribution and the program specific components contained within the State's programs, complete detail cannot be provided in this textbox section. Detailed State Action Plans have been uploaded in the Appendix of this HUD E-Consolidated Plan. The State Action Plans can also be viewed on the Oklahoma Department of Commerce website located at: http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/</p>

<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State CDBG program Action Plan can only provide summary information in this section. As identified earlier, the State E-Consolidated Plan encompasses a majority of the state (Geographic Distribution) and includes five (5) HUD funded programs comprised of the CDBG, ESG, HOME, HTF, and HOPWA programs. Given the large geographic distribution and the multiple set-asides contained within the State CDBG program, complete detail cannot be provided in this textbox section. A detailed State CDBG Action Plan has been uploaded as Appendix A in this HUD E-Consolidated Plan. The State CDBG Action Plan can also be viewed on the Oklahoma Department of Commerce website located at: https://www.okcommerce.gov/reporting-compliance/consolidated-plan/</p>
<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>The State ESG program is a competitive program and geographic distribution is based on applications received and the results of the project selection process. The eligible applicants are units of general local government, non-profits (including community and faith-based organizations) and Community Action Agencies (CAAs). The ESG applications are taken on an annual basis. (See detailed program description in the ESG Annual Action Plan). The State ESG Action Plan can also be viewed on the Oklahoma Department of Commerce website located at: https://www.okcommerce.gov/reporting-compliance/consolidated-plan/.</p>
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	

Describe how resources will be allocated among funding categories.	<p>Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State Action Plan can only provide summary information in this section. As identified earlier, the State E-Consolidated Plan encompasses a majority of the state (Geographic Distribution) and includes five (5) HUD funded programs comprised of the CDBG, ESG, HOME, HTF, and HOPWA programs. Given the large geographic distribution and the multiple set-asides contained within the State Plan, complete detail cannot be provided in this textbox section. A detailed State Action Plan can also be viewed on the Oklahoma Department of Commerce website located at: https://www.okcommerce.gov/reporting-compliance/consolidated-plan/</p>
Describe threshold factors and grant size limits.	<p>Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State Action Plan can only provide summary information in this section. As identified earlier, the State E-Consolidated Plan encompasses a majority of the state (Geographic Distribution) and includes five (5) HUD funded programs comprised of the CDBG, ESG, HOME, HTF, and HOPWA programs. Given the large geographic distribution and the multiple set-asides contained within the State Plan, complete detail cannot be provided in this textbox section. A detailed State Action Plan can also be viewed on the Oklahoma Department of Commerce website located at: https://www.okcommerce.gov/reporting-compliance/consolidated-plan/</p>
What are the outcome measures expected as a result of the method of distribution?	<p>Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State Action Plan can only provide summary information in this section. As identified earlier, the State E-Consolidated Plan encompasses a majority of the state (Geographic Distribution) and includes five (5) HUD funded programs comprised of the CDBG, ESG, HOME, HTF, and HOPWA programs. Given the large geographic distribution and the multiple set-asides contained within the State Plan, complete detail cannot be provided in this textbox section. A detailed State Action Plan can also be viewed on the Oklahoma Department of Commerce website located at: https://www.okcommerce.gov/reporting-compliance/consolidated-plan/</p>

Discussion:

The State of Oklahoma has not set aside or reserved dollar amounts of assistance specifically for geographic areas within the State for the CDBG, ESG, HOME, HTF and HOPWA programs. Rather, each of these programs has its own method of distribution procedures that sometimes include specific requirements for projects in certain areas within the State. All seventy-seven (77) Oklahoma counties that are eligible to benefit from the CDBG, ESG, HOME, HTF and HOPWA programs.

AP-35 Projects – (Optional)

Introduction:

The listing of individual projects in the Consolidated Plan is ONLY required of ENTITLEMENT jurisdictions and NOT of NON-ENTITLEMENT jurisdictions such as states per HUD guidance.

