State of Oklahoma Consolidated Plan

Five-Year Strategic Plan

FY 2019 – 2023

Includes:

FY 2019 Annual Action Plan
Program Year: April 1, 2019 – March 31, 2020

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1. Introduction

The FY 2019 -2023 *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.

OMB Control No: 2506-0117 (exp. 06/30/2018)

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 historic, 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 evalution 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 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.

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 via press releases throughout the state.

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

- Informal meetings were held during the months of July, and August to discuss the annual updates on the categories of Homeless, Housing, and Non-Housing Community Development. Notifications were posted on the agency's website, and the meeting information was placed in the *Community Developer* newsletter inviting all interested individuals to participate.

- A Public Input Session was held in September in Oklahoma City where all components were discussed. Notifications were posted on the agency's website, and the meeting information was placed in the *Community Developer* newsletter inviting all interested individuals to participate. Additionally, the session was listed on the calendar of the Oklahoma Department of Commerce website, and announced at various meetings.

- A Public Hearing was held in October in Oklahoma City. As with the Public Input Session, the hearing was publicized through the resources mentioned above. As per HUD Cititizen Participant requirements, the State accepted comments up to 30 days after the date of the formal Public Hearing.

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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; Governor's Interagency Council on Homelessness; various state agencies; and others.

5. Summary of public comments

A summary of Public Comments taken during the Citizen Participation process is as attached. 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

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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 in order 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 - 91.110, 91.300(b); 91.315(l)

1. Introduction

It should be recognized that 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(l))

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 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 - The State facilitates Statewide CoC meetings 5-6 times a year. These meetings are used for peer-to-peer discussions of issues relating to serving the needs of those who are homeless; best practices of CoC Grant competitions and statewide coordination of the Point-in-Time Count and Homeless Needs Assessment.

Topics discussed by the CoC representatives needing State Agency assistance or answers are submitted to the Governor's Interagency Council for discussion and resolution. The GICH is a twenty-five (25) member Council that includes representatives from nineteen (19) State agencies along with representatives from the nonprofit direct service provider role and others who are knowledgeable regarding homelessness.

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

Emergency Solutions '

In addition to the Statewide CoC meetings held throughout the year, Focus Groups were held with each of the six rural CoC to discuss program changes and how the ESG funds were to be distributed. It was decided that each of the rural Continua would receive an allocation that they would award to the highest scoring applications in their Continuum. Each Continuum has also been given the authority to create stricter requirements in regard to awarding grant funds as long as they can justify that the stricter regulations will help adhere more closely to that CoC's Strategic Plan to 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

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Table 2 – Agencies, groups, organizations who participated

1	**Agency/Group/Organization**	Oklahoma Association of Regional Councils
	Agency/Group/Organization Type	Housing PHA 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 Health Agency Child Welfare Agency Other government - State Other government - Local Regional organization Planning organization Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment 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

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	As members of the Oklahoma Association of Regional Councils (OARC), our statewide network of 11 regional councils provides numerous services and federal levels.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.Today, we are taking a leadership role on a variety of important issues, such as homeland security, hazard mitigation, rural fi re defense, environmental stewardship and brownfi elds redevelopment, transportation planning, business and workforce development and human services, such as 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 and public hearings. We respond to information inquiries, facilitate information exchanges 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 that do not always apply for funding to see what ideas are missing from the program.

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Identify any Agency Types not consulted and provide rationale for not consulting

Not Applicable. 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 Dept. 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, Governors Interagency Council on Homelessness, etc.
Federal Strategic Plan to End Homelessness	USICH	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 to improving a lasting System to reduce homelessness for Chronic homeless, Veteran homelessness, Family Homelessness and unaccompanied youth and increase affordable housing.

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))

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.

Emergency Solutions - Local Units of Goverment are involved in the State's Consolidated Plan through their consultation of the members of the various Continuum of Care Networks.

Narrative (optional):

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PR-15 Citizen Participation - 91.115, 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 meetings to include informal program specific input sessions, formal Public Input Session, and the formal Public Hearing are held in handicap accessible facilities. Meeting announcements were made via the New Pioneer newsletter 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:

- Informal meetings were held during the months of July, and August to discuss the annual updates on the categories of Homeless, Housing, and Non-Housing Community Development. Notifications were posted on the agency's website, and the meeting information was placed in the New Pioneer newsletter inviting all interested individuals to participate.

- A Public Input Session was held in September in Oklahoma City where all components were discussed. Notifications were posted on the agency's website, and the meeting information was placed in the New Pioneer newsletter inviting all interested individuals to participate. Additionally, the session was listed on the calendar of the Oklahoma Department of Commerce website, and announced at various meetings.

- A Public Hearing was held in October 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.

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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; Governor's Interagency Council on Homelessness; various state agencies; and others.

Inputs provided by attendees of the various public meetings (informal/formal) and formal submitted public comments helped to identify areas of need within the state along with any program adaptations required to best meet the needs of all citizens statewide.

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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 Meeting	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing CAA's, UGLG's, Non-Profits	See Summary for Attached List of Responses	See Summary for Attached List of Comments	Not Applicable	

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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	Internet Outreach	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing CAA's, UGLG's, Non-Profits	See Summary for Attached List of Responses	See Summary for Attached List of Comments	Not Applicable	http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/

OMB Control No: 2506-0117 (exp. 06/30/2018)

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	Community Developer Newsletter	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing CAA's, UGLG's, Non-Profits	Not Applicable	Not Applicable	Not Applicable	

OMB Control No: 2506-0117 (exp. 06/30/2018)

4	Community Developer Newsletter	Non-targeted/broad community	Seven (7) Focus Groups were facilitated around the State. Focus groups were primarily attended by service providers; several of which were formerly homeless or attend decision making entities where members who are homeless or formerly homeless are involved in the policy-making decisions.	At all meetings, there was a general consensus of agreement to the proposed changes giving the Continuum of Care more authority over requirements and award amounts regarding the grant competition. General comments were made regarding CoC Governing Boards needing more access to subrecipient assessment information, implementing a policy how funds not awarded in one CoC would be	All comments were accepted.	

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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)
				distributed and awarded in another and creating policy to allow for an appeal process for funding applicants who do not recieve funding.		

Table 4 – Citizen Participation Outreach

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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.

OMB Control No: 2506-0117 (exp. 06/30/2018)

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.

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

Summary of Housing Needs

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. Additional data and housing information was supplied by a comprehensive statewide affordable housing needs assessment. http://oklahomahousingneeds.org/

Demographics	Base Year: 2015	Most Recent Year: 2018	% Change
Population	3,785,742	3,943,079	4%
Households	1,444,081	1,455,320	1%
Median Income	$45,339.00	$49,767.00	10%

Table 5 - Housing Needs Assessment Demographics

Alternate Data Source Name:
CHAS DATA - June 25, 2018 - www.huduser.gov

Data Source Comments: U.S. Census Quick Facts Data and CHAS Data

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	186,230	179,505	257,810	148,995	679,845
Small Family Households	118,055	56,895	95,690	60,685	367,130
Large Family Households	24,415	14,260	22,985	14,225	53,840
Household contains at least one person 62-74 years of age	29,805	37,185	54,705	31,800	145,260
Household contains at least one person age 75 or older	22,245	39,785	38,875	17,615	49,245
Households with one or more children 6 years old or younger	35,785	34,960	48,490	26,490	99,380

Table 6 - Total Households Table

Alternate Data Source Name:
CHAS DATA - June 25, 2018 - www.huduser.gov

Data Source Comments: CHAS TABLE 5, CHAS TABLE 7, CHAS TABLE 13 "HAMFI" The terms "area median income" (AMI) or "median family income" (MFI) used in the CHAS, assume it refers to HAMFI

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	3,275	2,170	2,065	660	8,170	1,555	1,305	995	665	4,520
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	1,930	1,095	1,315	835	5,175	385	305	785	350	1,825
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	3,755	3,900	4,130	1,305	13,090	1,340	3,325	2,070	1,770	8,505
Housing cost burden greater than 50% of income (and none of the above problems)	65,600	21,230	3,365	445	90,640	31,405	18,095	9,870	2,310	61,680

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	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)	78,615	62,145	33,735	4,775	179,270	44,155	40,255	43,890	16,565	144,865
Zero/negative Income (and none of the above problems)	17,715	24,655	66,040	43,890	152,300	13,105	47,925	104,625	78,810	244,465

Table 7 – Housing Problems Table

Alternate Data Source Name:
CHAS DATA - June 25, 2018 - www.huduser.gov

Data Source Comments: CHAS TABLE 3

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	149,120	56,795	21,750	6,504	234,169	69,380	43,540	29,945	10,180	153,045
Having none of four housing problems	61,459	131,140	192,815	96,445	481,859	51,719	140,175	277,290	186,130	655,314

	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	24,835	0	0	0	24,835	15,940	0	0	0	15,940

Table 8 – Housing Problems 2

Alternate Data Source Name:
CHAS DATA - June 25, 2018 - www.huduser.gov

Data Source Comments: CHAS TABLE 2

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	32,250	26,675	13,705	72,630	12,380	13,495	18,595	44,470
Large Related	6,335	5,090	2,305	13,730	3,145	3,630	4,185	10,960
Elderly	12,615	12,405	6,410	31,430	19,775	17,900	13,625	51,300
Other	33,810	22,280	12,885	68,975	10,750	6,495	8,420	25,665
Total need by income	85,010	66,450	35,305	186,765	46,050	41,520	44,825	132,395

Table 9 – Cost Burden > 30%

Alternate Data Source Name:
CHAS DATA - June 25, 2018 - www.huduser.gov

Data Source Comments: CHAS TABLE 7

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	27,475	8,285	765	36,525	9,460	6,400	3,800	19,660
Large Related	4,985	1,090	55	6,130	2,275	1,160	645	4,080
Elderly	9,055	5,150	1,890	16,095	12,570	7,355	3,505	23,430
Other	28,920	7,750	1,175	37,845	8,285	3,410	2,010	13,705
Total need by income	70,435	22,275	3,885	96,595	32,590	18,325	9,960	60,875

Table 10 – Cost Burden > 50%

Alternate Data Source Name:
CHAS DATA - June 25, 2018 - www.huduser.gov

Data Source Comments: CHAS TABLE 7

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	50,320	45,790	56,140	27,825	180,075	26,665	44,495	95,150	67,255	233,565
Multiple, unrelated family households	1,905	2,140	2,615	1,855	8,515	1,555	2,685	5,705	3,595	13,540
Other, non-family households	65,495	46,040	48,530	21,790	181,855	40,299	44,679	52,764	27,304	165,046
Total need by income	117,720	93,970	107,285	51,470	370,445	68,519	91,859	153,619	98,154	412,151

Table 11 – Crowding Information – 1/2

Alternate Data Source Name:
CHAS DATA - June 25, 2018 - www.huduser.gov

Data Source Comments: CHAS TABLE 10

	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	28,180	23,840	25,155	77,175	7,605	11,120	23,335	42,060

Table 12 – Crowding Information – 2/2

Alternate Data Source Name:
CHAS DATA - June 25, 2018 - www.huduser.gov

Data Source Comments: CHAS TABLE 13

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

1. Point in Time data shows 3,777 homeless persons in Oklahoma, though this figure certainly understates the number of homeless persons in the state.
2. 2,309 of these persons were shown to be in emergency shelters, 690 of these persons were located in traditional housing, and 778 of these persons were unsheltered.

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.

Point in Time data shows 480 families in need of housing assistance in "Transitional Housing" homeless and 652 families classified as "Unsheltered". Data does not identify the specific type of family.

What are the most common housing problems?

Based on data supplied by HUD in the Housing Need Summary Tables, there are two significant housing problems which stand out above all others for both Renters and Owners in terms of overall totals. First, the Housing cost burden greater than 50% of income (and none of the above problems) category stands out as most significant in Oklahoma. Second, the Housing cost burden greater than 30% of income (and none of the above problems) category also stands out as an overall significant housing problem for both Renters and Owners.

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

Pursuant to the data set forth on IDIS screen NA-15, in the 30% to 50% of Area Median Income (AMI) category only, Black/African American, American Indian/Alaskan Native, Pacific Islander and Hispanic households are slightly more affected. In all AMI categories, Pacific Islander households are slightly more affected than other classes. This trend continues in the data sets contained on IDIS screen NA-20 as well.

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

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.

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 24,000 housing choice vouchers. Their spatial distribution is outlined below. 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), 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

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	135,009	30,819	20,085
White	81,710	20,775	12,430
Black / African American	19,215	3,415	3,590
Asian	2,165	245	755
American Indian, Alaska Native	10,760	2,870	1,140
Pacific Islander	134	4	10
Hispanic	12,250	1,510	1,000
Other (including Mult Races, Non-Hispanic)	8,775	2,000	1,160

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Alternate Data Source Name:
CHAS DATA - June 25, 2018 - www.huduser.gov

Data Source Comments: CHAS Table 1

*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	113,245	72,565	0
White	72,150	52,085	0
Black / African American	13,035	4,665	0
Asian	1,680	640	0
American Indian, Alaska Native	7,235	5,875	0
Pacific Islander	95	15	0
Hispanic	12,620	5,355	0
Other (including Mult Races, Non-Hispanic)	6,430	3,930	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Alternate Data Source Name:
CHAS DATA - June 25, 2018 - www.huduser.gov
Data Source Comments: CHAS TABLE 1

*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	90,230	170,670	0
White	62,225	122,820	0
Black / African American	8,475	11,810	0
Asian	1,535	1,920	0
American Indian, Alaska Native	5,185	11,175	0
Pacific Islander	255	125	0
Hispanic	7,665	13,875	0
Other (including Mult Races, Non-Hispanic)	4,890	8,945	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Alternate Data Source Name:
CHAS DATA - June 25, 2018 - www.huduser.gov
Data Source Comments: CHAS TABLE 1

*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	26,925	122,700	0
White	19,325	90,015	0
Black / African American	2,230	7,970	0
Asian	610	1,760	0
American Indian, Alaska Native	1,355	7,770	0
Pacific Islander	80	105	0
Hispanic	1,865	8,910	0
Other (including Mult Races, Non-Hispanic)	1,460	6,170	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Alternate Data Source Name:
CHAS DATA - June 25, 2018 - www.huduser.gov
Data Source Comments: CHAS TABLE 1

*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, Asion, 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 (Disproportionally 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	109,250	56,592	20,085
White	65,365	37,130	12,430
Black / African American	15,985	6,650	3,590
Asian	1,935	474	755
American Indian, Alaska Native	8,420	5,210	1,440
Pacific Islander	130	8	10
Hispanic	10,240	3,515	1,000
Other (including Mult Races, Non-Hispanic	7,175	3,605	1,160

Table 17 – Severe Housing Problems 0 - 30% AMI

Alternate Data Source Name:
CHAS DATA - June 25, 2018 - www.huduser.gov

Data Source Comments: CHAS TABLE 2

*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	50,165	135,660	0
White	31,840	92,400	0
Black / African American	5,755	11,950	0
Asian	835	1,490	0
American Indian, Alaska Native	3,220	9,890	0
Pacific Islander	50	65	0
Hispanic	5,570	12,405	0
Other	2,895	7,460	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Alternate Data Source Name:
CHAS DATA - June 25, 2018 - www.huduser.gov

Data Source Comments: CHAS TABLE 2

*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	25,850	235,050	0
White	17,005	168,030	0
Black / African American	1,800	18,490	0
Asian	645	2,810	0
American Indian, Alaska Native	1,615	14,750	0
Pacific Islander	220	160	0
Hispanic	3,265	18,275	0
Other	1,300	12,535	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Alternate Data Source Name:
CHAS DATA - June 25, 2018 - www.huduser.gov

Data Source Comments: CHAS TABLE 2

*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	8,344	141,290	0
White	5,445	103,890	0
Black / African American	575	9,620	0
Asian	250	2,130	0
American Indian, Alaska Native	560	8,570	0
Pacific Islander	4	185	0
Hispanic	1,150	9,625	0
Other	360	7,270	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Alternate Data Source Name:
CHAS DATA - June 25, 2018 - www.huduser.gov
Data Source Comments: CHAS TABLE 2

*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 classe 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% AMI category, only the racial/ethnic class of Pacific Islander exceeds the 10% definition. Under the 80% - 100% AMI category, no

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

The following Needs Analysis (Disproportionally Greater Need: Housing Cost Burdens) 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 are 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.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	1,066,360	203,620	163,490	21,860
White	816,415	138,975	105,420	13,020
Black / African American	56,825	20,770	21,965	3,875
Asian	14,740	3,295	2,630	935
American Indian, Alaska Native	63,305	12,350	10,725	1,625
Pacific Islander	720	330	125	10
Hispanic	61,460	16,700	12,760	1,155
Other (including Mult Races, Non-Hispanic	52,895	11,200	9,865	1,240

Table 21 – Greater Need: Housing Cost Burdens AMI

Alternate Data Source Name:
CHAS DATA - June 25, 2018 - www.huduser.gov

Data Source Comments: CHAS TABLE 9

Discussion

Disproportionately greater need was analyzed in relation to housing cost burdon. 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

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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 clase of Pacific Islander exceeds the 10% defination. Under the freater 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 regards to neighorhood 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

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	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

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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)

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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 populationat large.

Discussion:

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

NA-40 Homeless Needs Assessment – 91.305(c)

Introduction:

The following data comes from the 2018 PIT and the 2017 Emergency Solutions Annual Closeout Reports. The homeless count is from recent continuum of care submissions based on the physical snapshot count accomplished in January. While the data provides basic information to be used and extrapolated, it is by no means a scientifically exact number. However, based on the recent count, at least 14,600 people or 34 % of the State's population experienced homelessness in 2018 . Of the 2,422 people who were counted as homeless during the Point in time count, the chronically homeless count was 442 or 5.48%. Several studies indicate that the chronically homeless are about 10% of the homeless population. NOTE: Per HUD requirement, additional CDBG DR specific Needs were added to this Five Year Consolidated Plan.

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)	1,147	722	1,729	3,626	0	0
Persons in Households with Only Children	341	99	422	391	0	0
Persons in Households with Only Adults	1,085	742	3,236	8,847	0	0
Chronically Homeless Individuals	442	942	1,384	1,817	0	0
Chronically Homeless Families	90	34	81	122	0	0
Veterans	108	73	130	153	0	0
Unaccompanied Child	137	28	1,240	136	0	0
Persons with HIV	8	1	0	0	0	0

Table 26 - Homeless Needs Assessment

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Data Source Comments: The totals provided for the Homeless Needs Assessment come from an analysis of the 2013 Point-in-time Survey Counts lead by the Continuum of Care networks throughout the State.

CDBG DR Homeless Needs

To date, the State has received information identifying a subsidiary of the Oklahoma City Public Housing Authority has having an unmet need for physical or structural repairs. No other entity has identified a need for financial assistance to address an increase in homeless individuals or families or physical damage to homeless or transitional housing facilities for any of the events covered by the Federal Register Notice.

As the State continues to work on recovery efforts, and continues planning activities for future disasters, it will continue to reach out to public housing authorities, owners/operators of HUD-assisted housing, homeless service and shelter providers, as well as the owners and managers of both transitional and permanent housing for the homeless in order address any newly identified unmet needs that may arise.

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

Indicate if the homeless population is: Partially Rural Homeless

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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)	132	378	1,348	2,034	0	0
Persons in Households with Only Children	68	200	220	332	0	0
Persons in Households with Only Adults	195	412	1,717	2,591	0	0
Chronically Homeless Individuals	94	164	332	501	0	0
Chronically Homeless Families	34	90	65	98	0	0
Veterans	30	23	179	270	0	0
Unaccompanied Youth	16	96	464	700	0	0
Persons with HIV	0	0	4	0	0	0

Table 27 - Homeless Needs Assessment

Data Source Comments: The totals provided for the Homeless Needs Assessment come from an analysis of the 2013 Point-in-time Survey Counts lead by the Continuum of Care networks throughout the State.

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 asÂ employment, financial assistance and transportaion spread over a larger geographic areaÂ makes it difficult to receive services needed to achieve a level of self-sufficiency to maintain housing.

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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):

Estimated number of days persons were homeless; data was not collected separated by the categories above. Data was collected based on number of days persons were in shelters. According to the data collected from 1,874 persons days of homelessness were recorded as follows; 0 – 14 days – 59.0%; 15 – 30 days – 13.2%; 31 – 60 days – 13.9%, 61 – 90 days – 8.4%, 91 – 180 days – 6.7%; 181 – 365 days – 1.1% and over 365 days – 3.4%.

Estimated number exiting homelessness: Based on direct service numbers, an estimated 4,199, are being helped out of homelessness. No data is collected on the housing status of those who seek, but do not receive service.

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Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	1,048	0
Black or African American	263	0
Asian	6	0
American Indian or Alaska Native	168	0
Pacific Islander	7	0
Ethnicity:	**Sheltered:**	**Unsheltered (optional)**
Hispanic	97	0
Not Hispanic	1,441	0

Data Source Comments: Analysis of 2018 Point-in-Time Survey Counts

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

Based on previous Point-in-Time Counts and Service availability, it is estimated that 130 families of veterans are in need of some sort of housing assistance.

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

Based on the number reported as served; 68.2% were white, 18.0% were African-American; 12.1% were Native American and 0.7% reported either as Asian, Pacific, refused or missing information.

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 much more difficult to receive assistance 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	5,954
Area incidence of AIDS	5,954
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 28 – HOPWA Data

Alternate Data Source Name:
Oklahoma Department of Health

Data Source Comments: Data for cumulative cases of AIDS in Oklahoma from Oklahoma Department of Health current as of 12/31/16

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 29 – 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 reminder 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.

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 is considered the number one priority under Public Facility and Improvements. This is primarily due to the significant cost of these types of projects coupled with the fact they deal with public health and safety, and is necessary for supporting existing business and recruiting new business. Good quality drinking water depends not only of good water supplies, but also on the proper construction, maintenance, and operation of treatment, storage, and distribution lines. Adequate wastewater collection and treatment facilities affect local public health as well as the quality of streams and rivers. Local rural decision makers are generally unable to turn their attention to other community needs such as streets, parks, community centers, etc. until they achieve a solid foundation in water and wastewater services which in turn other improvements. NOTE: Per HUD requirement, additional CDBG DR specific Needs were added to the earlier Five Year Consolidated Plan.

How were these needs determined?

Currently, ODOC, Oklahoma Water Resources Board, USDA Rural Development, and the state funded Rural Economic Action Plan grants fund approximately $150 million worth of water and wastewater projects annually. According to the most recent Water and Wastewater Survey's conducted by the U.S. Environmental Protection Agency there is at least $4.8 Billion worth of water needs and $848 Million worth of wastewater needs in the state. This data clearly shows the enormous undertaking to improve water and wastewater infrastructure throughout Oklahoma.

salkfskfjsdkfsdkfsd

CDBG DR Infrastructure ÿ Economic Needs

Economic Revitalization Needs Assessment (Impact to the State's Economy)

No CDBG-DR eligible Economic Revitalization unmet needs survey responses were received. The multiple disasters impacted the State's economy by temporarily or permanently specific economic activity, including, for example, cancelled tourist visits, forgone business revenue due to shuttered offices, and wages not paid to workers who could not work during the storm and in its aftermath. In addition, the physical damage to residential housing, commercial buildings, public facilities, infrastructure and business equipment and inventory required new unplanned expenditures that diverted funds that could otherwise be reasonably expected to have been directed towards savings and investment. This could be viewed as a reduction in the State's wealth and stock of productive resources.

Separately, damages to public infrastructure such as roads, drainage as well as compromised water and electrical utility systems have caused significant interruption on the State's economy and have had a corresponding negative impact on businesses trying to recover after the storm.

Infrastructure Needs Assessment

Based on the State's needs assessment survey, public outreach and FEMA reports, it is clear that unmet infrastructure needs rank number one due to sustained significant damage to infrastructure as a result of the multiple disasters occurring over the past three years (2013, 2012, 2011). It should be noted that infrastructure stands as the single largest category in terms of unmet needs among all eligible CDBG-DR categories as defined by this Action Plan. Unmet infrastructure needs comprised 61.8% of the overall disaster unmet needs requests.

Infrastructure unmet needs are, for the purpose of this Action Plan, limited to the repair and replacement of existing infrastructure. This includes the construction of new infrastructure or 'hardening' of existing infrastructure damaged due to the subsequent disasters occurring in 2011, 2012, and 2014.

The largest unmet need identified to date in the area of infrastructure is the repair or replacement of roads and drainage systems. These two categories combined constitute 57% of the total infrastructure repair and replacement activities identified. In total, nearly 51% of the activities identified as having unmet needs are located in Oklahoma and Cleveland counties.

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

Infrastructure activities will include the construction or reconstruction of drainage systems. The State's needs assessment indicates a large unmet need for infrastructure repairs related to damaged drainage systems. Road repairs can be noted as following as a close second in terms of unmet infrastructure needs. Anticipated uses of infrastructure funds are expected to include a focus on road and drainage improvements.

Describe the jurisdiction's need for Public Improvements:

Other Public Facility and Improvement projects besides water, wastewater, economic development, housing, and planning are also important. Though, in general, these types of projects do not constitute "big ticket" items as compared to a water treatment plant, they are important to accomplish comprehensive community development. These types of projects contribute to a better quality of life

and tend to spark a sense of pride. Examples include community centers, streets, fire stations, sidewalks, senior centers, etc.

How were these needs determined?

Arriving at a dollar figure for these “other” Public Facility and Improvement projects is difficult. A review of ODOC, REAP and USDA-RD funding indicates that approximately $20 Million worth of projects are funded annually. However, the real need clearly outstrips available funding.

Describe the jurisdiction’s need for Public Services:

Based on information provided each year during the CDBG specific input sessions along with the HUD required public input session and public hearing, a hierarchy of priority needs was established for the State's CDBG program. Public Services are not considered a priority need by the citizens under the State's Non-Entitlement CDBG program. Additionally, lack of sufficient annual CDBG program funding by HUD preempts funding Public Service activities at this time.

How were these needs determined?

Based on information provided each year during the CDBG specific input sessions along with the HUD required public input session and public hearing, a hierarchy of priority needs was established for the State's CDBG program. Public Services are not considered a priority need by the citizens under the State's Non-Entitlement CDBG program. Additionally, lack of sufficient annual CDBG program funding by HUD preempts funding Public Service activities at this time.

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 four (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.

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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 Homeless Assistance Program (HAP), 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.

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 provided by HUD.

NOTE: Per HUD requirement, additional CDBG DR specific Housing requirements were added to the earlier Five Year Consolidated Plan.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	1,219,987	73%
1-unit, attached structure	34,434	2%
2-4 units	76,276	5%
5-19 units	117,571	7%
20 or more units	59,842	4%
Mobile Home, boat, RV, van, etc	161,718	10%
Total	*1,669,828*	*100%*

Table 30 – Residential Properties by Unit Number

Data Source: 2009-2013 ACS

CDBG DR Housing Analysis

Multifamily housing unmet need ranked first in terms of overall housing related monetary requests. Only one unmet needs survey response was received by the deadline from eligible municipalities, public housing authorities. The survey response located within the City of Mannford for a forty (40) unit elderly housing complex for a total of $5,000,000 in unmet need.

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	2,580	0%	13,948	3%
1 bedroom	16,837	2%	101,850	21%
2 bedrooms	166,446	17%	179,121	38%
3 or more bedrooms	782,873	81%	180,426	38%
Total	*968,736*	*100%*	*475,345*	*100%*

Table 31 – Unit Size by Tenure

Data Source: 2009-2013 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, experience 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?

There was historically always been a lack of affordable housing units to meet the need, sadly a situation that will probably always exist due to the wide disparity between supply and demand.

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.

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: 2000	Most Recent Year: 2013	% Change
Median Home Value	67,700	112,800	67%
Median Contract Rent	363	525	45%

Table 32 – Cost of Housing

Data Source: 2000 Census (Base Year), 2009-2013 ACS (Most Recent Year)

Rent Paid	Number	%
Less than $500	237,239	49.9%
$500-999	207,436	43.6%
$1,000-1,499	21,640	4.6%
$1,500-1,999	4,823	1.0%
$2,000 or more	4,207	0.9%
Total	*475,345*	*100.0%*

Table 33 - Rent Paid

Data Source: 2009-2013 ACS

CDBG DR Housing Cost

Multifamily housing unmet need ranked first in terms of overall housing related monetary requests. Only one unmet needs survey response was received by the deadline from eligible municipalities, public housing authorities. The survey response located within the City of Mannford for a forty (40) unit elderly housing complex for a total of $5,000,000 in unmet need.

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	39,020	No Data
50% HAMFI	143,955	112,260
80% HAMFI	320,225	273,740
100% HAMFI	No Data	382,630
Total	*503,200*	*768,630*

Table 34 – Housing Affordability

Data Source: 2009-2013 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 35 – 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.

Definitions

Given the large statewide jurisdictional coverage, federal, state, and local regulations and housing codes would present the boundaries of determining the "condition" of the housing units. As stated earlier in the State Consolidated Plan, the HOME program conducts the housing related activities and defines investment as:

Maximum HOME investment: There are three limiting factors that must be taken into account when determining the maximum HOME investment:

1. An award of HOME funds cannot exceed the HOME Program Maximum Per Unit Subsidy Limits defined by jurisdiction. The limits are further determined by number of bedrooms.

1. The maximum HOME investment is limited to the minimum amount required to cover the project's financial gap, as determined by subsidy layering analysis.

1. The maximum HOME investment is limited to the pro-rata share of HOME-eligible project costs, as determined by multiplying the total HOME-eligible project costs multiplied by the percentage of HOME units to total units or the percentage of HOME unit square footage to total unit square footage (whichever percentage is less).

The maximum HOME investment, therefore, is limited to the LOWEST of the pro-rata share of eligible costs, the HOME Program Maximum Per Unit Subsidy Limits, or the financial gap as determined by a subsidy layering analysis.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	192,158	20%	194,155	41%
With two selected Conditions	5,954	1%	13,093	3%
With three selected Conditions	551	0%	877	0%
With four selected Conditions	13	0%	29	0%
No selected Conditions	770,060	79%	267,191	56%
Total	*968,736*	*100%*	*475,345*	*100%*

Table 36 - Condition of Units

Data Source: 2009-2013 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	163,935	17%	55,902	12%
1980-1999	274,074	28%	125,381	26%
1950-1979	405,347	42%	223,756	47%
Before 1950	125,380	13%	70,306	15%
Total	*968,736*	*100%*	*475,345*	*100%*

Table 37 – Year Unit Built

Data Source: 2009-2013 CHAS

CDBG DR Housing Conditions

Multifamily housing unmet need ranked first in terms of overall housing related monetary requests. Only one unmet needs survey response was received by the deadline from eligible municipalities, public housing authorities. The survey response located within the City of Mannford for a forty (40) unit elderly housing complex for a total of $5,000,000 in unmet need. This project is for New Housing Construction as allowed under DR.

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	530,727	55%	294,062	62%

Housing Units build before 1980 with children present	113,845	12%	74,205	16%

Table 38 – Risk of Lead-Based Paint

Data Source: 2009-2013 ACS (Total Units) 2009-2013 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 39 - Vacant Units

Data Source: 2005-2009 CHAS

Need for Owner and Rental Rehabilitation

A majority of the housing for both the Owner-Occupied and Renter Occupied units date prior to 1980. Fifty-five percent (55%) of the Owner-Occupied housing units were built before 1980. Sixty-two percent (62%) of the Renter-Occupied housing units were built before 1980. Thus, it appears there could be a large amount of housing needing rehabilitation based upon the large stock of older housing.

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

There is no reliable data currently available that accurately assesses the total number of low or moderate income family occupied housing units that contain lead-based paint hazards. Data indicates that fifty-five percent (55%) of the Owner-Occupied housing units were built before 1980 are at risk of containing lead based paint hazards. Sixty-two percent (62%) of the Renter-Occupied housing units were built before 1980 are at risk of containing lead based paint hazards. Lead has been banned from household paints in the United States since 1978. The data relating to housing related lead based paint hazard risks simply uses this cutoff in it's estimate. Actual assessment would be taken at time of rehabilitation.

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 40 – 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 unuseful.

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 stategies.

Discussion:

MA-30 Homeless Facilities – 91.310(b)

Introduction

This section is relevant to the Emergency Solutions Block (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)	948	99	286	714	0
Households with Only Adults	1,611	99	382	1,730	0
Chronically Homeless Households	0	99	0	0	0
Veterans	59	99	92	950	0
Unaccompanied Youth	217	99	89	590	0

Table 41 - Facilities Targeted to Homeless Persons

Data Source Comments: Totals based off 2018 Housing Inventory Chart

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

The State requires that each ESG sub recipient 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 consists of twenty-five (25) members of which nineteen (19) are State Agencies (SSA Disability Determination Division of the OK Department of Rehabilitation Services, Office of Juvenile Affairs, US Veterans Administration, Oklahoma Employment Security Commission, Department of Education, Department of Health, Oklahoma Department of Mental Health and Drug Abuse Services, Oklahoma Department of Human Services, Oklahoma Health Care Authority, Head Start / Community Action Agencies, Department of Corrections, OHFA, Oklahoma Department of Commerce, Legal Aid of Oklahoma, Local Housing Authority, Governor's Office, Career Tech) **with knowledge of the subject of homelessness. These agencies work with each other through the GICH and with the CoC's to make sure their services are available through or in partnership with the service providers.**

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

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 Assistance Baseline Table

Type of HOWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
TBRA	9
PH in facilities	0
STRMU	45
ST or TH facilities	5
PH placement	2

Table 42 – HOPWA Assistance Baseline

Alternate Data Source Name:
2017 Caper

Data Source Comments:

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

Emergency Solutions- Each subrecipient is required to have a Discharge Plan to keep from discharging clients back into Homelessness. Subrecipients are also required to work with their CoC members to make sure no person that enters a program is left homeless.

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)

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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))

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	46,997	43,884	8	10	2
Arts, Entertainment, Accommodations	70,353	52,470	12	12	0
Construction	42,813	35,395	7	8	1
Education and Health Care Services	99,151	69,005	17	16	-1
Finance, Insurance, and Real Estate	35,276	23,717	6	6	0
Information	9,367	5,968	2	1	-1
Manufacturing	81,668	58,131	14	14	0
Other Services	17,782	13,229	3	3	0
Professional, Scientific, Management Services	37,729	22,343	6	5	-1
Public Administration	0	0	0	0	0
Retail Trade	90,919	66,368	15	16	1
Transportation and Warehousing	24,658	17,863	4	4	0
Wholesale Trade	31,261	19,148	5	4	-1
Total	587,974	427,521	--	--	--

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Table 43- Business Activity

Data Source: 2009-2013 ACS (Workers), 2013 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	933,677
Civilian Employed Population 16 years and over	866,681
Unemployment Rate	7.18
Unemployment Rate for Ages 16-24	19.37
Unemployment Rate for Ages 25-65	4.18

Table 44 - Labor Force

Data Source: 2009-2013 ACS

Occupations by Sector	Number of People
Management, business and financial	161,620
Farming, fisheries and forestry occupations	32,290
Service	94,749
Sales and office	204,402
Construction, extraction, maintenance and repair	115,506
Production, transportation and material moving	62,868

Table 45 – Occupations by Sector

Data Source: 2009-2013 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	578,004	70%
30-59 Minutes	195,099	24%
60 or More Minutes	50,257	6%
Total	*823,360*	*100%*

Table 46 - Travel Time

Data Source: 2009-2013 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		
	Civilian Employed	Unemployed	Not in Labor Force
Less than high school graduate	61,335	7,731	60,054

Educational Attainment	In Labor Force		
	Civilian Employed	Unemployed	Not in Labor Force
High school graduate (includes equivalency)	236,889	17,060	113,945
Some college or Associate's degree	232,853	14,153	84,839
Bachelor's degree or higher	166,213	4,281	32,188

Table 47 - Educational Attainment by Employment Status

Data Source: 2009-2013 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	4,146	7,400	8,221	18,816	27,446
9th to 12th grade, no diploma	32,491	24,117	21,052	49,529	41,733
High school graduate, GED, or alternative	67,763	84,116	85,108	199,009	121,842
Some college, no degree	72,972	65,286	61,271	127,747	64,260
Associate's degree	8,448	19,411	20,181	39,562	12,348
Bachelor's degree	9,159	36,380	36,753	70,441	28,243
Graduate or professional degree	409	9,872	13,652	36,430	21,113

Table 48 - Educational Attainment by Age

Data Source: 2009-2013 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	0
High school graduate (includes equivalency)	0
Some college or Associate's degree	0
Bachelor's degree	0
Graduate or professional degree	0

Table 49 – Median Earnings in the Past 12 Months

Data Source: 2009-2013 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 publically 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 industrustries 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 mininum 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 publically owned infrastructure projects tied directly to businesses.

Discussion

The State CDBG program is the prirmary funding mechanism in regards to 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 under-served 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.

CDBG DR Needs / Market Discussion

Per HUD requirement, additional CDBG DR specific Housing requirements were added to this Five Year Consolidated Plan. The required information has been added to this Five Year Consolidated Plan as text boxes attached to the applicable screens.

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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.

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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 50 - 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.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	The four 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.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	

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

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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, HTF or HOPWA programs.

The selection of the CDBG projects is a competitive process with the exception of the Small Cities Set-Aside. ODOC set aside funds for communities with populations between 15,000 and 50,000 and that are not currently HUD designated entitlement communities or a participant in the CDBG Urban County Designation for Tulsa County. There are currently eighteen (18) eligible entities for the small cities set aside comprised of Ada, Altus, Ardmore, Bartlesville, Bethany, Chickasha, Claremore, Del City, Duncan, Durant, El Reno, McAlester, Muskogee, Mustang, Ponca City, Stillwater, Tahlequah, and Yukon.

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.

The HOME program funds projects on a continuous application process from all parts of the State, with the exception of the HUD-designated metropolitan Participating Jurisdictions of Oklahoma City, Tulsa, Lawton and Norman, which receive a direct annual allocation of HOME funds. Applicants must pass all threshold criteria and evaluation factors, including but not limited to project readiness, leverage, staff capacity, and prior contractor performance in the use of HOME program funds.

HOPWA provides funding to eligible applicants ranked by a review committee. Analysis of epidemiological data has been utilized to determine an equitable distribution of Funds. Western Oklahoma will be eligible to receive approximately 61% of the available funds; Eastern Oklahoma will be eligible to receive the remaining 39%. These funds will be awarded through a competitive Invitation to Bid (ITB) process to one or more applicants judged as the most capable of meeting the plan objectives.

HTF provides a limited priority for geographic diversity. This is accomplished through additional points for the highest scoring applications in the eastern and western areas of the State. Otherwise, HTF follows a competitive application process with no other geographic priorities. Applicants must pass all threshold criteria and evaluation factors, including but not limited to project readiness, leverage, and staff capacity.

SP-25 Priority Needs – 91.315(a)(2)

Priority Needs

Table 51 – Priority Needs Summary

1	**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 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 Victims of Domestic Violence
	Geographic Areas Affected	State Geography
	Associated Goals	State HOME Program

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	Description	OHFA operates the HOME Program on a State-wide basis, excluding the Participating Jurisdictions (PJs) of Oklahoma City, Tulsa, Norman, and Lawton. HOME funds are accessed competitively by cities, counties, tribes, non-profits, for-profit developers and Community Housing Development Organizations (CHDOs). Each of these entities has varying types, amounts, and priorities in regards to their housing needs. Therefore, OHFA does not attempt to prioritize housing needs for communities. OHFA does, however, divide its HOME award among the various eligible HOME activities according to historical and projected demand. (See attached HOME Action Plan.) Statistics indicate there are a relatively high percentage of persons who are cost burdened, whether they rent or own. As can be expected this is amplified in the lower ranges of Median Family Income. Major market **characteristics** influencing priority housing needs include: • Costs of rental housing • Availability of rental units • Condition of rental units • Price of starter homes within the local market • Age and condition of existing housing stock • Availability of homes • Income Levels Major housing **problems** influencing priority housing needs are: • Lack of availability of affordable rental units • Lack of availability of for-sale homes • Number of rental vouchers in relation to the demand for assistance • Prevailing sales prices of entry level homes • Condition and operating costs of aging housing units The basis for assigning priorities is OHFA's belief that those who are the most in need should be helped first. From the CHAS data, persons earning less than 30% of Median Family Income are most challenged when trying to locate affordable housing. Obstacles to meeting underserved affordable housing needs include limited resources and staffing, lead-based paint issues, and lots of competition for competitive resources

	Basis for Relative Priority	Statistics indicate there are a relatively high percentage of persons who are cost burdened, whether they rent or own. As can be expected this is amplified in the lower ranges of Median Family Income. Major market **characteristics** influencing priority housing needs include: • Costs of rental housing • Availability of rental units • Condition of rental units • Price of starter homes within the local market • Age and condition of existing housing stock • Availability of homes • Income Levels Major housing **problems** influencing priority housing needs are: • Lack of availability of affordable rental units • Lack of availability of for-sale homes • Number of rental vouchers in relation to the demand for assistance • Prevailing sales prices of entry level homes • Condition and operating costs of aging housing units The basis for assigning priorities is OHFA's belief that those who are the most in need should be helped first. From the CHAS data, persons earning less than 30% of Median Family Income are most challenged when trying to locate affordable housing. Obstacles to meeting underserved affordable housing needs include limited resources and staffing, lead-based paint issues, and lots of competition for competitive resources
2	**Priority Need Name**	State HOPWA Program
	Priority Level	High

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	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
	Geographic Areas Affected	State Geography
	Associated Goals	State HOPWA Program

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	Description	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. 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. 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.
	Basis for Relative Priority	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. 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.
3	**Priority Need Name**	State CDBG Program
	Priority Level	High

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	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Non-housing Community Development
	Geographic Areas Affected	State Geography
	Associated Goals	State CDBG Program
	Description	Based on public input sessions water and wastewater infrastructure is considered the number one priority under Public Facility and Improvements. This is primarily due to the significant cost of these types of projects coupled with the fact they deal with public health and safety, and is necessary for supporting existing business and recruiting new business. Good quality drinking water depends not only of good water supplies, but also on the proper construction, maintenance, and operation of treatment, storage, and distribution lines. Adequate wastewater collection and treatment facilities affect local public health as well as the quality of streams and rivers. Local rural decision makers are generally unable to turn their attention to other community needs such as streets, parks, community centers, etc. until they achieve a solid foundation in water and wastewater services which in turn other improvements.
	Basis for Relative Priority	Local rural decision makers are generally unable to turn their attention to other community needs such as streets, parks, community centers, etc. until they achieve a solid foundation in water and wastewater services which in turn other improvements. Currently, ODOC, Oklahoma Water Resources Board, USDA Rural Development, and the state funded Rural Economic Action Plan grants fund approximately $150 million worth of water and wastewater projects annually. According to the most recent Water and Wastewater Survey's conducted by the U.S. Environmental Protection Agency there is at least $4.8 Billion worth of water needs and $848 Million worth of wastewater needs in the state. This data clearly shows the enormous undertaking to improve water and wastewater infrastructure throughout Oklahoma.
4	**Priority Need Name**	State ESG Program
	Priority Level	High

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	Population	Extremely Low Rural Chronic Homelessness 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 ESG Program
	Description	The Governor's Interagency Council on Homelessness. (GICH) still collaborates with the State's Continua toward the initiative to end homelessness. The GICH framework specifically prescribed in the Order ensures the success of Oklahoma's strategies to end homelessness. GICH members have been working to update the State's strategies to align the State work with that of the Federal Strategic Plan to End Homelessness. The GICH works closely with the State's Continua of Care to meet Oklahoma's five (5) key goals that have been revised under four (4) main categories; 1) Healthcare, 2) Transportation, 3) Employment (Education/Training) and 4) Resources. Such goals include promoting collaborations among stakeholders, developing an implementation of strategies to improve access to services, mainstream resources and developing affordable permanent housing. These goals are representative of the responses from the State survey that was facilitated by the GICH.

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	Basis for Relative Priority	It has long been argued the most effective strategy for addressing homelessness for those at imminent risk is to prevent its occurrence in the first place. This includes more systemic strategies that seek to prevent homelessness by ensuring people leaving institutions such as jails, prisons, foster care, or treatment facilities are not discharged to the streets or shelter system as well as making greater efforts to reduce domestic violence. Prevention efforts also include strategies such as one- time or short--term rent or mortgage assistance, legal assistance programs, representative payee and direct payment programs, meeting transportation needs, and housing placement services. In addition, strategies to improve educational and job skills, financial management, and a reduction in language barriers are needed. These efforts all serve to increase access to truly affordable housing which is the key to preventing homelessness in Oklahoma.
5	**Priority Need Name**	Housing Trust Fund
	Priority Level	High
	Population	Extremely Low Low Large Families Families with Children Elderly
	Geographic Areas Affected	State Geography
	Associated Goals	State National Housing Trust Fund
	Description	Housing Trust Fund
	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)

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.Â Currently two Project Sponsors administer the program with one being located in the Oklahoma City area and one

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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.Â

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 will be utilized in markets where there exists more than adequate affordable housing choices for low-income renters, but where eligible households are rent overburdened and require assistance with monthly rental payments.
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	New units of rental housing will be constructed in markets where there exists a significant number of low-income households, an insufficient stock of rental housing units, and an insufficent number units suitable for rehabilitation. New units of homeownership housing may also be produced if there is a proven market and need for the units.
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	Acquistion will almost exclusively used with rehabilitation, since the cost of acquiring housing units that already meet all of the HOME requirements is very high. However, acquisition of newly constructed housing is permitted if the acquisition cost is reasonable.

Table 52 – Influence of Market Conditions

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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 Program Descriptions / One-Year Action Plans, which are included in this Consolidated Plan.

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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	14,152,241	800,000	0	14,952,241	56,608,964	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.

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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	7,611,246	150,000	0	7,761,246	28,000,000	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.

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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	369,988	0	0	369,988	1,400,000	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.

OMB Control No: 2506-0117 (exp. 06/30/2018)

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	1,584,755	0	0	1,584,755	6,339,020	Each subrecipient is required to provide and track "dollar-for-dollar" match to spend on eligible Emergency Solution activites during the Program period.

OMB Control No: 2506-0117 (exp. 06/30/2018)

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	3,000,000	0	0	3,000,000	12,000,000	Since the HTF 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 3 million for the next 4 years.

Table 53 - 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 Program Descriptions / One-Year Action Plans, which are included in this Consolidated Plan.

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

OMB Control No: 2506-0117 (exp. 06/30/2018)

Not Applicable.

Discussion

Not Applicable.

OMB Control No: 2506-0117 (exp. 06/30/2018)

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
OKLAHOMA	Other	Economic Development Homelessness Non-homeless special needs Planning neighborhood improvements public facilities	State
OKLAHOMA HOUSING FINANCE AGENCY	Other	Ownership Public Housing Rental	State

Table 54 - 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 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.

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

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Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
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 55 - 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

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: **The State requires that each ESG sub recipient 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.**

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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 reference to the services targeted to persons with HIV, the real strength of the service deliver system is that all activities are eligible in all areas of the state. That is to say that services are not limited by area to only one activity such as rental assistance only, this allows for a more flexible program that can serve each community based upon the needs of the client in that particular community.

Emergency Solutions: 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: The State will require 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	2019	2023	Non-Housing Community Development	State of Oklahoma	State CDBG Program	CDBG: $14,152,241	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 350000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 100000 Households Assisted Jobs created/retained: 150 Jobs Other: 65000 Other

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	State HOME Program	2019	2023	Affordable Housing	State of Oklahoma	State HOME Program	HOME: $8,356,961	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
3	State HOPWA Program	2019	2023	Non-Homeless Special Needs	State of Oklahoma	State HOPWA Program	HOPWA: $327,506	Housing for People with HIV/AIDS added: 425 Household Housing Unit

OMB Control No: 2506-0117 (exp. 06/30/2018)

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	State ESG Program	2019	2023	Homeless	State of Oklahoma	State ESG Program	ESG: $1,525,140	Tenant-based rental assistance / Rapid Rehousing: 6000 Households Assisted Homeless Person Overnight Shelter: 25000 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 0 Beds Homelessness Prevention: 4500 Persons Assisted Jobs created/retained: 4000 Jobs
5	State National Housing Trust Fund	2019	2023	Affordable Housing Homeless Non-Homeless Special Needs Extremely Low Income households	State of Oklahoma	Housing Trust Fund	HTF: $3,000,000	Rental units constructed: 100 Household Housing Unit Rental units rehabilitated: 185 Household Housing Unit

Table 56 – Goals Summary

Goal Descriptions

OMB Control No: 2506-0117 (exp. 06/30/2018)

1	**Goal Name**	State CDBG Program

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	Goal Description	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): **Decent Housing.** 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. **A suitable living environment.** 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. **Expanded economic opportunity.** Applies to activities related to economic development, commercial revitalization, job creation and/or job retention. 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: **Availability/Accessibility** applies to activities that make services, infrastructure, public facilities, public services, etc available or accessible to low and moderate income persons. **Affordability** 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. **Sustainability** 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. Additionally, under the performance measurement system, specific data indicators will be collected on CDBG-Funded activities. There are four common indicators for each CDBG-funded activity to include; Funds Leveraged, Quantity of persons, households; Income levels; and Current racial/ethnic and disability categories. In addition, HUD has identified seventeen (17) other indicators to be used depending on the CDBG-funded activity and its intent. To collect the applicable indicator data and meet the HUD performance measures system requirements, the ODOC/OCD will establish a performance measurement data collection system that is directly integrated with HUD's

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		Integrated Disbursement Information System (IDIS) to include grant application forms, contracting documents, and closeout forms.
2	**Goal Name**	State HOME Program
	Goal Description	The Housing Needs section consists of two parts: the estimated housing needs projection and an assessment of racial disparities. The Comprehensive Housing Affordability Strategy (CHAS) data series provided by HUD was the primary source of data used.
3	**Goal Name**	State HOPWA Program
	Goal Description	Program goals for the state HOPWA Program are set out below: <u>Western Oklahoma</u> Short-term rent fifteen (15) households Rent and utility assistance fifteen (15) households Supportive Services fifteen (15) households <u>Eastern Oklahoma</u> Short-term rent ten (10) households Rent and utility assistance fifteen (15) households Supportive Services fifteen (15) households

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4	**Goal Name**	State ESG Program
	Goal Description	The Governor's Interagency Council on Homelessness. (GICH), collaborates with the State's eight (8) Continua toward the initiative to end homelessness. GICH members have been working to update the State's strategies to align the State work with that of the Federal Strategic Plan to End Homelessness. The GICH works closely with the State's Continua of Care to meet Oklahoma's five (5) key goals that have been revised under four (4) main categories; 1) Healthcare, 2) Transportation, 3) Employment (Education/Training) and 4) Resources. Such goals include promoting collaborations among stakeholders, developing and implementation of strategies to improve access to services, mainstream resources and developing affordable permanent housing.
5	**Goal Name**	State National Housing Trust Fund
	Goal Description	OHFA estimates serving 57 families annually with NHTF for a total of 285 families over the 5-year Consolidated Plan term.

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 6,000 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 familes per income categories. This is an annual estimate. Over the next 5 years's HOME estimates serving the following familes.

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.

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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)

Not applicable.

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

Not applicable.

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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.Ã¿Â¿Ã¿Â OHFA constantly works with municipalities and citizen interest groups to educate them as to what affordable housing is and is not.Ã¿Â¿Ã¿Â 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 StateÃ¿Â¢Ã¿Â¿Ã¿Â¿s Analysis of Impediments to Fair Housing Choice.Ã¿Â¿Ã¿Â 85 stakeholders responded to this survey.Ã¿Â¿Ã¿Â The survey did not ask about the greatest housing need, but instead asked about the StateÃ¿Â¢Ã¿Â¿Ã¿Â¿s most significant impediment to Fair Housing choice.Ã¿Â¿Ã¿Â 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 educating State Agencies and service providers of the importance of transitioning to a "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. In shifting from the current tiered system of shelters and transitional housing to a 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.

The Governor's Council on Homelessness (GICH) sent a survey to Stakeholders around the State. From the 641 responses, the largest barriers reported were 1) lack of funding; 2) lack of affordable housing; 3) lack of transportation; 4) lack of emergency shelter; 5) lack of collaboration; 6) lack of job supports and 7) lack of local needs. At the State level with the help of the GICH members, there are plans to work with the Continuum of Care members and other interested service providers to improve education and resources in all areas; especially collaboration to reduce the barriers for any homeless persons so they can find stable housing and prevent those helped from becoming homeless again.

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

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The GICH members have been diligently working with stakeholders to educate and improve processes so that no one is discharged into homelessness. The Department of Mental Health and Substance Abuse Services (ODMHSAS) is working with Pay for Success grants to improve housing resources and services for unaccompanied youth. GICH members 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 GICH 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 t hat 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 sols 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 pain 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 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

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:

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- 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

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

OMB Control No: 2506-0117 (exp. 06/30/2018)

Program Descriptions / One-Year Action Plans, which are included in this Consolidated Plan.

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	14,152,241	800,000	0	14,952,241	56,608,964	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.

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			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
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ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	1,584,755	0	0	1,584,755	6,339,020	Each subrecipient is required to provide and track "dollar-for-dollar" match to spend on eligible Emergency Solution activites during the Program period.

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HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	3,000,000	0	0	3,000,000	12,000,000	Since the HTF 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 3 million for the next 4 years.

Table 57 - 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 Program Descriptions / One-Year Action Plans, which are included in this Consolidated Plan.

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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

Not Applicable.

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	2014	2018	Non-Housing Community Development	State of Oklahoma	State CDBG Program	CDBG: $14,152,241	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 105000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 50000 Households Assisted Jobs created/retained: 30 Jobs Other: 25000 Other
2	State ESG Program	2019	2023	Homeless	State of Oklahoma	State ESG Program	ESG: $1,525,140	Tenant-based rental assistance / Rapid Rehousing: 1400 Households Assisted Homeless Person Overnight Shelter: 5000 Persons Assisted Homelessness Prevention: 900 Persons Assisted Jobs created/retained: 1150 Jobs

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	State HOME Program	2014	2018	Affordable Housing	State of Oklahoma	State HOME Program	HOME: $8,356,961	Rental units constructed: 52 Household Housing Unit Rental units rehabilitated: 41 Household Housing Unit Homeowner Housing Added: 73 Household Housing Unit Homeowner Housing Rehabilitated: 0 Household Housing Unit Direct Financial Assistance to Homebuyers: 171 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 0 Households Assisted
4	State HOPWA Program	2014	2018	Non-Homeless Special Needs	State of Oklahoma	State HOPWA Program	HOPWA: $327,506	Housing for People with HIV/AIDS added: 85 Household Housing Unit
5	State National Housing Trust Fund	2016	2016	Affordable Housing Homeless Non-Homeless Special Needs Extremely Low Income households	State of Oklahoma		HTF: $3,000,000	Rental units constructed: 30 Household Housing Unit Rental units rehabilitated: 27 Household Housing Unit

Table 58 – Goals Summary

Goal Descriptions

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1	**Goal Name**	State CDBG Program

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	Goal Description	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): **Decent Housing.** 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. **A suitable living environment.** 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. **Expanded economic opportunity.** Applies to activities related to economic development, commercial revitalization, job creation and/or job retention. 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: **Availability/Accessibility** applies to activities that make services, infrastructure, public facilities, public services, etc available or accessible to low and moderate income persons. **Affordability** 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. **Sustainability** 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. Additionally, under the performance measurement system, specific data indicators will be collected on CDBG-Funded activities. There are four common indicators for each CDBG-funded activity to include; Funds Leveraged, Quantity of persons, households; Income levels; and Current racial/ethnic and disability categories. In addition, HUD has identified seventeen (17) other indicators to be used depending on the CDBG-funded activity and its intent. To collect the applicable indicator data and meet the HUD performance measures system requirements, the ODOC/OCD will establish a performance measurement data collection system that is directly integrated with HUD's

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		Integrated Disbursement Information System (IDIS) to include grant application forms, contracting documents, and closeout forms.
2	**Goal Name**	State ESG Program
	Goal Description	Due to E-Consolidated Plan system narrative text limitations, more detailed program information is available in the Appendix of the E-Consolidated Plan.
3	**Goal Name**	State HOME Program
	Goal Description	OHFA is proposing to continue its stronger emphasis on rental activities as opposed to homeownership activities, based on the number of recent contract modifications from homeownership to rental activities, and also the results of surveys taken by OHFA and the Affordable Housing Committee. The depressed real estate market and the record number of foreclosures over the past few years have driven the demand for affordable rental housing to record levels. In 2011 the Affordable Housing Committee, formed as a partnership between the Oklahoma Housing Finance Agency (OHFA) and a variety of its partners and stakeholders, conducted a statewide survey of cities and towns, as well as non-profit and for-profit housing providers, and received nearly 140 responses. By far the most commonly cited housing problems were a lack of personal funds for housing, and a lack of affordable housing, especially rental housing. In addition, in 2011 OHFA conducted a separate statewide survey for an update to the State's Analysis of Impediments to Fair Housing Choice. 165 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.
4	**Goal Name**	State HOPWA Program
	Goal Description	Due to E-Consolidated Plan system narrative text limitations, more detailed program information is available in the Appendix of the E-Consolidated Plan.

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5	**Goal Name**	State National Housing Trust Fund
	Goal Description	Due to E-Consolidated Plan system narrative text limitaitons, more detailed program information is available in the Appendix of the E-Consolidated Plan.

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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 Program (%)	State National Housing Trust Fund (%)	Total (%)
CDBG	80	0	0	0	0	**80**
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 59 – 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

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

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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 provde 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 60 - 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

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	Describe the state program addressed by the Method of Distribution.	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provde 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/
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provde 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/

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	If only summary criteria were described, how can potential applicants access application manuals or other **state publications describing the application criteria? (CDBG only)**	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State CDBG program Action Plan can only provde summary information in this 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 mutlple 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: http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/
	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)**	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 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: http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/

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	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	HOPWA funds are distributed statewide through an Invitation to Bid process. This process is open to or accessible to grassroots faith-based and other community organizations. Proposals are selected based upon inventiveness, community support, and must contain evidence of cooperation and collaboration with a network of public and private agencies. A detailed HOPWA Action Plan has been uploaded in the appendix of this HUD E-Consolidated Plan. The HOPWA action plan can also be viewed on the Oklahoma Department of Commerce website at: http:okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/
	Describe how resources will be allocated among funding categories.	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provde 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/

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	Describe threshold factors and grant size limits.	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provde 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/
	What are the outcome measures expected as a result of the method of distribution?	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provde 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/
2	**State Program Name:**	State of Oklahoma Non-Entitlement Program (CDBG, ESG, HOME, HOPWA, HTF)
	Funding Sources:	CDBG HOPWA HOME ESG HTF

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	Describe the state program addressed by the Method of Distribution.	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provde 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/
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provde 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/

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	If only summary criteria were described, how can potential applicants access application manuals or other **state publications describing the application criteria? (CDBG only)**	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State CDBG program Action Plan can only provde summary information in this 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 mutlple 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: http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/
	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)**	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 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: http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/

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	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	HOPWA funds are distributed statewide through an Invitation to Bid process. This process is open to or accessible to grassroots faith-based and other community organizations. Proposals are selected based upon inventiveness, community support, and must contain evidence of cooperation and collaboration with a network of public and private agencies. A detailed HOPWA Action Plan has been uploaded in the appendix of this HUD E-Consolidated Plan. The HOPWA action plan can also be viewed on the Oklahoma Department of Commerce website at: http:okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/
	Describe how resources will be allocated among funding categories.	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provde 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/

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	Describe threshold factors and grant size limits.	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provde 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/
	What are the outcome measures expected as a result of the method of distribution?	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provde 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/
3	**State Program Name:**	State of Oklahoma Non-Entitlement Program (CDBG, ESG, HOME, HOPWA, HTF)
	Funding Sources:	CDBG HOPWA HOME ESG HTF

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	Describe the state program addressed by the Method of Distribution.	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provde 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/
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provde 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/

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	If only summary criteria were described, how can potential applicants access application manuals or other **state publications describing the application criteria? (CDBG only)**	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State CDBG program Action Plan can only provde summary information in this 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 mutlple 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: http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/
	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)**	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 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: http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/

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	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	HOPWA funds are distributed statewide through an Invitation to Bid process. This process is open to or accessible to grassroots faith-based and other community organizations. Proposals are selected based upon inventiveness, community support, and must contain evidence of cooperation and collaboration with a network of public and private agencies. A detailed HOPWA Action Plan has been uploaded in the appendix of this HUD E-Consolidated Plan. The HOPWA action plan can also be viewed on the Oklahoma Department of Commerce website at: http:okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/
	Describe how resources will be allocated among funding categories.	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provde 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/

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	Describe threshold factors and grant size limits.	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provde 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/
	What are the outcome measures expected as a result of the method of distribution?	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provde 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/
4	**State Program Name:**	State of Oklahoma Non-Entitlement Program (CDBG, ESG, HOME, HOPWA, HTF)
	Funding Sources:	CDBG HOPWA HOME ESG HTF

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	Describe the state program addressed by the Method of Distribution.	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provde 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/
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provde 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/

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	If only summary criteria were described, how can potential applicants access application manuals or other **state publications describing the application criteria? (CDBG only)**	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State CDBG program Action Plan can only provde summary information in this 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 mutlple 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: http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/
	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)**	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 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: http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/

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	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	HOPWA funds are distributed statewide through an Invitation to Bid process. This process is open to or accessible to grassroots faith-based and other community organizations. Proposals are selected based upon inventiveness, community support, and must contain evidence of cooperation and collaboration with a network of public and private agencies. A detailed HOPWA Action Plan has been uploaded in the appendix of this HUD E-Consolidated Plan. The HOPWA action plan can also be viewed on the Oklahoma Department of Commerce website at: http:okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/
	Describe how resources will be allocated among funding categories.	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provde 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/

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	Describe threshold factors and grant size limits.	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provde 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/
	What are the outcome measures expected as a result of the method of distribution?	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provde 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/
5	**State Program Name:**	State of Oklahoma Non-Entitlement Program (CDBG, ESG, HOME, HOPWA, HTF)
	Funding Sources:	CDBG HOPWA HOME ESG HTF

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	Describe the state program addressed by the Method of Distribution.	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provde 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/
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provde 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/

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	If only summary criteria were described, how can potential applicants access application manuals or other **state publications describing the application criteria? (CDBG only)**	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State CDBG program Action Plan can only provde summary information in this 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 mutlple 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: http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/
	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)**	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 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: http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/

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	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	HOPWA funds are distributed statewide through an Invitation to Bid process. This process is open to or accessible to grassroots faith-based and other community organizations. Proposals are selected based upon inventiveness, community support, and must contain evidence of cooperation and collaboration with a network of public and private agencies. A detailed HOPWA Action Plan has been uploaded in the appendix of this HUD E-Consolidated Plan. The HOPWA action plan can also be viewed on the Oklahoma Department of Commerce website at: http:okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/
	Describe how resources will be allocated among funding categories.	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provde 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/

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	Describe threshold factors and grant size limits.	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provde 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/
	What are the outcome measures expected as a result of the method of distribution?	Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provde 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/

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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. CDBG DR program information is posted at the Oklahoma Department of Commerce's website found at: http://okcommerce.gov/ A link is provided at the top of the Commerce webpage labled as CDBG Disaster Recovery.

#	Project Name

Table 61 – 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.

AP-38 Project Summary

Project Summary Information

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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

NA

Acceptance process of applications

NA

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 **$150,000** grant maximum. Only one (1) project can be undertaken.

Communities have the ability to make a high impact through revitalization. Often, communities have several areas of interest to enhance. 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, provide for fire protection, housing rehabilitation, street improvements or other types of projects that allow communities to remain viable and improve the quality of life. The Community Revitalization project is a positive experience for communities, and would hope to spark a sense of pride in citizens to further assist sustainable growth in rural Oklahoma.

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.

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

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 selection of the CDBG projects is a competitive process with the exception of the Small Cities Set-Aside. ODOC set aside funds for communities with populations between 15,000 and 50,000 and that are not currently HUD designated entitlement communities or a participant in the CDBG Urban County Designation for Tulsa County. There are currently eighteen (18) eligible entities for the small cities set aside comprised of Ada, Altus, Ardmore, Bartlesville, Bethany, Chickasha, Claremore, Del City, Duncan, Durant, El Reno, McAlester, Muskogee, Mustang, Ponca City, Stillwater, Tahlequah, and Yukon.

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.

The HOME program funds projects on a continuous application process from all parts of the State, with the exception of the HUD-designated metropolitan Participating Jurisdictions of Oklahoma City, Tulsa, Lawton and Norman, which receive a direct annual allocation of HOME funds. Applicants must pass all threshold criteria and evaluation factors, including but not limited to project readiness, leverage, staff capacity, and prior contractor performance in the use of HOME program funds.

HOPWA provides funding to eligible applicants ranked by a review committee. Analysis of epidemiological data has been utilized to determine an equitable distribution of Funds. Western Oklahoma will be eligible to receive approximately 61% of the available funds; Eastern Oklahoma will be eligible to receive the remaining 39%. These funds will be awarded through a competitive Invitation to Bid (ITB) process to one or more applicants judged as the most capable of meeting the plan objectives.

HTF provides funding through a competitive application process. Funds are available in all areas of the State. Applicants must pass all threshold criteria and evaluation factors, including but not limited to

project readiness, leverage, and staff capacity

Geographic Distribution

Target Area	Percentage of Funds
State of Oklahoma	100

Table 62 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

As identified earlier, 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.

Discussion

As identified earlier, 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, HTF or HOPWA programs.

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 63 - 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 64 - 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 acquistion 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 Okahoma.

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 Main stream 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 Main

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stream 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

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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:

It should be mentioned that 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.

Actions planned to address obstacles to meeting underserved needs

The primary obstacle to meeting under-served needs is the lack of adequate funding. There are also some secondary obstacles with regard to the State's ability to coordinate resources in the most efficient and effective manner.

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.

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 pain requirements for HUD-assisted housing. Also in our HOME Implementation Manual we have a dedicated section to LBP. The Implementation Manual is availalbe online at www.ohfa.org. During HOME and HTF monitoring visits,

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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 chose 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

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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 ÂÂÂ¿ including several Federal and State agencies, as well as private business and nonprofit entities ÂÂÂ¿ share the desire and responsibility for appropriate community development.

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

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.

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	800,000
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:	**800,000**

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:

   The State of Oklahoma will not use HOME funds for any form of investment not identified in Section

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92.205.

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.

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.

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 still working on their Coordinated Assessment system. Cleveland County, Oklahoma City and Tulsa County have their own systems in place. The Rural Continua are considering how to use the State's 2-1-1 system in developing their coordinated assessment systems.

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 were 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 contarct period. During the time of the monitoring, the subrecipient is evaluated by comparing actual accomplishments with those projected in the approved application. An Agency Status Scales questionnaire is also completed to evaluate the strength of the organization. This evaluation along with the completed monitoring report will be forwarded to the CoC Governing Board 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”.

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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 Consolicated 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 selection criteria are included HTF Application Instructions which is included in this Consolicated 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 thorough and 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; and Capital Needs Assessments (if applicable).

Due to complexity and textbox limitations, rehabilitation standards are included HTF Application Instructions which is included in this Consolicated 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, Resale or Recapture Guidelines are included HTF Application Instructions which is included in this Consolicated 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 has determined its own affordable homeownership limits using the methodology described in § 93.305(a)(2) and the limits are attached.

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** 2017 Caper
	List the name of the organization or individual who originated the data set.
	Provide a brief summary of the data set.
	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.
	Briefly describe the methodology for the data collection.

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	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.
3	**Data Source Name** CHAS DATA - June 25, 2018 - www.huduser.gov
	List the name of the organization or individual who originated the data set. 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.
	Provide a brief summary of the data set. On June 25, 2018 HUD released updated CHAS data for the 2011-2015 period. **About the CHAS** 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.
	What was the purpose for developing this data set? "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.
	Provide the year (and optionally month, or month and day) for when the data was collected. 2011 - 2015 ACS
	Briefly describe the methodology for the data collection. "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.

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	Describe the total population from which the sample was taken. State of Oklahoma
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed. "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.

Appendices

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- App A: CDBG Action Plan

- App B: ESG Action Plan

- App C: HOME Action Plan

- App D: HOPWA Action Plan

- App E: HTF Action Plan

- App F: Broadband Initiative

- App G: Climate Change Impact

- App H: Impediments to Fair Housing / Affirmatively Furthering Fair Housing

Appendix A

Section Contents…

- CDBG Action Plan

Oklahoma Department of Commerce

Community Development Block Grant (CDBG)

FY 2019

State CDBG Action Plan

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INTRODUCTION

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

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

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

All community activities funded by CDBG must meet one of the broad, federally mandated National Objectives. These are:

1. Benefit to low and moderate income persons;

2. Aid in the prevention or elimination of slums or blight; or

3. Community Development needs having a particular urgency, posing a serious and immediate threat to the health or welfare of a community.

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

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

ELIGIBLE APPLICANT

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

City of Bixby	City of Jenks	Town of Skiatook

City of Broken Arrow
City of Collinsville
City of Glenpool
City of Owasso
City of Sand Springs
City of Sapulpa
Town of Sperry
Unincorporated Tulsa County

GRANT ALLOCATION

Funding for the Fiscal Year 2019 CDBG Program:

Allocation:	$14,152,241
Less State administrative allowance:	$383,044
Less State technical assistance:	$141,522
Total available for distribution:	$13,627,675

CDBG Set-Aside Funding Distribution:

Public Facility and Improvements		$11,187,675
Water and Wastewater Engineering	$2,200,000	
Water and Wastewater Construction	$4,617,675	
Community Revitalization	$1,500,000	
CDBG-REAP	$1,500,000	
Small Cities	$1,370,000	
Planning		
Capital Improvement Planning (CIP)		$440,000
Economic Development		
Economic Development Infrastructure Financing (EDIF)		$2,000,000

Program Income from the State's Economic Development Revolving Loan Fund shall be used to fund Economic Development Infrastructure Financing (EDIF) activities as described in this Plan. The ***estimated*** amount of program income made available during the program year will be $800,000. This amount will be used in addition to the $2,000,000 of regular CDBG funding allocated to this year's CDBG EDIF set-aside.

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

GUIDELINES FOR SET-ASIDES

Audit Requirements

To be eligible to apply for funds in any category, units of general local government must demonstrate the ability to manage federal funds utilizing generally accepted principles of accounting. TOWNS AND CITIES (COUNTIES ARE EXEMPT) MUST SUBMIT A COPY OF THEIR AUDIT OR THE AGREED UPON PROCEDURES BY THE APPLICATION DEADLINE. ALL TOWNS AND CITIES THAT HAVE A JUNE 30, FISCAL YEAR END DATE ARE REQUIRED TO SUBMIT A COPY OF THEIR FY 2018 AUDIT AND TOWNS AND CITIES THAT HAVE A DECEMBER 31, FISCAL YEAR END DATE ARE REQUIRED, AS A MINIMUM, TO SUBMIT A COPY OF THEIR FY 2017 AUDIT. NO APPLICATION WILL BE CONSIDERED FOR REVIEW OR FUNDING THAT DOES NOT MEET THE REQUIREMENTS STATED ABOVE.

If the city or town receives less than $25,000 in annual revenues from its normal business and does not have an audit or agreed upon procedure, the city or town cannot apply directly to ODOC/CD. The city or town can apply only by having the local County apply on their behalf, if the County chooses to do so. Nothing contained herein mandates a county to act as an accommodating party.

Application Submission Requirements

1. City/Town and County (Direct Jurisdiction) Applicants: **City/Towns and Counties receiving a direct jurisdictional benefit may submit only one (1) grant application per CDBG Program Year** selecting from CDBG Water/Wastewater Engineering, Water/Wastewater Construction, Community Revitalization, or Rural Economic Action Plan (REAP). A City/Town and County (Direct Jurisdiction) cannot submit a CDBG application if it currently has an open CDBG grant. **Exclusions:** Economic Development Infrastructure Financing (EDIF), Capital Improvement Planning (CIP). Typical County direct jurisdiction CDBG application projects are roads, bridges, County hospital, etc.

2. County Sponsored Applicants: Counties acting in a “sponsorship” capacity may submit a maximum of one sponsored CDBG grant application per CDBG Program Year selecting from Water/Wastewater Engineering, Water/Wastewater Construction, Community Revitalization, or Rural Economic Action Plan (REAP). **Limitation: Counties may ONLY have one (1) open sponsored CDBG grant and still make another sponsored CDBG application. Counties cannot exceed a maximum number of two open sponsored CDBG grants open at any given time**. **Exclusions:** Economic Development Infrastructure Financing (EDIF), Capital Improvement Planning (CIP). Counties may sponsor applications where they do not have direct jurisdiction over certain public functions. Generally, these are communities with less than $25,000 in revenue, Rural Water Districts, and Rural Fire Districts.

CDBG Project Eligibility Policy

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

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

a. The prospective applicant will be required to submit a project/activity narrative regarding the requested activity. This will be required by HUD to conduct their review and make a determination. It is the responsibility of the prospective applicant to provide the narrative. The submission of the narrative to ODOC/CD will be seen by as the formal request to seek a final determination from HUD.

b. Once a detailed project narrative is received by ODOC/CD, it will be submitted to the Oklahoma City HUD office for a final eligibility determination.

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

NON-COMPETITIVE WATER & WASTEWATER PHASE II CONSTRUCTION

The recipients below were funded under the FY 2018 CDBG Phase I Engineering Program. Each award recipient must achieve Release of Funds and their construction permit before entering into the construction phase (Phase II) of the project. Once a recipient secures Release of Funds and a construction permit, the remainder of their funding for construction will be provided, assuming future CDBG funds are provided and the U.S. Department of Housing and Urban Development approves the program.

If the project fails to materialize, the Applicant may be subject to contract de-obligation and reimbursing ODOC for any Phase I project costs expended. Extensions to the contract deadline will be considered ONLY under special circumstances with the verification and concurrence of the Oklahoma Department of Environmental Quality (ODEQ).

AWARDS TO BE MADE

1. Barnsdall, City of
2. Braggs, Town of
3. Carney, Town of
4. Keota, Town of
5. McCurtain, Town of
6. Mountain Park, Town of
7. Oaks, Town of
8. Shidler, City of
9. Tishomingo, City of

WATER & WASTEWATER ENGINEERING

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

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

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

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

A. Year One – The subgrantee will be required to successfully complete project engineering and achieve Release of Funds within one (1) year. ODOC/CD will carefully monitor project activity and subsequent progress. Allowable engineering costs will be based on the U.S. Department of Agriculture Rural Development (USDA-RD) sliding scale. Once the Oklahoma Department of Environmental Quality (ODEQ) permit and Oklahoma Department of Commerce/Community Development (ODOC/CD) Release of Funds requirements are complete (regardless of the source of funds), the subgrantee will be able to proceed with project construction.

(a) If the above deliverables are not met, the contract will be subject to de-obligation by ODOC/CD.

(b) As part of ODOC/CD's monitoring and evaluation of the project's engineering progress, the subgrantee must submit all required documentation to the ODOC/CD monitor in a timely manner. Failure to submit any or all required documentation will result in contract de-obligation.

(c) Should the contract be de-obligated, any expended CDBG funds will be required to be reimbursed by the subgrantee. The contract will remain open until repayment is made during which time the subgrantee will not be eligible to apply for additional CDBG funding.

(d) An ODOC/CD review committee will determine de-obligation of the CDBG funding if the project's engineering has NOT been satisfactorily completed and Release of Funds has NOT been obtained. This review committee will be composed of ODOC/CD staff to include: CDBG Planners, the Director of Programs (Planning & Monitoring), Deputy Division Director, and Division Director.

(e) If a subgrantee is de-obligated "in good standing" without any CDBG funds expended, or has made the proper CDBG repayment as deemed necessary, the subgrantee could close the contract and reapply during the next year's application cycle.

B. Years' Two & Three – Project construction will be allowed for a period of two (2) years plus any time left available should the engineering and Release of Funds be accomplished before the one (1) year engineering limit is reached.

The grant maximum for the CDBG Water/Wastewater Engineering application is **$450,000**. The maximum amount of CDBG Water/Wastewater Engineering funds that may be used for project administration is eight percent (8%) of the total CDBG Water/Wastewater Engineering funds awarded for total construction and professional/non-construction funds provided. **All CDBG Water/Wastewater Engineering applications must be received no later than May 1, 2019.** Applications received after this date will NOT be considered for funding.

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

THRESHOLD REQUIREMENTS FOR CDBG WATER & WASTEWATER ENGINEERING

1. Requests for funds must address at least one or more of the Primary National Objectives of the CDBG Water/Wastewater Engineering program:

   (a) Provide a direct benefit (fifty-one percent [51%] or more) principally for persons of low income;

   (b) Aid in the prevention or elimination of slums or blight; and

   (c) Address a particular urgent need posing a serious and immediate threat to the health or welfare of a community.

2. Cities, Towns and Counties with previous CDBG funding must have close-out documents submitted by January 31, 2019.

   (a) City/Town and County (Direct Jurisdiction) Applicants: **City/Towns and Counties receiving a direct jurisdictional benefit may submit only one (1) grant application per CDBG Program Year** selecting from CDBG Water/Wastewater Engineering, CDBG Water/Wastewater Construction, CDBG Community Revitalization, or CDBG Rural Economic

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

(b) County Sponsored Applicants: Counties acting in a "sponsorship" capacity may submit a maximum of one sponsored CDBG grant application per CDBG Program Year selecting from Water/Wastewater Engineering, Water/Wastewater Construction, Community Revitalization, or Rural Economic Action Plan (REAP). **Limitation: Counties may ONLY have one (1) open sponsored CDBG grant and still make another sponsored CDBG application. Counties cannot exceed a maximum number of two open sponsored CDBG grants open at any given time**. **Exclusions:** Economic Development Infrastructure Financing (EDIF), Capital Improvement Planning (CIP). Counties may sponsor applications where they do not have direct jurisdiction over certain public functions. Generally, these are communities with less than $25,000 in revenue, Rural Water Districts, and Rural Fire Districts.

3. Per the design and intent of the State's CDBG Water/Wastewater Engineering Program, the following application specific limitations or restrictions are in place.

   (a) Applicants can apply for up to a $450,000 grant maximum.

   (b) Applicants may not apply for more than one (1) project activity per application under this CDBG Water/Wastewater Engineering set-aside.

   (c) A CDBG Water/Wastewater Engineering application must contain an engineering component regardless of whether CDBG or leveraged funds are being committed as payment. This is documented through the submission of the required Preliminary Engineering Report at the time of application submission.

   (d) The CDBG Water/Wastewater Engineering application pursuant with 24 CFR §570.207 will not fund equipment only requests. The purchase of equipment under CDBG is generally ineligible except under very limited conditions as outlined in 24 CFR §570.207. Requests such as water meters must be encompassed by a broader type of water/wastewater project. Applicants are encouraged to review the entire regulation and should immediately consult ODOC should there questions as to the eligibility of their prospective project funding request.

4. A proper sponsor for CDBG Water/Wastewater Engineering projects is defined as a Unit of Local government with direct jurisdiction over the majority (60%) of the proposed project beneficiaries.

5. Proof that citizen participation requirements have been met, as evidenced by an application phase public hearing and written Citizen Participation Plan.

6. All cost estimates shall be obtained from professional sources, and submitted with the application. These estimates must be certified and from professional engineers, architects, construction companies, vendors, or appropriate personnel with experience to make such estimates.

7. The CDBG Water/Wastewater Engineering grant request cannot exceed $2,000 per beneficiary.

8. TOWNS AND CITIES (COUNTIES ARE EXEMPT) MUST SUBMIT A COPY OF THEIR AUDIT OR THE AGREED UPON PROCEDURES BY THE APPLICATION DEADLINE. ALL TOWNS AND CITIES THAT HAVE A JUNE 30, FISCAL YEAR END DATE ARE REQUIRED TO SUBMIT A COPY OF THEIR FY 2018 AUDIT AND TOWNS AND CITIES THAT HAVE A DECEMBER 31, FISCAL YEAR END DATE ARE REQUIRED, AS A MINIMUM, TO SUBMIT A COPY OF THEIR FY 2017 AUDIT. NO APPLICATION WILL BE CONSIDERED FOR REVIEW OR FUNDING THAT DOES NOT MEET THE REQUIREMENTS STATED ABOVE.