Per HUD requirement as it relates to CDBG Disaster Recovery and this Five-Year Consolidated Plan, projects for CDBG-DR should not be created on the AP-35 screen. Guidance states that a link should be provided to the grantee’s website where its CDBG-DR Action Plan is posted as a resource for parties that wish to find out more. The Community Development Block Grant Disaster Recovery Program (CDBG-DR 2019 & 2022) grants are intended to support communities affected by the DR-4438, DR-4657, and DR-4670 disasters. For additional information please visit <https://www.okcommerce.gov/community-development/local-governments-edos/community-development-block-grant-programs/>

#	Project Name

Table 60 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The listing of individual projects in the Consolidated Plan is ONLY required of ENTITLEMENT jurisdictions and NOT of NON-ENTITLEMENT jurisdictions such as states per HUD guidance. Overall allocation priorities and obstacles in terms of NON-ENTITLEMENT jurisdictions are addressed in the Action Plan portion of the State Consolidated Plan. Detailed information regarding the State Action Plan can be located here: <https://www.okcommerce.gov/reporting-compliance/consolidated-plan/>

Per HUD requirement as it relates to CDBG Disaster Recovery and this Five-Year Consolidated Plan, projects for CDBG-DR should not be created on the AP-35 screen. Guidance states that a link should be provided to the grantee’s website where its CDBG-DR Action Plan is posted as a resource for parties that wish to find out more. The Community Development Block Grant Disaster Recovery Program (CDBG-DR 2019 & 2022) grants are intended to support communities affected by the DR-4438, DR-4657, and DR-4670 disasters. For additional information please visit <https://www.okcommerce.gov/community-development/local-governments-edos/community-development-block-grant-programs/>

AP-38 Project Summary

Project Summary Information

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Esti and tha fro act
<TYPE=[pivot_table] REPORT_GUID=[54A4ED67473EDAEE248792836A1D83B0]>							

AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)

Will the state help non-entitlement units of general local government to apply for Section 108 loan funds?

No

Available Grant Amounts

N/A

Acceptance process of applications

N/A

AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)

Will the state allow units of general local government to carry out community revitalization strategies?

Yes

State's Process and Criteria for approving local government revitalization strategies

Community Revitalization is predominately carried out under the CDBG Community Revitalization set-aside. Applicants can apply for up to **\$300,000** grant maximum. Only one (1) project can be undertaken per application.

By planning and extensive assessment of the goals of the community, the CDBG Community Revitalization grant can help a community flourish into a thriving environment. Basic community development projects benefit the aesthetic appeal of the community, and provide for fire protection, senior centers, street improvements, community centers, or other types of projects that allow communities to remain viable and improve the quality of life.

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

All projects shall conform to eligible activities listed under Section 105(a) of the Federal Housing and Community Development Act of 1974, as amended, in addition to addressing one or more of the Primary National Objectives of the CDBG program.

AP-50 Geographic Distribution – 91.320(f)

Description of the geographic areas of the state (including areas of low-income and minority concentration) where assistance will be directed

The State of Oklahoma has not set aside or reserved dollar amounts of assistance specifically for geographic areas within the State for the CDBG, ESG, HOME, HTF or HOPWA programs. Rather, each of these programs has its own distribution procedures that sometimes include specific requirements for projects in certain areas within the State. The map below provides a geographical reference of all seventy-seven (77) Oklahoma counties that are eligible to benefit from the CDBG, ESG, HOME, or HOPWA programs.

The State of Oklahoma has not set aside or reserved dollar amounts of assistance specifically for geographic areas within the State for the CDBG, ESG, HOME, HTF or HOPWA programs. Rather, each of these programs has its own distribution procedures that sometimes include specific requirements for projects in certain areas within the State and its (77) seventy-seven counties.

The ESG program is a competitive program. Funds are allocated to each of the seven (7) rural Continuum of Care (CoC) regions based on a formula involving population, median income, unemployment and overcrowded housing. Competition for funding takes place within each of the CoC regional service areas. The eligible applicants are units of general local government and nonprofits. The ESG applications are taken on an annual basis.

Geographic Distribution

Target Area	Percentage of Funds
State of Oklahoma	100

Table 61 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The State of Oklahoma has not set aside or reserved dollar amounts of assistance specifically for geographic areas within the State for the CDBG, ESG, HOME, HTF or HOPWA programs. Rather, each of these programs has its own distribution procedures that sometimes include specific requirements for projects in certain areas within the State and its (77) seventy-seven counties.

Discussion

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

projects in certain areas within the State and its (77) seventy-seven counties.

Affordable Housing

AP-55 Affordable Housing – 24 CFR 91.320(g)

Introduction:

It is difficult to assess the possible number of affordable housing units to be constructed or the number of households to be assisted, due to the nature of the State's programs. However, the following goals were based on historical data and trends.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	0
Special-Needs	0
Total	0

Table 62 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	150
Rehab of Existing Units	100
Acquisition of Existing Units	87
Total	337

Table 63 - One Year Goals for Affordable Housing by Support Type

Discussion:

This projection is based upon the actual numbers from prior years and the anticipated level funding for the total allocation for the State. The production of new units and the acquisition and rehabilitation of existing units will be funded through the HOME and HTF Programs. These goals include only HOME and HTF units and not any other units in the HOME-assisted or HTF-assisted projects.

The number submitted for Homeless and Non-Homeless served are based on numbers served by the State Emergency Solutions program during previous year.

AP-60 Public Housing - 24 CFR 91.320(j)

Introduction:

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 planned during the next year to address the needs to public housing

OHFA does not have any actions planned during the next year to address the needs to public housing.

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

OHFA has made it a requirement that all of the entities awarded HOME funds have a Tenant Participation Plan.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

If any public housing authorities are designated as “troubled” during Program Year 2019, 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.

Discussion:

Public Housing in the State of Oklahoma has unmet needs, but the level of HOME Program funding is not adequate for OHFA to assist with those needs. What little funding is available goes to the most pressing need, which is currently for more affordable rental housing units.

AP-65 Homeless and Other Special Needs Activities – 91.320(h)

Introduction

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

The State requires each subrecipient to have a plan to address Outreach in their service area without creating unnecessary duplication of services.

Addressing the emergency shelter and transitional housing needs of homeless persons

Subrecipients are required to have either an emergency shelter and/or emergency shelter plan that will best use the resources within their CoC and immediate service area.

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

Subrecipients are required to have standards and a plan for helping homeless persons into housing and providing the services they need so they do not become homeless again. The subrecipients are required to have plans that includes partnerships and collaboration with their fellow CoC members and Mainstream organizations and to assure as little duplication of services as possible.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: 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); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Subrecipients are required to have standards and a plan for helping homeless persons into housing and providing the services they need so they do not become homeless again. The subrecipients are required to have plans that include partnerships and collaboration with their fellow CoC members and

Mainstream organizations and to assure as little duplication of services as possible.

Discussion

AP-70 HOPWA Goals – 91.320(k)(4)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	40
Tenant-based rental assistance	45
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	85

AP-75 Barriers to affordable housing – 91.320(i)

Introduction:

One of the primary obstacles to meeting underserved needs is the lack of coordination of financing resources. In an effort to promote that coordination, OHFA has published the *Affordable Housing Handbook* from which the following information was gathered. The *Handbook* is a guide that focuses on the processes, tools, and techniques that can be utilized to help solve these issues.

Actions it planned 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

Barriers to affordable housing typically fall into one of three categories:

- Production
- Financing
- Cost to the individual

Production barriers can be either financial or non-financial. Financial barriers include land costs, development costs, and materials and labor costs. Non-financial barriers include lack of buildable land supply, lack of access to materials and labor, lack of infrastructure (roads, utilities, etc.), lack of local government support, zoning, permitting, and lack of knowledge.

Financing barriers can include lack of capital, lack of access to capital, or lack of awareness of existing financing programs.

Cost to the individual includes cost burdens such as paying over 30% of monthly income for rent/mortgage payments and utilities.

Discussion:

The complete *Affordable Housing Handbook* can be obtained by contacting a member of the Oklahoma Housing Finance Agency's Housing Development Team.

AP-85 Other Actions – 91.320(j)

Introduction:

The primary obstacle to meeting under-served needs such as in the areas of affordable housing and poverty is the lack of adequate funding. This holds true in all five of the HUD funded programs (CDBG, ESG, HOME, HTF and HOPWA) covered by this State Consolidated Plan.

However, the COVID pandemic caused a significant increase in the need for public services such as utility assistance, rental/mortgage assistance, mental health assistance, and others. Even after the pandemic, there continues to be a need for public services to combat homelessness around the state.

In 2021, the Oklahoma Department of Commerce provided funds to communities across the state for COVID recovery needs using CARES Act funding from HUD. CDBG-CV dollars were used to help primarily low-to moderate income individuals with public service needs. Furthermore, this also demonstrates a necessity for additional funding to support housing needs across the state.