   If a city or town receives less than $25,000 in annual revenues from its normal business and does not have an audit or agreed upon procedures, the city or town cannot apply directly to ODOC/CD. The city or town can apply only by having the local County apply on their behalf, if the County chooses to do so. Nothing contained herein mandates a County to act as an accommodating party.

9. Applicants are responsible for accomplishing online application corrections/revisions along with any applicable application upload corrections/revisions as directed by ODOC/CD staff within the pre-determined deadline. In fairness to other applicants and in order to maintain HUD required ODOC/CD's CDBG funding expenditure rates; ODOC/CD can NOT indefinitely hold applications until the respective application corrections/revisions are accomplished. Applications will be considered INCOMPLETE if the prescribed corrections/revisions are not made to the application within the pre-determined deadline established by ODOC/CD. This will result in a **FAILED** threshold application rating.

10. The Application Guidelines associated with this CDBG Water/Wastewater Engineering set-aside contains an APPLICATION FORMS CHECKLIST outlining all application related documentation required to be uploaded into the online OKGrants application. It is the applicant's responsibility to follow this checklist and seek additional guidance from ODOC/CD staff as required. Applicants will be responsible for following and providing each item listed on the checklist. **Failure to provide any of the required application documentation listed on the checklist will result in a FAILED application rating.** Additionally, applicants must provide a response to all application questions and satisfy all documentation requirements delineated in the CDBG Water/Wastewater Engineering Application Guidelines and online OKGrants Application System including, but not limited to: Resolution, income survey results, resolution requesting assistance, survey maps, certifications, Section 102 Disclosures, project budget, etc.

RATING CRITERIA FOR WATER & WASTEWATER ENGINEERING

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

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

LMI%	Points	#of LMI Persons	Points
51-55	1	0-250	1
56-60	2	251-500	2
61-65	3	501-750	3
66-70	4	751-1,000	4
71-75	5	Over 1,000	5
76-80	6		

81-85	7
86-90	8
91-95	9
96-100	10

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

   Projects will be rated on the verification of the level of seriousness associated with documented health, safety, and welfare hazards.

   Water and wastewater health, safety, and welfare deficiencies may be documented in one of two ways: (1) through the presence of a legal enforceable order issued by Oklahoma Department of Environmental Quality (ODEQ) or the U.S. Environmental Protection Agency (EPA), or (2) by written confirmation of a "hazard" from ODEQ that specifically states the cause and extent of the water or wastewater, health, safety, and welfare deficiency. Water and Wastewater category health, safety, and welfare hazards will be validated and analyzed by ODOC/CD through ODEQ. Additionally, ODEQ will determine the level of severity associated with legal enforceable orders or documented hazards and will assist in determining whether a proposed project's activities directly address the identified system deficiencies.

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

Legal Enforceable Orders	
Low Severity	5.0 points
Medium Severity	7.5 points
High Severity	10.0 points

Documented Hazards	
Invalid	0 points
Low Severity	2.5 points
Medium Severity	5.0 points
High Severity	7.5 points

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

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

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

Project proposals will earn points based on the first 5,000 gallons of their most current associated water rate structure. Water rate structures that favor both strong fiscal management and conservation awareness will be analyzed and awarded points by using portions of the Oklahoma "Water Resources Board's Grant Priority Point Evaluation Policy". Points will be awarded based on the following table:

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

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

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

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

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

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

Table #1 For Systems Providing Water Service Only:

Cost Per 5,000 Gallons	Points
$35 or greater	7
$30 to $34.99	6
$25 to $29.99	5
$23 to $24.99	4
$21 to $22.99	3
$19 to $20.99	2
$18 to $18.99	1
Less than $18	0

Table #2 For Systems Providing Wastewater Service Only:

Cost Per 5,000 Gallons	Points
$28 or greater	7
$26 to $27.99	6
$24 to $25.99	5
$22 to $23.99	4
$20 to $21.99	3
$18 to $19.99	2
$16 to $17.99	1

Less than $16	0

Table #3 For Systems Providing Water and Wastewater Services:

Cost Per 5,000 Gallons	Points
$45 or greater	7
$41 to $44.99	6
$37 to $40.99	5
$34 to $36.99	4
$32 to $33.99	3
$31 to $31.99	2
$30 to $30.99	1
Less than $30	0

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

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

FP=AR(0.1102)
(12) (c)
FP = Estimate of amount of rates to be raised to finance project through loan
AR = Amount Requested
0.1102 = Annual rate factor for a 25 year loan at 10%
12 = Number of months per year
c = Number of Customers

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

6. **Grant Request Amount (0 - 10 points)**

Due to the limited amount of funds, ODOC/CD encourages the smallest grant possible.

Grant Request	Points
$159,999 or Less	10
$160,000 to $169,999	9
$170,000 to $179,999	8
$180,000 to $199,999	7
$200,000 to $224,999	6
$225,000 to $249,999	5

$250,000 to $274,999	4
$275,000 to $299,999	3
$300,000 to $324,999	2
$325,000 to $399,999	1
$400,000 to $450,000	0

WATER & WASTEWATER CONSTRUCTION

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

CDBG funds may only be utilized for construction, inspection, and administration. The grant maximum for single applicants is **$450,000.** All projects shall be single purpose, either water or wastewater that will focus on some of the most serious problems in the state. **The deadline for application submission is May 1, 2019.**

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

THRESHOLD REQUIREMENTS FOR WATER & WASTEWATER CONSTRUCTION

1. Requests for funds must address at least one or more of the Primary National Objectives of the CDBG Water/Wastewater Construction program:

   (a) Provide a direct benefit (fifty-one percent [51%] or more) principally for persons of low income;

   (b) Aid in the prevention or elimination of slums or blight; and

   (c) Address a particular urgent need posing a serious and immediate threat to the health or welfare of a community.

2. Cities, Towns and Counties with previous CDBG funding must have close-out documents submitted by January 31, 2019.

   (a) City/Town and County (Direct Jurisdiction) Applicants: **City/Towns and Counties receiving a direct jurisdictional benefit may submit only one (1) grant application per CDBG Program Year** selecting from CDBG Water/Wastewater Engineering, CDBG Water/Wastewater Construction, CDBG Community Revitalization, or CDBG Rural Economic Action Plan (REAP). A City/Town and County (Direct Jurisdiction) cannot submit a CDBG application if it currently has an open CDBG grant. **Exclusions:** Economic Development Infrastructure Financing (EDIF), Capital Improvement Planning (CIP). Typical County direct jurisdiction CDBG application projects are roads, bridges, County hospital, etc.

   (b) County Sponsored Applicants: Counties acting in a “sponsorship” capacity may submit a maximum of one sponsored CDBG grant application per CDBG Program Year selecting from Water/Wastewater Engineering, Water/Wastewater Construction, Community Revitalization, or Rural Economic Action Plan (REAP). **Limitation: Counties may ONLY have one (1) open sponsored CDBG grant and still make another sponsored CDBG application. Counties**

cannot exceed a maximum number of two open sponsored CDBG grants open at any given time. **Exclusions:** Economic Development Infrastructure Financing (EDIF), Capital Improvement Planning (CIP). Counties may sponsor applications where they do not have direct jurisdiction over certain public functions. Generally, these are communities with less than $25,000 in revenue, Rural Water Districts, and Rural Fire Districts.

3. Applicants can apply for up to a $450,000 grant maximum. Applicants may not apply for more than one (1) project activity per application under CDBG Water/Wastewater Construction set-aside.

4. A proper sponsor of CDBG water and wastewater projects is defined as a unit of local government with direct jurisdiction over the majority (60%) of the proposed project beneficiaries.

5. Proof that citizen participation requirements have been met, as evidenced by an application phase public hearing and written Citizen Participation Plan. Each unit of local government benefiting from a consolidation project must meet Citizen Participation Requirements.

6. All cost estimates must be derived from professional sources and submitted with the application. CDBG Water or wastewater projects must have a certified cost estimate from a professional engineer licensed to do business in the State of Oklahoma.

7. Grant request cannot exceed $2,000 per beneficiary for all projects, except in the case of new housing development.

8. Applicant must provide a response to all application questions and satisfy all documentation requirements delineated in the CDBG Water and Wastewater Construction Guidelines and application package including but not limited to: Resolution, Income Survey Results, Survey Maps, Certifications, Section 102 Disclosure, Project Budget, etc.

9. TOWNS AND CITIES (COUNTIES ARE EXEMPT) MUST SUBMIT A COPY OF THEIR AUDIT OR THE AGREED UPON PROCEDURES BY THE APPLICATION DEADLINE. ALL TOWNS AND CITIES THAT HAVE A JUNE 30, FISCAL YEAR END DATE ARE REQUIRED TO SUBMIT A COPY OF THEIR FY 2018 AUDIT AND TOWNS AND CITIES THAT HAVE A DECEMBER 31, FISCAL YEAR END DATE ARE REQUIRED, AS A MINIMUM, TO SUBMIT A COPY OF THEIR FY 2017 AUDIT. NO APPLICATION WILL BE CONSIDERED FOR REVIEW OR FUNDING THAT DOES NOT MEET THE REQUIREMENTS STATED ABOVE.

   If a city or town receives less than $25,000 in annual revenues from its normal business and does not have an audit or agreed upon procedures, the city or town cannot apply directly to ODOC/CD. The city or town can apply only by having the local County apply on their behalf, if the County chooses to do so. Nothing contained herein mandates a County to act as an accommodating party.

10. Applicants must provide documentation that Final Plans and Specifications have been provided to Oklahoma Department of Environmental Quality (ODEQ) or a Construction Permit has been issued by ODEQ, prior to the Application deadline. If an ODEQ Permit is not required, Applicants must provide documentation from ODEQ stating an ODEQ Permit is Not Requried. If applicant has been issued a Construction Permit and that Construction Permit is

greater than one year old, a Construction Permit Extension from ODEQ is required and must be Uploaded to OKGrants with the application submittal before the permit will be accepted.

11. Applicants are responsible for accomplishing online application correction/revisions along with any applicable application upload corrections/revisions as directed by ODOC staff within the pre-determined deadline. In fairness to other applicants and in order to maintain HUD required CDBG funding expenditure rates; ODOC can NOT indefinitely hold applications until the respective application corrections/revisions are accomplished. Applications will be considered INCOMPLETE if the prescribed corrections/revisions are not made to the application within the pre-determined deadline established by ODOC. This will result in a **FAILED** threshold application rating.

12. The Application Guidelines associated with the CDBG W-WW Construction set-aside contains an APPLICATION FORMS CHECKLIST outlining all application related documentation required to be uploaded into the online OKGrants application. It is the Applicant's responsibility to follow this checklist and seek additional guidance from ODOC staff as required. Applicants will be responsible for following and providing each item listed on the checklist. Failure to provide any of the required application documentation listed on the checklist will result in a FAILED application rating. Additionally, Applicants must provide a response to all application questions and satisfy all documentation requirements delineatd in the Application Guidelines and online OKGrants Application System including, but not limited to: Resolution, Income Survey Results; Survey Maps; Certifications; Section 102 Disclosure; Project Budget; etc.

RATING CRITERIA FOR WATER & WASTEWATER CONSTRUCTION

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

1. **Project Benefit to Low to Moderate Income Persons (0 - 10 points).**

   Projects awarded under these criteria will be awarded 0-5 points for percentage of LMI, and 0-5 points for total number of LMI.

LMI%	Points	#of LMI Persons	Points
51-60	1	0-250	1
61-70	2	251-500	2
71-80	3	501-750	3
81-90	4	751-1,000	4
91-100	5	Over 1,000	5

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

   Projects will be rated on the verification of the level of seriousness associated with documented health, safety, and welfare hazards.

   Water and wastewater health, safety, and welfare deficiencies may be documented in one of two ways: (1) through the presence of a legal enforceable order issued by Oklahoma Department of Environmental Quality (ODEQ) or the U.S. Environmental Protection Agency (EPA), or (2) by written confirmation of a "hazard" from ODEQ or the local ODEQ

representative that specifically states the cause and extent of the water or wastewater, health, safety, and welfare deficiency. Water and Wastewater category health, safety, and welfare hazards will be validated and analyzed by ODOC/CD through ODEQ. Additionally, ODEQ will determine the level of severity associated with legal enforceable orders or documented hazards and will assist in determining whether a proposed project's activities directly address the identified system deficiencies.

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

Legal Enforceable Orders	
Low Severity	5.0 points
Medium Severity	7.5 points
High Severity	10.0 points

Documented Hazards	
Invalid	0 points
Low Severity	2.5 points
Medium Severity	5.0 points
High Severity	7.5 points

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

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

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

3. ***Residential Water and Wastewater Rates and Water Rate Structures***
(-3 to +3 points)

Water project proposals will earn points based on the first 5,000 gallons of the most current water rate structure and the subsequent revenue generating capacities where wastewater service is provided in conjunction with water service. Water rate structures that favor both strong fiscal management and conservation awareness will be analyzed and awarded points by using portions of the Oklahoma "Water Resources Boards' Emergency Grant Priority Point System." *Only proposals for water related system improvements* will receive points for the residential water rate structure based on the following table:

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

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

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

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

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

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

Table #1 For Systems Providing Water Service Only:

Cost Per 5,000 Gallons	Points
$35 or greater	7
$30 to $34.99	6
$25 to $29.99	5
$23 to $24.99	4
$21 to $22.99	3
$19 to $20.99	2
$18 to $18.99	1
Less than $18	0

Table #2 For Systems Providing Water and Wastewater Services:

Cost Per 5,000 Gallons	Points
$45 or greater	7
$41 to $44.99	6
$37 to $40.99	5
$34 to $36.99	4
$32 to $33.99	3
$31 to $31.99	2
$30 to $30.99	1
Less than $30	0

Table #3 For Systems Providing Wastewater Service Only:

Cost Per 5,000 Gallons	Points
$28 or greater	7
$26 to $27.99	6
$24 to $25.99	5
$22 to $23.99	4
$20 to $21.99	3
$18 to $19.99	2
$16 to $17.99	1
Less than $16	0

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

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

FP=AR(0.1102)
(12) (c)
FP = Estimate of amount of rates to be raised to finance project through loan
AR = Amount Requested
0.1102 = Annual rate factor for a 25 year loan at 10%
12 = Number of months per year
c = Number of Customers

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

6. **Grant Request Amount (0 - 10 points)**

Due to the limited amount of funds, ODOC/CD encourages the smallest grant possible.

Grant Request	Points
$159,999 or Less	10
$160,000 to $169,999	9
$170,000 to $179,999	8
$180,000 to $199,999	7
$200,000 to $224,999	6
$225,000 to $249,999	5
$250,000 to $274,999	4
$275,000 to $299,999	3
$300,000 to $324,999	2
$325,000 to $399,999	1
$400,000 to $450,000	0

7. **Leverage (0 - 10 points)**
Projects will be rated on their ability to integrate the use of funds other than CDBG to carry out the proposed CDBG project. *Leverage will be valued using full value for cash leverage and **half** of the in-kind leverage will be recognized as cash. The leverage score will be calculated as follows:*

Formula:

Cash Leverage	$_____	x	1 =	$_____
In-Kind Leverage	$_____	x	.5 =	$_____
Total Cash Leverage Allowed for Rating				$_____

Total Cash Leverage X 10 = Leverage Points
Grant Request Amount

EXAMPLE:

Grant Amount Requested $100,000

Cash Leverage	$50,000	x	1	$50,000
In-Kind Leverage	$25,000	x	.5	$12,500
Total Cash Leverage Allowed For Rating				$62,500

$62,500
$100,000 X 10 = 6.25 points

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

Permitting Status	**Points**
• ODEQ Permit **not** required	0
• Final Plans and Specifications submitted to ODEQ for approval	5
• Permit to Construct Issued by ODEQ	10

COMMUNITY REVITALIZATION

Under this broad category, an Applicant may submit a project proposal for any eligible activity listed under Section 105(a) of the Federal Housing and Community Development Act of 1974, as amended, other than water or wastewater projects. Such projects could include fire protection, storm water drainage, solid waste, street improvements, community centers, and housing demolition.

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

The grant maximum for the CDBG Community Revitalization application is **$150,000**. **The deadline for application submission is March 29, 2019.** The maximum amount of CDBG Community Revitalization funds that may be used for project administration is six percent (6%) of the total CDBG Revitalization funds awarded. Applications received after this date will NOT be considered for funding. Additionally, CDBG Community Revitalization projects not meeting all of the threshold requirements will NOT be considered for funding.

THRESHOLD REQUIREMENTS FOR COMMUNITY REVITALIZATION

1. Requests for funds must address at least one or more of the Primary National Objectives of the CDBG Community Revitalization Program:

   (a) Provide a direct benefit (fifty-one percent [5l%] or more) principally for persons of low income;

   (b) Aid in the prevention or elimination of slums or blight; and

   (c) Address a particular urgent need posing a serious and immediate threat to the health or welfare of a community.

2. A proper sponsor for CDBG Community Revitalization projects is defined as a Unit of Local government with direct jurisdiction over the majority (60%) of the proposed project beneficiaries.

3. Applicants can apply for up to $150,000 grant maximum. Applicants may not apply for more than one (1) project activity per application under this CDBG Community Revitalization set-aside.

4. Proof that citizen participation requirements have been met, as evidenced by an application phase public hearing and written Citizen Participation Plan.

5. All cost estimates shall be obtained from professional sources, as applicable, and submitted with the application. These estimates must be certified from professional engineers, architects, construction companies, vendors or appropriate personnel with experience to make such estimates.

6. Cities, Towns and Counties with previous CDBG funding must have close-out documents submitted by January 31, 2019.

(a) City/Town and County (Direct Jurisdiction) Applicants: City/Towns and Counties receiving a direct jurisdictional benefit may submit only one (1) grant application per CDBG Program Year selecting from CDBG Water/Wastewater Engineering, CDBG Water/Wastewater Construction, CDBG Community Revitalization, or CDBG Rural Economic Action Plan (REAP). A City/Town and County (Direct Jurisdiction) cannot submit a CDBG application if it currently has an open CDBG grant. Exclusions: Economic Development Infrastructure Financing (EDIF), Capital Improvement Planning (CIP). Typical County direct jurisdiction CDBG application projects are roads, bridges, County hospital, etc.

(b) County Sponsored Applicants: Counties acting in a "sponsorship" capacity may submit a maximum of one sponsored CDBG grant application per CDBG Program Year selecting from Water/Wastewater Engineering, Water/Wastewater Construction, Community Revitalization, or Rural Economic Action Plan (REAP). Limitation: Counties may ONLY have one (1) open sponsored CDBG grant and still make another sponsored CDBG application. Counties cannot exceed a maximum number of two open sponsored CDBG grants open at any given time. Exclusions: Economic Development Infrastructure Financing (EDIF), Capital Improvement Planning (CIP). Counties may sponsor applications where they do not have direct jurisdiction over certain public functions. Generally, these are communities with less than $25,000 in revenue, Rural Water Districts, and Rural Fire Districts.

7. The CDBG Community Revitalization grant request cannot exceed $2,000 per beneficiary.

8. TOWNS AND CITIES (COUNTIES ARE EXEMPT) MUST SUBMIT A COPY OF THEIR AUDIT OR THE AGREED UPON PROCEDURES BY THE APPLICATION DEADLINE. ALL TOWNS AND CITIES THAT HAVE A JUNE 30, FISCAL YEAR END DATE ARE REQUIRED TO SUBMIT A COPY OF THEIR FY 2018 AUDIT AND TOWNS AND CITIES THAT HAVE A DECEMBER 31, FISCAL YEAR END DATE ARE REQUIRED, AS A MINIMUM, TO SUBMIT A COPY OF THEIR FY 2017 AUDIT. NO APPLICATION WILL BE CONSIDERED FOR REVIEW OR FUNDING THAT DOES NOT MEET THE REQUIREMENTS STATED ABOVE.

   If the city or town receives less than $25,000 in annual revenues from its normal business and does not have an audit or agreed upon procedure, the city or town cannot apply directly to ODOC. The city or town can apply only by having the local County apply on their behalf, if the County chooses to do so. Nothing contained herein mandates a County to act as an accommodating party.

9. Applicants must certify that if the proposed project is funded by CDBG Community Revitalization dollars it will be properly insured for the life of the asset (as applicable). Proper insurance for buildings include property and liability insurance coverage. When the project includes vehicles proper insurance will include liability, comprehensive and collision coverage.

10. Applicants are responsible for accomplishing online application corrections/revisions along with any applicable application upload corrections/revisions as directed by ODOC/CD staff within the pre-determined deadline. In fairness to other applicants and in order to maintain HUD required CDBG funding expenditure rates; ODOC/CD can NOT indefinitely hold applications until the respective application corrections/revisions are accomplished. Applications will be considered INCOMPLETE if the prescribed corrections/revisions are not made to the application within the pre-determined deadline established by ODOC/CD. This will result in a FAILED threshold application rating.

11. The Application Guidelines associated with the CDBG Community Revitalization set-aside contains an APPLICATION FORMS CHECKLIST outlining all application related documentation required to be uploaded into the online OKGrants application. It is the Applicant's responsibility to follow this checklist and seek additional guidance from ODOC/CD staff as required. Applicants will be responsible for following and providing each item listed on the checklist. Failure to provide any of the required application documentation listed on the checklist will result in a FAILED application rating. Additionally, Applicants must provide a response to all application questions and satisfy all documentation requirements delineated in the CDBG Community Revitalization Application Guidelines and online OKGrants Application System including, but not limited to: Resolution, income survey results, resolution requesting assistance, survey maps, certifications, Section 102 Disclosures, project budget, etc.

RATING CRITERIA FOR COMMUNITY REVITALIZATION

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

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

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

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

2. **Grant Request Amount (0 – 10 points)**

Due to limited CDBG funding, ODOC/CD encourages smaller CDBG $ dollar requests in order to maximize applicant funding potential.

Grant Request	**Points**
$14,999 or Less	10
$15,000 to $29,999	9
$30,000 to $44,999	8
$45,000 to $59,999	7
$60,000 to $74,999	6
$75,000 to $89,999	5
$90,000 to $104,999	4
$105,000 to $119,999	3
$120,000 to $134,999	2
$135,000 to $144,999	1
$145,000 to $150,000	0

3. **Leverage (0 – 15 points)**

Projects will be rated on their ability to integrate the use of funds other than CDBG Community Revitalization to carry out the proposed CDBG Community Revitalization project. **Leverage will be valued using full value for cash leverage and half of the in-kind leverage (MAX $50,000 x .5 = $25,000) will be recognized as cash**. **A maximum of 15 points is available for leverage.**

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

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

The leverage score will be calculated as follows:

Formula:

Cash Leverage	$_____	x	1 =	$_____
In-Kind Leverage	$_____	x	.5 =	$_____
Total Cash Leverage Allowed for Rating				$_____

$$\frac{\text{Total Leverage}}{\text{Grant Request Amount}} \times 10 = \text{Leverage Points}$$

EXAMPLE A:

Grant Amount Requested $150,000

Cash Leverage	$50,000	x	1	$50,000
In-Kind Leverage	$50,000	x	.5	$25,000
Total Leverage Allowed For Rating				$75,000

$$\frac{\$75{,}000}{\$150{,}000} \times 10 = 5 \text{ Points}$$

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

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

4. **Previous Grant (0 - 7 points)**

A city, town or county will be awarded points based on the CALENDAR YEAR & MONTH of closeout of the last CDBG Award. The applicant will receive points based on the following scale:

A. One year after grant closeout –	0 Points
B. Two years after grant closeout -	1 Point
C. Three years after grant closeout –	3 Points
D. Four years after grant closeout –	5 Points
E. Five years or more after grant closeout –	7 Points

EXAMPLE: City 'A' successfully closed out a CDBG application in January of 2013. If City 'A' applies for a CDBG Community Revitalization application in March of 2016, City 'A' would receive three points on a 2016 CDBG Community Revitalization application.

CDBG/RURAL ECONOMIC ACTION PLAN (REAP)

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

The maximum amount of funds that may be used for CDBG REAP project administration is six percent (6%) of the total award. **The deadline for application submission is February 28, 2019.**

The SSPD Allocations are listed below:

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

THRESHOLD CRITERA FOR CDBG REAP

1. Eligible applicants for the CDBG REAP Program are units of general local governments (counties and incorporated towns and cities) that are State appropriated REAP funding eligible as identified by the Sub-state Planning District and in accordance with 62 O.S. § 2001 et al as amended.

2. CDBG REAP funds must be matched dollar for dollar by State appropriated REAP funds. For example, if a project is $80,000 it must be $40,000 CDBG REAP and $40,000 State appropriated REAP funds. Applicants may not apply for more than one (1) project activity per application under this set-aside.

3. Requests for funds must address at least one or more of the Primary National Objectives of the CDBG REAP program:

   (a) Provide a direct benefit (fifty-one percent [5l%] or more) principally for persons of low income;

(b) Aid in the prevention or elimination of slums or blight; and

(c) Address a particular urgent need posing a serious and immediate threat to the health or welfare of a community.

4. Cities, Towns, and Counties with previous CDBG funding must have close-out documents submitted by January 31, 2019.

   (a) City/Town and County (Direct Jurisdiction) Applicants: City/Towns and Counties receiving a direct jurisdictional benefit may submit only one (1) grant application per CDBG Program Year selecting from CDBG Water/Wastewater Engineering, CDBG Water/Wastewater Construction, CDBG Community Revitalization, or CDBG Rural Economic Action Plan (REAP). A City/Town and County (Direct Jurisdiction) cannot submit a CDBG application if it currently has an open CDBG grant. Exclusions: Economic Development Infrastructure Financing (EDIF), Capital Improvement Planning (CIP). Typical County direct jurisdiction CDBG application projects are roads, bridges, County hospital, etc.

   (b) County Sponsored Applicants: Counties acting in a “sponsorship” capacity may submit a maximum of one sponsored CDBG grant application per CDBG Program Year selecting from Water/Wastewater Engineering, Water/Wastewater Construction, Community Revitalization, or Rural Economic Action Plan (REAP). Limitation: Counties may ONLY have one (1) open sponsored CDBG grant and still make another sponsored CDBG application. Counties cannot exceed a maximum number of two open sponsored CDBG grants open at any given time. Exclusions: Economic Development Infrastructure Financing (EDIF), Capital Improvement Planning (CIP). Counties may sponsor applications where they do not have direct jurisdiction over certain public functions. Generally, these are communities with less than $25,000 in revenue, Rural Water Districts, and Rural Fire Districts.

5. A proper sponsor for CDBG REAP projects is defined as a Unit of Local government with direct jurisdiction over the majority (60%) of the proposed project beneficiaries.

6. Proof that citizen participation requirements have been met, as evidenced by an application phase public hearing and written Citizen Participation Plan.

7. All cost estimates shall be obtained from professional sources, as applicable, and submitted with the application. These estimates must be certified and from professional engineers, architects, construction companies, vendors, or appropriate personnel with experience to make such estimates.

8. The CDBG REAP grant request cannot exceed $2,000 per beneficiary.

9. TOWNS AND CITIES (COUNTIES ARE EXEMPT) MUST SUBMIT A COPY OF THEIR AUDIT OR THE AGREED UPON PROCEDURES BY THE APPLICATION DEADLINE. ALL TOWNS AND CITIES THAT HAVE A JUNE 30, FISCAL YEAR END DATE ARE REQUIRED TO SUBMIT A COPY OF THEIR FY 2018 AUDIT AND TOWNS AND CITIES THAT HAVE A DECEMBER 31, FISCAL YEAR END DATE ARE REQUIRED, AS A MINIMUM, TO SUBMIT A COPY OF THEIR FY 2017 AUDIT. NO APPLICATION WILL BE CONSIDERED FOR REVIEW OR FUNDING THAT DOES NOT MEET THE REQUIREMENTS STATED ABOVE.

   If the city or town receives less than $25,000 in annual revenues from its normal business and does not have an audit or agreed upon procedure, the city or town cannot apply directly to

ODOC. The city or town can apply only by having the local County apply on their behalf, if the County chooses to do so. Nothing contained herein mandates a County to act as an accommodating party.

10. Applicants must certify that if the proposed project is funded by CDBG REAP dollars it will be properly insured for the life of the asset. Proper insurance for buildings include property and liability insurance coverage. When the project includes vehicles proper insurance will include liability, comprehensive and collision coverage.

11. Applicants are responsible for accomplishing online application corrections/revisions along with any applicable application upload corrections/revisions as directed by ODOC/CD staff within the pre-determined deadline. In fairness to other applicants and in order to maintain HUD required ODOC/CD's CDBG funding expenditure rates; ODOC/CD can NOT indefinitely hold applications until the respective application corrections/revisions are accomplished. Applications will be considered INCOMPLETE if the prescribed corrections/revisions are not made to the application within the pre-determined deadline established by ODOC/CD. This will result in a FAILED threshold application rating.

12. The Application Guidelines associated with this CDBG REAP set-aside contain an APPLICATION FORMS CHECKLIST outlining all application related documentation required to be uploaded into the online OKGrants application. It is the Applicant's responsibility to follow this checklist and seek additional guidance from ODOC/CD staff as required. Applicants will be responsible for following and providing each item listed on the checklist. Failure to provide any of the required application documentation listed on the checklist will result in a FAILED application rating. Additionally, Applicants must provide a response to all application questions and satisfy all documentation requirements delineated in the CDBG REAP Application Guidelines and online OKGrants Application System including, but not limited to: Resolution, income survey results, resolution requesting assistance, survey maps, certifications, Section 102 Disclosures, project budget, etc.

SMALL CITIES

Communities with a 2010 U.S. Census Bureau population estimate of 15,000 to 50,000 that are currently **not** HUD designated entitlement communities are eligible to participate in the FY 2019 Small Cities category. Oklahoma's entitlement cities are Edmond, Enid, Lawton, Midwest City, Moore, Norman, Oklahoma City, Shawnee, and Tulsa as well as the units of local government participating in the CDBG Urban County Designation for Tulsa County which consists of the following:

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

The total amount of funding for the Small Cities category is **$1,370,000.** The allocation formula for each community will be based on a weight of 70% for poverty and 30% for population with a base amount of $50,000. Those communities who are eligible to participate are listed below with their tentative allocations: These figures are estimated until allocation is received from the U.S. Department of Housing and Urban Development (HUD). The deadline for application submission is July 17, 2019.

These figures are estimated until allocation is received from the U.S. Department of Housing and Urban Development (HUD). Listed below are the eligible communities with their tentative allocations:

1.	Ada	$91,398
2.	Altus	$76,494
3.	Ardmore	$69,595
4.	Bartlesville	$58,280
5.	Bethany	$66,007
6.	Chickasha	$88,086
7.	Claremore	$71,527
8.	Del City	$77,874
9.	Duncan	$75,115
10.	Durant	$92,225
11.	El Reno	$71,251
12.	McAlester	$85,878
13.	Muskogee	$78,702
14.	Mustang	$59,383
15.	Ponca City	$68,491
16.	Stillwater	$85,602
17.	Tahlequah	$96,916
18.	Yukon	$57,176
		$1,370,000

THRESHOLD REQUIREMENTS FOR SMALL CITIES

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

To participate in the Small Cities set-aside, the communities with open Small Cities contracts must comply with **First** the following Threshold Requirements.

100% of 2017 Small Cities Award expended
50% of 2018 Small Cities Award expended

If the above expenditure requirements have not been met, the community will not be allowed to participate in the FY 2019 Small Cities set-aside. Once the above expenditure criterion has been met, then the community may apply in the Small Cities Set-Aside or choose to compete in the appropriate CDBG set asides.

Second, the following Threshold Requirements must be met:

1. Leverage project at 1:1. Proposed leverage must be ***directly*** related to the proposed CDBG project. For example, local funds being utilized in one section of town would not be considered as leveraging the CDBG funds if the CDBG funds were being utilized in a different section of town.

2. No administration from CDBG, but leverage can include reasonable administration.

3. Cannot apply for any other Community Development (CD) set-aside during the FY 2019 program year.

4. The project must achieve a national objective. Most CDBG projects are qualified under the National Objective as benefiting at least 51% of persons who are low to moderate income. This is accomplished by conducting a random sample income survey in the project target area. However, the use of any Census Data to document the percentage of low and moderate income beneficiaries for any CDBG funded activity should receive prior ODOC review and approval.

5. Each community must have an updated Citizen Participation Plan, and conduct one public hearing before the application is submitted. Acceptable documentation of the public hearing consists of the <u>affidavit of publication</u>.

6. Communities participating in the CDBG Small Cities set-aside must have a Letter of Intent submitted to the Oklahoma Department of Commerce / Community Development, (ODOC/CD) by 5:00 PM, April 13, 2019.

7. Specific projects identified in the application must have cost estimates derived from professional sources. Water and wastewater projects must have certified cost estimates from a professional engineer licensed to work in Oklahoma. For other types of projects professional cost estimates may be derived from architects, engineers, vendors, construction companies, or appropriate personnel to make such estimates.

8. Applications must include a Resolution passed by the current governing body requesting the particular assistance.

9. Grant request cannot exceed $2,000 per beneficiary for all projects.

10. TOWNS AND CITIES (COUNTIES ARE EXEMPT) MUST SUBMIT A COPY OF THEIR AUDIT OR THE AGREED UPON PROCEDURES BY THE APPLICATION DEADLINE. ALL TOWNS AND CITIES THAT HAVE A JUNE 30, FISCAL YEAR END DATE ARE REQUIRED TO SUBMIT A COPY OF THEIR FY 2018 AUDIT AND TOWNS AND CITIES THAT HAVE A DECEMBER 31, FISCAL YEAR END DATE ARE REQUIRED, AS A MINIMUM, TO SUBMIT A COPY OF THEIR FY 2017 AUDIT. NO APPLICATION WILL BE CONSIDERED FOR REVIEW OR FUNDING THAT DOES NOT MEET THE REQUIREMENTS STATED ABOVE.

    If the city or town receives less than $25,000 in annual revenues from its normal business and does not have an audit or agreed upon procedure, the city or town cannot apply directly to ODOC. The city or town can apply only by having the local County apply on their behalf, if the County chooses to do so. Nothing contained herein mandates a County to act as an accommodating party.

ECONOMIC DEVELOPMENT

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

ELIGIBLE APPLICANT

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

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

Applicants seeking funding under other FY 2019 CDBG set-asides may concurrently apply for funding under the Economic Development set-aside.

Economic Development Infrastructure Financing (EDIF) Program

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

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

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

1. New Jobs for low - moderate income persons are the primary purpose of this program;
2. Funding is for publicly owned infrastructure;
3. The infrastructure improvement activity must be directly related to the industry being assisted and have a clear link to the creation of jobs;
4. Funding is not for the benefit of retail, private prisons, educational institutions or the retention of jobs.
5. ODOC/CD will examine the business(es) involved and its reasonable potential to create the projected jobs;
6. Start-up businesses will not be considered unless the company has cash capitalization of at least 25% of the company's project costs;

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

FINANCING OPTION:

Business Expansions or Targeted Industries

- Targeted towards assisting Oklahoma existing companies' expansion efforts and new companies or industries to the state.

- Targeted industry group (i.e. alternative energy, agribusiness, aerospace, defense or other advanced manufacturing),with the new jobs being Quality Job eligible in terms of health insurance (as long as the company has a plan to meet the National Objective of benefit to low and moderate income persons).

- Maximum grant amount is $1,000,000 based upon jobs and leverage.

PROJECT SELECTION PROCEDURES – EDIF PROJECTS

CDBG-EDIF PROGRAM – THRESHOLD REQUIREMENTS

1. At least 51% of the projected jobs to be created shall be held by, or made available to, persons who qualified as low to moderate-income persons.

2. At least one permanent job shall be created for every $35,000 of CDBG-EDIF funds.

3. All projects shall require one new dollar committed as financial leverage to the project for each CDBG-EDIF dollar requested.

4. Proof that citizen participation requirements have been met, as evidenced by an application phase public hearing and written Citizen Participation Plan.

5. If the city or town receives less than $25,000 in annual revenues from its normal business the city or town cannot apply directly to ODOC. The city or town can apply only by having the local County apply on their behalf, if the County chooses to do so. Nothing contained herein mandates a County to act as an accommodating party. Any applications by a County to act as an accommodation for a city or town that does not have $25,000 in annual revenues from its normal business, will not count against the County's open contract maximum.

6. 110% of the average county wage for all new jobs. If the project does not meet the 110% ACW, the following three criteria may be considered:
   - Established Company – in business for at least 10 years.

- County unemployment is higher than the state average.
- Wages are no lower than the ACW.

7. The proposed use of the CDBG-EDIF funds is "allowable, reasonable, and appropriate."

EVALUATION CRITERION FOR EDIF PROGRAM

General: There are no specific application deadlines. ODOC/CD reserves the right to suspend the taking of applications based upon availability of funding. Projects will be evaluated and a funding decision reached as expeditiously as possible. However, project evaluation will depend on the applicant satisfactorily completing the application and all information requested by ODOC/CD.

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

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

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

EVALUATION CRITERIA FOR CDBG-ED – BUSINESS EXPANSION

Business Expansions (60 Points Maximum)

Leverage

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

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

New job benefits:

Does the company provide Quality Job minimum level of health insurance for all full time positions?

Yes	5 points
No	0 points

Average wages of the new jobs compared to average county wage (ACW):

County name: _____
Average County Wage _____

Average wages 110% of ACW	0 points
Average wages _____ of ACW	5 points
Average wages _____ of ACW	10 points

Each 5% increase is worth one point to a maximum of 10 points. Percentages are rounded down.

Job threshold:

- Small community population <5,000 people; greater than 5 jobs — 5 points
- Community of 5,000 – 10,000 people; greater than 10 jobs — 5 points
- Medium community population 10,000 – 40,000 people: greater than 25 jobs — 5 points
- Large community >40,000 people: greater than 50 jobs — 5 points

Company information:

Is the company a manufacturing company?

Yes	5 points
No	0 points

How long has the company been in existence in Oklahoma?

2 – 0 years	0 points
5 – 3 years	1 points
8 – 6 years	2 points
12 – 9 years	3 points
15 – 13 years	4 points
18 – 16 years	5 points
Greater than 18 years	10 points

Project location:

Is the project located in an enterprise zone?

Yes	5 points
No	0 points

Regional project:

How many units of local government involvement does the project include?

One unit	0 points
Two units	5 points
Three units	10 points

EVALUATION CRITERIA FOR CDBG-ED – TARGETED INDUSTRIES

Targeted Industries (55) Points Maximum)

Leverage

1:1	0 points
2:1	1 points

3:1 2 points
Each whole number increase is worth one point to a maximum of 10 points.
Leverage does not include in-kind contributions, and ratios are rounded down.

New job benefits:

Does the company provide Quality Job minimum level of health insurance for all full time positions?
Yes 5 points
No 0 points

Average wages of the new jobs compared to average county wage (ACW):

County name: _____
Average County Wage _____

Average wages 110% of ACW 0 points
Average wages _____ of ACW 5 points
Average wages _____ of ACW 10 points
Each 5% increase is worth one point to a maximum of 10 points. Percentages are rounded down.

Job threshold:

- Small community population <5,000 people; greater than 5 jobs 5 points
- Community of 5,000 – 10,000 people; greater than 10 jobs 5 points
- Medium community population 10,000 – 40,000 people greater than 25 jobs: 5 points
- Large community >40,000 people: greater than 50 jobs 5 points

Company information:

Is the company a manufacturing company?
Yes 5 points
No 0 points

Is the company within an industry targeted by ODOC?
Yes 5 points
No 0 points

Project location:

Is the project located in an enterprise zone?
Yes 5 points
No 0 points

Regional project:

How many units of local government involvement does the project include?
One unit 0 points
Two units 5 points
Three units 10 points

CAPITAL IMPROVEMENT PLANNING (CIP)

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

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

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

The total allocation for the CIP Program will be **$440,000**. The deadline for application submission is **July 8, 2019**. The amount of CDBG funds that may be used for a CIP project varies depending on the project. Grant amounts will be based on the criteria set forth in the CDBG application packet. Each SSPD/COG should determine their priority list of projects. Each local government must update compliance with meeting the National Objective of benefiting at least 51% of persons who are low to moderate income.

CDBG CIP SSPD/COG Allocations:

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

THRESHOLD REQUIREMENTS FOR CIP

1. COGs will evaluate CDBG CIP needs in their regions and recommend potential projects for eligible applicants to Commerce.