Actions planned to address obstacles to meeting underserved needs

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. The State will continue to exhaust all methods to provide assistance to underserved needs across Oklahoma.

Actions planned to foster and maintain affordable housing

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.

Actions planned to reduce lead-based paint hazards

Subrecipients are required to follow state and federal regulations which prohibit the use of lead-based paint (LBP). Subrecipients are relied upon to advise households receiving federal assistance of all the

applicable hazards involving lead-based paint.

The HOME and NHTF applicants are required to certify that all units in a Project assisted with HOME and HTF comply with 24 CFR Part 35 regarding the lead-based paint requirements for HUD-assisted housing. Also, in our HOME Implementation Manual we have a dedicated section to LBP. The Implementation Manual is available online at www.ohfa.org. During HOME and HTF monitoring visits, Staff check each unit to determine if the LBP requirements were met.

All HOME Grantees must ensure that all housing assisted with HOME funds must comply with the Lead-Based Paint Regulations at 24 CFR Part 35 and Asbestos Regulations at 40 CFR Part 61, Subpart M as stated in the HOME written agreements.

Subrecipients are relied upon to advise households receiving federal assistance of all the applicable hazards involving lead-based paint. All subrecipients are subject to monitoring as outlined in the MONITORING section of this Consolidated Plan.

If LBP is found, a Grantee can choose to select another unit or comply with 24 CFR Part 35 as described above.

Actions planned to reduce the number of poverty-level families

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

Two agencies of the State government are primarily identified for administering these programs: the Department of Human Services (DHS) and ODOC. It is clear, however, that many State agencies provide support for low-income clientele, including the Department of Education, the Department of Health, the Department of Mental Health and Substance Abuse, and the Department of Veterans Affairs.

Additionally, a wide range of nonprofit service providers offer various forms of assistance to those in need within their respective local service areas. Included in this group are such organizations as the American Red Cross, the Salvation Army, United Way-sponsored agencies, Community Action Agencies (CAAs), and churches of all denominations.

An excellent example of coordinated service delivery of aid to those living in impoverished conditions is the network of CAAs. The primary purpose of the 20 designated CAAs (whose service areas encompass the entire State of Oklahoma) is to advocate for the reduction of the causes, conditions, and effects of poverty, and to provide social and economic opportunities that foster self-sufficiency for low-income persons, including the elderly and disabled.

CAAs use funding from a variety of sources including the Community Services Block Grant (CSBG) program, various Stewart B. McKinney program funds, State Appropriated Funds, and the Emergency

Shelter Grant program. Related services include:

- housing
- counseling
- providing short-term housing through vouchers
- homeless shelters
- education and employment counseling
- payment of medical expenses
- rent and utility deposits
- payment of day care costs

The CAAs address their goal by helping eligible clients in the following ways:

Securing and maintaining meaningful employment, training, work experience, and unsubsidized employment

- Attaining an adequate education
- Making better use of available income
- Obtaining and maintaining adequate housing and suitable living environments
- Obtaining emergency assistance through loans or grants
- Removing obstacles and solving personal problems that block the achievement of self-sufficiency
- Achieving greater participation in the affairs of the community
- Undertaking family planning consistent with family goals, religious and moral convictions
- Obtaining emergency assistance and conservation and weatherization services

The major accomplishments of the CAAs include:

- Approximately 16,000 children participate in the CAA-sponsored Head Start and Early Head Start

Programs each year

- More than 9,000 individuals housed in emergency shelters
- More than 400,000 meals served to senior citizens at 58 nutrition centers

Providing services and assistance to 112,671 individuals and 47,489 families

Actions planned to develop institutional structure

The State of Oklahoma affordable housing programs, which include the HOME program and the coordination of the Section 8 Rental Assistance program, are administered OHFA. ODOC, OHFA, and the Oklahoma Association of Community Action Agencies (OACAA) supported legislation enacted to establish a State Housing Trust Fund. In 1998, the Oklahoma Legislature passed HB 3065, which established a trust fund to meet rural Oklahoma's affordable housing needs. OHFA administers the trust fund.

The State's homeless issues are addressed essentially by the Governor's Interagency Council on Homelessness (GICH). The group does not have regulatory powers but serves in advisory roles and makes recommendations to State agencies and nonprofit organizations which administer individual programs. As stated previously, OHFA administers the HOPWA program.

In the area of non-housing community development, ODOC serves as the major resource for economic development for the State. Through the administration of CDBG program, ODOC assists non-entitlement communities to reach self-sufficiency by funding eligible activities that enhance their capacity, improve outdated infrastructure, and encourage capital planning. Many groups including several Federal and State agencies, as well as private business and nonprofit entities share the desire and responsibility for appropriate community development.

Actions planned to enhance coordination between public and private housing and social service agencies

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

Two agencies of the State government are primarily identified for administering these programs: the Department of Human Services (DHS) and ODOC. It is clear, however, that many State agencies provide support for low-income clientele, including the Department of Education, the Department of Health, the Department of Mental Health and Substance Abuse, and the Department of Veterans Affairs.

Additionally, a wide range of nonprofit service providers offer various forms of assistance to those in need within their respective local service areas. Included in this group are such organizations as the

American Red Cross, the Salvation Army, United Way-sponsored agencies, Community Action Agencies (CAAs), and churches of all denominations.

An excellent example of coordinated service delivery of aid to those living in impoverished conditions is the network of CAAs. The primary purpose of the 20 designated CAAs (whose service areas encompass the entire State of Oklahoma) is to advocate for the reduction of the causes, conditions, and effects of poverty, and to provide social and economic opportunities that foster self-sufficiency for low-income persons, including the elderly and disabled.

CAAs use funding from a variety of sources including the Community Services Block Grant (CSBG) program, various Stewart B. McKinney program funds, State Appropriated Funds, and the Emergency Solutions Grant program. Related services include:

- housing
- counseling
- rental assistance
- homeless shelters
- education and employment counseling
- prescription assistance
- rent and utility deposits
- payment of day care costs

Discussion:

NOT APPLICABLE

Program Specific Requirements

AP-90 Program Specific Requirements – 91.320(k)(1,2,3)

Introduction:

The following program data and narratives on this page refer specifically to the CDBG, ESG, HOME, and HTF programs.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.320(k)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	1,000,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	1,000,000

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.320(k)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

24 CFR 92.254 provides guidance for Resale/Recapture options for Homeownership. OHFA is authorized under the HOME Rules to select which option will be used for preserving the period of affordability. For 2019, OHFA has chosen the recapture option. **If applicants demonstrate to OHFA staff that special conditions exist that would make the resale option superior, then it may be considered as an exception. If there is no direct subsidy to the homebuyer, the resale option must be used.**

Since Recapture is only possible if there is a direct subsidy to the homebuyer, some contracts between OHFA and a CHDO, non-profit developer, State Recipient or Sub-recipient may be structured such that under certain circumstances a Recapture Agreement with one homebuyer will be required, and under other circumstances a Resale Agreement with a different homebuyer will be required. Nonetheless, **the agreement between the CHDO, non-profit developer, State Recipient or Sub-recipient and any individual recipient of HOME funds may contain only one provision, either Recapture or Resale. An agreement with an individual recipient of HOME funds cannot contain both.**

The applicant is to describe to OHFA its procedures as they relate to the HOME Recapture (or Resale) requirements. The procedures must fully comply with the HOME Rules, and must be approved by OHFA before implementation.

Recapture provisions must ensure that there is recovery of all or a portion of the HOME assistance that represents a direct subsidy to the homebuyer, if the housing does not continue to meet the affordability requirements and/or continue to be the principal residence of the family for the duration of the period of affordability. **Mortgages, deed restrictions, land covenants or other similar legal mechanisms must be in place to enforce these provisions.**

The amount subject to recapture is based on the amount of HOME assistance that represents a direct subsidy to the homebuyer. The amount subject to recapture may be forgiven over time. It

must be forgiven on a prorated basis based on the amount of time remaining on the period of affordability. For instance, if the period of affordability is five years, the amount subject to recapture may be forgiven at the rate of twenty percent (20%) per year. The recaptured funds must be returned to OHFA. **OHFA requires that all recapture provisions for Homeownership and Homeowner Rehabilitation activities base the recapture amount on the net proceeds available from the sale and not the entire amount of the HOME investment.** Applicants may structure their recapture provisions such that the HOME funds are recaptured in one of the following three methods:

Recapture of the HOME investment first, with the homeowner receiving any remaining net proceeds

- Allow the homeowner to recover his/her initial investment first, with the remainder of the net proceeds recaptured
 - A “shared appreciation” method, where a pre-determined percentage of the net proceeds is retained by the homeowner, and the remainder of the net proceeds is recaptured
3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

If the homebuyer receives no direct subsidy from the HOME funds, such as down-payment assistance or a reduction in the price of the home below its appraised value, and subsequently sells the home within the Period of Affordability, the resale option will be used ensure that the HOME-assisted unit remains affordable over the affordability term.