2. Eligible applicants for the CDBG CIP Program are units of general local governments (counties and incorporated towns and cities) that are CDBG eligible as identified by the Sub-state Planning District and in accordance with 62 O.S. § 2001 et al as amended.

3. Eligible applicants are required to work with their local COG to discuss doing a project.

4. Requests for funds must address at least one or more of the Primary National Objectives of the CDBG program:

   (a) Provide a direct benefit (fifty-one percent [5l%] or more) principally for persons of low income;

   (b) Aid in the prevention or elimination of slums or blight; and

   (c) Address a particular urgent need posing a serious and immediate threat to the health or welfare of a community.

5. Cities, Towns and Counties with previous CDBG funding must have close-out documents submitted by January 31, 2019.

   (a) City/Town and County (Direct Jurisdiction) Applicants: **City/Towns and Counties receiving a direct jurisdictional benefit may submit only one (1) grant application per CDBG Program Year** selecting from CDBG Water/Wastewater Engineering, CDBG Water/Wastewater Construction, CDBG Community Revitalization, or CDBG Rural Economic Action Plan (REAP). A City/Town and County (Direct Jurisdiction) cannot submit a CDBG application if it currently has an open CDBG grant. **Exclusions:** Economic Development Infrastructure Financing (EDIF), Capital Improvement Planning (CIP). Typical County direct jurisdiction CDBG application projects are roads, bridges, County hospital, etc.

   (b) County Sponsored Applicants: Counties acting in a “sponsorship” capacity may submit a maximum of one sponsored CDBG grant application per CDBG Program Year selecting from Water/Wastewater Engineering, Water/Wastewater Construction, Community Revitalization, or Rural Economic Action Plan (REAP). **Limitation: Counties may ONLY have one (1) open sponsored CDBG grant and still make another sponsored CDBG application. Counties cannot exceed a maximum number of two open sponsored CDBG grants open at any given time**. **Exclusions:** Economic Development Infrastructure Financing (EDIF), Capital Improvement Planning (CIP). Counties may sponsor applications where they do not have direct jurisdiction over certain public functions. Generally, these are communities with less than $25,000 in revenue, Rural Water Districts, and Rural Fire Districts.

6. A proper sponsor for CDBG CIP projects is defined as a Unit of Local government with direct jurisdiction over the majority (60%) of the proposed project beneficiaries.

7. Proof that citizen participation requirements have been met, as evidenced by an application phase public hearing and written Citizen Participation Plan.

8. The Project Assessment is a detailed explanation of the scope of the project. It should include all work to be done and the tasks to be accomplished. Details on methodology and workflow used in the field as well as in the office should be provided. It should also include a description of the deliverables that are expected to be submitted at the end of the project.

9. The CDBG CIP grant request cannot exceed $2,000 per beneficiary.

10. Applicants must provide a response to all application questions and satisfy all documentation requirements delineated in the Guideline and Application package including, but not limited to: Resolution, income survey results, survey maps, certifications, Section 102 Disclosures, project budget; etc.

11. TOWNS AND CITIES (COUNTIES ARE EXEMPT) MUST SUBMIT A COPY OF THEIR AUDIT OR THE AGREED UPON PROCEDURES BY THE APPLICATION DEADLINE. ALL TOWNS AND CITIES THAT HAVE A JUNE 30, FISCAL YEAR END DATE ARE REQUIRED TO SUBMIT A COPY OF THEIR FY 2018 AUDIT AND TOWNS AND CITIES THAT HAVE A DECEMBER 31, FISCAL YEAR END DATE ARE REQUIRED, AS A MINIMUM, TO SUBMIT A COPY OF THEIR FY 2017 AUDIT. NO APPLICATION WILL BE CONSIDERED FOR REVIEW OR FUNDING THAT DOES NOT MEET THE REQUIREMENTS STATED ABOVE.

    If the city or town receives less than $25,000 in annual revenues from its normal business and does not have an audit or agreed upon procedure, the city or town cannot apply directly to ODOC. The city or town can apply only by having the local County apply on their behalf, if the County chooses to do so. Nothing contained herein mandates a County to act as an accommodating party.

12. Applicants are responsible for accomplishing online application corrections/revisions along with any applicable application upload corrections/revisions as directed by ODOC staff within the pre-determined deadline. In fairness to other applicants and in order to maintain HUD required CDBG funding expenditure rates, ODOC can NOT indefinitely hold applications until the respective application corrections/revisions are accomplished. Applications will be considered INCOMPLETE if the prescribed corrections/revisions are not made to the application within the pre-determined deadline established by ODOC. This will result in a FAILED threshold application rating.

13. The Application Guidelines associated with this CDBG CIP Set-Aside contains an APPLICATION FORMS CHECKLIST outlining all application related documentation required to be uploaded into the online OKGrants application. It is the Applicant's responsibility to follow this checklist and seek additional guidance from ODOC staff as required. Applicants will be responsible for following and providing each item listed on the checklist. **Failure to provide any of the required application documentation listed on the checklist will result in a FAILED application rating.** Additionally, Applicants must provide a response to all application questions and satisfy all documentation requirements delineated in the Application Guidelines and online OKGrants Application System including, but not limited to: Resolution, income survey results, resolution requesting assistance, survey maps, certifications, Section 102 Disclosures, project budget, etc.

State CDBG Program Primary National Objective

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

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

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

1. Benefit to low and moderate income persons;

2. Aid in the prevention or elimination of slums or blight; or

3. Community Development needs having a particular urgency, posing a serious and immediate threat to the health or welfare of a community.

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

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

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

SPECIAL FUNDING AND ALLOCATION CONSIDERATIONS

New Allocation from HUD

If any additional CDBG monies are allocated to the State, in addition to the regular allocation, by the U.S. Department of Housing and Urban Development, they will be allocated in the same manner as stated in the re-use statement, after the State administration and technical assistance (TA) have been subtracted.

Program Income Statement

Economic Development: All uses of program income must be for CDBG eligible activities, must comply with applicable State and Federal rules and regulations, and must be reported to the Oklahoma Department of Commerce. Local recipients are generally required to spend program income prior to requesting additional grant funds. Program income from FY'87-08 Economic Development projects deposited in the State's revolving fund will be utilized for CDBG EDIF eligible activities.

Community Development: All program income will revert to the State. These funds will be utilized following the guidelines established in the re-use plan.

Re-use Statement
The definition of re-use is the funds available from cancellation of projects; from projects completed under budget; from funds designated but not expended; the Community Development loan repayment program income or from funds allocated by this Plan in a set-aside but not utilized. As the State cannot predict in advance the source, amount, or timing of available re-use funds, the State reserves the right to determine, based upon need, timing and amount of funds available for re-use, the most appropriate utilization of these funds. This includes but is not limited to other set-asides or federally declared disaster areas. All re-use funds must be used for CDBG eligible activities and must comply with applicable State and Federal rules and regulations.

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

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

GENERAL DEFINITIONS

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

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

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

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

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

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

Proper Sponsors
A proper sponsor under the Community Development set-aside is defined as the unit of government with direct jurisdiction over the majority (60%) of the proposed project's beneficiaries. In the event that no unit of local government has sixty percent (60%) of the proposed beneficiaries, then the unit of local government with the majority of the proposed beneficiaries must sponsor the application. Request for Waivers to the proper sponsor rule must be accompanied by proof that the rule is counter productive to the goals of the program.

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

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

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

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

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

Slum

Any area where dwellings predominate, which by reason of dilapidation, overcrowding, faulty arrangement or design, lack of ventilation, light, or sanitary facilities, or any combination of these factors, is detrimental to safety, health and morals.

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

Urgent Need
The State defines needs having a particular urgency as declared by the Governor, as those needs that are proposed to be remedied that alleviate existing conditions that pose a serious and immediate threat to the health or welfare of the recipient that are of recent origin or that recently became urgent, that the recipient could not have foreseen, that the recipient is unable to finance the activity on its own, and that other sources of funding are not available. A condition will generally be considered to be of recent origin if it developed or became critical within 12 months preceding the certification of the recipient.

GENERAL APPLICATION PROCEDURES

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

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

Disallowance of Supplemental Funding:

Once a unit of local government is awarded CDBG funds for a specific project/activity, that unit of local government will not be allowed to apply for additional/supplemental CDBG funds for that specific project/activity until the project/activity has met all close out requirements.

Audit Requirement: All audits of prior awards from ODOC/CD must be in accordance with ODOC/CD Audit Policies and Procedures Manual. An audit is required if $25,000 or more was received from ODOC/CD. The audit should be completed and the report submitted no later than twelve (12) months after the end of the contractor's fiscal year.

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

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

All individuals who wish to administer a Community Development Block Grant (CDBG) project for a fee, regardless of the source of the fee, except for full-time employees of local

units of government, will have to be certified by the Oklahoma Department of Commerce/Community Development. This requirement went into effect at the beginning of the 1998 CDBG Fiscal Year on April 1, 1998.

SAM.Gov Debarred / Exclusion Check Requirement:

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

- Register to do business with the U.S. government
- Update or renew your entity registration
- Check status of an entity registration
- Search for entity registration and exclusion records

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

PERFORMANCE MEASUREMENT SYSTEM

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

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

RISK ASSESSMENT

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

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

1. Multi-jurisdictional, i.e., involving more than one unit of local government;

2. Involve some level of risk, as evidenced by:

    a. Lack of recent history in administering a CDBG project;

    b. Evidence of numerous accounting or financial tracking errors on current or previous projects;

    c. A record of serious findings or sanctions in previous monitoring session;

    d. High turnover of administrative staff;

    e. Delays in submitting required reports;

    f. Prior violations;

    g. Failure to attend and participate in implementation workshops;

    h. Excessive tardiness in responding to prior monitoring findings.

3. By definition, economic development projects are considered high risk.

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

Appendix B

Section Contents…

- ESG Action Plan

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

Date	Description
Thursday, March 28, 2019	Mandatory Application Workshop
April 1 – May 31, 2019	Applications entered into OK Grants
5:00 pm May 31, 2019	Application must be submitted into OK Grants
Friday, June 7, 2019	Application Reviewer Training Webinar
June – July, 2019	Continua score, rank and recommend
August – September, 2019	ODOC verifies eligibility of potential subrecipients
Second Week of September, 2019	Approximate Date for Award Notification
October 1, 2019	ESG 2019 Contract Start Date
September 30, 2020	ESG 2019 contract end date. All funds must be expended by this date.
November 30, 2020	ESG 2019 Closeout Documentation and Annual Report Due to ODOC.

FY 2019 Emergency Solutions Grant
Request for Application

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

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

Eligible Applicants
Shelter operators interested in making application, must meet one of three options:

1. Private Nonprofits who have a yearly independent audit and have received ESG funds in previous years may directly apply for an ESG grant without sponsorship.
2. Shelters may seek sponsorship from either a unit of general local government or, Community Action Agency (CAA) operating in that jurisdiction, or a private nonprofit that has previous

experience with following federal regulations and being an umbrella organization. For example, a local United Way or the Nonprofit arm of a Housing Authority.

   a. Emergency Shelters that are owned and/or operated by a unit of general local government or a CAA must submit their request for funding through their owner.

3. Private Nonprofits seeking ESG funding for the **first time** must have a Sponsor. After the first funded program year, the private nonprofit has received an audit with no major findings and a monitoring report with no major findings, the private nonprofit can request permission from ODOC to apply for ESG funding independently with no sponsor.

Sponsorship Responsibilities

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

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

A unit of general local government or CAA may retain prevention or administrative funds to carry out certain activities. Not all funds used by the unit of general local government or CAA for prevention or administrative activities must be used by the shelter.

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

ODOC/CD funds only those ESG applicants located in and serving non-formula areas. Potential applicants with a shelter located in the jurisdictions of the City of Tulsa or the City of Oklahoma City must apply through their prospective entitlement communities.

Local Government Project Approval

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

General Program Requirement Overview

1. These competitive program funds are to be used to provide services to clients who meet the HUD definition of homelessness, including the new expansion of the definitions at risk of homelessness and other federal regulation definitions of homelessness.
2. Grant recipients must be an active participant in their local Continuum of Care
3. Grant recipients must use their local Continuum of Care HMIS database. The only exception is for Domestic Violence Shelters who must have a comparable client-tracking database approved by ODOC.
4. Grant recipients must participate in the Continuum of Care Point in Time Count Survey.
5. Grant recipients must provide 100% match of grant funds to be used for services under the ESG program.
6. Grant recipients must be signed up for the federal System for Award Management (SAM) system. The website is www.sam.gov .

Threshold Requirements for the Emergency Solutions Grant:

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

- Applicant / Shelter must have an emergency shelter component or partnership to provide emergency shelter services.
- Access to the Shelter or access to beds must be available 24 hours /7 days/365 days a year.
- Applicant/ Shelter must provide documentation of active involvement in Continuum of Care planning and coordination of service efforts.
- Applicant/ Shelter must provide documentation that the applicant is a participating member of the Continuum of Care's Coordinated Intake/Assessment.
- Applicant/ Shelter must provide documentation they are collecting service data through their Continuum of Care HMIS database.
- All outstanding monitoring findings and audit or unresolved financial/program issues from previously awarded grants must be resolved.
- All required certifications must be received and signed by the appropriate signatory.
- One hundred percent (100%) of contract funds including match must be expended before newly awarded funds can be used.
- Must have a complete set of written policies and procedures in which to manage the Emergency Solutions Grant Program.
- Must have Termination of Participation and Grievance Procedures.
- Must have a process for participation of Homeless Persons in Policy-Making and Operations.
- Must have a Confidentiality Policy.
- Must have a current Audit submitted before funds can be requested from grant.
- Must follow all General Record Keeping Requirements, both for financial and client files.
- Must meet all spending timeline requirements. Fifty percent (50%) of awarded funds must be spent by the first six (6) months of the contract; seventy-five percent (75%) must be spent within nine (9) months of the contract and one-hundred percent (100%) must be spent by the end of the contract period.
- Must be activated in the System for Award Management (SAM). Applicant must be clear of any findings and show as eligible for federal contracts and assistance awards.

Continuum of Care

The Continuum of Care model is based on the understanding that homelessness is not caused by simply a lack of shelter, but involves a variety of underlying needs. ODOC believes that the best approach for alleviating homelessness is through a community-based process that provides a comprehensive response to the diverse needs of homeless persons. Sponsor / Shelter must obtain verification from their Continuum of Care that they are involved in the CoC organization and service delivery process as well as participate in the HMIS data collecting, Point-In-Time Count Survey and Coordinated Intake. The fundamental components of a Continuum of Care system are:

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

Continuum of Care Criteria

Each of the seven (7) State Program eligible Continuum of Care organizations will be allocated a portion of the State program funds. In order for a Continuum of Care to be allocated funds, the Continuum must comply with the HUD Continuum rule definitions, regulations and timeline pertaining to Continuum structure and planning process.

An eligible Continuum of Care must manage the three primary responsibilities under the CoC Program regulations.

Operate the CoC:

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

Designate and Operate a Homeless Management Information System:

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

Coordinate CoC Planning:

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

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

Continuum of Care Authority of the ESG Program:

- The CoC Governing Board must establish policies/procedures to decide the dollar amount of grants awarded in their CoC region. The overall total amounts awarded must meet at minimum the 60(Shelter)/40(Housing)% spending regulations of the ESG Program.
- The CoC Governing Board must establish policies/procedures to add restrictions/requirements to the scoring process for awarding ESG funds. Any restrictions/requirements added to the scoring process must be in line with making improvements to better adhere to the CoC's Action Plan and/or Performance Measures.
- The CoC Governing Board must establish an Appeal Process for a case in which an Emergency Solutions Grant Program applicant has its application rejected. The Process must include the following:
    - Number of days in which the applicant has to appeal in writing;
    - How the Board shall meet to hear the appeal;
    - After local appeal procedures are exhausted; the applicant may appeal the CoC's decision to ODOC.
- The CoC Governing Board must establish policies/procedures regarding how to redistribute funds that are returned to the CoC if funds are made available after initial awards are granted.
- The CoC Governing Board creates policies/procedures regarding how funds will be awarded/distributed throughout each Continua service area to best answer the Federal/State's overall "No Wrong Door" goals.

Distribution of Non-allocated or Dollars not awarded:
In any case, where funds are not allocated due to there being no eligible CoC in a region or if dollars are returned due to lack of eligible applicants in a CoC region, the funds will be redistributed to the remaining CoC's for award distribution. Any funds not awarded through a first round allocation will be entered into the ODOC/CD ESG distribution formula and redistributed to the remaining CoC's to award to their eligible applicants until all funds have been awarded.

Continuum of Care Eligibility Documentation:

1. Each CoC Lead Agency must submit the following to ODOC/CD:
    a. Names of members who will be scoring the applications
    b. If applicable, agreement with another lead CoC agency to score each other's CoC applications
    c. The following data to show proof of Lead CoC Eligibility:
        i. Copy of most updated CoC Governance Charter
        ii. Copy of most current Point-in-Time Survey data showing who submitted the response into the HDX (Only if this has not already been submitted).
        iii. Copy of most current Continuum of Care Grant application (Exhibit 1) showing the name of the lead agency or member agency who submitted the application (Only if this has not already been submitted)
        iv. Documentation of any changes that have been made regarding the grant amounts awarded and proof that membership was made aware and agreed to approved changes:
            1. Copy of Agenda and Minutes of meeting where changes were discussed and/or approved.
            2. Copy of policies/procedures created as a result of above discussion and approval.

FY 2019 Program Design
The 2019 ESG Program is designed to address the following priority areas:

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

Emergency Solutions subrecipients are required to choose and track all State Performance measures that best match their own organizational performance measures and local Continuum Action Plan. The Statewide Performance Measures tracked for the purpose of this program are:

1. Track the Extent to which Persons who Exit Homelessness to Permanent Housing Destinations Return to Homelessness within six (6) to twelve (12) months
   Explanation: This measure begins with clients who exited a permanent housing destination in the date range two years prior to the report date range. Of those clients, the measure reports on how many of them returned to homelessness as indicated in the HMIS system for up to two years after their initial exit.
2. Track total number of Homeless Persons served.
   Explanation: A) Counts of clients using PIT count data. This data should be manually entered from the appropriate point-in-time count data previously submitted. Due to ever-changing data, it is often difficult or impossible to run the same query months later and return the same results. Thus, this metric is not intended to be programmed into the HMIS as part of the System

Performance Measures Report. B) Counts of clients using HMIS data. Using HMIS data, determine the unduplicated counts of active clients for each of the project types throughout the reporting period.

3. Track Employment and Income Growth for Homeless Persons in ESG Program-funded Projects.
   Explanation: This measure is collected by six (6) tables in HMIS. The project types reported are divided by type of income and universe of clients differ.
4. Track number of Persons who become homeless for the first time.
   Explanation: This measure tracks clients entering in Emergency Shelter, Safe Haven and Transitional housing.
5. Track Homeless Prevention and Housing Placement of Persons Defined by Category 3 of HUD's Homeless Definitions.
   Explanation: All numbers tracked are limited to all persons in projects serving Category 3 homeless.
6. Track successful placement from Street Outreach and Successful Placement in or Retention of Permanent Housing.
   Explanation: This measure tracks A) leavers who exited during the report date range and how many of those exited to an acceptable destination; B) tracks leavers who exited emergency shelter, supportive housing, transitional housing and permanent housing-rapid rehousing.

Definitions related to the Performance Measures:
Individuals – Persons not accompanied by children or adult partner. Individuals can also mean the number of family members in a household
Households – A single individual or group of persons who either currently live together in one dwelling unit or would live together in one dwelling unit were they able to maintain suitable housing accommodations.
Homeless Assistance Services – Any agency service providing assistance with ESG funds
"Increase or Maintain" – As relates to income, where assistance from the agency allows the client to keep their job during their housing crisis or assistance from the agency helps the client to receive a job or receive income benefits from mainstream services and/or local services.
Maintain – As it relates to Prevention, services provided that allows the client households to stay in their housing for at least 90 days if such follow up is possible.
Housing Services – As it relates to Rapid Re-Housing, services provided through Rapid ReHousing services that assist households who are literally homeless.
Unaccompanied Youth – Youth - for the purposes of this program -under the age of 25 years of age that qualify under the category for unaccompanied youth defined as homeless under other federal statutes. Youth who are in the official custody of the State, as a ward of the State, do not qualify for Emergency Solutions Grant assistance.

Funds will be distributed to each Rural Continuum of Care.
The State recognizes that use of the established Continuum of Care structure is the best method for determining appropriate entities for the distribution of the New ESG funds. Starting with a base of $140,000, the formula described below will be used to distribute the remainder of the funds; each eligible Continuum will be provided a target allocation of funds for distribution within its service area. Tulsa CoC will receive a base allocation of $60,000 to be awarded to service providers outside of the City of Tulsa entitlement area. Based on the 2019 HUD allocation of $ $1,584,755.00 (minus the ODOC admin of $59,428.00) the 2019 Continuum of Care allocations will be as follows:

CoC	Allocation with Base of $140,000 Tulsa with Base of $60,000
CLEVELAND	$165,733.00
North Central	$207,043.00
Northeast	$242,082.00

Northwest	$235,652.00
Southeast	$340,060.00
Southwest	$254,777.00
Tulsa (minus City of Tulsa)	$ 79,980.00

The formula used for ESG project funding:

a. 10% - 2014 Estimated Total Population
b. 30% - Weighted Median Income Measure
c. 30% - September 2015 Quintile Tiering Based on Unemployment Rate
d. 30% - 2010 - 2014 Housing units experience severe overcrowding (1.5 occupants per room)

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

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

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

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

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

Eligible Program Participants

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

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

Eligible Program Activities

While flexible in terms of the wide range of servings available to homeless sub-populations and preventing persons from becoming homeless, the ESG Program legislation and implementing regulations

do limit the types of activities and amounts of funds that can be spent on different activities. Details regarding eligible activities are listed below. Unlike the previous program guidelines, if the activity/service is not listed, then that activity/service cannot be funded through this program.

1.0 Street Outreach Component.

1.1 Eligible costs. Subject to the expenditure limits, ESG funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. For the purposes of this grant, the term "unsheltered homeless people" means individuals and families who qualify as homeless under paragraph (1)(i) of the "homeless" definition under § 576.2. The eligible costs and requirements for essential services consist of:

1.2 Engagement. The costs of activities to locate, identify, and build relationships with unsheltered homeless people and engage them for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs. These activities consist of making an initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting and providing information and referrals to programs targeted to homeless people and mainstream social services and housing programs, including emergency shelter, transitional housing, community-based services, permanent supportive housing, and rapid re-housing programs. Eligible costs include the cell phone costs of outreach workers during the performance of these activities.

1.3 Case management. The cost of assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant. Eligible services and activities are as follows: using the centralized or coordinated assessment system as required under § 576.400(d); conducting the initial evaluation required under § 576.401(a), including verifying and documenting eligibility; counseling; developing, securing and coordinating services; obtaining Federal, State, and local benefits; monitoring and evaluating program participant progress; providing information and referrals to other providers; and developing an individualized housing and service plan, including planning a path to permanent housing stability.

1.4 Emergency health services.

(A) Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals operating in community-based settings, including streets, parks, and other places where unsheltered homeless people are living.

(B) ESG funds may be used only for these services to the extent that other appropriate health services are inaccessible or unavailable within the area.

(C) Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate emergency medical treatment; and providing medication and follow-up services.

1.5 Emergency mental health services.

(A) Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions operating in community-based settings, including streets, parks, and other places where unsheltered people are living.

(B) ESG funds may be used only for these services to the extent that other appropriate mental health services are inaccessible or unavailable within the community.

(C) Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances.

(D) Eligible treatment consists of crisis interventions, the prescription of psychotropic medications, explanation about the use and management of medications, and combinations of therapeutic approaches to address multiple problems.

1.6 Transportation. The transportation costs of travel by outreach workers, social workers, medical professionals, or other service providers are eligible, provided that this travel takes place during the provision of services eligible under this section. The costs of transporting unsheltered people to emergency shelters or other service facilities are also eligible. These costs include the following:

(A) The cost of a program participant's travel on public transportation;

(B) If service workers use their own vehicles, mileage allowance for service workers to visit program participants;

(C) The cost of purchasing or leasing a vehicle for the subrecipient in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes and maintenance for the vehicle; and

(D) The travel costs of subrecipient staff to accompany or assist program participants to use public transportation.

1.7 Services for special populations. ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under paragraphs (a)(1) through (a)(5) of this section. The term *victim services* means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.

1.8 Maintenance of effort - If the subrecipient is a unit of general purpose local government, its ESG funds cannot be used to replace funds the local government provided for street outreach and emergency shelter services during the immediately preceding 12-month period, unless HUD determines that the unit of general purpose local government is in a severe financial deficit.

1.9 Minimum period of use. The subrecipient must provide services to homeless individuals and families for at least the period during which ESG funds are provided.

2.0 Emergency Shelter Component.

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

(A) Essential services. ESG funds may be used to provide essential services to individuals and families who are in an emergency shelter, as follows:

(B) Case management. The cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible. Component services and activities consist of:

1. Using the centralized or coordinated assessment system as required under § 576.400 (d);
2. Conducting the initial evaluation required under § 576.401(a), including verifying and documenting eligibility;
3. Counseling;
4. Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;
5. Monitoring and evaluating program participant progress;
6. Providing information and referrals to other providers;
7. Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and
8. Developing an individualized housing and service plan, including planning a path to permanent housing stability.

(C) Child care. The costs of childcare for program participants, including providing meals and snacks, and comprehensive and coordinated sets of appropriate developmental activities, are eligible. The children must be under the age of 13, unless they are disabled. Disabled children

must be under the age of 18. The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

(D) Education services. When necessary for the program participant to obtain and maintain housing, the costs of improving knowledge and basic educational skills are eligible. Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED). Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.

(E) Employment assistance and job training. The costs of employment assistance and job training programs are eligible, including classroom, online, and/or computer instruction; on the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is an eligible cost. Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates. Services that assist individuals in securing employment consist of employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching; and referral to community resources.

(F) Outpatient health services. Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals. Emergency Solutions Grant (ESG) funds may be used only for these services to the extent that other appropriate health services are unavailable within the community. Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate medical treatment, preventive medical care, and health maintenance services, including emergency medical services; providing medication and follow-up services; and providing preventive and non-cosmetic dental care.

(G) Legal services.

(1) Eligible costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the State in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing.

(2) Emergency Solutions Grant (ESG) funds may be used only for these services to the extent that other appropriate legal services are unavailable or inaccessible within the community.

(3) Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, and the resolution of outstanding criminal warrants.

(4) Component services or activities may include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling.

(5) Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services.

(6) Legal services for immigration and citizenship matters and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are ineligible costs.

(H) Life skills training. The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance use, and homelessness are eligible costs. These services must be necessary to assist the program participant to function independently in the community. Component life

skills training are budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting.

(I) Mental health services.

(1) Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions.

(2) ESG funds may only be used for these services to the extent that other appropriate mental health services are unavailable or inaccessible within the community.

(3) Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances. Problem areas may include family and marital relationships, parent-child problems, or symptom management.

(4) Eligible treatment consists of crisis interventions; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.

(J) Substance abuse treatment services.

(1) Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals.

(2) ESG funds may only be used for these services to the extent that other appropriate substance abuse treatment services are unavailable or inaccessible within the community.

(3) Eligible treatment consists of client intake and assessment, and outpatient treatment for up to 30 days. Group and individual counseling and drug testing are eligible costs. Inpatient detoxification and other inpatient drug or alcohol treatment are not eligible costs.

(K) Transportation. Eligible costs consist of the transportation costs of a program participant's travel to and from medical care, employment, childcare, or other eligible essential services facilities. These costs include the following:

(1) The cost of a program participant's travel on public transportation;

(2) If service workers use their own vehicles, mileage allowance for service workers to visit program participants;

(3) The cost of purchasing or leasing a vehicle for the subrecipient in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes, and maintenance for the vehicle; and (D) The travel costs of subrecipient staff to accompany or assist program participants to use public transportation.

(L) Services for special populations. ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under paragraphs (a)(1)(i) through (a)(1)(x) of this section. The term *victim services* means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.

(M) Renovation. Eligible costs include labor, materials, tools, and other costs for renovation (including major rehabilitation of an emergency shelter or conversion of a building into an emergency shelter). The emergency shelter must be owned by a government entity or private nonprofit organization.

(P) Shelter operations. Eligible costs are the costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter. Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual.

(Q) Assistance required under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA). Eligible costs are the costs of providing URA assistance under § 576.408, including relocation payments and other assistance to persons displaced by a project assisted with ESG funds. Persons that receive URA assistance are not considered "program participants" for the purposes of this part, and relocation payments and other URA assistance are not considered "rental assistance" or "housing relocation and stabilization services" for the purposes of this part.

(R) Prohibition against involuntary family separation. The age, of a child under age 18 must not be used as a basis for denying any family's admission to an emergency shelter that uses Emergency Solutions Grant (ESG) funding or services and provides shelter to families with children under age 18.

(S) Minimum period of use.

(1) Renovated buildings. Each building renovated with ESG funds must be maintained as a shelter for homeless individuals and families for not less than a period of 3 or 10 years, depending on the type of renovation and the value of the building. The "value of the building" is the reasonable monetary value assigned to the building, such as the value assigned by an independent real estate appraiser. The minimum use period must begin on the date the building is first occupied by a homeless individual or family after the completed renovation. A minimum period of use of 10 years, required for major rehabilitation and conversion, must be enforced by a recorded deed or use restriction.

(i) Major rehabilitation. If the rehabilitation cost of an emergency shelter exceeds 75 percent of the value of the building before rehabilitation, the minimum period of use is 10 years.

(ii) Conversion. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the minimum period of use is 10 years.

(iii) Renovation other than major rehabilitation or conversion. In all other cases where ESG funds are used for renovation, the minimum period of use is 3 years.

(2) Essential services and shelter operations. Where the subrecipient uses ESG funds solely for essential services or shelter operations, the subrecipient must provide services or shelter to homeless individuals and families at least for the period during which the ESG funds are provided. The subrecipient does not need to limit these services or shelter to a particular site or structure, so long as the site or structure serves the same type of persons originally served with the assistance (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or serves homeless persons in the same area where the subrecipient originally provided the services or shelter.

2.2 Long-term Emergency Shelter

The Transitional Housing that was Grandfathered in as of 2010 is no longer an eligible activity for the ESG Program. Applicants are welcome to propose projects for long-term Emergency Shelter.

This type of shelter would be for clients whose needs to become stable enough for permanent housing will take longer than the regular shelter stay period.

Details for approval of an extended length of stay in a shelter environment will have to be provided in the Project Narrative questions portion of the application.

2.3 Maintenance of effort. The maintenance of effort requirements under § 576.101(c), which apply to the use of ESG funds for essential services related to street outreach, also apply for the use of such funds for essential services related to emergency shelter.

3.0 Homelessness Prevention.

ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the "homeless" definition in § 576.2. This assistance, referred to as homelessness prevention, may be provided to individuals and families who

meet the criteria under the "at risk of homelessness" definition, or who meet the criteria in paragraph (2), (3), or (4) of the "homeless" definition in § 576.2 and have an annual income below 30 percent of median family income for the area, as determined by HUD. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing. Homelessness prevention must be provided in accordance with the housing relocation and stabilization services requirements in § 576.105, the short-term and medium-term rental assistance requirements in § 576.106, and the written standards and procedures established under § 576.400.

4.0 Rapid re-housing assistance component.
ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. This assistance, referred to as rapid re-housing assistance, may be provided to program participants who meet the criteria under paragraph (1) of the "homeless" definition in § 576.2 or who meet the criteria under paragraph (4) of the "homeless" definition and live in an emergency shelter or other place described in paragraph (1) of the "homeless" definition. The rapid re-housing assistance must be provided in accordance with the housing relocation and stabilization services requirements in § 576.105, the short- and medium-term rental assistance requirements in § 576.106, and the written standards and procedures established under §576.400.

5.0 Housing relocation and stabilization services.

5.1 Financial assistance costs. Subject to the general conditions under § 576.103 and § 576.104, ESG funds may be used to pay housing owners, utility companies, and other third parties for the following costs:

(A) Rental application fees. ESG funds may pay for the rental housing application fee that is charged by the owner to all applicants.

(B) Security deposits. ESG funds may pay for a security deposit that is equal to no more than 2 months' rent.

(C) Last month's rent. If necessary to obtain housing for a program participant, the last month's rent may be paid from ESG funds to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. This assistance must not exceed one month's rent and must be included in calculating the program participant's total rental assistance, which cannot exceed 24 months during any 3-year period.

(D) Utility deposits. ESG funds may pay for a standard utility deposit required by the utility company for all customers for the utilities listed in paragraph (5) of this section.

(E) Utility payments. ESG funds may pay for up to 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service. A partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments. Eligible utility services are gas, electric, water, and sewage. No program participant shall receive more than 24 months of utility assistance within any 3-year period.

(F) Moving costs. ESG funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance under paragraph (b) of this section and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.

5.2 Services costs. Subject to the general restrictions under § 576.103 and § 576.104, ESG funds may be used to pay the costs of providing the following services:

(A) Housing search and placement. Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing, include the following:

(i) Assessment of housing barriers, needs, and preferences;

(ii) Development of an action plan for locating housing;
(iii) Housing search;
(iv) Outreach to and negotiation with owners;
(v) Assistance with submitting rental applications and understanding leases;
(vi) Assessment of housing for compliance with Emergency Solutions Grant (ESG) requirements for habitability, lead-based paint, and rent reasonableness;
(vii) Assistance with obtaining utilities and making moving arrangements; and
(viii) Tenant counseling.

(B) Housing stability case management. ESG funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. This assistance cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing. Component services and activities consist of:
(i) Using the centralized or coordinated assessment system as required under § 576.400(d), to evaluate individuals and families applying for or receiving homelessness prevention or rapid re-housing assistance;

(C) Conducting the initial evaluation required under § 576.401(a), including verifying and documenting eligibility, for individuals and families applying for homelessness prevention or rapid re-housing assistance;
(D) Counseling;
(E) Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;
(E) Monitoring and evaluating program participant progress;
(F) Providing information and referrals to other providers;
(G) Developing an individualized housing and service plan, including planning a path to permanent housing stability; and
(H) Conducting re-evaluations required under § 576.401(b).

(3) Mediation. ESG funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.

(4) Legal services. ESG funds may pay for legal services, as set forth in § 576.102(a)(1)(vi), except that the eligible subject matters also include landlord/tenant matters, and the services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides.

(5) Credit repair. ESG funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.

5.3 Maximum amounts and periods of assistance. The recipient may set a maximum dollar amount that a program participant may receive for each type of financial assistance under paragraph (a) of this section. The recipient may also set a maximum period for which a program participant may receive any of the types of assistance or services under this section. However, except for housing stability case management, the total period for which any program participant may receive the services under paragraph (b) of this section must not exceed 24 months during any 3-year period. The limits on the assistance under this section apply to the total assistance an individual receives, either as an individual or as part of a family.

5.4 Use with other subsidies. Financial assistance under paragraph (a) of this section cannot be provided to a program participant who is receiving the same type of assistance through other public

sources or to a program participant who has been provided with replacement housing payments under the URA, during the period covered by the URA payments.

5.5 Short-term and medium-term rental assistance.

(A) **General provisions**. Subject to the general conditions under § 576.103 and § 576.104, the subrecipient may provide a program participant with up to 24 months of rental assistance during any 3-year period. This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance.

(1) Short-term rental assistance is assistance for up to 3 months of rent.

(2) Medium-term rental assistance is assistance for more than 3 months but not more than 24 months of rent.

(3) Payment of rental arrears consists of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.

(4) Rental assistance may be tenant-based or project-based, as set forth in paragraphs (h) and (i) of this section.

(5) Discretion to set caps and conditions. Subject to the requirements of this section, the recipient may set a maximum amount or percentage of rental assistance that a program participant may receive a maximum number of months that a program participant may receive rental assistance, or a maximum number of times that a program participant may receive rental assistance. The recipient may also require program participants to share in the costs of rent.

(6) Use with other subsidies. Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance, or living in a housing unit receiving project-based rental assistance or operating assistance, through other public sources. Rental assistance may not be provided to a program participant who has been provided with replacement housing payments under the URA during the period of time covered by the URA payments.

(7) Rent restrictions. (1) Rental assistance cannot be provided unless the rent does not exceed the Fair Market Rent established by HUD, as provided under 24 CFR part 888, and complies with HUD's standard of rent reasonableness, as established under 24 CFR 982.507.

(B) For purposes of calculating rent under this section, the rent shall equal the sum of the total monthly rent for the unit, any fees required for occupancy under the lease (other than late fees and pet fees) and, if the tenant pays separately for utilities, the monthly allowance for utilities (excluding telephone) established by the public housing authority for the area in which the housing is located.

(1) Rental assistance agreement. The subrecipient may make rental assistance payments only to an owner with whom the subrecipient has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the subrecipient a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant.

(2) Late payments. The subrecipient must make timely payments to each owner in accordance with the rental assistance agreement. The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease. The subrecipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds.

(3) Lease. Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears. The lease must be between the owner and the program participant. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or canceled checks. For program participants living in housing with project-based rental assistance under paragraph (i) of this section, the lease must have an initial term of one year.

(4) Tenant-based rental assistance.

(i) A program participant who receives tenant-based rental assistance may select a housing unit in which to live and may move to another unit or building and continue to receive rental assistance, as long as the program participant continues to meet the program requirements.

(ii) The recipient may require that all program participants live within a particular area for the period in which the rental assistance is provided.

(iii) The rental assistance agreement with the owner must terminate and no further rental assistance payments under that agreement may be made if:

(a) The program participant moves out of the housing unit for which the program participant has a lease;

(b) The lease terminates and is not renewed; or

(c) The program participant becomes ineligible to receive ESG rental assistance.

(C) Changes in household composition. The limits on the assistance under this section apply to the total assistance an individual receives, either as an individual or as part of a family.

6.0 Data Collection (HMIS) component.

6.1 Eligible costs.

(A) The subrecipient may use ESG funds to pay the costs of contributing data to the HMIS designated by the Continuum of Care for the area, including the costs of:

(i) Purchasing or leasing computer hardware;

(ii) Purchasing software or software licenses;

(iii) Purchasing or leasing equipment, including telephones, fax machines, and furniture;

(iv) Obtaining technical support;

(v) Leasing office space;

(vi) Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS;

(vii) Paying salaries for operating HMIS, including:

(a) Completing data entry;

(b) Monitoring and reviewing data quality;

(c) Completing data analysis;

(d) Reporting to the HMIS Lead;

(e) Training staff on using the HMIS or comparable database; and

(f) Implementing and complying with HMIS requirements;

(B) Paying costs of staff to travel to and attend HUD-sponsored and HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act;

(C) Paying staff travel costs to conduct intake; and

(D) Paying participation fees charged by the HMIS Lead, if the subrecipient is not the HMIS Lead. The HMIS Lead is the entity designated by the Continuum of Care to operate the area's HMIS.

6.2 If the recipient is the HMIS lead agency, as designated by the Continuum of Care in the most recent fiscal year Continuum of Care Homeless Assistance Grants Competition, it may also use ESG funds to pay the costs of:

(A) Hosting and maintaining HMIS software or data;

(B) Backing up, recovering, or repairing HMIS software or data;

(C) Upgrading, customizing, and enhancing the HMIS;

(D) Integrating and warehousing data, including development of a data warehouse for use in aggregating data from subrecipients using multiple software systems;

(E) Administering the system;

(F) Reporting to providers, the Continuum of Care, and HUD; and

(G) Conducting training on using the system or a comparable database, including traveling to the training.

6.3 If the subrecipient is a victim services provider or a legal services provider, it may use ESG funds to establish and operate a comparable database that collects client-level data over time (i.e.,

longitudinal data) and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to an HMIS.

(A) General restrictions. Activities funded under this section must comply with HUD's standards on participation, data collection, and reporting under a local HMIS.