Under the resale option:

- The homebuyer must sell the property to a new purchaser that meets the HOME Program definition of low-income.
- Said purchaser must occupy the property as his/her principal residence.
- The new purchaser’s PITI cannot exceed thirty-five percent (35%) of his/her gross income.
- The original homebuyer (now the seller) must receive a “fair return” on his/her investment.

OHFA defines a "fair return" on the original homebuyer's investment as a pro-rata share of any gain based on the net sales proceeds.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that

will be used under 24 CFR 92.206(b), are as follows:

The State of Oklahoma does not have any plans to use HOME funds to refinance any existing debt secured by multifamily housing that is rehabilitated with HOME funds.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).
 - (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).
6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).
 - (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).
7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

Not applicable

Emergency Solutions Grant (ESG) Reference 91.320(k)(3)

1. Include written standards for providing ESG assistance (may include as attachment)

The State requires each subrecipient to have written standards for providing ESG assistance.

Refer to ODOC's ESG Implementation Manual, Requirement 708, found at <https://www.okcommerce.gov/wp-content/uploads/Emergency-Solutions-Grant-Implementation-Manual-Effective-October-2023.pdf>.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Most Continua are working on updating their Coordinated Assessment system to be racially equitable. Oklahoma City and Tulsa County CoCs have contracted with outside entities to review their CoC data for overrepresentation and then assist in updated their Coordinated Intake and policies and procedures to be more equitable. ODOC is receiving technical assistance from HUD in order to assist the underfunded Rural Continua so data can be evaluated and coordinated assessments can be updated to be more equitable.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The State recognizes that use of the established Continuum of Care (CoC) structure is the best institutional structure in the State to carry out the ESG goals. Each Continuum will collect, score and rank submitted applications according to the ODOC provided rating system and return the scores and ranking to ODOC. The recommendations for funding will be assessed for compliance with all ESG and CoC threshold criteria. Applications meeting the threshold criteria will be verified and awards determined.

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

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

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

ODOC requires each ESG subrecipient to have written standards in regard to either having a member on their Board of Directors or Advisory Board who is homeless or formerly homeless and/or having a plan to receive feedback from those who are homeless and how the subrecipient incorporates the feedback into their decision-making process. Most plans consist of "House meetings" where residents share in discussions of need and support and/or exit interviews or surveys where feedback is encouraged regarding client needs and ideas to make the program better.

5. Describe performance standards for evaluating ESG.

ODOC Project Representatives monitor the ESG contracts at least once during the contract period. The type of monitoring is determined by a risk assessment completed for each sub-recipient before ESG contracts are awarded. During the time of the monitoring, the subrecipient is evaluated by comparing actual accomplishments with those projected in the approved application and checking subrecipient compliance with ESG and ODOC regulations. A monitoring tool is completed and includes an Agency Status Scale to evaluate the strength of the organization. This monitoring tool, including the evaluation, along with the completed monitoring report is given to each subrecipient and will be forwarded to the CoC Governing Board upon request for use to evaluate the organization before funding is awarded to organizations.

Housing Trust Fund (HTF)
Reference 24 CFR 91.320(k)(5)

1. How will the grantee distribute its HTF funds? Select all that apply:

☒ Applications submitted by eligible recipients

2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter "N/A".

N/A

3. If distributing HTF funds by selecting applications submitted by eligible recipients,

a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

The following are eligible to be selected by OHFA through the competitive Application process described herein, to develop a single HTF Program Project:

- Nonprofit developers: A nonprofit developer is a nonprofit housing development organization.
- For-profit developers: A for-profit developer is a for-profit housing development organization or individual.

- State Recipients: A State Recipient is a governmental entity within the State of Oklahoma. This includes cities, towns, counties and Indian tribes.

b. Describe the grantee's application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Due to complexity and textbox limitations, grantee's application requirements are included HTF Application Instructions which is included in this Consolidated Plan.

c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Due to complexity and textbox limitations, grantee's application requirements are included HTF Application Instructions which is included in this Consolidated Plan.

d. Describe the grantee's required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

OHFA will give bonus points to the highest scoring Application from each of the two main areas of the State, the Tulsa Jurisdiction and the Oklahoma City Jurisdiction. See below for the counties in the Tulsa Jurisdiction. All other counties are in the Oklahoma City Jurisdiction. Due to the limited funding available for 2018, OHFA believes that this is the most that can be done to encourage Geographic Diversity. Tiebreakers, as set forth below, will be used if two or more Applications achieve the same score.

The following counties are within the Tulsa jurisdiction. All other counties are within the Oklahoma City jurisdiction:

Adair, Atoka, Bryan, Cherokee, Choctaw, Coal, Craig, Creek, Delaware, Haskell, Hughes, Latimer, Leflore, McCurtain, McIntosh, Mayes, Muskogee, Nowata, Okfuskee, Okmulgee, Osage, Ottawa, Pawnee, Pittsburg, Pushmataha, Rogers, Sequoyah, Tulsa, Wagoner, Washington

e. Describe the grantee's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Points will be awarded for the Applicant's ability to undertake eligible activities in a timely manner, as evidenced by the following documentation:

A. Proof of acceptable form of ownership/site control-ownership, purchase contract or purchase option. For Acquisition and Acquisition/Rehabilitation, explain plan to obtain.

B. Production and implementation schedule, of no more than twenty-four (24) months, which clearly identifies all major phases of the proposed Project, including close-out. This schedule must be thoroughly detailed and must begin on the anticipated date of award. If the Applicant is awarded funds for the Application, this schedule will be incorporated into the Special Conditions of the Written Agreement between OHFA and the Recipient. This schedule will be used for monitoring the progress of all phases of the Project prior to completion. Funded Applicants will be required to provide progress reports at least quarterly. OHFA will utilize these progress reports in order to determine if the Project is proceeding on schedule.

C. Include preliminary plans and specifications. This documentation is not required for Acquisition/Rehabilitation activities if the property has not been identified at the time of application.

D. Document that the zoning required for the Project is in place. This documentation is not required for Acquisition/Rehabilitation activities if the property has not been identified at the time of application.

f. Describe the grantee's required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Points will be awarded to a Project that will preserve project-based rental assistance from any federal, State or local program; or for Projects with a binding commitment for project-based vouchers.

g. Describe the grantee's required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Five (5) points will be awarded for Applicants who promise to extend the affordability period from thirty

(30) to forty (40) years.

h. Describe the grantee's required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Points will be awarded for addressing any of the following priority housing needs as identified in the current State of Oklahoma Consolidated Plan. (Serving Extremely Low-Income individuals and families was identified as the highest priority, but that is already a requirement of the HTF for 2018.)

- Families with Children
- Elderly
- Public Housing Residents
- Rural
- Chronic Homelessness
- Mentally Ill
- Chronic Substance Abuse
- Veterans
- Victims of Domestic Violence
- Persons with Mental Disabilities
- Persons with Physical Disabilities
- Persons with Developmental Disabilities
- Persons with Alcohol or Other Addictions
- Victims of Domestic Violence

i. Describe the grantee's required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Public and private resources, such as Rural Housing Incentive Districts, CDBG, AHP, AHTC equity, Historic Tax Credit equity, USDA-RHS, HUD, foundation funds, and private capital will be considered in the leverage analysis.

4. Does the grantee's application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

5. Does the grantee's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

6. Performance Goals and Benchmarks. The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee's goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

Yes

7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds. Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds.

The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

HTF funding per HTF unit cannot exceed the HOME Program Maximum per Unit Subsidy Limits. HTF must also receive its pro-rata share of units based on the amount of HTF funding.

8. Rehabilitation Standards. The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; Capital Needs Assessments (if applicable); and broadband infrastructure (if applicable).

Due to complexity and textbox limitations, rehabilitation standards are included HTF Application Instructions which is included in this Consolidated Plan.