7.0 Administrative Activities.

7.1 Eligible costs. The subrecipient may use up to 3.75 percent of its ESG grant for the payment of administrative costs related to the planning and execution of ESG activities. This does not include staff and overhead costs directly related to carrying out activities eligible under § 576.101 through § 576.107, because those costs are eligible as part of those activities. Eligible administrative costs include:

(A) General management, oversight and coordination. Costs of overall program management, coordination, monitoring, and evaluation. These costs include, but are not limited to, necessary expenditures for the following:

(i) Salaries, wages, and related costs of the recipient's staff, the staff of subrecipients, or other staff engaged in program administration. In charging costs to this category, the recipient may either include the entire salary, wages, and related costs allocable to the program of each person whose *primary* responsibilities with regard to the program involve program administration assignments, or the pro rata share of the salary, wages, and related costs of each person whose job includes *any* program administration assignments. The recipient may use only one of these methods for each fiscal year grant. Program administration assignments include the following:

(a) Preparing program budgets and schedules, and amendments to those budgets and schedules;

(b) Developing systems for assuring compliance with program requirements;

(c) Developing interagency agreements and agreements with subrecipients and contractors to carry out program activities;

(d) Monitoring program activities for progress and compliance with program requirements;

(e) Preparing reports and other documents directly related to the program for submission to HUD;

(f) Coordinating the resolution of audit and monitoring findings;

(g) Evaluating program results against stated objectives; and

(h) Managing or supervising persons whose primary responsibilities with regard to the program include such assignments as those described in paragraph (A)(1)(i)(a) through (g) of this section.

(B) Administrative services performed under third-party contracts or agreements, including general legal services, accounting services, and audit services; and

(C) Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space.

(D) Training on ESG requirements. Costs of providing training on ESG requirements and attending HUD-sponsored ESG trainings.

(E) Consolidated plan. Costs of preparing and amending the ESG and homelessness related sections of the consolidated plan in accordance with ESG requirements and 24 CFR part 91.

Policy and Procedures Standards

The changes made to the homelessness assistance programs from the implementation of the HEARTH Act has given all entities involved a chance to review past policies and practices. Homeless Service Providers should take time to reflect on what changes need to be made to help those most in need in their service areas.

Each ESG subrecipient must establish written standards for providing ESG assistance. Returning applicants much submit documentation that the Program's Written Policies and Procedures have been reviewed by the Staff and Board at least once a year. Documentation must include a Board Agenda

showing the Policies/Procedures as an Agenda item as well as the minutes produced from the meeting showing the discussion and approval of the Policies/Procedures from the Board. New subrecipients must have an established set of Policies and Procedures within ninety (90) days of receiving their ESG Award letter. The new subrecipient must submit a copy of the written Policies/Procedures, Board Agenda showing the Policies/Procedures as an Agenda item as well as the minutes produced from the meeting showing the discussion and approval of the Policies/Procedures from the Board.

The following standards must be applied consistently within the subrecipient's program:

Evaluation of individuals and families eligible for assistance under ESG
Policies and procedures must include:

- Process by which the subrecipient must conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for assistance.
- Process by which the subrecipient conducts assessment in accordance with the CoC's centralized or coordinated assessment requirements.
- Process by which the subrecipient requires the program participant to meet with a case manager (not less than once per month to assist in ensuring long-term housing stability);
- Process by which the subrecipient develops a plan to assist the program participant to retain permanent housing after assistance ends; taking into account all relevant considerations such as current or expected income and expenses; other public or private assistance available to the program participant and relative affordability of the available housing in the area.
- Process by which the subrecipient re-evaluates the program participant's eligibility and the types and amounts of assistance the program participant needs not less than once every 3 months for those receiving homeless prevention assistance and not less than once a year for those receiving rapid re-housing assistance
- Process by which program participant notifies subrecipient of changes to the program participant's income of other circumstances that affect the need for assistance and how such changes will be re-evaluated.

Coordination of services among Emergency Shelter Providers
Policies and procedures must include:

- Where applicable, coordination of ESG-funded services with other services in the local or regional service area of the Continuum of Care or area over which the services are coordinated to provide a strategic, community-wide system to prevent and end homelessness for the area. These programs include:
    - Shelter Plus Care Program
    - Supportive Housing Program
    - Section 8 Moderate Rehabilitation Program for Single Room Occupancy Program for Homeless Individuals
    - HUD-Veterans Affairs Supportive Housing
    - Education for Homeless Children and Youth Grants for State and Local Activities
    - Grants for the Benefit of Homeless Individuals
    - Healthcare for the Homeless
    - Programs for Runaway and Homeless Youth
    - Projects for Assistance in Transition from Homelessness
    - Services in Supportive Housing Grants
    - Emergency Food and Shelter Program
    - Transitional Housing Assistance Grants for Victims of Sexual Assault, Domestic Violence, Dating Violence, and Stalking Program
    - Homeless Veterans Reintegration Program
    - Domiciliary Care for Homeless Veterans Program
    - VA Homeless Providers Grant and Per Diem Program

- Health Care for Homeless Veterans Program
- Homeless Veterans Dental Program
- Supportive Services for Veteran Families Program
- Veteran Justice Outreach Initiative

Coordination with Mainstream resources
Policies and procedures must include:

- Organizations and/or shelters receiving ESG funds must coordinate and integrate wherever possible ESG-funded activities with mainstream housing, 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.
- Such mainstream programs include; but are not limited to:
    - Public housing programs assisted under section 9 of the US Housing Act of 1937
    - Housing programs receiving tenant-based or project-based assistance under section 8 of the US Housing Act of 1937
    - Department of Developmental Disability Services
    - Supportive Housing for Persons with Disabilities
    - Home Investment Partnerships Program
    - Temporary Assistance for Needy Families (TANF)
    - Health Center Program
    - State Children's Health Insurance Program
    - Head Start
    - Mental Health and Substance Abuse Block Grants
    - Services funded under the Workforce Investment Act
    - Medicaid
    - Supplemental Nutrition Assistance Program
    - Women, Infants and Children
    - Federal- State Unemployment Insurance Program
    - Social Security Disability Insurance
    - Child and Adult Care Food Program
    - Developmental Screening programs/services for youth
    - Sooner Start

Determination and Prioritization of which eligible families and individuals receive homelessness prevention and which ones will receive rapid re-housing services The State requires that subrecipients create and implement written standards regarding how an individual or family is chosen to receive either homelessness prevention or rapid re-housing services. The written standards must be applied consistently within the subrecipient's program.

Determination of the share of rent and utilities costs that each program participant must pay, if any, while receiving homelessness prevention or rapid re-housing assistance
The State requires that subrecipients create and implement written standards regarding what participants have to pay, if anything, over time. The written standards must be applied consistently within the subrecipient's program.

Determination of how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time
The State requires that subrecipients create and implement written standards regarding adjusted amount of participant assistance, if any, over time. The written standards must be applied consistently within the subrecipient's program.

Determination of the type, amount and duration of housing stabilization and/or relocation services to provide a program participant

Policies and procedures must include:

- limits; if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive
- maximum amount of assistance
- maximum number of months the program participant receives assistance
- the maximum number of times the program participants may receive assistance.

Termination of Assistance

Policies and procedures must include:

- Process by which the subrecipient may terminate assistance when a program participant violates program requirements must include:
    - Written notice to the program participant containing a clear statement of the reasons for termination;
    - A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person or other than the person (or a subordinate of that person) who made or approved the termination decision; and
    - Prompt written notice of the final decision to the program participant.

Homeless Participation Requirement

The organization or shelter receiving ESG funds must provide for the participation of not less than one homeless individual or formerly homeless individual on the Board of Directors or other equivalent policy-making entity of the subrecipient; to the extent that the entity considers and makes policies and decisions regarding any facilities, services or other assistance that receive funding under ESG

If the subrecipient is unable to meet the above requirement; it must instead develop and implement a plan to consult with homeless or formerly homeless individuals in considering and making policies and decisions regarding any facilities, services or other assistance that receive funding under Emergency Solutions Grant. The plan must be included with the application upon submission.

Habitability Standards

The following are a number of basic standards to ensure that shelter and housing facilities, including qualifying rental assistance residences, funded through the ESG program are safe, sanitary, and adequately maintained.

Habitability Standards for Shelter Component and Housing programs

Organizations providing rental assistance with ESG funds will be required to conduct initial and any appropriate follow-up inspections of housing units into which a program participant will be moving. Following are the habitability standards that grantees must follow:

(a**) State and local requirements**. Each grant recipient under this Notice must ensure that shelter facilities or housing occupied by a family or individual receiving ESG assistance is in compliance with all applicable state and local housing codes, licensing requirements, and any other requirements in the jurisdiction in which the housing is located regarding the condition of the structure and the operation of the housing or services.

(b) **Habitability standards.** Housing occupied by a family or individual receiving ESG rental assistance must meet the following minimum requirements:

(1) **Structure and materials**. The structures must be structurally sound so as not to pose any threat to the health and safety of the occupants and so as to protect the residents from the elements.

(2) **Access**. The housing must be accessible and capable of being utilized without unauthorized use of other private properties. Structures must provide alternate means of egress in case of fire.

(3) **Space and security**. Each resident must be afforded adequate space and security for themselves and their belongings. Each resident must be provided an acceptable place to sleep.

(4) **Interior air quality**. Every room or space must be provided with natural or mechanical ventilation. Structures must be free of pollutants in the air at levels that threaten the health of residents.

(5) **Water supply**. The water supply must be free from contamination.

(6) **Sanitary facilities**. Residents must have access to sufficient sanitary facilities that are in proper operating condition, may be used in privacy, and are adequate for personal cleanliness and the disposal of human waste.

(7) **Thermal environment**. The housing must have adequate heating and/or cooling facilities in proper operating condition.

(8) **Illumination and electricity**. The housing must have adequate natural or artificial illumination to permit normal indoor activities and to support the health and safety of residents. Sufficient electrical sources must be provided to permit use of essential electrical appliances while assuring safety from fire.

(9) **Food preparation and refuse disposal**. All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a sanitary manner.

(10) **Sanitary condition**. The housing and any equipment must be maintained in sanitary condition.

(11) **Fire safety**.

(i) Each unit must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing impaired persons, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person.

(ii) The public areas of all housing must be equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to, laundry rooms, community rooms, day care centers, hallways, stairwells, and other common areas.

Release of Funds

Units of general local government/CAA must submit and receive authority to use grants funds prior to expending grant funds. Funds will not be released until all required documentation has been received. Funds expended prior to the authority to use grant funds will not be reimbursed.

Budget

Each recipient must complete a project budget and budget narrative form. Project budget should list the amount of ESG funds to be expended in each separate category and the project narrative should provide a description detailing the anticipated expenditures by category.

Matching Funds
The FY 2019 ESG Program requires a dollar-for dollar local match. Each Applicant is required to complete certification describing the sources and amounts submitted for match. The amount of match must be tracked and reconciled by month and reflected on the monthly expenditure report submitted to ODOC on the 20th of each month. It is the award recipient's responsibility to ensure that cash match must be spent on ESG eligible activities only. Match funds and expenditures must also be included in the annual audit.

The following are examples of what can be used as match:

- Cash (can only be spent on ESG eligible activities)
- The value or fair rental value of any building used for program purposes (in-kind)
- Donated material (in-kind)
- The value of an owned or donated building (match may be used only one time)
- Salary paid to staff to carry out the program of the recipient (Source of funding for staff salaries must be listed on Matcher Certification form and tracked monthly.
- Volunteer time (@ $5/hour)

Record Keeping
Through the CoC Statewide meetings, a taskforce will be established to review documents used for Record Keeping requirements. This taskforce will review documents currently used by current suprecipients and establish either a standardized checklist of required documents and/or a set of documents that each subrecipient must use in their intake/assessment and record keeping process to prove Status of Homelessness. Results from the Task Force will be distributed to the CoC Lead Agencies for the purpose of discussing and approving items in regular membership meetings.

Reporting
Emergency Solutions Grant recipients will use HMIS through the applicable Continuum of Care to collect data and report on outputs and outcomes as required by HUD. The required data elements to be collected are included in the revised HMIS Standards Final Rule September 2015:
https://www.hudexchange.info/resource/3826/hmis-data-standards-manual/

According to HUD's final ruling over data collection from Domestic Violence Shelters, the revised "VAWA Protections" include that Domestic Violence Shelters are exempt from having to use any shared database such as the HMIS software to collect client information and services provided. However, data collection relating to non-confidential demographics and services provided is required to be reported by the DV shelter.

Sage Reporting
SAGE is the online portal for the submission of aggregate, de-identified data from HMIS or comparable databases via a Comma Separated Value (CSV) import. As of October 1, 2017, The Office of Housing and Urban Development (HUD) now requires all ESG subrecipients to upload their CAPER report from HMIS into this database. SAGE replaces the former eCart database system. All Applicants who receive ESG funds will be required to upload Performance Report data to the SAGE System. Domestic Violence Shelters are not exempt from providing required aggregate data to upload into SAGE. The comparable system that the Domestic Violence Shelters use must be able to create a CSV file needed to upload to the SAGE system to meet requirements. If a Domestic Violence Shelter's comparable database cannot provide required demographic data and cannot provide required reports in the required format (CSV file for SAGE) the Domestic Violence Shelter may be disqualified to be awarded Emergency Solution Grant funds.

Reports due to ODOC using data from approved data collection methods are as follows:

Report Type	Reporting Period
Monthly Progress - Due the 20th of each following month.	For example, the January monthly report would be due no later than February 20th.
Semi-Annual Progress Reports – Report providing unduplicated numbers due 30 days after each semi-annual period; October – March, April –-- September	Period ending March 30th – Due April 30th Period ending September 30th – Due October 30th
Annual Performance Report – Due 60 days after the end of the contract year for each fiscal year in which ESG funds are expended.	Due November 30th
SAGE Upload – Must be uploaded 45 days before CAPER is due to HUD	Due May 15th

Payments
ODOC shall disburse funds to the units of general local government/CAA upon receipt and approval by ODOC of the Request for Release of Funds. Once the "Authorization to Spend funds" form has been received by the new subrecipient, a reimbursement payment process will be implemented.

Deadline for Using Grant Amounts
The grant period for the ESG project is 12 months effective from the date of the contract with the Oklahoma Department of Commerce. Extensions to the program (grant) periods are made at the discretion of the State and will only be approved in extreme circumstances.

Obligated
ODOC will send a letter to each rural continuum once agreement has been received by HUD notifying each Lead agency the total dollar amount the CoC will be allowed to award in their service area. Each CoC Governance Board has a certain time period in which they review the submitted applications. Once reviewed and final decisions made, each CoC will submit a letter to ODOC with their recommendations for funding to eligible applicants. Funds cannot be expended until ODOC/CD receives an Environmental Review (if applicable), Sponsor Shelter Agreement or summary (if applicable) and a Request for Release of Funds. Upon receipt of these documents, ODOC will return to the Applicant a signed Authority to Use Grant Funds.

Certifications
Federal requirements will be assured by certifications in the grant application. Federal requirement certifications that must be submitted by applicants are as follows:
Local Government Certification – This form is signed by the local unit of government Chief Elected Official when the unit of government agrees to be the Sponsor for a nonprofit organization. The local unit of government agrees to follow federal regulations as it relates to building standards, assistance to the homeless along with other Department of Housing and Urban Development (HUD) laws and regulations.
Private Non-Profit Certification – This form is signed by the Executive Director of the Community Action Agency when said agency agrees to be the Sponsor for a nonprofit organization or the independent nonprofit itself. The signing entity agrees to follow federal regulations
Certification of Local Government Approval for Nonprofit Organizations – This form is signed by the Chief Elected Official of the city/town in which the Homeless Assistance program activities are being provided. The local government approves of the services being provided in their city/town.

Applicant Assurances – This is signed by the Applicant. The Applicant agrees that Homeless individuals will receive an appropriate level of service and will be given opportunities to participate in policy making decisions regarding shelter and services provided.
Program Certifications – This is signed by the Applicant. The Applicant agrees to comply with having policies relating to the State's Consolidated Plan, Confidentiality, Discharge Planning, Affirmatively Further Fair Housing and HMIS.
Certification of Consistency with Consolidated Plan HUD 2991 – This form is signed by the Certifying Official at ODOC. The Certifying Jurisdiction agrees that the Applicant's program is consistent with the jurisdiction's Consolidated Plan.
J. Drug-Free Workplace Requirements - The Drug-Free Workplace Act of 1988 (41 U.S.C. 701, et seq.) and HUD's implementing regulations as applied to ESG.
Lead-Based Paint Requirements - The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4801 et seq.), as amended by the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851 et seq.) and implementing regulations at 24 CFR part 35, subparts A, B, M, and R shall apply to housing occupied by families receiving assistance through ESG.
Anti-Lobbying Certification – This is signed by the Applicant. The Applicant agrees that no Federally appropriated funds will be used for lobbying activities.
Request for Release of Funds and Certification – This is signed by the Applicant. The Applicant submits all forms necessary for Environmental Review compliance or states exemption status for Environmental Review process.
Applicant/Recipient Disclosure/Update Report – This form is signed by the Applicant. The applicant must disclose if they are receiving, or expect to receive, assistance from other HUD Programs that are subject to the disclosure requirements of Subpart C of 24 CFR Part 12.
Continuum of Care Lead Agency Participation letter – This is provided by the Continuum of Care Lead Agency. The letter must include that the shelter is a member of the Continuum of Care, the level of participation in the HMIS or comparable data collection database, level of participation during the Annual Point-in-Time Survey Count and any Continuum of Care committees or related participation.

Audit Requirement
All audits of prior awards from ODOC/CD must be in accordance with ODOC/CD Audit Policies and Procedures Manual. An audit is required if $25,000 or more was received from ODOC/CD. The audit should be completed and the report submitted no later than six (6) months after the end of the contractor's fiscal year.

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

Match is a contractual requirement on ESG and must be reported in the audit for both revenue and expenditures. Here are two examples:

1. Note with an asterisk or a number/letter on the financials for both revenues and expenditures. At the bottom of that audit page the explanation would include that this amount includes the match of $____ as required for contract number_____.
2. Add a Note to the financial statements that states the match of $_____ as required in the contract for contract number _____ was met.

Confidentiality
All ESG recipients must develop and implement procedures to ensure:
(1) The confidentiality of records pertaining to any individual provided with assistance; and
(2) That the address or location of any assisted housing will not be made public, except to the extent that this prohibition contradicts a preexisting privacy policy of the grantee.

Performance
ODOC reserves the right to recapture Emergency Solution Grant funds under the following circumstances:

- Failure to obligate and spend within the time periods as specified:
  - Fifty percent (50%) of awarded funds must be spent by the first six (6) months of the contract; seventy-five percent (75%) must be spent within nine (9) months of the contract
- Failure, without approved modification, to implement the project as set forth in the approved ESG grant application.
- Failure to meet the specified performance measures.
- Failure to meet threshold responsibilities during the contract period.

Application Procedures, Submission and Selection Requirements

Continuum of Care Scoring Process:

1. After applications are submitted into OK Grants, volunteers whose names have been submitted from each CoC will receive training to become a Reviewer through a Webinar. Reviewers will be trained how to use the ESG Scoring tool and shown how to enter scores into OK Grants. CoC Reviewers will then be given a login to OK Grants and additional instructions to score their assigned applications online. The Scoring criteria will not be released to the CoC leads until after the application deadline.
2. Raters will be given a deadline to score applications.
3. Once the applications have been scored, the CoC Lead agency will submit a letter to ODOC listing the applicants that are being recommended for funds and the dollar amount being awarded equaling the dollar amount allocated to the CoC.
4. ODOC will implement a Pre-Award Risk Assessment. The results of this survey will determine if an applicant is a Low, Medium or High Risk and will help determine any additional special conditions that will be added to the Applicant's contract. First time applicants that are awarded funds will be automatically scored as a "High Risk" and will have special conditions added to their contract, including additional Technical Assistance, monitoring and submitted source documentation with every expense report.
5. ODOC will send award letters to subrecipients with final instructions regarding how contracts are initiated in OK Grants.

Submission Requirements
In the occurrence of a Sponsor applying on behalf of more than one shelter, separate applications must be submitted for each shelter.

Application Workshop
A mandatory application workshop has been scheduled for March 28, 2019. Attendance will be mandatory for all organizations planning on applying for the 2019 Program year. After the Application is made available in OK Grants, only questions of a clarifying nature will be answered after the workshop has been held. ODOC will not answer any questions regarding the Emergency Solutions program or provide technical assistance during the application process.

Verification and On-site Visits
The Oklahoma Department of Commerce/ Community Development reserves the right to verify information and documentation received as part of the ESG application. An on-site visit may be scheduled by ODOC to conduct an observation of the facility where the proposed ESG project will be carried out. On site observations of shelter facilities will receive no more than 24 hour notice via telephone. A representative from both the shelter and the sponsor must be available during the visit.

Selection for Award
The Application Sections below provide justification and support for your proposed project. In the Narrative Section, please provide as much descriptive information as possible. Projects will be evaluated by a point system scoring each category of the narrative and taking into consideration the overall quality of the application and information collected during on-site reviews. After Reviewers from each Continuum of Care individually score each proposal, the combined scores are averaged. The averaged score reflects the Reviewer's determination of the merit and feasibility of the project. Funds may be awarded, in whole or in part, based on the application's relative score and funding availability determined by the guidelines set by each Continuum of Care Governing Board and policies. **ODOC reserves the right to refuse funding to applications that receive less than 50% of the total points available.** If funding remains available after all applicants with scores greater than 50% of the total points are awarded, then ODOC may consider applications receiving less than 50% of the total points for a provisional award.

Program Application Guidelines and Submission Requirements
All grant applications must be submitted electronically through the new ODOC OKGrants.gov. Here is the link to the grant site and registration instructions:

https://grants.ok.gov/

In the instance of a unit of general local government or CAA applying on behalf of more than one shelter, separate applications must be submitted for each shelter. Applicants may present multiple funding requests in a single application. When this occurs, answer the application questions associated with the highest level Tier for which funding is requested and list all Tiers the applicant is applying for under the appropriate application questions. **Only one application per shelter will be accepted.**

FY 2019 Emergency Solutions Grant Checklist (Form Online in OK Grants)

To be considered for ESG funds, an application must contain the items detailed below:

OK Grant Forms

- ❑ Application Summary (Form 424)
- ❑ All required responses Section I through Section V
- ❑ Budget Detail
- ❑ Budget Summary (Save Only)
- ❑ Budget Narrative
- ❑ Match / Additional Funds Certification Form
- ❑ Audit

Upload to Uploads Page

- ❑ Program Certifications and Assurances, which includes:
  - o Section I. Applicant Assurances
  - o Section II. Program Certifications (formerly ODOC 6)
  - o Section III. Drug-Free Workplace (formerly ODOC 7)
  - o Section IV. Anti-Lobbying Certification (formerly ODOC 8)
- ❑ Applicant/Recipient Disclosure/Update Report
- ❑ Certification of Consistency with Consolidated Plan HUD 2991
- ❑ System for Award Management (SAM.gov) PDF Search Verification of Non-DeBarred Status
- ❑ Continuum of Care Agreement for HMIS Data Entry
- ❑ Continuum of Care Lead Agency Participation letter
- ❑ Documentation showing proof of Annual Board Review of ESG Written Policies and Procedures
- ❑ Environmental Review Record for Exemptions/Release of Funds

- ❑ Required forms for Units of General Local Government
  - o Local Government Certification

    -Or-
- ❑ Required forms for Community Action Agency (CAA) or Independent Nonprofit
  - o Private Non-Profit Certification
  - o Certification of Local Government Approval for Nonprofit Organizations

- ❑ In the case of a Community Action Agency, a signed letter must be submitted by the Unit of Local Government assuring that they will perform the environmental review.

Section I – V Questions

Section I Community Needs(15 Pts)	
Description	**Question**
The shelter has a targeted and clearly demonstrated need. The shelter's services will make a significant impact on the community in alleviating homelessness. The applicant is knowledgeable of the level of need in the community and provides local data to document who is being served and a potential for those who may need to be served in the community. The Applicant's response to I-2 must clearly describe how their staff/volunteers participated in the annual Point-in-time (PIT) Count. The results from the PIT must also be included	I-1) Describe the need for homeless assistance services in your area o Include where "proof of need" data was collected. I-2) Describe Applicants participation in Annual Point-in-time Count. Explain the numbers collected by the applicant and how the applicant uses the PIT results to change program priorities or services.
Section II Proposed Use of Funds(50 pts)	
Description	**Question**
Applicant describes a well-defined independent program. Proposed program relates to the identified needs of the target clients. The needs identified in II-1 relate to proposed programs. A description of how the grant will be used corresponds with the budget/budget narrative	II-1. What sub-population(s) does the shelter serve (check all that apply) ___ Children and Youth ___ Chronic Substance Abusers ___ Co-Occurring Disorder (see definition) ___ Expectant Mothers ___ Persons with HIV/Aids ___ Mentally Ill ___ Veterans ___ Victims of Domestic Violence ___ Other (specify)
It is a program requirement that the shelter/organization providing services be accessible to clients 24/7/365. Applicant must explain how the shelter component is available 24/7/365. Response must include how the requirement is maintained, staffed or process, etc.	II-2 Explain how the shelter remains accessible/open to meet the 24/7/365 requirement
Length of stay is established by shelter's policies. Federal program maximum is up to 24 months continuous assistance and a lifetime maximum of 36 months.	II-3 What is the maximum length of stay?
Fee for services is established by shelter's policies.	II-4 Does your shelter charge a fee for services? If yes, provide explanation.

Each applicant must provide one of two options: 1) In communities where no appropriate emergency shelter is available, written agreements or a voucher system may be implemented to pay for hotel or motel costs for the family or individual, or a written agreement with a partnering organization that does have a shelter facility within reasonable distance of the applicant; or 2) Applicant has an Emergency Shelter facility designed to provide temporary housing for individuals and/or families lacking a fixed, regular, and adequate nighttime residence. Local policy shall determine length of stay in the shelter. Essential services to persons in emergency shelters and operating emergency shelters. Staff costs related to carrying out emergency shelter activities are also eligible.	II-5 Describe the organization's Emergency Shelter Component?
Applicant describes a well-defined, independent program from their Shelter services. A Street Outreach program cannot be one where the potential client is coming to any of the Shelter's facilities (example' Soup kitchen or Day Center). Services are provided to eligible participants on the street or in parks, abandoned buildings, bus stations, campgrounds, and in other such settings where unsheltered persons are staying. Staff salaries related to carrying out street outreach activities are also eligible.	II-6. Describe the organization's Street Outreach Services.
Thorough description of how Rapid Rehousing funds can be accessed and how client's program eligibility is determined as well as indication of what documentation is collected/verified. Applicant may have included a plan relating to short-term and medium term assistance. Depending on the needs of the community and the funding needs of the applicant, the applicant is not required to provide all of the listed activities. The applicant does not need to provide all activities listed to receive full points.	II-7) Describe how clients access requested Rapid Rehousing ; including what documentation is collected/verified regarding the client's program eligibility and how housing is selected.
Proposed case management services are well described and easily relate to the needs of the clients described in I-1 and target populations under II-1. All key positions are described in relation to program implementation and operation.	II-8) Describe what level of case management clients receive at the Shelter. ➢ Identify the person(s) responsible for carrying out case management activities. ➢ Include the qualifications of the case managers identified in the response

The Applicant must include qualifications required of case managers along with what type of training is provided or made available to case management staff.	➢Also include what kind of training is provided to case management staff
Applicant describes the steps taken to provide prevention and keep a client in their housing. Looking for data used to justify using prevention in service area. Answer must include some data relating to housing statistics, condition of local housing; affordability of available housing, barriers caused by landlords to rent, etc.	II-9) Describe how clients access prevention funds; including documentation collected. Provide justification as to why prevention funds are needed in proposed service area. Include housing statistics, available affordable housing data, etc.
Applicant describes the organization's participation in the CoC's Coordinated Intake Process required by HUD. The description must provide enough detail that the reviewer has a clear understanding of the Coordinated process and the applicant's involvement in the process.	II-10) Describe the Organization's involvement in the CoC's Coordinated Intake Process required by HUD.
Section III Performance Measures(30 Pts)	
Description	**Questions**
Performance measures of the program are clearly identified and applicant has described a clear plan for achieving those goals. Goals are quantitative, realistic and appear well thought out in relation to the services identified in the application narrative. For III-2; the applicant is not required to set an estimate for services they do not provide. For example, if an applicant does not provide prevention services, then they do not have to estimate how many clients for which they are going to provide prevention services. It is acceptable that the applicant has local performance measures or goals that are different from the State performance measures. In this case, the applicant must explain how accomplishing their local goals or performance measures will overall help achieve the State Performance measures. Examples of items that could be mentioned for questions 1 & 3. * Description of process used to determine program accomplishments and client progress/accomplishment is well defined. * The percentage of clients exiting to the next step in the Continuum is being measured and the process for how this is determined is well described and understandable. *The performance measures as they are listed on the HMIS APR report	III_1) List local Program Performance Measures and Outcomes. How will achieving the local performance measures help achieve the State Performance Measures? III-2) List the number of clients to be served under each performance measure tracked for the proposed services. III-3) How will the data be collected?

Section IV Community and Local Government Commitment (5 Pts)	
Description	**Questions**
Documentation corresponds with totals listed on Match / Additional Funds Form in OK Grants Letters relating to match must be on the letterhead of the organization's providing the match and uploaded within the Application. For IV-2: These points need to go to the organizations that go beyond matching their program with other federal or State grant dollars. For IV-2: The points should be awarded to the organizations that can prove their community is involved and have obtained multiple resources to provide for the needs of their clients. Do not take away points if source documentation is not provided. **Note: Match must be available during 2019 program year**	IV-1) Describe source(s) of match designated by the agency for use with the 2019 grant period. Eligible forms of match include but are not limited to: • The value of the time and services contributed by volunteers to carry out the program at a rate of $5.00 per hour. • The value of volunteers providing professional services such as medical or legal services valued at the reasonable and customary rate in the community. • The value of any donated goods, material or building. The value of any building lease using a method to reasonably calculate fair market value. • The value of salary paid to staff to carry out the ESG Program. • Cash awards from foundations, organizations, private individuals, and other government sources. IV-2) Describe how community and local government support (in-kind or cash contributions) is received and how these contributions benefit the proposed program.
Section V Continuum of Care Requirements (50 Pts)	
Description	**Questions**
The applicant should provide a description of how their services fit in with the performance measures, action plan and/or mission of their local Continuum.	V-1) Explain how services proposed fit into the local CoC's Action Plan to end homelessness? ➢Provide CoC Agreement for HMIS Data Entry • If exempt from using HMIS, describe how method for collecting data is comparable to HMIS.

Mainstream services and the process by which shelter clients are connected to those services is thoroughly described and appears feasible. **Mainstream services include SSI/SSDI, TANF, Food Stamps, services through DHS, OJA, etc.; services that are mainly provided through Federal or State funding.** The Shelter can also mention how they work with local law enforcement, hospitals and mental health facilities regarding discharge planning	V-2) Describe the mainstream services available in your area and the process for connecting shelter clients to these services.
The applicant should include names of specific organizations they partner and describe how services are delegated to prevent duplication. This is where local partners can be mentioned. This is also the section where the applicant mentions local partners; such as local churches, Rotary, AMBUCS, Lion's Club, local clinics and mental health facilities that provide services and partnerships to provide better services to clients.	V-3) What agencies in your area do you collaborate with to provide better care for your clients and to prevent duplication of services?
The organization must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient, to the extent that the entity considers and makes policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG)…	V-4) Describe how homeless and/or formerly homeless persons participate in the operations, planning, development, and/or policy making at your shelter.

HUD Programs Subject to the Disclosure Requirements

Please read before filling out the Applicant/Recipient Disclosure/Update Report

Following is a list of all the HUD Programs that are subject to the disclosure requirements of Subpart C of 24 CFR Part 12. All applicants for Emergency Solutions Grant assistance must review this list to determine if they are receiving, or expect to receive, assistance from other covered programs. Applicants must consider HUD funds that are received either directly from HUD or through the State.

It is the total amount of funds received from all the below sources that the applicant uses to answer the second question of Part II of the Disclosure Report.

- Section 312 Rehabilitation Loans under 24 CFR Part 510, except loans for single-family properties.
- Applications for grant amounts for a specific project or activity under the Rental Rehabilitation Grant Program under 24 CFR Part 511 made to:
- A State grantee under Subpart F;
- A unit of general local government or consortium of units of general local government or a consortium of units of general local government receiving funds from a State or directly from HUD whether or not by formula under Subparts D, F, and G; and
- HUD, for technical assistance under § 511.3.
- (Excludes formula distributions to States, units of general local government, or consortia of units of general local government under Subparts D and G, within-year reallocations under Subpart D, and the HUD-administered Small Cities Program under Subpart F.)
- Applications for grant amounts for a specific project or activity under Title I of the Housing and Community Development Act of 1974 made to:
- HUD, for a Special Purpose Grant under Section 105 of the Department of Housing and Urban Development Reform Act of 1989 for technical assistance, the Work Study Program or Historically Black colleges;
- HUD, for a loan guarantee under 24 CFR Part 470, Subpart M;
- HUD, for a grant to an Indian tribe under Title I of the Housing and Community Development Act of 1974;
- HUD, for a grant under the HUD-administered Small Cities Program under CFR Part 570, Subpart F; and
- A State or unit of general local government under 24 CFR Part 570.
- Applications for grant amounts for a specific project or activity under the Emergency Shelter Grant Program under 24 CFR Part 576 made to a State or to a unit of general local government, including a Territory.
- (Excludes formula distributions to States and units of general local government [including Territories]; reallocations to States, units of general local government [including Territories] and non-profit organizations; and applications to an entity other than HUD or a State or unit of general local government.)
- Transitional Housing under 24 CFR Part 577.
- Permanent Housing for Handicapped Homeless Persons under 24 CFR Part 578.
- Section 8 Housing Assistance Payments (only project-based housing under the Existing Housing and Moderate Rehabilitation programs under 24 CFR Part 882, including the Moderate Rehabilitation Program for Single Room Occupancy Dwellings for the Homeless under Subpart H).
- Section 8 Housing Assistance Payments for Housing for the Elderly or Handicapped under 24 CFR Part 885.
- Loans for Housing for the Elderly or Handicapped under Section 202 of the Housing Act of 1959 (including operating assistance for Housing for the Handicapped under Section 162 of the Housing and Community Development Act of 1987 and Seed Money Loans under Section 106(b) of the Housing and Urban Development Act of 1968).

- Section 8 Housing Assistance Payments - Special Allocations - under 24 CFR Part 886.
- Flexible Subsidy under 24 CFR Part 219 - both Operating Assistance under Subpart B and Capital Improvement Loans under Subpart C.
- Low-Rent Housing Opportunities under 24 CFR Part 904.
- Indian Housing under 24 CFR Part 905.
- Public Housing Development under 24 CFR Part 941.
- Comprehensive Improvement Assistance under 24 CFR Part 968.
- Resident Management under 24 CFR Part 964, Subpart C.
- Neighborhood Development Demonstration under Section 123 of the Housing and Urban-Rural Recovery Act of 1983.
- Nehemiah Grants under 24 CFR Part 280.
- Research and Technology Grants under Title V of the Housing and Urban Development Act of 1970.
- Congregate Services under the Congregate Housing Services Act of 1978.
- Counseling under Section 106 of the Housing and Urban Development Act of 1968.
- Fair Housing Initiatives under 24 CFR Part 125.
- Public Housing Drug Elimination Grants under Section 5129 of the Anti-Drug Abuse Act of 1988.
- Fair Housing Assistance under 24 CFR Part 111.
- Public Housing Early Childhood Development Grants under Section 222 of the Housing and Urban-Rural Recovery Act of 1983.
- Mortgage Insurance under 24 CFR Subtitle B, Chapter II (only multi-family and non-residential).
- Supplemental Assistance for Facilities to Assist the Homeless under 24 CFR Part 579.
- Shelter Plus Care Assistance under Section 837 of the Cranston-Gonzalez National Affordable Housing Act.
- Planning and Implementation Grants for HOPE for Public and Indian Housing Homeownership under Title IV, Subtitle A, of the Cranston-Gonzalez National Affordable Housing act.
- Planning and Implementation Grants for HOPE for Homeownership of Multi-family Units under Title IV, Subtitle B, of the Cranston-Gonzalez National Affordable Housing act.
- HOPE for Elderly Independence Demonstration under Section 804 of the Cranston-Gonzalez National Affordable Housing Act.

FY 2019 Emergency Solutions Grant (ESG) Program
Request for Application (RFA) - Definitions

For the purposes of this Request for Application, the following definitions will be used:

Administration: Units of General Local Government and/or Community Action Agencies are allowed 3.75% of the total award for administration of the ESG grant. These funds may be passed on to the shelter.

At risk of homelessness:

(1) An individual or family who:
(A) Has an annual income below 30 percent of median family income for the area, as determined by HUD;
(B) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the "homeless" definition in this section; and
(C) Meets one of the following conditions:
(a) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
(b) Is living in the home of another because of economic hardship;
(c) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
(d) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
(e) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;
(f) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
(g) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

(2) A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or

(3) A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

Consolidated plan*: A* plan prepared in accordance with 24 CFR part 91. An *approved consolidated* plan means a consolidated plan that has been approved by HUD in accordance with 24 CFR part 91.

Continuum of Care: The group composed of representatives of relevant organizations, which generally includes nonprofit homeless providers; victim service providers; faith-based organizations; governments; businesses; advocates; public housing agencies; school districts; social service providers; mental health agencies; hospitals; universities; affordable housing developers; law enforcement; organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons that are organized to plan for and provide, as necessary, a system of outreach, engagement, and assessment; emergency shelter; rapid re-housing; transitional housing; permanent housing; and prevention strategies

to address the various needs of homeless persons and persons at risk of homelessness for a specific geographic area.

Co-Occurring Disorder: Persons who have a diagnosis of mental illness and a diagnosis of substance abuse, HIV/AIDS, or other health condition.

Debarment: Debarment is the state of being excluded from certain possessions, rights, privileges, or practices and the act of prevention by legal means. For example, companies can be debarred from contracts due to allegations of fraud, mismanagement, and similar improprieties.

Eligible Applicants: Units of General Local Government and Community Action Agencies (CAAs). Cities of Tulsa and Oklahoma City must apply directly to HUD and are therefore excluded from the receipt of funds administered by ODOC.

Emergency shelter: Emergency Shelter is a facility designed to provide temporary housing for individuals and/or families lacking a fixed, regular, and adequate nighttime residence. Local policy shall determine length of stay in the shelter.

Emergency Shelter services are available to all persons or individuals who meet the definition of homeless. No person or family shall be denied shelter or services if they are a part of the sub-population to be served by the shelter and do not pose a safety risk to themselves or others. Emergency Shelter operators must have a plan in place to assist in the provision of emergency services, including clothing, food, and assistance locating other state and local services and funds. Emergency Shelters shall be available 24 hours a day and seven (7) days per week.

Equipment and Furnishings: Typically large, one-time expenditures essential for the continued operation of the homeless shelter. Office equipment and major furniture replacement or purchase such as beds or cots for an expanding facility, are examples of items to be budgeted under Equipment and Furnishings.

Developmental Disability: As defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002):

1) A severe, chronic disability of an individual that—
    a. Is attributable to a mental or physical impairment or combination of mental and physical impairments;
    b. Is manifested before the individual attains age 22;
    c. Is likely to continue indefinitely;
    d. Results in substantial functional limitations in three or more of the following areas of major life activity:
        i. Self-care;
        ii. Receptive and expressive language;
        iii. Learning;
        iv. Mobility;
        v. Self-direction;
    e. Capacity for independent living;
    f. Economic self-sufficiency; and
    g. Reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

(2) An individual from birth to age 9, inclusive, who has a substantial developmental delay or specific congenital or acquired condition, may be considered to have a developmental disability without meeting three or more of the criteria described in paragraphs (1)(i) through (v) of this definition if the individual, without services and supports, has a high probability of meeting those criteria later in life.

Homeless, homeless individual and homeless person:

1) An individual or family who lacks a fixed, regular, and adequate nighttime residence and is:
   a. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
   b. An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including hotels and motels paid for by Federal, State, or local government programs for low-income individuals or by charitable organizations and congregate shelters); or
   c. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in a shelter or place not meant for human habitation immediately before entering that institution;
2) An individual or family who will imminently lose their primary nighttime residence, provided that:
   a. The primary nighttime residence will be lost within 14 days of the application for homeless assistance;
   b. No subsequent residence has been identified; and
   c. The individual or family lacks the resources or support networks needed to obtain other permanent housing;
3) Unaccompanied youth and homeless families with children and youth defined as homeless under other Federal statutes who do not otherwise qualify as homeless under this definition and:
   a. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 91 days immediately preceding the application for homeless assistance;
   b. Have experienced persistent instability as measured by three moves or more during the 90-day period immediately before applying for homeless assistance; and
   c. Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse, the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration, and a history of unstable employment; and
4) Any individual or family who:
   a. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
   b. Has no other residence; and
   c. Lacks the resources or support networks to obtain other permanent housing.

Homeless individual with a disability:

1) an individual who is homeless and has a disability that:
   a. Is expected to be long-continuing or of indefinite duration;
   b. Substantially impedes the individual's ability to live independently;
   c. Could be improved by the provision of more suitable housing conditions; and
   d. Is a physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury;

2) Is a developmental disability, as defined in this section; or

3) Is the disease of acquired immunodeficiency syndrome (AIDS) or any conditions arising from the etiologic agency for acquired immunodeficiency syndrome, including infection with the human immunodeficiency virus (HIV).

Income Eligibility: A homeless individual shall be eligible for assistance under any program provided by the Stewart B. McKinney Homeless Assistance Act, or by the amendments made by this Act, only if the individual complies with the income eligibility requirements otherwise applicable to such program.

Exclusion: For purposes of this Act, the term "homeless" or "homeless individual" does not include any individual imprisoned or otherwise detained pursuant to an Act of the Congress or State Law.

Families with Children and Youth Defined as Homeless under other Federal Statutes: The term `families with children and youth defined as homeless under other Federal statutes' means any children or youth that are defined as `homeless' under any Federal statute other than this subtitle, but are not defined as homeless under section 103, and shall also include the parent, parents, or guardian of such children or youth under subtitle B of title VII this Act (42 U.S.C. 11431 et seq.).

Homeless Management Information System (HMIS): The information system designated by the Continuum of Care to comply with the HUD's data collection, management, and reporting standards and used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at-risk of homelessness.

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

Long Term Emergency Shelter: The Transitional Shelter that was Grand-Fathered in as of 2010 is no longer an eligible activity for the ESG Program. Applicants are welcome to propose projects for long-term Emergency Shelter. This type of housing would be for clients whose needs to become stable enough for permanent housing will take longer than the regular shelter stay period. Details for approval of an extended length of stay in a shelter environment will have to be provided in the Project Narrative questions portion of the application.

Match Funds: Funds contributed to the project for the expressed purpose of implementing the eligible activities proposed in the application. Eligible match includes cash on deposit, and cash committed from other sources, as documented by bank statements, and funding award letters. Non-cash match shall be documented by timesheets, appraisals, or other sufficient documentation. Match funds must be expended during the time frame of the ESG contract. Match Funds are a contractual requirement in ESG and must be reported in the audit for both revenue and expenditures.

Major Rehabilitation: Rehabilitation that involves costs in excess of 75 percent of the value of the building before rehabilitation. Major rehabilitation undertaken with ESG funds must meet local government safety and sanitation standards under 24 CFR 576.55. In addition, for projects of 15 or more units where rehabilitation costs are 75 percent or more of the replacement cost of the building, that project must meet the requirements of 24 CFR 8.23(a). The facility must be used as an emergency shelter for a period of not less than ten years after the ESG contract is closed or the applicant may be required to repay grant funds.

Nonprofit Recipient: Any nonprofit organization assisting the homeless to which a Unit of General Local Government or CAA distributes ESG funds.

Obligated: The ESG contractor, as appropriate, has placed orders, awarded contracts, received services, or entered similar transactions that require payment from the grant amount.

Operations: Recurring costs incurred by a recipient operating a homeless shelter with respect to administration, rent, food for feeding the homeless, security, maintenance, utilities, fuels, and insurance for the homeless shelter.

Private nonprofit organization: A private nonprofit organization that is a secular or religious organization described in section 501(c) of the Internal Revenue Code of 1986 and which is exempt from taxation under subtitle A of the Code, has an accounting system and a voluntary board, and practices nondiscrimination in the provision of assistance. A private nonprofit organization does not include a governmental organization, such as a public housing agency or housing finance agency.

Program income: Program income includes any amount of a security or utility deposit returned to the subrecipient under 24 CFR 85.25.
Program participant means an individual or family who is assisted under ESG program.

Program year means the consolidated program year established by the recipient under 24 CFR part 91.

Recipient*: A*ny State, territory, metropolitan city, or urban county, or in the case of reallocation, any unit of general purpose local government that is approved by HUD to assume financial responsibility and enters into a grant agreement with HUD to administer assistance under this part.

Rehabilitation: Labor, materials, tools, and other costs of improving the building, including repair directed toward an accumulation of deferred maintenance; replacement of principal fixtures and components of existing buildings; installation of security devices; and improvements through alterations or incidental additions to or enhancement of, existing buildings including improvements to increase the efficient use of energy. Rehabilitation includes the conversion of a building to an emergency shelter where the costs of conversion and any rehabilitation do not exceed 75 percent of the cost of the building before rehabilitation, and includes structural changes necessary to make a facility accessible to persons with physical handicaps. The facility must be used as an emergency shelter for a period of not less than three years after the ESG contract is closed or the applicant may be required to repay grant funds.

System for Award Management (SAM): The System for Award Management (SAM) is a Federal Government owned and operated free web site that consolidates the capabilities in Central Contractor Registration (CCR)/FedReg, Online Representations and Certifications Applications (ORCA) and the Excluded Parties List System (EPLS).

SAM Registration: Register your Business with the System of Award Management (SAM). You need to register your business (non-profit) with the federal government's SAM, the primary database of vendors doing business with the federal government. This registration is sometimes referred to as "self-certifying" your small business.

Subrecipient*: A* unit of general purpose local government or private nonprofit organization to which a recipient makes available ESG funds.

Transitional Housing: Facility-based or scattered-site temporary housing combined with essential services, with occupancy typically limited to 24 months. The applicant would administer the transitional housing activities and establish eligibility for occupants. Transitional Housing is an eligible activity under the Continuum of Care Grant funds only. Transitional housing also functions to do the following:

- Assist homeless families and individuals overcome the problems/conditions that made them homeless;
- Increase skills and/or income and aid in obtaining and remaining in permanent housing; and
- Provide or coordinate, as required, substance abuse services, mental health services, day care, life skills training, educational services and/or family support.

Transitional Housing, as compared to a general shelter, implies a greater level of responsibility in that residents typically maintain their own home or apartment without 24-hour supervision, while at the same time receiving essential services from the administrators of the facility, or from a contracted service provider. These services function to teach each resident the necessary skills in order for them to move to permanent housing and independent living. Individual rehabilitation plans are also emphasized over a group treatment approach.

Underserved Populations: The term `underserved populations' includes populations underserved because of geographic location, underserved racial and ethnic populations, populations underserved because of special needs (such as language barriers, disabilities, alienage status, or age), and any other population determined to be underserved by the Secretary, as appropriate.

Unit of local government: means any city, county, town, township, parish, village, or other general purpose political subdivision of a State.

Value of building: Value of building is defined as the monetary value assigned to a building by an independent real estate appraiser or as otherwise reasonably established. If the value of the building is established other than by an appraisal, ODOC must be advised and provided with written documentation of the method for determining the value.

The value of the building can only be used as match if the building is donated after the ESG contract is entered into with ODOC. If the shelter is purchasing or renting the facility, only the mortgage or lease amount paid with non-ESG funds multiplied by 12 months (the term of the ESG contract) can be used as match.

Please refer to Federal Register, Title 24, Volume 3, revised April 1, 1998 for further clarification and for other related definitions.

Victim Service Provider: The term `victim service provider' means a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women's shelters, domestic violence transitional housing programs, and other programs.

Victim Services: The term `victim services' means services that assist domestic violence, dating violence, sexual assault, or stalking victims, including services offered by rape crisis centers and domestic violence shelters, and other organizations, with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.

Appendix C

Section Contents…

- HOME Action Plan

Home Investment Partnerships Program (HOME) Program
Annual Action Plan
Program Year 2019

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HOME Program: One-Year Action Plan

The State of Oklahoma's allocation of HOME funds for Program Year 2019 is $7,611,246. The range of activities planned for 2019 is similar to that of Program Year 2018, but some changes have been made.

Title 24 Code of Federal Regulations, Part 92, governs this program. Those regulations are incorporated by reference in this Action Plan. In some cases, the Oklahoma Housing Finance Agency (OHFA) has adopted more restrictive requirements than are included in Title 24 CFR Part 92. The primary goal of the OHFA HOME Program is to retain and increase the supply of decent, safe, and sanitary affordable housing. OHFA furthers this goal by using the HOME Program financial resources as a catalyst in the development and strengthening of public partnerships with local governments, nonprofit organizations, private sector development entities, financial institutions, and debt and equity capital outlets.

Participating Jurisdiction Service Area

Applications for HOME funds will be accepted from all parts of the State of Oklahoma with the exception of the HUD designated HOME Program Metropolitan Participating Jurisdictions of Oklahoma City, Tulsa, Lawton, and Norman. These communities receive a direct annual allocation of HOME funds from HUD.

An exception will be made for applications for Tenant-Based Rental Assistance (TBRA) only. TBRA funds may be utilized anywhere within the State of Oklahoma, including within the city limits of Oklahoma City, Tulsa, Lawton and Norman.

Applications for HOME funds will also be accepted from within the Tulsa HOME Consortium, provided the proposed activities will not be undertaken within the city limits of the City of Tulsa. Consortium areas, for purposes of OHFA's HOME Program, are considered rural.

1. HOME Eligible Entities

OHFA encourages partnerships that promote the goals of the HOME program. OHFA plans to partner with the following entities. Only these entities are eligible to receive HOME funds from OHFA.

State Recipients: Units of general local government, including cities, towns, counties and Indian tribes.

CHDOs: A Community Housing Development Organization (CHDO) is a private, nonprofit organization that meets a series of qualifications prescribed in the HOME regulations. OHFA must use a minimum of 15 percent of its annual allocation for housing owned, developed or sponsored by CHDOs. OHFA will evaluate organizations' qualifications and designate them as CHDOs. CHDOs also may be involved in the program as sub-recipients, but the use of HOME funds in this capacity is not counted toward the 15 percent minimum requirement.

Sub-recipients: A sub-recipient is a public agency or nonprofit organization selected by OHFA to administer all or a portion of the HOME Program. It may or may not also qualify as a CHDO. **Sub-recipients run programs, not projects**.

Nonprofit Developers: Private, nonprofit housing development organizations that do not meet the qualifications to be a CHDO, or that have not applied to be a CHDO with OHFA. **Nonprofit developers may also be CHDOs applying for non-CHDO funds.** Nonprofit developers may undertake individual projects that comply with the HOME Program requirements, and may do so out of any set-aside for which they are eligible.

Private, for-profit Developers: Private, for-profit developers are eligible to apply for HOME funds only for projects developed in conjunction with Affordable Housing Tax Credits. **They are ineligible to apply for HOME funds for any of the other HOME-eligible activities.**

2. HOME Funding Activities

Homeowner Rehabilitation
OHFA does not intend to use any of its 2019 HOME Program allocation for Homeowner Rehabilitation activities.

Homeownership
HOME funds may be used by eligible applicants to assist individuals or families for homebuyer assistance, acquisition, acquisition and rehabilitation, new construction and lease-purchase of affordable housing for homeownership. **Homebuyer education classes are required for homeownership activities.**

Rental Housing
HOME funds may be used by eligible applicants for acquisition, rehabilitation, acquisition and rehabilitation, or new construction of affordable rental housing.

Tenant-Based Rental Assistance (TBRA)
HOME funds may be used by eligible applicants to help individual households afford housing costs such as rent and utility costs.

CHDO Project Pre-development Loans
HOME funds may be used by eligible CHDOs for project-specific pre-development assistance intended to assure funds for up-front, eligible project expenditures.

CHDO Operating Assistance
HOME funds may be used by eligible CHDOs for general operating assistance. **CHDO Operating Assistance funds will be awarded at the same time a CHDO receives an award of HOME funds for a CHDO activity**. **CHDO Operating Assistance funds will only be awarded to CHDOs that are currently receiving HOME funds for a CHDO activity.**

3. HOME Program Funds Allocation

OHFA will use the funds allocated for Program Year 2019 in accordance with the percentages listed below. The percentages identified below will be used to calculate the final dollar amounts.

Administrative Funds
Ten percent (10%), of the annual allocation will be used for administration. These funds will be used by OHFA to support its overall program delivery and monitoring.

CHDO Operating

No more than five percent (5%), of the State PJ's annual allocation will be available for CHDO operating assistance. **For the 2019 Program Year, the amount for which any eligible CHDO may apply will be limited to a maximum of $50,000. In addition, CHDO Operating Assistance will be limited to ten percent (10%) of the HOME funds awarded for CHDO activities.** Therefore, total CHDO Operating Assistance awarded to any one CHDO during Program Year 2019 will be limited to the lesser of $50,000 or ten percent (10%) of the HOME funds awarded to a CHDO for all CHDO activities.

CHDO Set-Aside

Twenty-five percent (25%) of the annual allocation shall be reserved for CHDOs applying for CHDO activities. Only CHDO-eligible activities as defined in the HOME Final Rule, 24 CFR Part 92, will be funded from this set-aside.

Rental/Homeownership

Fifty percent (50%) of the annual allocation shall be used for other Rental or Homeownership activities. This set-aside will be open to eligible non-CHDO Applicants. It will also be available to CHDOs applying for non-CHDO activities, and to CHDOs applying for CHDO activities once the CHDO Set-Aside funds have been exhausted, but not sooner.

Down-Payment Assistance

Ten percent (10%) of the annual allocation shall be used for Down-Payment Assistance programs. Assistance to individual households cannot exceed $14,999. If any funds remain in this set-aside after October 1, 2019, they will be transferred to the Rental/Homeownership Set-Aside, unless there are pending applications that could be funded at the November 2019 meeting of OHFA's Board of Trustees. .

General Information on Funds Allocation:

All amounts set forth in this Action Plan may be changed at the discretion of OHFA, except where mandated by HOME Program rules. Such decisions shall be based upon demand, need, efficient resource use, and other Program-relevant considerations. Funding awards are subject to the availability of HOME funds and the timing needs of individual Projects.

Program Income

Awardees are required to clearly identify whether or not the proposed activity will result in Program Income. **All Program Income must be returned to OHFA**. OHFA no longer permits Awardees to retain Program Income. **Exceptions may be made for Awardees that are currently reusing Program Income derived from Written Agreements already completed and closed out**. Such exceptions must be specifically approved by OHFA and HUD, and may be rescinded at any time should OHFA Monitoring Staff determine that the Program Income is not being used in accordance with HOME Program and OHFA rules and regulations.

Recaptured Funds

If OHFA recaptures any HOME funds, they will be allocated by OHFA to eligible activities. In the event a significant amount of funding becomes available, a public announcement of the availability of funds may be made.

4. Administrative funds

OHFA will use all of the administrative funds for its costs of administering the HOME Program for the State of Oklahoma. OHFA will not accept Applications for administrative funds.

5. Mode of HOME investment

- OHFA shall award HOME funds in the form of equity grants. The only exception is for CHDO Pre-Development Loans, which per the Final Rule must be in the form of loans.

6. HOME Written Agreement Award Instrument

Written Agreements will be used to contract with funded Applicants in order to implement proposed HOME activities and govern project execution. **All Written Agreements will provide for protection of the Period of Affordability throughout its entire term.**

At OHFA's discretion, a pre-agreement meeting between OHFA, the HOME Awardee, and any Project partners may be required prior to execution of Written Agreements.

For all Homebuyer activities, OHFA will require that funded Applicants execute Written Agreements with the ultimate beneficiaries of the HOME funds, setting forth the restrictions and requirements of the HOME Program. The Written Agreements must contain, at a minimum, the following requirements:

- The housing must conform to the requirements of 24 CFR 92.254(a).
- The housing must be modest; its value must not exceed 95% of the median price of comparable housing. It must also not include any luxury improvements as defined by HUD and/or OHFA.
- The home must be the principal place of residence of the homebuyer.
- Recapture or Resale provisions must be set forth in detail, and written in such a way that the homebuyer can understand them.
- The agreement should set forth the amount of HOME assistance provided, the form of such assistance, and the deadline for acquiring the housing unit with the HOME funds, if applicable.
- The agreement should be drafted in such a manner as to ensure compliance with all HOME Program requirements, and ensure that the homebuyer fully understands such requirements.

Activity and design modifications to funded projects are strongly discouraged. **Activity and design modifications cannot be made to funded Projects without the prior written approval of OHFA.**

Extensions of Written Agreement periods may, at OHFA's discretion, be permitted for any HOME

Awardee that can demonstrate that the Project is proceeding in a manner such that completion of the Project is certain in the time identified. **However, Written Agreements cannot be extended beyond the Project completion deadlines set forth in the Final Rule.**

Funded Applications are subsequently made a part of all Written Agreements between OHFA and the HOME Awardee. Unapproved variations to funded Project designs are considered violations of contractual agreements and may result in disallowed costs, the repayment of HOME funds, or possible suspension from future Program participation.

Projects selected for funding in conjunction with Applications for Affordable Housing Tax Credits (AHTC) or the National Housing Trust Fund (HTF) may receive a contingent HOME commitment, since they may be considered prior to a reservation of Tax Credits or an award of HTF funds. Contingent commitments will be withdrawn should an Applicant be unable to obtain a reservation of Tax Credits or an award of HTF funds, as applicable, within the time period specified by OHFA.

Projects selected for funding that involve the acquisition and rehabilitation of existing housing, and the specific address or addresses of the housing unit(s) cannot be identified at the time of application, will also receive a contingent HOME commitment. **The HOME Program Final Rule states that no Written Agreement can be executed without a specific address or legal description**. Therefore, for these projects, the Written Agreement will be executed once the legal description, address or addresses have been determined.

No other contingent HOME commitments are permitted. Contingent HOME commitments will not be made for any other eligible activities or in conjunction with any other type of funding source. All other funding sources must already be committed to the Project.

Contingent commitment amounts are good faith estimates by OHFA and may be adjusted based on the actual award of Tax Credits and/or HTF funds, or the work write-ups and cost estimates of acquisition/rehabilitation Projects. OHFA may reduce the amount of the contingent award, but **under no circumstances will OHFA increase the amount of a contingent award.**

OHFA will limit to five (5) the number of open HOME Written Agreements that any one entity may have at any given time. This includes Written Agreements for which said entity is either the Awardee or the Administrator. OHFA defines an open HOME Written Agreement as one that has not been 100% expended and all close-out documents submitted to OHFA. **This limit will not include CHDO Operating Assistance Written Agreements.**

A large number of open Written Agreements represents a possible capacity issue, especially should key staff leave before the Written Agreements are completed and closed out. Capacity is of great concern to OHFA, since OHFA must certify in the Integrated Disbursement and Information System (IDIS) that an Awardee has the capacity to undertake the Project or activity for which an award has been made. Further, the five (5) Written Agreement limit prevents any one entity from monopolizing the very limited HOME funds available**.**

7. HOME Written Agreement Performance

OHFA regularly assesses the performance of its HOME partners. Based on the performance pursuant to the requirements contained in its Written Agreements and the Program regulations, OHFA may withdraw funding due to non-performance, poor performance, and/or untimely performance. In addition, OHFA may, at its discretion and within its regulatory authority pursuant to 24 CFR Part 92.2, reassign untimely Written Agreement funding in order to affect timely expenditure, performance, and Project completion.

Satisfactory performance in regard to HOME Written Agreements is a threshold requirement for all Applications for new awards of HOME funds. The 2019 HOME Application will set forth specific performance standards. Failure to meet these performance standards will be grounds for denial of any new Application for HOME funds. **Some information on how Written Agreement performance will be measured can be found in Section 22 of this Action Plan, "Written Agreement Performance Measurement".**

8. Compliance Monitoring

These compliance monitoring procedures apply to all buildings placed in service in Oklahoma, which have received allocations of HOME funds determined under the HOME Regulations. The compliance monitoring procedures and requirements are as follows:

A. OHFA will verify that the Awardee of a low-income housing Project is maintaining records for each qualified low-income unit in the Project. These records must show, for each year in the compliance period, the information required by the record-keeping provisions contained in the HOME Regulations, incorporated herein by reference.
B. OHFA will verify that the records documenting compliance with the HOME Regulations for each year as described in Paragraph A above are retained for the entire affordability period.
C. **OHFA will conduct construction inspections** in order to ensure that HOME funds are not being drawn down for work that has not been completed, work that has not been done according to the specifications of the Written Agreement, or costs that are ineligible for HOME funding.
D. OHFA will inspect one hundred percent (100%) of the HOME Written Agreements as prescribed by HUD regulations and will inspect the low-income certification, the documentation the Awardee has received to support that certification, the rent records for Rental Projects and the home valuation limits for Homebuyer Projects.
E. For Rental Projects, OHFA will perform on-site inspections at the time of property completion and, at a minimum, every three years thereafter, in order to determine compliance with construction standards and physical condition standards. **All HOME-assisted Rental housing must meet the Uniform Physical Condition Standards, or UPCS**. HOME Compliance monitors will not conduct a REAC inspection, but will monitor for any violations. OHFA may perform more frequent on-site inspections based upon a risk assessment of all projects.
F. The Awardee must allow OHFA to perform an on-site inspection of any low-income unit and/or building in the Project through the end of the Period of Affordability. This inspection may be separate or in conjunction with any review of tenant files, and will include habitability requirements.
G. During programmatic monitoring activities, OHFA shall review Program Awardees' affirmative marketing, minority outreach, and fair housing activities to ascertain compliance with standards established by HUD's Fair Housing Office.

H. OHFA will promptly notify the Awardee in writing if OHFA is not permitted to inspect and review as described in Paragraphs C, D, E, F and G, or otherwise discovers that the Project does not comply with the HOME Regulations. In such event, the Awardee will be allowed a correction period to supply missing documentation or to correct noncompliance.
I. OHFA will notify HUD of an Awardee's noncompliance or failure to certify no later than forty-five 45 days after the end of the time allowed for correction and no earlier than the end of the correction period.
J. Compliance with requirements of the HOME Regulations is the responsibility of the Awardee and the owner of the building for which HOME funds are loaned or granted. OHFA's obligation to monitor for compliance with the requirements of the HOME Regulations does not make OHFA or the State of Oklahoma liable to any owner or to any shareholder, officer, director, partner, member or manager of any owner or of any entity comprising any owner for an owner's non-compliance therewith.
K. The Final Rule for the HOME Program permits Participating Jurisdictions to charge compliance monitoring fees for all projects funded after August 23, 2013. OHFA intends to charge a small monitoring fee for some properties at some point in the future. Any fee increase must be incorporated into OHFA's HOME Program Rules, Title 330, Chapter 55, before they can be implemented. **No compliance monitoring fees will be charged in Program Year 2019.**

9. Affirmative Marketing, Minority Outreach, and Fair Housing

All Applicants for HOME Program funds for Rental and Homebuyer projects containing five (5) or more units must adopt affirmative marketing procedures and follow all affirmative marketing requirements for all HOME-assisted housing. Affirmative marketing requirements and procedures must include:

- methods for informing the public, owners and potential tenants about fair housing laws and the policies of the local program;
- a description of what owners and/or the program administrator will do to affirmatively market housing assisted with HOME Program funds;
- a description of what owners and/or the program administrator will do to inform persons not likely to apply for housing without special outreach;
- maintenance of records to document actions taken to affirmatively market HOME-assisted units and to assess marketing effectiveness; and
- a description of how efforts will be assessed and what corrective actions will be taken when requirements are not met.

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

Implementation manuals shall be provided to Awardees and shall contain information regarding Affirmative Marketing, Minority Outreach, and Fair Housing Standards and Procedures. At a minimum, Written Agreements shall require all contractors and subcontractors to comply with equal opportunity requirements, procurement efforts to solicit the use of minority and women's'

business enterprises, undertake activities to further fair housing, and, where five (5) or more units are HOME- assisted, implement Affirmative Marketing procedures.

Affirmative Marketing is now required for all HOME Program activities, including Down-Payment Assistance and Tenant-Based Rental Assistance.

Section 281 of the National Affordable Housing Act (the "Act") requires the State to prescribe procedures acceptable to the Secretary of HUD to establish and oversee a minority outreach program to ensure the inclusion, to the maximum extent possible, of minorities and women, and entities owned by minorities and women, including without limitation, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking firms, underwriters, accountants, and legal firms, in all Written Agreements, entered into by the Participating Jurisdiction with such persons or entities, public and private, in order to facilitate the activities of the Participating Jurisdiction to provide affordable housing authorized under the Act or any other federal housing law applicable to such jurisdiction.

Minority Business Enterprises/Women Business Enterprises
Applicants will be required to solicit and encourage the participation of Minority Business Enterprises/Women Business Enterprises (M/WBEs) in connection with their Project. **Applicants must affirm and certify to the same in their Applications or they will not be eligible to receive an award of HOME funds.**

Recommended Methods for the Encouragement of M/WBEs:
The following methods are recommended for Applicants who wish to encourage the participation of M/WBEs on HOME-assisted contracts:
(i) Actively and affirmatively solicit bids for contracts and subcontracts from qualified M/WBEs, including solicitations to minority and women contractor associations;
(ii) Ensure that plan specifications, request for proposals and other documents used to secure proposals for the performance of work or supply of materials will be made available in sufficient time for review by prospective M/WBEs;
(iii) Divide, where economically and technically feasible, the work into smaller portions to enhance participation by M/WBEs;
(iv) Encourage, where economically and technically feasible, the formation of joint ventures, partnerships or other arrangements among contractors to enhance participation by M/WBEs;
(v) Consult with and use the services of governmental agencies, their consultants and contractor associations to further the participation of M/WBEs;
(vi) Ensure that progress payments to M/WBEs are made on a timely basis and with such frequency that undue financial hardship is avoided and other credit requirements are waived or appropriate alternatives developed to encourage M/WBE participation;
(vii) Make written solicitations in a timely fashion of M/WBEs listed in the Minority
and Women-Owned Business Directory; and
(viii) Make timely responses to any advertisements and solicitations provided by M/WBEs.

Reporting
All applicants must submit M/WBE Utilization reports, which will include, but are not limited to the following:
(i) The name, address and telephone number of each M/WBE the Applicant intends to use;
(ii) A brief description of the contract scope of work to be performed for the Applicant by each M/WBE and the scheduled dates for performance;
(iii) A statement of whether the Applicant has a written agreement with each M/WBE, and if requested, copies of the agreements the applicant is using or intends to use;

(iv) The actual total cost of the contract, the work performed and the materials provided, scope of work to be performed by each M/WBE for each contract;
(v) The actual amounts of any payments made by the Applicant to each M/WBE as of the date the compliance report was submitted; and
(vi) The percentage of total contractors, subcontractors, vendors and suppliers utilized for the project and the total prices for each.

10. Language Access

Recipients of federal financial assistance, including HOME funds, are required to provide meaningful access to their programs and services for persons with limited English proficiency (LEP). The U.S. Supreme Court has held that failing to take reasonable steps to ensure meaningful access for LEP persons is a form of national origin discrimination prohibited by Title VI of the Civil Rights Act of 1964.

The requirement to provide language assistance to LEP individuals applies to all recipients of federal financial assistance, including HOME funds, regardless of conflicting state or local laws. When meaningful access requires interpretation, interpreters should be provided at no cost to the persons involved. Budgeting adequate funds to ensure language access is essential. While costs are a consideration in determining what language assistance is reasonably required, fiscal pressures do not provide an exemption from civil rights requirements.

Recipients of HOME funds should develop, and periodically update, a written LEP plan that describes their language assistance services and explains how staff and LEP persons can access those services. Recipients who are not fully compliant with the LEP guidance issued by the federal government should be making steady progress toward becoming fully compliant. Guidance regarding LEP compliance can be accessed on the HUD website at www.hud.gov.

11. HOME Subsidy limits and minimums

Minimum HOME Investment: The minimum amount of HOME funds that must be invested in a project is $1,000 multiplied by the number of HOME- assisted units in a project. **The minimum only relates to the HOME funds, and not to any other funds that might be used for Project costs.** The minimum HOME investment does not apply to Tenant-based Rental Assistance.

Special Minimum Investment for HOME awards in conjunction with Affordable Housing Tax Credits (AHTCs): The minimum amount of HOME funds that must be invested in a project that is utilizing HOME funds in conjunction with AHTCs is $200,000.

Maximum HOME investment: There are three limiting factors that must be taken into account when determining the maximum HOME investment:

1. An award of HOME funds cannot exceed the HOME Program Maximum per Unit Subsidy Limits as established by HUD. The limits are based on the Section 234 Mortgage Limits and are determined by number of bedrooms.
2. The maximum HOME investment is limited to the minimum amount required to cover the project's financial gap, as determined by subsidy layering analysis.
3. The maximum HOME investment is limited to the pro-rata share of HOME-eligible project costs, as determined by multiplying the total HOME-eligible project costs multiplied by the

percentage of HOME units to total units or the percentage of HOME unit square footage to total unit square footage (whichever percentage is less).

The maximum HOME investment, therefore, is limited to the LOWEST of the pro-rata share of eligible costs, the HOME Program Maximum per Unit Subsidy Limit, or the financial gap as determined by a subsidy layering analysis.

The maximum for HOME Down-payment Assistance is $14,999 per HOME-assisted unit. However, it should be noted that this limit is also subject to underwriting analysis, and HOME Awardees cannot provide Down-Payment Assistance in an amount over and above the amount required to permit the homebuyer(s) to qualify to purchase the home.

Maximum Awards for Activities

The maximum amount of HOME funds that will be awarded to a Rental or a Homeownership project is **$500,000.** The maximum amount of HOME funds for Down-Payment Assistance programs will be **$200,000**. The Maximum amount of HOME funds for a Tenant-Based Rental Assistance program will be **$500,000**.

12. Period of Affordability

Rental Housing:

Rehabilitation or Acquisition

$1,000 - 14,999 HOME funds per unit	5 years
$15,000 - 40,000 HOME funds per unit	10 years
$40,001 - maximum allowable HOME funds per unit	15 years

New Construction (or acquisition of newly constructed housing): 20 years, regardless of the amount of HOME funds invested.

Homeownership:

$1,000 - 14,999 HOME funds per unit	5 years
$15,000 - 40,000 HOME funds per unit	10 years
$40,001 - maximum allowable HOME funds per unit	15 years

13. Resale and Recapture Options

24 CFR 92.254 provides guidance for Resale/Recapture options for Homeownership. OHFA is authorized under the HOME Rules to select which option will be used for preserving the Period of Affordability. For 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 Written Agreements between OHFA and a CHDO, non-profit developer, State Recipient or Sub-recipient may be structured such that under certain circumstances a Recapture Agreement with one homebuyer will be required, and under other circumstances a Resale Agreement with a different

homebuyer will be required. Nonetheless, **the agreement between the CHDO, non-profit developer, State Recipient or Sub-recipient and any individual recipient of HOME funds may contain only one provision, either Recapture or Resale. An agreement with an individual recipient of HOME funds cannot contain both.**

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

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

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

- Recapture of the HOME investment first, with the homeowner receiving any remaining net proceeds
- Allow the homeowner to recover his/her initial investment first, with the remainder of the net proceeds recaptured
- A “shared appreciation” method, where a pre-determined percentage of the net proceeds is retained by the homeowner, and the remainder of the net proceeds is recaptured

14. Match Requirements

Match contributions must meet the definition of eligible Match under the federal program regulations at 24 CFR Part 92. **Written, itemized documentation of all proposed Match contributions must be provided.**

Specific documentation requirements will be detailed in the application. At a minimum, Match documentation must include a signed statement that Match is not from federal sources, as well as documentation of the sources and amounts of commitments. Applicants proposing to meet their Match liability using banked Match must at a minimum include confirmation that the banked Match has not been expended or committed to any other application or project. Banked Match cannot be derived from an open contract. Banked Match can only be derived from a closed, audited contract.

The HOME Program operates using a twenty-five percent (25%) non-federal Matching requirement. **All Applicants must structure their proposals based on the twenty-five percent (25%) Match requirement. Waivers granted by HUD will not affect this requirement.**

OHFA may make available to Applicants a portion of its banked Match credit. This will be set forth more specifically in the 2019 HOME Program Application Packet.

Potential sources of local Match include, but are not limited to, donated or discounted land, donated or discounted materials, and donated or discounted labor.

15. Leverage

Applicants must fully describe all development leverage resources, inducements and incentives that are present in the proposed Application. All sources of financing, except HOME, paying development budget costs are potentially eligible for leverage. Assistance for Homebuyers, such as a first mortgage, is not considered leverage.

Any leveraged funds will require a commitment letter to be attached to the application.

16. Troubled Public Housing Authorities

OHFA will wait to hear from HUD regarding whether or not there are currently any troubled public housing authorities.

OHFA will work closely with HUD to provide technical assistance and oversight where necessary. **It is not anticipated that any HOME funds will be used to help troubled public housing authorities. The State of Oklahoma has not appropriated funds for this purpose, nor has it authorized OHFA to assume the federal government's role of subsidizing the operations of public housing agencies.**

17. Projected Production

The following chart details the units the OHFA is projecting will be produced with the 2019 HOME allocation. This projection is based upon the actual numbers from prior years and amounts allotted to the various set-asides for 2019. It includes only HOME units and not any other units in the HOME-assisted projects:

Activity	HOME	Leveraged
Rental	40	20
Homeownership	20	0
DPA	50	0
TBRA	0 tenants	0

18. Application Process

The HOME Program operates on a continuous Application basis. The Board of Trustees of OHFA must review and approve all awards of HOME funds to Applicants. The Board meets every other

month throughout the year, and therefore deadlines will be established for the consideration of Applications at each of the upcoming Board meetings. These deadlines will be set forth specifically in the 2019 HOME Program Application Packet, and are established in order to allow OHFA Staff to properly review each individual Application.

Even though Applications for HOME Program activities are continuously accepted, it may become necessary to cease accepting Applications before the end of the Program Year because funds are no longer available.

The Program Year 2019 HOME Program Application Packet, as well as the 2019 HOME Program Processes, Procedures and Topical Guidance will be drafted, and will be made available for public input. The Application Packet will contain the Application submission requirements, threshold factors, and the evaluation criteria for all HOME Program Applications.

Applications for Rental Activities in Conjunction with AHTCs

For Program Year 2019, all eligible entities wishing to submit an Application for Rental Activities in Conjunction with AHTCs for the Second AHTC Funding Period of 2019 must submit their applications on or before June 27, 2019. The Applications for Rental Activities in Conjunction with AHTCs will be considered at either the September or November 2019 meeting of the OHFA Board of Trustees. It is OHFA's intent to consider them at the September 2019 Board meeting if possible.

Applications that meet all threshold requirements will be funded in rank order by score, from highest to lowest. Tie-breakers as set forth in the 2019 Application Packet will be used in the event that there are sufficient funds remaining for only one application, and the next two or more applications in rank order have achieved an equal score.

Application timeline:

- A draft of the proposed 2019 HOME Program Application Packet, including all Application and scoring evaluation criteria will be presented for public comment and input on or about February 1, 2019. The draft will be posted on OHFA's website, www.ohfa.org
- An informal public input session on the 2019 HOME Application will be held in February of 2019 at the offices of OHFA in Oklahoma City.
- The final version of the 2019 HOME Application Packet will be available on or about March 1, 2019. It will be posted on OHFA's website, www.ohfa.org.
- OHFA may hold a training session on the 2019 HOME Program Application Packet in March of 2019 at the offices of OHFA in Oklahoma City. If OHFA Staff determines that the changes to the HOME Program for 2019 are minimal, OHFA may decide not to hold such a training session.
- OHFA will begin accepting Applications April 1, 2019.

OHFA staff will make every effort to meet this timeline. The dates for each step in the Application process will be published on OHFA's website. The web address is www.ohfa.org. All prospective Applicants and interested parties are encouraged to check the website frequently for updated information concerning important dates.

2019 Program Year – Important Dates

- **March 1, 2019 – Final version of 2019 HOME Application Packet available**

- **April 1, 2019 – OHFA will begin accepting applications for the 2019 Program Year for all eligible activities**
- **June 27, 2019 – Applications for Rental Activities in Conjunction with AHTCs are due**

During Application review, the following are the factors that may be considered as Threshold Factors and/or Evaluation Criteria:

- Application Information Form
- **Attachments A, B and C**
- HOME Application Certification
- Description
- Audit
- Match
- Monitoring
- Federal Requirements
- Market Analysis
- Development Commitments
- Organizational Structure and Experience
- Capital Needs Assessment
- Financial Management
- Financing
- Readiness to Proceed
- CHDO Eligibility Criteria Elements
- Special Populations
- HOME Training
- Leverage
- HOME Investment per Unit
- CHDO Status
- Energy Efficiency

The complete list of Threshold Factors and Evaluation Criteria may not be limited to those above, and also may not include every criteria listed above.

Applications to be considered at the next OHFA Board of Trustees meeting must be submitted by the deadlines listed in OHFA's 2019 Application Packet. Applicants are encouraged to access the 2019 HOME Program Application Packet available on OHFA's web-site at www.ohfa.org to verify submission deadlines and ensure timely filing of their applications.

Applicants proposing to incorporate the use of HOME funds with Affordable Housing Tax Credits (AHTCs) should confirm the deadlines for submission in the HOME Application and the AHTC Application.

Awards of HOME funds are subject to the availability of funds and the satisfaction of all threshold factors. **Applications that do not satisfy these criteria are ineligible for funding.**
In the event that insufficient funds remain to award HOME funds to all Applications for any eligible activity, Applications for each activity will be funded in rank order by score, as determined by Staff review of the evaluation criteria. In the event that two or more Applications achieve an equal score, tie-breakers as set forth in the 2019 HOME Application Packet will be used to determine funding.

Applications for Down-Payment Assistance and CHDO Operating Assistance will not be scored. If insufficient funds remain to award to all Applications for Down-Payment Assistance and CHDO Operating Assistance, tie-breakers as set forth in the 2019 HOME Application will be used to determine which Applications will be funded.

Application Requirements Specific to CHDOs

CHDOs are responsible for notifying OHFA of any changes relating to the HOME Program CHDO eligibility criteria elements. Therefore, OHFA certified CHDOs making Application for CHDO activities, including CHDO Operating and Project Specific Loans, must, at the time of Application, indicate any changes in the eligibility criteria elements since the date of their last certification.

Eligibility criteria elements:

- Legal status
- Capacity and Experience
- Organizational structure
- Board Composition of current members.
- Relationships with for-profit entities
- Service Area

CHDOs with current OHFA certifications that have had no eligibility criteria element changes since their certification date, must submit a certification signed by the Board Chairman or Executive Director indicating that no eligibility criteria element changes have occurred.

If eligibility criteria element changes have occurred since the date of the CHDO's last OHFA certification, updated documentation relating to all changes must be provided. In addition, the CHDO must provide a certification signed by the Board Chairman or Executive Director that clearly identifies all the relevant changes that have been made. All certifications must indicate that all supporting documents relating to the CHDO's certification are on file in the CHDO's corporate office and available for OHFA's review.

19. CHDO Annual Recertification Process

OHFA requires that CHDOs meet the CHDO eligibility criteria in order to apply for HOME funds for CHDO activities. **OHFA no longer requires annual recertification of all CHDOs. CHDOs will be recertified whenever they apply for new funding from OHFA for a CHDO Project.**

20. New Applicants for CHDO Certification

Any not-for-profit organization receiving OHFA HOME-CHDO funding must be certified by OHFA as a CHDO under 24 CFR 92.2.

New Applicants for certification must meet with OHFA Staff. Those in attendance must be authorized representatives of the organization. They must also be principals in the operation of

the applicant. This meeting is required before an application may be submitted for CHDO certification.

OHFA will prepare an Application Packet for CHDO Certification, and will make it available to prospective Applicants after the required meeting has taken place. A completed Application must be submitted with all required documentation.

Applications for CHDO certification may be submitted to OHFA at any time throughout the year. **However, the not-for-profit organization must have received its CHDO certification from OHFA before submitting an Application for HOME CHDO funding.**

Applicants should allow 4-6 weeks for OHFA to review a fully completed CHDO Certification Application. Once OHFA is satisfied that all certification requirements have been met, a CHDO certification letter and a certificate will be issued within two weeks.