9. Resale or Recapture Guidelines. Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

Due to complexity and textbox limitations, rehabilitation standards are included HTF Application Instructions which is included in this Consolidated Plan.

10. HTF Affordable Homeownership Limits. If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter “N/A”.

☒ The grantee will use the HUD issued affordable homeownership limits.

N/A

11. Grantee Limited Beneficiaries or Preferences. Describe how the grantee will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the grantee will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter “N/A.”

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan.

N/A

12. Refinancing of Existing Debt. Enter or attach the grantee’s refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee’s refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter “N/A.”

N/A

Discussion:

The program data and narratives on this page refer specifically to the CDBG, HOME, and ESG programs.

Appendix - Alternate/Local Data Sources

1	Data Source Name Oklahoma Department of Health
	List the name of the organization or individual who originated the data set. Oklahoma Health Department
	Provide a brief summary of the data set. Data for cumulative cases of AIDS in Oklahoma
	What was the purpose for developing this data set?
	Provide the year (and optionally month, or month and day) for when the data was collected. Current as of 12/31/16
	Briefly describe the methodology for the data collection.
	Describe the total population from which the sample was taken.
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.
2	Data Source Name 2023 CAPER
	List the name of the organization or individual who originated the data set. See 2023 CAPER for details.
	Provide a brief summary of the data set. See 2023 CAPER for details.
	What was the purpose for developing this data set? See 2023 CAPER for details.
	Provide the year (and optionally month, or month and day) for when the data was collected. See 2023 CAPER for details.
	Briefly describe the methodology for the data collection.

	<p>Describe the total population from which the sample was taken.</p> <p>See 2023 CAPER for details.</p> <p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>See 2023 CAPER for details.</p>
3	<p>Data Source Name</p> <p>CHAS DATA - June 25, 2018 - www.huduser.gov</p> <p>List the name of the organization or individual who originated the data set.</p> <p>Each year, the U.S. Department of Housing and Urban Development (HUD) receives custom tabulations of American Community Survey (ACS) data from the U.S. Census Bureau. These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low income households. The CHAS data are used by local governments to plan how to spend HUD funds, and may also be used by HUD to distribute grant funds.</p> <p>Provide a brief summary of the data set.</p> <p>On June 25, 2018 HUD released updated CHAS data for the 2011-2015 period.</p> <p>About the CHAS</p> <p>Each year, the U.S. Department of Housing and Urban Development (HUD) receives custom tabulations of American Community Survey (ACS) data from the U.S. Census Bureau. These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low income households. The CHAS data are used by local governments to plan how to spend HUD funds, and may also be used by HUD to distribute grant funds.</p> <p>What was the purpose for developing this data set?</p> <p>"CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low income households. The CHAS data are used by local governments to plan how to spend HUD funds, and may also be used by HUD to distribute grant funds.</p> <p>Provide the year (and optionally month, or month and day) for when the data was collected.</p> <p>2011 - 2015 ACS</p> <p>Briefly describe the methodology for the data collection.</p> <p>"CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low income households. The CHAS data are used by local governments to plan how to spend HUD funds, and may also be used by HUD to distribute grant funds.</p>

	<p>Describe the total population from which the sample was taken.</p> <p>State of Oklahoma</p> <p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>"CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low income households. The CHAS data are used by local governments to plan how to spend HUD funds, and may also be used by HUD to distribute grant funds.</p>
4	<p>Data Source Name</p> <p>2013-2017 ACS</p> <p>List the name of the organization or individual who originated the data set.</p> <p>United States Census Bureau</p> <p>Provide a brief summary of the data set.</p> <p>The American Community Service (ACS) helps local officials, community leaders, and businesses understand the changes taking place in their communities. It is the premier source for detailed population and housing information about our nation. -US. Census Bureau</p> <p>What was the purpose for developing this data set?</p> <p>The purpose of this data set is to observe Market Analysis trends.</p> <p>Provide the year (and optionally month, or month and day) for when the data was collected.</p> <p>2013-2017</p> <p>Briefly describe the methodology for the data collection.</p> <p>See https://www.census.gov/programs-surveys/acs</p> <p>Describe the total population from which the sample was taken.</p> <p>See https://www.census.gov/programs-surveys/acs</p> <p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>See https://www.census.gov/programs-surveys/acs</p>