21. Outcome Performance Measurement System

The Office of Community Planning and Development (CPD) at HUD has developed an Outcome Performance Measurement System. This system will enable HUD to collect information on the outcomes of activities funded with CPD formula grant assistance, and to aggregate that information at the national, state, and local level. The outcome performance measurement system is not intended to replace existing local performance measurement systems that are used to inform local planning and management decisions and increase public accountability.

Performance Measurement Objectives

The outcome performance measurement system has three overarching objectives: (1) Creating Suitable Living Environments, (2) Providing Decent Affordable Housing, and (3) Creating Economic Opportunities. There are also three outcomes under each objective: (1) Availability/Accessibility, (2) Affordability, and (3) Sustainability. Thus, the three objectives, each having three possible outcomes, will produce nine possible ``outcome/objective statements'' within which to categorize HOME activities. OHFA will complete an outcome/objective statement in HUD's Integrated Disbursement and Information System (IDIS) by entering data in the form of an output indicator.

It is mandatory for OHFA to collect this data. The collection and reporting of performance data is not optional, but individual outcome indicators can and will vary, depending on the activity. The proposed outcome measurement framework will not change the types of activities available to eligible applicants, but it will require new ways of reporting the data. The flexibility of the Program will be maintained. The objectives and outcomes will be determined by OHFA, based on the intent of the activity.

The following is a list of the activities to be undertaken with HOME funds in Program Year 2019, and the outcome and objective for each of those activities:

Rental/Homeownership:	Affordability for the purpose of providing Decent Housing
CHDO Pre-Development Loans:	Affordability for the purpose of providing Decent Housing
CHDO Operating Assistance:	This activity is not covered in the Performance Measurement System.

22. Written Agreement Performance Measurement

Meeting affordable housing objectives and obtaining satisfactory outcomes is important, but proper performance goes beyond housing production. Administration of the HOME Written Agreement is also important. The OHFA HOME Finance Staff has developed the following chart outlining how contract progress will be monitored. **All time periods are from the date of the execution of the Written Agreement unless otherwise specified by OHFA.**

Written Agreement Performance Measurement

Time Period	*% Expended*	*Action*	*Performance*
12 months from WA begin date	If 0% expended	send letter	**Concern**
18 months from WA begin date	0% expended	Determine contract **feasibility**	
18 months from WA begin date	< 25% expended and no explanation	send letter	**Finding**
24 months from WA begin date	< 50% expended	send letter	**Concern**
36 months from WA begin date	<100%	send letter	**Concern**
	There must be a plan in place to complete by 4-yr deadline **If not, it will be a finding and awardee may have to pay back HOME funds** (Plan must be approved by OHFA)		
0 – 60 days after WA end date	Need closeout documents; Will send a letter 1-month before WA end date to request closeout documents**; If documents are not received within 60-day closeout period, a compliance visit will be scheduled and this will be a Finding**		

IDIS Expenditure Measurement per Activity

Time Period	*% Expended*	*Action*	*Performance*
9 months after IDIS setup	0%	Send letter to request reimbursement request	**Concern**
12 months after IDIS setup	0%	Activity flagged and cancelled in IDIS	**Concern**
12 months between drawdowns		Activity flagged; need explanation from Grantee to continue	**Concern**

90 days from last drawdown	100%	Send letter if no activity completion report received	**Concern**
120 days from last drawdown drawdowns	100%	Activity flagged; Need completion report to continue processing drawdown requests	**Finding**

Written Agreement Extensions

Written Agreements will be for three year periods. However, Written Agreements will contain specific performance benchmarks, and except in very unusual circumstances, project completion will be required well in advance of the three year term. If an extension beyond the three year period is required, it will be a **Finding.**

For CHDOs, excessive findings in regard to Written Agreement performance may result in CHDOs being placed on probation or, in severe cases, decertified.

Additional performance benchmarks will be set forth in Written Agreements and the failure to meet a performance benchmark could result in a concern, a finding or cancellation of the agreement, depending on the severity.

Appendix D

Section Contents…

- HOPWA Action Plan

Housing Opportunities for People with AIDS

(HOPWA) 2019 Action Plan-
Five-Year Strategic Plan for 2019-2023
Updated For Program Year 2019

Oklahoma Housing Finance Agency
HOPWA Development Team
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Oklahoma City, OK 73126-0720
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Action Plan for Addressing Housing for People with HIV/AIDS

The Oklahoma Housing Finance Agency (OHFA), in its role as a housing service provider for low-income persons, is making **$369,988.00** available during the program year April 1, 2019, to March 31, 2020 (PY2019). This budgeted amount does not include amounts appropriated under the Housing Opportunities for People with AIDS (HOPWA) Program for the City of Oklahoma City or the City of Tulsa. All funds will be used to ensure housing for persons living with HIV/AIDS is an essential component of the Continuum of Care approach. Priority will be given to projects that target low-income individuals living with HIV/AIDS in Oklahoma, who are either currently homeless or in eminent danger of becoming homeless.

OHFA has designated its HOPWA Program to support:

- Project or tenant-based rental assistance, including assistance for group housing;
- Short-term emergency rent and utility payments to prevent eviction or loss of services;
- Supportive services which include, but are not limited to: health and mental health, substance abuse, child care, assessment and case management, nutrition, intensive medical care, assistance in accessing federal, state, and local programs, and assistance in locating permanent housing;
- Resource identification to establish, coordinate, and develop housing assistance to eligible persons;
- Technical assistance in establishing and operating a community residence, including planning and other pre-construction activities;
- Operating costs for housing;
- Acquisition, rehabilitation, conversion, or lease of buildings used in the project; and
- Administrative expenses.

Funds Distribution

In 2015 OHFA initiated an Invitation to Bid (ITB), thereby announcing to all eligible applicants the program availability, guidelines, etc. for FY2016. A HOPWA Proposal Review Committee then ranked each proposal submitted by eligible applicants. Factors considered in the selection process were outlined in the ITB and included projects that targeted low-income persons living with HIV/AIDS in Oklahoma, and who are homeless or were in eminent danger of becoming homeless. The proposals selected demonstrated inventiveness, community support, and additional resources leveraged from non-HOPWA sources. Most importantly however, the proposals contained convincing evidence of cooperation and collaboration with a network of public and private agencies that provided complimentary services for people with HIV/AIDS; thus encouraging a true Continuum of Care approach. Project Sponsors are required to submit monthly program reports and funds are distributed to the Project Sponsors from the State Grantee based upon actual expenditure of funds. Project Sponsors selected in FY 2015 to administer the HOPWA

Program for the State of Oklahoma beginning in FY 2016 are eligible for an annual extension through FY 2019, based upon performance. Those extensions may be subject to approval by the OHFA Board of Trustees. OHFA is not recommending any changes for Program Year 2019. However, a new Invitation to Bid will be required for Program Year 2020.

OHFA, with the assistance of its local HUD representative, developed new Grant Agreements for Program Years 2017 and 2018 with improved guidance for the Project Sponsors, as well as more specific goals and performance measurements. OHFA believes these new Grant Agreements will greatly improve the delivery of vital services to the beneficiaries of HOPWA assistance.

2019 Program Goals

Program goals are as follows:

Western Oklahoma

Short-term rent fifteen (10) households
Rent and utility assistance fifteen (15) households
Supportive Services fifteen (15) households

Eastern Oklahoma

Short-term rent five (5) households
Rent and utility assistance ten (10) households
Permanency Planning one (1) household
Supportive Services fifteen (15) households

EXHIBIT 1: PROGRAM ABSTRACT

The State of Oklahoma is proposing to utilize *Housing Opportunities for People with AIDS* (HOPWA) FY 2019 program funds to ensure that housing becomes an essential component of the continuum of care for persons living with HIV disease in our State. The proposed plan seeks to address both short and immediate housing needs, and to build a foundation to meet future housing needs. The plan consists of statewide rental assistance including emergency, short term and long term assistance and a utility bill assistance program combined with mental health and intensive case management services. Up to approximately one-fifth of Oklahoma's total award could be realigned for other eligible activities (e.g., rehabilitation, acquisition). This plan strives to develop a program that will provide housing and supportive services to those persons who have the fewest resources to access these services and those who have the greatest need. It is essential that low-income individuals living with the HIV disease be able to access available direct care resources in the most accommodating environment possible rather than negotiating through a traditional bureaucracy.

EXHIBIT 2: PROGRAM DESCRIPTION

Characteristics of Eligible Persons:

Persons to be served by the proposed activities of this plan include the men, women and children of our State who are living with and/or affected by HIV disease.

Although the HIV/AIDS epidemic in Oklahoma may not reflect the alarming number of cases observed in larger epicenters, this disease has nonetheless had a devastating effect on those persons living with HIV. From the first reported case in 1983, the needs of persons living with HIV in our State have far exceeded the resources available. As a low-incident state, Oklahoma has struggled to secure funding for services, often to discover we were ineligible for funds due to our lower number of reported AIDS cases. Despite this, Oklahoma service providers have been successful in developing a service delivery system that continues to be strengthened as more resources become available.

HIV/AIDS in Oklahoma:

From the Oklahoma State Department of Health, as of December 31, 2016 (last update available):

Newly Diagnosed HIV 2016

•In 2016, 295 cases of HIV were newly diagnosed in Oklahoma. Of these cases, 82.4% (243 cases) were male and 17.6% (52 cases) were female.

•Almost 65% of the newly diagnosed cases were ages 20-39 in Oklahoma in 2016 (189 cases).

•Black/African Americans had the highest rate of newly diagnosed HIV cases in 2016 (26.4 cases per 100,000 population) among all racial and ethnic groups.

•Of the newly diagnosed cases, 53.9% (159 cases) self-reported as MSM (Men who have Sex with Men).

•Three Metropolitan Statistical Areas (MSAs) in Oklahoma accounted for the majority of the 2016 newly diagnosed cases: Oklahoma City (150 cases; 50.8%), Tulsa (77 cases; 26.1%), and Lawton (10 cases; 3.4%).

Newly Diagnosed AIDS 2016

•In 2016, 75 AIDS cases were newly diagnosed in Oklahoma. Of these cases, 85.3% (64 cases) were male and 14.7% (11 cases) were female, and 40% were diagnosed only 1-4 years after their HIV diagnosis.

•At the time of AIDS diagnoses, the 40-49 years age group accounted for the highest number (32.0% or 24 cases) and highest rate (5.2 cases per 100,000) of newly diagnosed AIDS cases in 2016.

•Black/African Americans had the highest rate of newly diagnosed AIDS cases in 2016 (9.6 cases per 100,000) which was 5 times higher than the overall state rate.

•Over half (54.7% or 41 cases) of new AIDS cases were diagnosed among MSM.

•Two counties in Oklahoma accounted for over 60% of newly diagnosed AIDS cases in 2016: Oklahoma (33.3% or 25 cases) and Tulsa (28.0% or 21 cases). Tulsa had

the highest rate with 3.3 cases per 100,000.

People Living with HIV/AIDS (PLWHA) 2016

•At the end of 2016, an estimated 5,954 people were living with HIV/AIDS (PLWHA) in Oklahoma. Of these, 53.7% were HIV cases and 46.3% were AIDS cases.

•Males accounted for 82.7% (4,925 cases) of the HIV/AIDS cases living in Oklahoma, while females accounted for 17.3% (1,029 cases).

•Over half (54.6%) of the living cases are currently between 40-59 years of age.

•In 2016, Black/African Americans had the highest rate of PLWHA cases (518.5 cases per 100,000) and accounted for 25.4% of all PLWHA (1,510 cases).

•Of the 5,954 PLWHA in 2016, 55.7% (3,316 cases) self-reported as MSM.

•Almost half (49.1% or 2,922 cases) of PLWHA in Oklahoma live in counties within the Oklahoma City MSA. The Tulsa MSA accounted for 31.0% (1,848 cases) of PLWHA in 2016.

Deaths among HIV/AIDS 2016

•By the end of 2016, 42.9% (4,469 cases) of the cumulative 10,423 HIV/AIDS cases diagnosed from 1982-2016 in Oklahoma were known to have died. Of these, 84.2% (3,762 cases) were diagnosed with AIDS, while 15.8% (707 cases) were diagnosed with HIV.

Of these, 20.3% (907 cases) died less than one year after their HIV diagnosis, and 63.7% (2,846 cases) of deaths were due to underlying HIV disease.

Those ages 30-49 years accounted for 64.8% (2,897 cases) of these cumulative deaths.

•In 2016, 90 deaths occurred among persons diagnosed with HIV/AIDS in Oklahoma. Of these, 75.6% (68 cases) were among AIDS cases and 24.4% (22 cases) were among HIV cases. The majority of the deaths were among males at 81.1% (73 cases), while deaths among females were 18.9% (17 cases).

In 2016 people who were 50-59 years of age at the time of death accounted for the largest number of deaths (34.4% or 31 cases) as well as the highest rate of deaths (6.2 per 100,000).

Black/African Americans had the highest death rate in 2016 at 4.1 deaths per 100,000, but accounted for only 13.3% of deaths in 2016 among all racial and ethnic groups.

HIV/AIDS Cases Diagnosed in OKC Metropolitan Statistical Area (MSA) 2016.

•The OKC MSA had a new HIV rate of 10.9 cases per 100,000.

•Men Who Have Sex with Men (MSM) accounted for 56.6% of the living HIV/AIDS cases.

•Males accounted for 83.2% of the living HIV/AIDS cases in the OKC MSA.

•Age group 20-29 years had the highest rate (29.7 per 100,000) of new HIV cases.

HIV/AIDS Cases Diagnosed in Tulsa Metropolitan Statistical Area (MSA) 2016.

•In 2016, the Tulsa MSA had a rate of 187.2 cases per 100,000 living with HIV/AIDS.

•Blacks had the highest rate of living with HIV/AIDS cases (530.8 cases per 100,000) in the Tulsa MSA.

•Males accounted for 85.7% of the newly diagnosed cases in the Tulsa MSA.

•The 20-29 years age group had the highest rate of new HIV at 21.3 cases per 100,000.

OVERVIEW

At the end of 2016, an estimated 5,954 cases were living with HIV/AIDS in Oklahoma. Of these, 53.7% (3,197) were HIV cases and 46.3% (2,757) were AIDS cases. The rate of cases living with HIV/AIDS was 151.7 cases per 100,000 population. Of the 10,423 cumulative cases diagnosed in Oklahoma, 42.9% (4,469) were known to have died.

BY SEX

Males accounted for 82.7% (4,925) of the HIV/AIDS cases living in Oklahoma, while females accounted for 17.3% (1,029). The rate of males (253.4 cases per 100,000 population) living with HIV/AIDS in Oklahoma was 4.8 times higher than the rate of females (52.0 cases per 100,000 population). Almost half of the persons living with HIV/AIDS were White males (2,809; 47.2%). Black males accounted for approximately 20% of those living with HIV/AIDS (1,174; 19.7%). White females (462) and Black females (336) accounted for 7.8% and 5.6% of the living HIV/AIDS cases, respectively. Of the race/sex groups, Black males had the highest rate of living with HIV/AIDS (804.7 cases per 100,000), followed by Black females (231.2 cases per 100,000), White males (219.7 cases per 100,000), and Hispanic males (211.4 cases per 100,000).

BY RACE/ETHNICITY

At the end of 2016, Blacks had the highest rate of living HIV/AIDS cases (518.5 cases per 100,000) among the racial/ethnic groups in Oklahoma. Hispanics (131.0 cases per 100,000) had the second highest rate, followed closely by Whites (126.0 cases per 100,000). The rate among American Indians/Alaska Natives was 110.0 cases per 100,000 and the rate among Multi Race was 98.6 cases per 100,000. Asians/Pacific Islanders had the lowest rate of persons living with HIV/AIDS (81.2 cases per 100,000) in Oklahoma. Blacks are disproportionately affected by HIV/AIDS in Oklahoma, as the rate for Blacks living with HIV/AIDS was 3.4 times higher than the state rate and 4.1 times higher than the rate of Whites living with HIV/AIDS in Oklahoma. Of the 5,954 persons living with HIV/AIDS at the end of 2016:

- 54.9% (3,271) were White,
- 25.4% (1,510) were Black,
- 8.9% (529) were Hispanic,
- 6.0% (357) were American Indian/Alaska Native,
- 1.2% (74) were Asian/Pacific Islander, and
- 3.6% (213) were Multi Race.

BY AGE

By age at time of diagnosis, the 20-29 years age group (2,175; 36.5%) and the 30-39 years age group (1,978; 33.2%) combined to account for nearly 70% of the living HIV/AIDS cases. The 40-49 years age group accounted for 17.3% (1,032) of the living cases and the 50-59 years age group accounted for 6.5% (385). Ap-proximately 4% (231; 3.9%) of living cases were diagnosed as teenagers (13-19 years), while children 12 years and under (59) only accounted for 1.0% of living cases. Less than 2% (92; 1.5%) of the cases were diagnosed among persons aged 60 years and older.

By current age group, the 50-59 years age group (1,714; 28.8%) had the highest burden of living HIV/AIDS cases in Oklahoma, followed very closely by the 40-49 years age group (1,535; 25.8%). The 30-39 years age group (1,190; 20.0%) accounted for the third highest number of cases. The 20-29 years age group (740) accounted for 12.4% and the 60 years and over (723) accounted for 12.1%. Teenagers (29; 0.5%) and children 12 years and under (23 cases; 0.4%) combined to account for less than 1% of the living HIV/AIDS cases. The 50-59 years age group had the highest rate (340.7 cases per 100,000), followed by the 40-49 years age group (334.3 cases per 100,000).

BY MODE OF TRANSMISSION

Of the 5,954 HIV/AIDS cases living in Oklahoma:

- 55.7% (3,316) were men who have sex with men (MSM),
- 17.8% (1,062) were heterosexual contact,
- 8.5% (505) were MSM and injection drug use (IDU),
- 8.3% (496) were IDU,
- 0.8% (45) were perinatal,
- 0.4% (26) were blood recipients, and
- 8.5% (504) were no reported risk or no identified risk.

Among males, MSM was the most commonly reported risk factor accounting for 67.3% (3,316) of the cases. Heterosexual contact was the second most common risk factor among males accounting for 11.7% (575), followed by cases reporting both MSM and IDU (505; 10.3%) as risk factors. Among females, hetero-sexual contact (487; 47.3%) was the most com-monly reported risk factor, followed by IDU (210; 20.4%).

BY GEOGRAPHY

Approximately 75% of the living HIV/AIDS cases reside in four counties: Oklahoma (2,266; 38.1%), Tulsa (1,582; 26.6%), Cleveland (388; 6.5%), and Comanche (212; 3.6%). Oklahoma County had the highest rate of cases living with HIV/AIDS (289.4 cases per 100,000). Tulsa County had the second highest rate of cases living with HIV/AIDS cases (246.1 cases per 100,000).

The Oklahoma City MSA accounted for nearly half of the living HIV/AIDS cases (2,922;

49.1%) and had the largest rate (212.8 cases per 100,000) among the MSAs. The Tulsa MSA ac-counted for 31.0% (1,848) of the living cases and had the second highest rate at 187.2 cases per 100,000. The Lawton MSA accounted for 3.6% (214) of the living cases. Approximately 17% (970; 16.3%) of the living HIV/AIDS cases resided in counties outside of these MSAs in Oklahoma.

Regardless of the location of HIV/AIDS cases as set forth above, Project Sponsors of eligible activities are required to ensure access to services throughout the state.

Eligibility:

Experience in other HIV-AIDS service delivery programs has proven how critical well-defined, concrete guidelines for eligibility are to the success of any plan. Criteria used to determine eligibility for services vary to some degree within the service areas. Basic considerations in determining eligibility for any program services will utilize the following criteria:

- HIV/AIDS Status
- Current Housing/Living Situations
- Income Levels

HIV/AIDS Status and Current Housing Living Situation:

Five levels of priority have been established to determine eligibility based on HIV/AIDS status and current housing/living situation:

Five Levels of Priority:

1) Homeless individuals (AIDS & HIV+)
2) Individuals who have received an AIDS diagnosis and are seeking to get new housing (they would go to Priority 1 if they are at eminent risk of becoming homeless).
3) Individuals who have received an AIDS diagnosis and are seeking assistance where they are living (they would go to Priority 1 if they are at eminent risk of becoming homeless).
4) Individuals who have received an HIV+ diagnosis and are seeking to get new housing (they would go to Priority 1 if they are at eminent risk of becoming homeless).
5) Individuals who have received an HIV+ diagnosis and are seeking assistance where they are living (they would go to Priority 1 if they too were at eminent risk of becoming homeless).

Income Levels:

Recipients of HOPWA assistance must be low-income as defined by HUD. Households receiving HOPWA assistance must earn no more than 80% of the Area Median Income (AMI) established by HUD for the county in which they reside. Out-of-pocket documented medical expenses are deducted from their gross monthly income.

The following are links to the HUD-established HOPWA Income Limits and the HUD 80% of AMI limits:

https://www.hudexchange.info/resource/5332/hopwa-income-limits/

https://www.huduser.gov/portal/datasets/il.html#2018

Medical expenses do not include over-the-counter medications and/or supplies. Any allowable medical expenses must be documented through either paid receipt or check stub.

Mental health and case management services will use these same eligibility requirements to establish priority in service delivery to ensure those persons who are most in need receive the services that are available. Staff members providing these services will be allowed to extend services to other persons living with HIV disease as their workload permits.

The effectiveness of the established eligibility criteria will be evaluated throughout the year to ensure it continues to meet the needs of persons in need of program services. Adjustments will be made by the grant administrator if indicated.

General Locations and Costs of Proposed Activities

Location:

The purpose of this plan is to ensure the provision of resources and incentives to devise short and long-term comprehensive strategies for meeting the housing needs of low-income individuals and their families who are living with HIV disease. Given the rural nature of Oklahoma's population, these strategies must include a method of comprehensive service delivery throughout the state. ITB guidelines require successful contractors to submit plans that include service provision to Western Oklahoma, Eastern Oklahoma, or the entire state. Western and Eastern Oklahoma are defined by area code, Western being the 405 and 580-usage area and Eastern, the 918-usage area. This method of division is widely used within this state to assign service delivery responsibility. It also mirrors the current division of service responsibility assigned to the HIV CARE Consortia within the state. Oklahoma City, in the western half of the state, and Tulsa, in the eastern half of the state, will serve as "hubs" of service delivery.

Cost:

The State of Oklahoma has been awarded a total of $327,506 HOPWA funds for use in FY 2019. Analysis of epidemiological data has been utilized to determine an equitable distribution of funds.

Western Oklahoma will be eligible to receive approximately 61% of State and City funding, which would include the funding available exclusively for the City of Oklahoma City while the City of Tulsa; and Eastern Oklahoma will be eligible to receive the remaining 39%. Funding awards are granted through a competitive bidding process whereby an ITB is developed by OHFA and distributed to potential bidders. The ability to provide specified services of sufficient quality and quantity have been evaluated and evidence has been provided demonstrating their abilities to cooperate with a network of public and private agencies providing complementary services concerning HIV disease.

Urgent Housing Needs

As the need for stable housing resources has become more pressing, it is evident that Oklahoma does not have adequate resources to meet these needs. HOPWA funds represent an opportunity to provide resources and incentives to devise long-term comprehensive strategies for meeting housing needs of persons with AIDS in our state. Initial responses to the AIDS epidemic focused on who, what, when, where and how of this devastating diseases' evolution and its effect on individuals. Now the focus is on who, what, when, where, and how of providing a better quality of life for the same individuals. One emerging concern is how and where persons living with AIDS will find stable housing. We now know enough about this disease to recognize how critical stable living conditions are to the medical management of HIV/AIDS. Traditional resources available to homeless or marginally homeless individuals often are not a viable option for people with HIV/AIDS. For example, shelters often pose infection control problems that place persons with HIV disease at risk for other infections (e.g., tuberculosis). They also may not have safeguards on confidentiality sufficient to protect the rights of individuals living with HIV/AIDS or staff trained to deal with HIV-related problems. OHFA worked with a variety of agency representatives, community leaders, and individuals living with HIV disease to develop a comprehensive plan that would provide the most critically needed services to those least able to meet those needs without assistance.

OHFA met with representatives of the two HIV CARE consortia responsible for the continuum of care for individuals living with HIV disease within the state as well as other state agencies responsible for related care, to set priorities for program activities. Years of first-hand experience, results of the housing needs assessment, and a review of case history information, led to a decision to provide short-term rent, rental, and utility bill assistance program with a comprehensive and intensive mental health and case management component. The rental assistance and short-term rent and utility bill assistance programs were designed to meet the immediate housing needs of persons living with HIV disease and their families who are homeless or in eminent danger of becoming homeless. Individuals in immediate need (e.g., currently homeless or at risk of becoming homeless in the near future) will be eligible to utilize the short-term rental

assistance program for up to 21 weeks. Case managers will work to ensure that Housing Quality Standards are met in all housing units in the event that rental assistance is needed for a longer period of time. Clients of the short-term rental assistance program will be able to access the longer-term rental assistance component. Case managers will also work to facilitate access to Section 8 Housing and other long term housing solutions when and where appropriate. Past state plans required payments for utility bills, short-term rent and/or long-term rental assistance could not exceed a cap of $4,848 per person per year. The total maximum for short term was $2,020 with the cap for long term set at $3,272. There is no longer a need to limit these resources. Additionally, even though the HOPWA Program has been successful over the past several years a housing consultant may be utilized to evaluate program efficiencies. And, although not anticipated, OHFA reserves the right to realign program funding in the event the pursuit of other eligible housing activities such as acquisition or rehab becomes a more appropriate approach to meeting the housing needs as outlined.

Other Points of Agreement:

- Need for collaborative efforts to achieve an integrated service delivery system statewide.
- Need to diminish barriers to access of care for persons with AIDS (e.g., bureaucratic red tape).
- Need for continuity of care; diminish fragmentation of service delivery.
- Need to address the reluctance of traditional health and service delivery systems to provide services to individuals living with HIV disease.

History of Assessment of Need:

The Housing Needs Assessment was utilized to assist in prioritizing program services to be offered with HOPWA funds.

The purpose of this assessment was to gather information regarding housing and supportive needs from individuals living with HIV/AIDS. The survey was conducted at the request of OHFA by the HIV/STD Service of the Oklahoma State Department of Health (OSDH). The assessment, due to time constraints, was not scientific in its development or administration. Surveys used in other programs were used as models in the development of the survey. Specific survey questions requested information from the respondents in the following areas: employment status; financial resources; current living/housing situation; access/need for health care; supportive services utilization; and housing and support services preferences.

Community-based HIV/AIDS service delivery organizations were the primary vehicle for distribution and collection of surveys. A total of 110 surveys were returned. Surveyed results may be biased and are not necessarily representative of the needs of all persons living with HIV within our state. Despite this, the survey allowed input from at

least a portion of individuals living with HIV disease.

An analysis of the survey results identified the following needs as priorities:

- Utility Bill Assistance
- Assistance with Rent and Mortgage Payments
- Advocacy/Assistance Accessing all types of supportive services
- Increased Knowledge About Services Available
- Daily Living Skills Assistance
- Options for Living Arrangements to Meet Individual Needs

Urgent housing and supportive services needed and proposed program activity to address needs are listed below:

Urgent Housing Needs/Supportive Service	Proposed Activity
Rent Assistance Emergency Housing Utility Bill Assistance	Short-term Rent and Utility Bill Assistance Project Based Assistance
Supportive Services Easy Access to Resource; e.g., Local/State/Federal Benefits Crisis Intervention Alcohol and Drug Treatment Grief Counseling Mental Health Assessment Continuity of Care	Case Managers Mental Health Services Collaboration/Service Providers
Variety of Housing Options to Meet the Varying Needs of Persons Living with HIV in our State	Funds for Additional Eligible Activities including, but not limited to: Acquisition, Rehabilitation, Conversion, Lease and Repair of Facilities to Provide Housing.

Project Sponsors Selection/Process:

Project Sponsors were selected in 2015 through an Invitation to Bid (ITB) process conducted by OHFA. Copies of the ITB are available by contacting OHFA. The ITB was used to select Project Sponsors to provide rental assistance, short-term rent and utility bill assistance and administer a supportive services program. Grant Agreements for Project Sponsors are renewable on an annual basis.

The ITB was developed based on:

- Prior experience with HIV service delivery programs within Oklahoma
- needs assessment
- models from housing programs in other areas of the country
- community input

Eligibility requirements and the evaluation criteria to be used by reviewers in the selection process were outlined within the ITB. A review committee was established that consisted of representatives from agencies not eligible to apply for funds, but involved in the delivery of services to individuals living with HIV disease.

Successful applicants were required to ensure complete coverage of an entire services area (e.g., the 405 and 580 area codes and/or the 918 area code).

Project Promotion/Accessibility:

Methods of informing eligible persons of the housing assistance and supportive services available are integrated into the service delivery plan. Project Sponsors will be required to develop and implement effective strategies to increase awareness of, and accessibility to, services for clients.

These strategies should include, but not be limited to, the following:

- media coverage (e.g., radio, television, newspapers)
- newsletters, journals or other publications that are widely read by persons living with HIV disease and their service providers
- inclusion in resource directories
- pamphlet describing program placed at HIV-related service provider sites (e.g., Social Security Offices, Food Stamp Offices)
- presentations at coalition and committee meetings attended by HIV service community and/or individuals living with HIV
- outreach
- referrals by service provider network

Accessibility to the programs will be enhanced by mobile case managers who will be working within the community on a full-time basis. For instance, case managers could complete the application process with any potential client at the site of convenience for the client rather than at a designated office. Sponsors will utilize existing HIV service delivery infrastructure to enhance statewide accessibility to clients. State agencies such as Oklahoma State Department of Health (OSDH), the Department of Human Services (DHS), and the Department of Mental Health & Substance Abuse Services (DMHSAS) who have facilities serving persons with HIV disease throughout the 77 counties may be used as points of access to services.

Coordination/Collaboration:

OHFA developed the state plan for HOPWA funds through the cooperation and collaborative efforts of other state agencies including continuum of care agencies, community-based organizations, and the Oklahoma HIV Treatment and Care Consortium (OHTCC).

Specific examples of these efforts include:

- Housing Needs Assessment developed by both the OSDH and the OHTCC and distributed to HIV-related service community-based organizations throughout the state.
- Program planning and development involving the state HIV CARE Consortia; DHS; Oklahoma Department of Corrections; OSDH; Oklahoma Department of Education; Oklahoma Department of Veteran's Affairs and DMHSAS.
- Technical assistance from OSDH and Department of Central Services (now the Office of Management and Enterprise Services) in preparation of the HOPWA ITB.
- Mutual agreement by planning group that letters of commitment will be provided to ensure integrated service delivery.

Other measures to ensure future coordination and collaboration:

- Requirement that Project Sponsors utilize existing HIV service delivery infrastructure in provision of housing services.
- Evaluation methods that require input from community (e.g., patient satisfaction survey, public comment meetings).

EXHIBIT 3: PROGRAM SUMMARY BUDGET

Eligible Activities For more detail see 574.300 of the program regulations.	Short Term Facilities		SRO Dwellings		Community Residences		Other Housing Activities		Non-Housing Based Activities			
	HOPWA Funds	Other Funds	HOPWA Funds	Other Funds	HOPWA Funds	Other Funds	HOPWA Funds	Other Funds	HOPWA Funds	Other Funds	HOPWA Funds	Other Funds
Acquisition												
Rehab/Conversion												
Lease												
Repairs												
New Construction												
Operating Costs												
Technical Assistance												
Supportive Services Associated With Housing												
Supportive Services Not Associated With Housing									104.140		104,140	
Housing Information												
Resources Identification												
Rental Assistance							124,196				124,196	
Short Term Rent, Mortgage, & Utility Payments							66,400				66,400	
Grantee Administrative Expenses							9,830				9,830	
Project Sponsor Admin. Expenses							22.940				22,940	
Totals							223,366		104,140		327,506	
Instructions: Enter the amount of funding proposed for each eligible activity in the appropriate column. For example, if a building will be acquired to be used for a community residence, the amount of funds involved should be entered in the "Community Residences" column across from "Acquisition." If an eligible activity is not associated with a particular type of housing, the "Non-Housing Based Activities" column should be used. Shaded boxes indicate that HOPWA funds cannot be used for those purposes.									Total HOPWA Funds (should equal formula allocation)		327,506	
									Total Other Funds			

	Total Program Funds	327,506	

EXHIBIT 4: DESCRIPTION/EVALUATION OF SUPPORTIVE SERVICES

Supportive Services Associated With Housing:

Supportive services associated with housing will be provided by case managers assigned to work throughout the State. The main objective will be to complete a housing plan that would include both long and short term housing goals. In addition, case managers will provide the following types of client services:

- assist in the completion of application for housing services
- determine eligibility
- assist with financial planning
- secure cooperation of applicant's landlord and utility company representatives
- provide assistance to ensure housing program resources are more easily accessible and available
- evaluate rental units for Housing Quality Standards (HQS)
- assist with transportation
- assist with referrals and provide outreach

Supportive Services Not Associated With Housing:

Supportive services not associated with housing will be provided by the case managers assigned to work throughout the State and by the mental health therapists. Services will include a broad range of mental health services, as well as case management services unrelated to housing. These services would include, but not be limited to:

- crisis intervention
- support groups
- individual, couple and family counseling
- referrals to appropriate mental health resources including drug and alcohol treatment
- referrals for other supportive living resources
- transportation
- major health crisis intervention
- food, dietary, and nutrition services

Evaluation and Monitoring of Program Services Will Consist of:

- monthly reports of demographic characteristics of clients and types of services rendered
- service provider satisfaction surveys
- client satisfaction surveys
- programmatic review performed by outside technical assistance

Appendix E

Section Contents…

- Housing Trust Fund Action Plan

OKLAHOMA HOUSING FINANCE AGENCY
2019 HOUSING TRUST FUND
Allocation Plan/Action Plan

100 N.W. 63rd St., Suite 200
P.O. Box 26720
Oklahoma City, OK 73126-0720

Introduction
This 2019 Allocation Plan/Action Plan is necessary to implement the federal government's National Housing Trust Fund (HTF). The Oklahoma Housing Finance Agency (OHFA) has been designated by the Governor of the State of Oklahoma to administer the HTF for the State. HTF funding is provided through the U.S. Department of Housing and Urban Development (HUD). OHFA will receive $3,000,000 for HTF in 2019.

All HTF funds that OHFA receives in 2019 will be used to provide housing for Extremely Low-Income families or families at or below the Poverty Line, whichever is greater. In accordance with 24 CFR Part 93, OHFA will allocate 10% of its grant to program planning and administration costs ($300,000); up to one-third for funding operating cost reserves; the balance of the grant will provide capital funding for new construction or rehabilitation of housing units.

1. National Housing Trust Fund Strategic Plan §91.315(b)(2)

Geographic Priorities
The HTF funds will be targeted to address specific and critical needs in rental housing markets, including multiple geographic areas if at all possible.
.
Goals
- Number of HTF units constructed or rehabilitated with 2019 funds: 30
- Number of HTF units receiving operating subsidies in the form of operating reserves: up to 30

2. National Housing Trust Fund Action Plan §91.320(k)(5)

Distribution of HTF funds
OHFA for 2019 will <u>not</u> allocate funds to sub-grantees for their distribution to owners/developers. Instead, HTF funds will be distributed directly to owner/developers of affordable housing via OHFA's 2019 HTF Application, a competitive process of selecting the best possible Projects for an award of HTF funds.

Application Requirements and Selection Criteria
Developers, owners, and the entire development team are required to meet the same threshold eligibility criteria as for other OHFA programs, as specified in the 2019 HTF Application Packet.

In addition, points will be awarded for certain other priorities, including those set forth in 24 CFR Part 91.320. **These are highlighted to distinguish them from OHFA's own requirements.** They may include, but are not limited to:

Threshold Requirements:
- Affirmatively Furthering Fair Housing Marketing Plan
- Audit
- Program and Financial Monitoring
- Market Analysis
- Description of the Project

- Financing, Underwriting and Subsidy Layering
- **Applicant Organizational Structure, Capacity and Experience**
- Capital Needs Assessment (for acquisition/rehabilitation projects only)
- **Affordable Rents**

Priority (Points) for Awarding Funding to Eligible Applicants

Geographic Diversity
OHFA will give bonus points to the highest scoring applications from the two main areas of the State, Eastern Oklahoma and Western Oklahoma, as set forth in the 2019 HTF Application Packet. The areas will be designated on a county by county basis. Due to the limited funding for 2019, OHFA believes that this is the most that can be done to encourage Geographic Diversity. Tiebreakers will be used if two or more applications achieve the same score.

Project-based Rental Assistance
OHFA will award points for the preservation of rent-assisted projects; and for projects with binding commitments for project-based vouchers.

Duration of Affordability Period
New Construction, rehabilitation, and rehabilitation and acquisition rental projects have an affordability period of thirty (30) years. OHFA will award points for Projects promising an additional ten (10) years of affordability.
.
Priority housing needs
Oklahoma's most current Consolidated Plan identifies priority housing needs among ELI renters for all renter household types from small and large families to elderly households. OHFA will award points for **the merits of the Application in meeting the State's priority housing needs** as set forth in the Consolidated Plan.

Leveraging
OHFA will award points for leveraging the HTF funds with other funding sources, including **the extent to which an Application makes use of non-federal funding sources,** such as State and local funding sources and private funding. Points will not be awarded for funding from the developer or the ownership entity.

Readiness to Proceed
Points will be awarded for the Applicant's **ability to undertake eligible activities in a timely manner.**

Special Populations
Points will be awarded for Projects that propose to serve special populations. The special populations for 2019 will be the homeless, families or individuals dealing with mental and physical disabilities, veterans, youth aging out of foster care, and individuals transitioning out of incarceration and their families.

Services for Special Populations
OHFA will award points for access to high quality supportive services focused on staying housed, improving physical and mental health, increasing income and employment, and developing social and community connections. Applications for HTF funding should be tied to funding for services that are appropriate to the population to be served.

Cross-agency collaboration is particularly important when serving an ELI population because they may be frequent users of other public services, and providing affordable, service enriched housing may represent cost savings that could be reinvested in services funding)

In addition, many ELI populations want to work but have experienced barriers related to health, disability, criminal justice background, access to child care, or lack of skills that could put them on a path to family-sustaining work. HTF developers are encouraged to show evidence of partnerships with workforce development agencies.

Roles, responsibilities and communication strategies should be clearly established among the supportive housing partners, codified in written agreements (MOUs, MOAs, contractual or grant agreements) and revisited regularly.

Relative Importance of Scoring Criteria
OHFA will award the above described points using the following scoring system, in order to ensure that the best projects are awarded funds.

Application responses are to be structured and information presented in such a way as to fully address each scoring criterion. The information, data, and statements provided in response to each criterion will be the basis for evaluating each Application. Failure to submit or properly address evaluation criteria items will disqualify the Application from receiving points for those items. Some criteria may not apply to all Applications. Some requirements under a particular criterion may not apply to all Applications.

The scores for all Applications will be totaled, and the Application scores will be used to determine the order of funding if there are insufficient funds available to fund all of the Applications for HTF funds. The highest scoring Application will receive an award of funds. In the event of a tie on scores between Applications, tiebreakers shall be used. The tiebreakers are set forth in the Tiebreakers criterion at the end of this section.

Leveraging - 10 Points
Applicants must fully describe all development leverage resources, inducements and incentives that are present in the proposed Application. All sources of construction or permanent financing, except HTF, paying development budget costs are eligible for leverage points. **If any source of funding provides both construction and permanent financing, it will not be counted twice.**

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

Leverage points to be awarded:

At least 10% up to 50% of the HTF funds requested	2 points
At least 51% up to 100% of the HTF funds requested	4 points
At least 101% up to 200% of the HTF funds requested	6 points
At least 201% up to 300% of the HTF funds requested	8 points
301% or more of the HTF funds requested	10 points

When determining the leverage percentage, **normal rounding shall apply**. Thus, for example, 50.5% will be rounded up to 51%. 50.4% will be rounded down to 50%.

Duration of Affordability - 5 Points

Five (5) points will be awarded for Applicants who promise to extend the affordability period from thirty (30) to forty (40) years.

Readiness to Proceed – 10 Points

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 should be thorough and detailed, and should 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 and the property has not been identified.
D. Document that the zoning required for the Project is in place. This documentation is not required for Acquisition/Rehabilitation activities and the property has not been identified.

Energy Efficient Building Materials – 7 Points

The following is an exclusive list of amenities for which OHFA may award points. One point shall be awarded for each item below, up to a maximum of 7 points.

- Shower heads with a maximum of 2.5 gallons per minute flow rate
- Low-flow kitchen faucets
- Low-flow toilets (must be all toilets in every unit)
- The use of **better than** R-2 insulation on exposed hot water pipes
- Installation of Energy Star qualified appliances
- Energy Star qualified windows with Low E glass
- Energy Star qualified HVAC
- Energy Star qualified Efficiency Water Heaters
- Radiant barrier per ASTM standards in attic and/or roof sheathing; and/or exterior wall sheathing (**may not be combined with spray foam insulation)**

- Low or no VOC paint
- Programmable thermostats
- Insulation: R-3 or better insulation installed around the exterior foundation of every Building
- **Applicants may select one (1) of the following:**
- Insulation: Attic insulation **better than** R- 38, wall insulation **better than** R – 13, and floor insulation (if applicable) **better than** R-19
    - **OR**
- Spray foam insulation exceeding code requirements

Priority Housing Needs – 5 Points
Points will be awarded for addressing any of the following priority housing needs as identified in the Consolidated Plan. (Serving Extremely Low Income individuals and families was identified as the highest priority, but that is already a requirement of the HTF.)

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

Project Based Rental Assistance – 5 Points
Points will be awarded to a Project that will preserve project=based rental assistance from any federal, State or local program, or for Projects with a binding commitment for project-based vouchers.

The Applicant must provide an executed agreement with the entity providing the project-based rental assistance, or a signed letter promising to provide such assistance. The commitment to provide project-based rental assistance must be a firm commitment.

Tenant Special Needs Populations – 10 Points
Points will be awarded to a Project that commits to dedicate at least ten percent (10%) of the total residential units to serve a Special Needs Population, or multiple Special Needs Populations. A minimum of one (1) unit dedicated to a Special Needs Population is required in order to receive

the points, regardless of the percentage. Points will be awarded for the following Special Needs Populations. This is an exclusive list:

- Homeless
- Persons with mental or physical disabilities
- Military veterans
- Youth aging out of foster care
- Formerly incarcerated individuals transitioning into society

Services for Special Populations – 5 Points
OHFA will award points for Applications promising access to high quality supportive services focused on the ELI beneficiaries remaining housed, improving physical and/or mental condition, increasing income and employment, and developing social and community connections. To receive the points, Applications for HTF funding must be tied to funding for services that are appropriate for the population to be served.

The Applicant must provide an executed agreement with the entity providing the services, or a signed letter promising to provide such services. OHFA must be able to determine that the commitment to provide the services is a firm commitment. OHFA may request additional documentation if necessary to make such a determination.

Geographic Diversity – 5 Points
OHFA will give bonus points to the highest scoring Application from each of the two main areas of the State, the counties grouped with the Oklahoma City MSA for establishing the HOME Program Maximum Per-Unit Subsidy Limits, and the counties grouped with the Tulsa MSA for the same purpose. Due to the limited funding available for 2019, OHFA believes that this is the most that can be done to encourage Geographic Diversity. Tiebreakers, as set forth below, will be used if two or more Applications achieve the same score.

Tiebreakers
Applications compete only against other Applications for funding being considered at the same Board meeting. If there are sufficient funds to fund all Applications that meet all threshold requirements, then all of the Applications will be funded. If not, Applications will be funded in rank order by score, from highest to lowest. Tie-breakers will be used in the event that there are sufficient funds remaining for only one Application, and the next two or more Applications in rank order have achieved an equal score.

1. First, the Application proposing the most HTF units will be awarded ahead of the others. If there is still a tie;
2. Second, the Application utilizing the least amount of HTF funding per HTF-assisted unit will be awarded ahead of the others. If there is still a tie;
3. The third and final tiebreaker will be a random drawing.

3. Eligible Activities

Activities to be undertaken include rehabilitation (including acquisition), preservation, and new construction of rental housing, including operating reserves if necessary to ensure the financial feasibility of the Project.

All Applications must include descriptions of the Eligible Activities that include, at a minimum, all of the following:

A. Describe the location of the Project (e.g. county, city or town, street address if known, general location, or service area).
B. Define the number and type of units. This should include bedroom mix. Specify if the units are fixed or floating units.
C. The Applicant must show the calculation of the number of HTF-assisted units at the HTF Rents established by HUD as set forth in 24 CFR Part 93.302. The number of HTF-assisted units must be equal or greater than a pro rata share of the total units according to the percentage of HTF monies in the Project, compared to the total Project costs.
D. Describe how the Period of Affordability will be implemented. Include drafts or templates of all documents that will be used for this purpose.
E. Depict the type of construction codes or standards to be used. Applicants should note that they must follow OHFA's Written Rehabilitation Standards or Written New Construction Standards, as applicable, as well as all State and local codes and the most recent version of the International Residential Code.
F. Address the relocation of tenants or residents if applicable.
G. For Rental New Construction only, Applicants must provide sufficient documentation to allow OHFA to make the determination that proposed sites for new construction meet the requirements in 24 CFR Part 983.57(e)(2) and (3) (Site and Neighborhood Standards). Applicants for Rental New Construction activities should carefully review the Site and Neighborhood Standards section of the 2019 HOME Program Processes, Procedures and Topical Guidance. **All documentation utilized in making the determination must be included with the Application. OHFA is responsible to maintain records that document the results of the site and neighborhood standards review. If the documentation does not support the conclusion that a site meets the requirements, additional documentation will be requested.**

4. Eligible Recipients

- **Nonprofit developers*:*** A nonprofit developer is a nonprofit housing development organization selected by OHFA, through the competitive Application process described herein, to develop a single HTF Program Project.

- **For-profit developers*:*** A for-profit developer is a for-profit housing development organization or individual selected by OHFA, through the competitive Application process described herein, to develop a single HTF Program Project.

- **State Recipients**: A State Recipient is a governmental entity within the State of Oklahoma selected by OHFA, through the competitive Application process described herein, to develop a single HTF Program Project. This includes cities, towns, counties and Indian tribes.

Eligible Recipients must certify that housing assisted with HTF funds comply with all HTF regulations. OHFA will provide an Application Certification Form with the Application Packet.

5. Performance Goals and Benchmarks

Oklahoma expects to receive the minimum state grant amount of $3,000,000 in 2019. All HTF funds received in 2019 will be used to house Extremely Low-Income families, or families at or below the Poverty Line.

OHFA will execute Written Agreements with all eligible recipients that receive an award of HTF funds. Such Written Agreements will contain multiple performance goals and benchmarks, allowing OHFA to ensure that the Projects will be completed successfully and in a timely manner, and that all the requirements of OHFA and the HTF will be met.

These goals and benchmarks include, but are not limited to:

- Quarterly reports during construction, until the Projects have placed in service
- Deadlines for construction commencement and construction completion
- Regular construction inspections by OHFA's inspector
- Deadlines for the submission of required documentation
- Written New Construction Standards or Written Rehabilitation Standards, as applicable
- Documentation of Environment Review
- Performance reports

7. Maximum Per-unit Development Subsidy Limits

For 2019, OHFA will use the most current HOME Program Maximum Per-Unit Subsidy Limits for the HTF. In future years OHFA may develop separate per-unit subsidy limits for the HTF when historical data is available.

OHFA already uses the HOME Program Maximum Per-Unit Subsidy Limits not only for the HOME Program but also for the federal Low Income Housing Tax Credit Program (Also known as the Affordable Housing Tax Credit Program), which OHFA also administers. OHFA has found these limits to be appropriate for both programs.

HUD's experts have calculated these limits. Due to the fact that OHFA is not a direct lender, OHFA does not maintain staff to closely monitor development costs, other than through its historical records of the federal programs it administers. Based both on the HOME Program and

the LIHTC Program results over the last several years, these limits have allowed sufficient funding to create long-term sustainability, while not allowing excessive per-unit subsidies.

OHFA believes there will be a need to partner the HTF funding with other federal, State and local funds, due to the limitation on the amount of HTF funds available to the State, and in order to create sustainable projects by blending funding for ELI households with funding for households at 50 to 80% of Area Median Income, allowing for higher rents for those units. The use of a single per-unit subsidy limit would reduce the administrative burden for both OHFA and the Recipients of the HTF funds.

A single limit for the entire State is appropriate because OHFA's records indicate that costs across the State of Oklahoma are fairly consistent. Oklahoma is a rural state with only two metropolitan areas of even moderate size. Development costs in those metro areas are relatively low compared to some major metro areas around the United States, where housing prices and related costs, especially land costs, are extremely high.

The most current Maximum Subsidy Limits are as follows:

The following limits are determined, pursuant to 24 CFR 92.250(a), as amended, by taking the Basic Statutory Mortgage Limits for Section 234 Condominium Housing, elevator-type projects, and multiplying them by the latest published multiplier for the Ft. Worth, TX Southwest Regional Office, which at this time is 225%. These limits were effective June 4, 2018.

Number of Bedroom(s)	Maximum Subsidy Limit
0	$137,882
1	$158,062
2	$192,204
3	$248,652
4+	$272,940

8. Rehabilitation Standards

Projects awarded HTF funds must comply with all applicable State and local codes, standards and ordinances by project completion. In cases where standards differ, the most restrictive standard will apply. In the absence of a State or local building code, the latest version of the International Residential Code will apply. In addition, all Projects must meet or exceed OHFA's Written New Construction Standards or OHFA's Written Rehabilitation Standards, whichever applicable.

Projects must meet local housing habitability or quality standards throughout the affordability period. Projects must also meet HUD's Uniform Physical Conditions Standards (UPCS), as set

forth in 24 CFR 5.705. In addition, Projects proposing rehabilitation of rental housing must follow the federal Lead-Based Paint requirements.

A copy of OHFA's Written Rehabilitation Standards for the HTF Program is attached and marked as "Attachment A." A chart of the Inspect-able Items under UPCS is attached and marked as "Attachment B."

9. Resale and Recapture Provisions

OHFA will not undertake any Homeownership activities with the HTF for 2019, and therefore no Resale and Recapture provisions would apply.

10. Affordable Homeownership Limits

OHFA will not undertake any Homeownership activities with the HTF for 2019, and therefore no Affordable Homeownership Limits would apply.

11. Limitation on Beneficiaries or Preferences

OHFA does not plan to limit the HTF funding to certain beneficiaries. However, preference will be given to certain special populations by way of extra points in the 2019 HTF Application Packet.

Points will be awarded to a Project that commits to dedicate at least ten percent (10%) of the total residential units to serve a Special Needs Population, or multiple Special Needs Populations. A minimum of one (1) unit dedicated to a Special Needs Population is required in order to receive the points, regardless of the percentage. Points will be awarded for the following Special Needs Populations. This is an exclusive list:

- Homeless
- Persons with mental or physical disabilities
- Military veterans
- Youth aging out of foster care
- Formerly incarcerated individuals transitioning into society

15. Refinancing Existing Debt

OHFA will not use HTF to refinance existing debt.

ATTACHMENT A

OKLAHOMA HOUSING FINANCE AGENCY

National Housing Trust Fund Minimum Rehabilitation Standards

Please note: Regardless of the standards set forth herein, all housing assisted by Housing Trust Fund monies must meet all applicable State and local codes, ordinances and requirements, as well as such other requirements HUD may establish. In the absence of State or local building codes, the housing must meet the International Existing Building Code or the International Code Council.

For Rental housing, Awardees must produce an estimate, based on age and condition, of the remaining useful life of all major systems, including structural support, roofing, cladding and weatherproofing, plumbing, electrical, and HVAC.

A capital needs assessment (CNA), prepared no longer than 18 months prior to the date of Application, is required for all multi-family Rental Rehabilitation or Acquisition/Rehabilitation Projects of 26 or more units, and for all Applications in conjunction with Affordable Housing Tax Credits, regardless of the number of units. A CNA may be requested by OHFA for smaller Projects if deemed necessary to properly underwrite the Projects. Capital needs assessments performed for the same Project as a requirement of another funding source will be accepted in lieu of a specific CNA for the HTF Application.

Capital Needs Assessment (CNA) means a qualified professional's opinion of a property's current physical condition determined after a physical inspection of the interior and exterior of the units and structures. The physical inspection should include an interview with the onsite manager and maintenance personnel. This assessment should identify deferred maintenance, physical needs, **remaining useful life**, material building code violations that affect the property use, structural and mechanical integrity, and the future physical and financial needs. The assessment must include the cost of labor and materials identified in detail and the extent of future expenditures contemplated to ensure the costs will be addressed through operating and replacement reserves. Components which should be examined and analyzed in this assessment include but are not limited to:

- Site, including topography, drainage, pavement, curbing, sidewalks, parking, landscaping, amenities, water, sewer, storm drainage, gas and electric utility lines;
- Structural systems, both substructure and superstructure, including exterior walls and balconies, exterior doors and windows, roofing system and drainage;
- Interiors, including unit and common area finishes (carpeting, vinyl or tile flooring, plaster walls, paint condition, etc.), unit kitchen finishes, cabinets and appliances, unit bathroom finishes and fixtures, and common area lobbies and corridors; and
- Mechanical systems, including plumbing and domestic hot water, HVAC, electrical, lighting fixtures, fire protection, and elevators.

In all cases, f the remaining useful life of one or more major systems is less than the Period of Affordability, the Awardee must establish and maintain a replacement reserve and make adequate monthly payments thereto, such that there are sufficient funds to repair or replace systems as needed.

For Homebuyer housing, upon completion each of the major systems must have a minimum useful life of five years, or the major systems must be rehabilitated or replaced as a part of the rehabilitation work.

If the housing is occupied at the time of rehabilitation, Awardees must identify any life-threatening deficiencies and must address them immediately before any further work is undertaken. The potential life-threatening deficiencies, pursuant to the Uniform Physical Condition Standards (UPCS), are highlighted in orange on Attachment B, which contains the complete list of inspect-able items covered by UPCS.

OHFA will review and approve all written cost estimates and ensure that construction contracts and work performed will meet these Rehabilitation Standards.

OHFA will conduct initial, progress and final inspections to ensure that all work is done in accordance to work write-ups.

I. PURPOSE OF STANDARDS

A. The National Housing Trust Fund Rehabilitation Standards (known herein as the "HTF Standards") are designed to outline the requirements for building rehabilitation for all National Housing Trust Fund (HTF) funded multi-family housing projects in the State of Oklahoma. The HTF Standards, though a requirement specifically to the development entity in direct receipt of HTF funding, are written to provide guidance to all relevant members of a project development team.

B. The goal of the HTF Program is to provide functional, safe, affordable and durable housing that meets the needs of the tenants and communities in which the housing is located. The purpose of the HTF Standards is to ensure that property rehabilitation puts each building in the best possible position to meet this goal over its extended life and that, at a minimum, all health and safety deficiencies are addressed.

C. If a project is out of compliance with the HTF Standards, the Awardee shall bring to the attention of OHFA Staff the specific portion of the project which does not comply, stating the reasons for non-compliance. OHFA Staff will make a determination as to whether an exception to the HTF Standards shall be granted.

D. Note: At the time of publication and adoption of the HTF Standards, the adopted codes referenced are believed to be those in force. As standards and codes change and are put into effect by the governing authorities having jurisdiction, the new standards and codes will apply in lieu of those referenced.

II. QUALITY OF WORK

A. Quality of Work: Awardees and developers shall ensure that all rehabilitation work is completed in a thorough and workmanlike manner in accordance with industry practice and contractually agreed upon plans and specifications as well as subsequent mutually agreed upon change orders during the construction process. Awardees and developers will employ best practice industry standards relating to quality assurance to verify all work completed.

B. By meeting the various code requirements as a minimum standard, together with the other standards herein or in attendant OHFA policies, each building rehabilitation project is assured to be brought up to an acceptable level of rehabilitation.

C. Warranties shall be required per the standard construction contracts on all materials, equipment and workmanship.

III. CODE COMPLIANCE

A. All work shall comply with all applicable Oklahoma State and local codes, ordinances, and zoning requirements.

B. Please note that the OHFA HTF Awardee must demonstrate compliance with all State and local codes through project affiliation with professional design team drawing certifications (e.g. architectural design stamp) and/or other approved methods such as State inspector certification.

C. The HTF Standards are designed to meet or exceed the Uniform Physical Condition Standards (UPCS) and ensure that upon completion, the HTF-assisted project and units will be decent, safe, sanitary, and in good repair as described in 24 CFR 5.703. See Attachment B to the 2019 HTF Allocation Plan for a list of Inspect-able Items and Observable Deficiencies, including descriptions of the type and degree of deficiency for each item that any HTF-assisted project must address, at a minimum.

IV. HEALTH AND SAFETY

A. If the housing is occupied at the time of rehabilitation, any life-threatening deficiencies must be identified and addressed immediately. See Attachment B to the 2019 HTF Allocation Plan for a list of Inspect-able Items and Observable Deficiencies, including the identification of life-threatening deficiencies (highlighted in orange) for the property site, building exterior, building systems, common areas, and units.

V. SCOPE OF WORK DETERMINATION

A. In developing scopes of work, Awardees and developers will work with OHFA to ensure that all requirements under the HTF Standards are satisfied and that the proposed scope of work meets the goals of Part I above. OHFA approval of all scopes of work is required in accordance with OHFA standard practices.

VI. EXPECTED USEFUL LIFE

A. In developing scopes of work on housing rehabilitation projects, OHFA HTF Awardees and developers will consider the remaining expected useful life of all building components with regard to building long-term sustainability and performance. Specifically, each building component with a remaining expected useful life of less than the applicable HTF period of affordability (30 years) shall be considered for replacement, repair or otherwise updated. Additionally, new building components with an expected useful life of less than 30 years shall be considered for future replacement.

B. OHFA Staff will underwrite the proposed project to determine if sufficient replacement reserves will be set aside each month to cover the full cost of any such replacement, repair or update. Whether or not a particular building component has been replaced, repaired or otherwise updated as part of the rehabilitation scope of work, all building components and major systems must demonstrate adequate funding to be viable throughout the 30-year affordability period.

VII. DISASTER MITIGATION

A. To the extent applicable/relevant, the housing must be improved to mitigate the impact of potential disasters (e.g. earthquakes, tornadoes, floods, wildfires) in accordance with State or local codes, ordinances, and requirements, or such other requirements that HUD may establish. The relevant State codes are the International Residential Code of 2009, as amended, for new construction and the International Building Code for rehabilitation.

B. In addition, construction of the housing must adhere to the Oklahoma Standard Hazard Mitigation Plan adopted in 2014. Awardees of HTF funds should particularly review and adhere to Chapter 3 regarding Risk Assessment and Chapter 4 regarding Mitigation Strategies.

VIII. ENERGY CONSERVATION

A. Equipment, appliances, windows, doors and appurtenances replaced during rehabilitation shall be replaced with Energy Star qualified products.

B. If feasible, attics should be insulated to R38 and walls to a minimum of R11.

C. Replacement heating and/or cooling systems shall be properly sized as evidenced by completion of ACCA/ANSI Manual J® or an equivalent sizing calculation tool.

D. All accessible air ducts shall be tightly sealed.

E. Heating or cooling supply running through unconditioned space should be avoided or rerouted if possible, but when present and accessible, shall be insulated.

IX. ACCESSIBILITY REQUIREMENTS

A. Housing that is rehabilitated with HTF funds must meet all applicable federal and State regulations regarding accessibility for persons with disabilities. The applicability of these rules is complex and therefore it is recommended that developers seeking HTF funds consult with a qualified design professional.
B. Projects shall comply with other standards as may apply or be required by funding sources (i.e. USDA Rural Development)
C. Projects, if applicable, shall comply with Section 504 of the Rehabilitation Act of 1973 implemented at 24 CFR Part 8 a. For "substantial" rehabilitation (projects with 15 or more total units and the cost of rehabilitation is 75% or more of the replacement cost): i. At least 5% of the units (1 minimum) must be made fully accessible for persons with mobility impairments based on the Uniform Federal Accessibility Standards (UFAS) ii. In addition, at least 2% of the units (1 additional unit minimum) must be made accessible for persons with sensory impairments. iii. Common spaces must be made accessible to the greatest extent feasible
D. For projects with "less-than-substantial" rehabilitation (anything less than "substantial"), the project must be made accessible to the greatest extent feasible until 5% of the units are physically accessible, and common spaces should be made accessible as much as possible.

X. REHABILITATION CONSTRUCTION STANDARDS

A. SITE

1. General: a. Assure that the site is safe, clean and usable, and designed with details, assemblies and materials to provide ongoing durability without undue future maintenance.
a. Site design and engineering shall be by a licensed professional civil engineer, or other qualified professional.
b. Design and systems shall conform to all applicable codes, rules and regulations: i. Local and municipal zoning; ii. NFPA Codes as they may apply
2. Sprinkler water service – Underground water service as required for building sprinkler system shall be in accordance with NFPA 24.
3. Drainage – assure that the grading surrounding the building will slope away from the building and drain properly, without ponding or erosion.
4. Sewer connections to municipal sewage systems and on-site sewage disposal: a. Existing sewer laterals that are to be reused should be evaluated to assure that they are serviceable and have a remaining useful life of 30 years, or are covered by a plan to repair or replace during the 30-year affordability period.
b. New systems designed to conform to the State codes and regulations.
5. Water service: a. Existing municipal water supplies to buildings shall be evaluated to assure that they are serviceable, of adequate capacity and have a remaining useful life of 30 years, or are covered by a plan to repair or replace during the 30-year affordability period.
b. Required new systems shall be designed to conform to State codes and regulations.
6. Vehicular access to public way – site design shall conform to local zoning and regulations, as well as be sensible in its layout to maximize vehicular and pedestrian safety.
7. On-site Parking – parking shall be adequate for project type, meet local codes, and be designed to drain well, with a durable appropriate surface material. Handicapped parking shall be provided as required.
8. Pedestrian access and hardscape – In general, paved walkways within the site will be designed to provide sensible pedestrian access from the public way into the site, from parking areas, and provide access to buildings. All walkways should generally conform to applicable codes for width and slopes, and fall protection. Site stairs shall be safe and sound, constructed of durable materials, with proper rise and run,

and with code approved railings as required. Accessible routes into buildings shall be provided as required by code.
9. Site amenities – site amenities may be provided which enhance the livability of the project including playground areas, seating, benches, patio areas, picnic tables, bike racks, grills, and fencing, etc.
10. Mailboxes - Provision will be made for USPS-approved cluster mailbox units if required by the USPS.
11. Landscaping – lawns, ground cover, planting beds, perennial plants, shrubs and trees may be provided to enhance the livability, and to provide a positive aesthetic sense. a. Planting choices specified should be low maintenance, non-invasive species, of an appropriate size and scale and located, when adjacent to building structures, with regard to their size at maturity.
12. Solid waste collection & storage – if necessary, provision shall be made for the outdoor storage and collection of solid waste and recycling materials in receptacles (dumpsters, wheeled trash cans, totes). Enclosures may be provided and should be accessible as required by code.
13. Site lighting with shielded fixtures may be provided to illuminate parking and pedestrian walkways, and will conform to local zoning.
14. Fuel Storage – On site outdoor placement and storage of fuels per applicable regulations and utility requirements.
15. Underground or overhead utilities – as regulated by code and utility rules.

B. FOUNDATIONS
1. Existing foundations shall be examined by a qualified professional. a. Foundations to be adequately sized, free of broken components or deterioration which may compromise the load bearing structural integrity.
b. Design and implement structural reinforcements or reconstruction as necessary.
2. Above-grade masonry unit block or brick shall be reasonably stable, plumb and sound with no missing units or voids.
3. Pointing of mortar joints shall be specified as necessary to assure the continued integrity of the structural assembly.
4. New below-grade structures to conform to Chapter 18 of IBC as appropriate.

C. MASONRY COMPONENTS
1. Buildings with masonry bearing walls shall be examined for their structural integrity. Existing masonry building components shall be examined to assure sound condition, and repaired as necessary to provide the load-bearing capacity, resistance to water penetration, and aesthetic quality to assure the assemblies will perform for the purpose intended. a. Masonry shall be plumb, and structurally sound.
2. Repair or replace deteriorated portions or missing units. a. Brick veneer shall be sound, or repaired to be sound.
3. Masonry mortar joints shall be sound, and free of loose or deteriorated mortar, with no voids. a. Pointing of mortar joints shall be specified as necessary to assure the continued integrity of the structural assembly, and prevent water intrusion.
4. Historic masonry designated to remain shall be restored to sound serviceable condition, and in accordance with Section 106 of National Historic Preservation Act. a. Where masonry is considered historic, repairs will be carried out utilizing the Secretary of the Interior's "Standards of Rehabilitation" and related NPS Preservation Briefs for "Repointing Mortar Joints on Historic Masonry Buildings"
5. Chimneys a. Assure structural integrity, reconstruct, and point as necessary
b. If used for fuel heating appliances – provide lining as may be required by code and as prescribed by the heating appliance manufacturer.

D. STRUCTURE
1. A qualified professional shall examine each building's load-bearing structure, and assess its existing condition to determine suitability of continued use.

2. In general, structure evaluation and design shall be in conformance with IBC, Chapter 16. a. In most residential rehab projects where there is no change in use, it is not expected that the structure will be brought up to new construction standards.
b. Consideration shall be given if there are any proposed changes in use which would impact the historical loading.
3. Deficiencies identified shall be addressed and repairs designed and specified as necessary to correct such conditions: a. Repairs shall be made to any deteriorated load-bearing structural elements.
b. Reinforce, install supplemental or replace structural members determined not to be adequate for use.

E. ENCLOSURE - SHELL

1. Roofing a. Existing: i. Examine existing roofing and flashing systems to determine suitability for continued use. Continued life expectancy of existing roofing should be a minimum of 30 years, or covered by a plan to repair or replace during 30-year affordability period. ii. Repair existing roofing as required. iii. Existing historical slate roofs shall be repaired in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements if applicable.
b. New Roofing i. New roofing shall be installed where existing roofing does not meet requirements for continued use. ii. New roofing system components shall be compatible, and include - the nail base, the underlayment layer, ice & water shield self-adhesive membrane flashings, metal flashings and roofing. • Strip existing roofing and dispose of properly. • Examine exposed existing substrate for structural soundness • Install new roofing system per code and per NCRA trade practices, and manufacturer specifications • Flashings – deteriorated flashings shall be replaced, and the weather proof integrity of the roof system shall be assured.
c. Ventilation i. Roof assemblies shall be properly ventilated in accordance with applicable code requirements, and appropriate building science detailing.
2. Exterior Finishes a. Cladding i. Wood Siding – • Examine existing siding for soundness – shall be free of major cracks, rot, and other deterioration which may compromise its useful life and be suitable to hold exterior paint. • Siding shall be free of gaps and holes and provide continuous weatherproof system.
• Repair or re-side as necessary to provide a weather resistant enclosure. • Replace existing wood siding on historic buildings as necessary in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements. ii. Masonry • Masonry bearing walls and veneers shall be restored as necessary. All work on historic masonry shall be done in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements. iii. Other existing cladding system types and materials shall be repaired and/or restored in-kind with matching or similar materials to provide a durable weather resistant enclosure.
3. Trim – Exterior trim and architectural woodwork. a. Existing wood trim: i. Existing trim to remain must be sound, free of defects and deterioration which compromises its use. ii. Repair and restore trim to usable condition. Patch or replace in kind any deteriorated wood trim components. iii. Repair of historic woodwork and trims shall be in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements. b. New wood trim shall be installed in a workmanlike manner. Reference may be made to Architectural Woodwork Institute (AWI) standards. c. Other trim materials which are suitable may be used as appropriate and shall be installed per manufacturer's recommendations.
d. Trim which is part of the weather tight enclosure shall be flashed or caulked with joint sealers as necessary to prevent water intrusion.
4. Paint a. In general, all existing exterior wood surfaces shall receive new paint coatings, except as appropriate due to the recent application of paint and/or the sound condition of existing coatings.
b. Examine surfaces and apply paint only to sound acceptable materials / surfaces. i. Prepare surfaces properly, removing loose or peeling previous paint. ii. Paint prep shall be done in accordance with applicable lead safe standards. c. Before painting, assure that any moisture issues which may compromise the life expectancy of the paint system are remedied. d. Exterior paint systems shall be compatible, and installed in accordance with manufacturers' specifications.

5. Porches, decks and steps i. Existing porches, decks, steps and railings proposed to remain shall be examined and repaired as necessary. Repair and reconstruction shall be carried out to assure that they will have a continued useful life of 30 years, or covered by a plan to repair or reconstruct during the 30-year affordability period. ii. Inspect structure for soundness and reconstruct any deteriorated members as required. iii. Install new support piers as may be required. iv. Patch existing decking with matching materials, or install new durable decking. b. Railings i. shall be sound and adequately fastened to meet code requirements for structural loading. Repair or replace in-kind as appropriate. ii. Shall meet code requirements for height of protective guards, or have supplemental guards installed. c. Steps shall be safe and sound and meet applicable codes, with railings as necessary. d. Historic porches designated to remain shall be restored to sound serviceable condition, and in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements. e. All porch elements shall be able to withstand the weather elements to prevent premature deterioration.

F. ACOUSTICAL TREATMENTS

1. Dwelling units separated acoustically using Chapter 1207 of IBC as a guideline minimum standard.

G. DOORS

1. General a. Doors to meet code requirements of NFPA 101, Chapters 7.2, 8.3, 30.3.6.2 & 30.2.2.2
b. Meet egress requirements for dimensions, swing and clearances, and be accessibility compliant as required. c. Be sound and secure. d. New doors shall be installed per manufacturers' recommendations and standard trade practice standards. e. Flash properly, and have shim spaces insulated. f. Existing doors to remain should be examined and determined to be suitable for reuse with a remaining life after restoration of 30 years, or covered by a plan to repair or replace during the 30-year affordability period. i. Restore as required to provide useful life. ii. Shall be tested and modified as necessary to operate properly. iii. Install new weather stripping and sweeps to provide seal against weather elements and air infiltration. iv. Historic doors designated to remain shall be restored to sound serviceable condition, and in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements.
2. Unit doors a. Unit unit entry doors shall be fire rated as required.
3. Other doors – Access doors shall meet code requirements for fire rating.
4. Door hardware shall operate properly, be secure and shall meet accessibility standards and NFPA 101, Chapters 7.2, 8.3, 30.3.6.2 & 30.2.2.2.

H. WINDOWS

1. Windows shall be of legal egress size when required by code a. In townhouse units, existing windows which are non-conforming egress size shall be reviewed for code compliance.
2. Existing windows: a. Existing windows to remain should be examined and determined to be suitable for reuse with a reasonable remaining life after restoration of 30 years without undue future maintenance, or covered by a plan to maintain or replace during the 30-year affordability period. b. Capable of providing adequate seal against air infiltration, weather elements, and be determined to be appropriately energy efficient in keeping with the overall energy efficiency strategy of the project. c. Install new weather stripping to provide seal against weather elements and air infiltration. d. Air seal shim spaces and window weight pockets if possible. e. Restore and modify as required to provide useful life. f. Shall be tested and modified as necessary to operate smoothly and properly per code. g. Historic windows designated to remain shall be restored to sound serviceable condition, and in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements. h. Hardware shall be intact and operational, or be replaced with new hardware as required
3. New Windows: a. where existing windows do not meet the standards for egress, condition, and/or energy efficiency deemed appropriate to the project, they shall be replaced by new windows. b. New windows shall be code compliant. Developers are encouraged to consider upgrading to Tier II level by providing R-5 windows. c. Additionally, new window units should be tested assemblies meeting ASTM standards for water penetration & air leakage. d. All windows shall be installed per manufacturer's installation guidelines

and specifications, and shall incorporate appropriate detail, flashings, joint sealers, and air sealing techniques.

I. INTERIOR FINISHES

1. In general, all interior finishes will be new and installed per manufacturer's recommendations and the standards of quality construction per trade practices and associations related to the particular product or trade.
2. Per chapter 10 of NFPA 101 (Reference also Chapter 8 of the IBC).
3. Walls & ceilings a. Where existing finishes are proposed to remain, they will be determined to meet the standard of being sound, durable, lead-safe, and have a remaining useful life of no less than 30 years, or covered by a plan to repair or replace during the 30-year affordability period.
4. Flooring a. Existing wood flooring in good condition should be repaired, sanded and refinished.
b. All new flooring materials (resilient flooring, wood flooring, laminate flooring, carpet, and/or ceramic tile) shall be installed over suitable substrates per manufacturer's specs and the trade association practices.
5. Trim - Wood trim and architectural woodwork a. Existing trim shall be repaired and restored to usable condition, free of deterioration which compromises its use. Repair of historic woodwork & trims shall be in accordance with the Secretary of the Interior's "Standards for Rehabilitation" project requirements.
b. New wood trim shall be installed in a workmanlike manner. Reference may be made to AWI standards.
6. Paint - In general, all interior ceiling, wall, and trim surfaces shall receive renewed coatings of paint (or other clear/stain) finishes. Painting shall be done in a workmanlike manner, and in accordance with the manufacturer's recommendations. All painting including preparation of existing surfaces shall be done in a lead-safe manner (See Section X. N).

J. SPECIALTIES

1. Toilet accessories – each bath will have appropriate accessories such as towel bars, robe hooks, bath tissue holders, etc., installed and securely fastened in place. Accessories shall be located per accessibility requirements where necessary.
2. Medicine cabinets and mirrors – install in each unit bath as appropriate.
3. Signage and identification – building signage shall be provided as appropriate: a. Including building address 911 #'s, units' identification, building directory, exits, stairways, common and utility spaces, etc. shall be in conformance with NFPA 101 Life Safety Code, and be accessibility compliant and 911 approved.
4. Exit signage will be provided as required by code and be accessibility compliant as required.
5. Fire protection specialties – provide fire extinguishers in buildings, and in units as required by code and/or by State or local fire authorities. Locate as directed by authorities.
6. Shelving – provide durable, cleanable shelving for pantries, linen closets, clothes closets and other storage as appropriate, securely fastened in place.

K. EQUIPMENT

1. All new equipment to be ENERGY STAR® rated.
2. Existing equipment to be retained and continued to be used shall be in serviceable condition with an expected useful life of 30 years, or covered by a plan to replace during the 30-year affordability period.
3. Kitchen appliances – a. provide new stove and refrigerator in each unit. b. Existing appliances to be reused shall be in good and serviceable condition. c. Provide other appliances (such as microwaves) as may be appropriate to the project. d. All appliances in accessible unit units shall be accessibility compliant, and located in an arrangement providing required clear floor spaces.
4. Laundries –where adequate space is available and when appropriate to meet the project goals, washers and dryers may be provided in laundry rooms or in units. a. Heat pump dryers are encouraged where appropriate and readily available. b. Where a project is served by natural gas, consideration of the use of

natural gas dryers is encouraged. In projects not served by natural gas, propane fired dryers should be considered for cost of operation reasons where feasible and appropriate.
5. Solid waste handling – Provide trash and recycling receptacles as appropriate to enable the tenants and property management staff to handle and store solid waste.
6. Playground equipment – Provide safe, code-approved new playground equipment if a playground is appropriate to the project.

L. FURNISHINGS - CASEWORK
1. Kitchen cabinetry and counters a. Existing cabinetry and/or countertops proposed to remain shall be in good condition with a remaining useful life of 30 years, or covered by a plan to restore or replace during the 30-year affordability period. b. New cabinetry i. shall be of good quality, meeting ANSI/KCMA A161.1-2012 "Performance & Construction Standards for Kitchen Cabinetry and Bath Vanities" standards. Other industry standards for cabinetry may be used as guidelines, such as the Kitchen Cabinet Manufacturer's Association (KCMA) "Severe Use Specification – 2014," the Architectural Woodwork Institute's (AWI) Woodwork Standards and Cabinet Fabrication Handbook. ii. New counters shall be provided with a cleanable sanitary surface material impervious to water such as high pressure laminate (HPL). • Shop fabricated as one piece assembly where possible. Seal field joints. • Installed level and securely fastened to cabinetry
2. Bath cabinetry and counters – vanity lavatory tops, when used, should be one piece integral bowl with integral backsplash.

M. ASBESTOS REMOVAL
1. Project will be assessed for the existence of asbestos-containing building materials by qualified professionals: i. National Emission Standards for Hazardous Air Pollutants (NESHAP) apply. ii. Removal of asbestos shall be carried out per Federal EPA and State regulations and rules.

N. LEAD-BASED PAINT
As required under 24 CFR Part 35, the Final HUD Regulation on Lead-Based Paint Hazards in Federally Owned Housing and Housing Receiving Federal Assistance, all assisted dwelling units constructed before January 1, 1978, will be evaluated for lead-based paint hazards or presumed to have lead-based paint present throughout the unit when paint is disturbed.
1. Evaluation will be done by a qualified, certified or licensed person as required under the regulation.
2. All lead-based paint hazards will be identified and reduced or eliminated through paint stabilization, interim controls or abatement with work being done by supervised, trained, qualified, certified or licensed persons as required under the regulation.
3. Safe work practices will be followed at all times.
4. Occupants shall be protected or temporarily relocated as required by the regulation. With some exceptions, as listed at 24 CFR 35.1345, occupants shall be temporarily relocated before and during hazard reduction activities to a suitable, decent, safe and similarly accessible dwelling unit that does not have lead hazards.
5. The dwelling unit and worksite shall be secured. The worksite shall be prepared and warning signs shall be posted as required by the regulation.
6. Clearance examinations will be performed by qualified personnel and final clearance shall be cleared by DEQ certified personnel.
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O. CONVEYANCE SYSTEMS
1. Elevators may be installed when appropriate and possible, when such elevator is part of the project's program goals, or as required by code, as follows: a. Installed per code NFPA 101, Chapter 9.4
b. ASME 17.1 Safety Code for Elevators - 2013

2. Existing elevators and lifts may be retained if they are appropriate to the use of the building and in serviceable condition with an expected useful life of 30 years, or covered by a plan to maintain or replace during the 30-year affordability period, and approved by agencies having jurisdiction.

P. MECHANICAL

1. General: a. all mechanical systems shall be designed by a mechanical engineer or other qualified professional. b. All mechanical systems shall meet all applicable codes.
2. Fire protection a. In general, all buildings assisted with HTF funds shall have fire suppression as required by applicable codes with approved sprinkler systems installed as required by NFPA 101 and NFPA 1: i. System design to conform to applicable NFPA standard 13 or 13R. ii. System installed by State approved persons. iii. Underground water services for sprinkler system shall meet NFPA 24
iv. Provide fire pumps, standpipes, and fire department connection as required per NFPA 13, 14 & 25.
b. Where possible, piping for the sprinkler system shall be concealed.
3. Plumbing a. Where existing components of a system are to be reused, they will be examined and determined to be in good condition, code compliant and have a remaining useful life of a minimum of 30 years, or covered by a plan to repair or replace during the 30-year affordability period. Substandard or critical non-code compliant components shall be replaced. b. Use water-saving shower heads and faucet aerators. c. All fixtures, piping fittings and equipment shall be lead-free. d. Kitchen fixtures – When existing kitchen fixtures are not reused in accordance with a. above, new sinks and faucets, and associated plumbing shall be installed in each unit. e. Bath fixtures – When existing bath fixtures are not reused in accordance with a. above, new toilets, tubs and tub surrounds, lavatory sinks, and faucets shall be installed in each unit. i. Three and four-bedroom units are encouraged to be designed to include 1½ baths minimum where adequate space is available. f. Provision for laundry rooms or laundry hook-ups may be made per project's program requirements. g. Provision for other utility plumbing for janitor sinks, floor drains, outdoor faucets, drains for dehumidification systems, etc., may be made as desired or required.
4. Heating a. System design: a. where existing components of a system are proposed to be reused, they will be examined and determined to be in good and serviceable condition, code compliant and have a remaining useful life of a minimum of 30 years, or covered by a plan to repair or replace during the 30-year affordability period. b. Temperature control - The temperature in each unit shall be individually thermostatically controlled. c. Provide adequate heat in common spaces. d. Install pipe insulation with minimum 1.5" wall thickness.
5. Ventilation a. Code-compliant indoor air quality will be addressed by the installation of either exhaust only or balanced (heat recovery) ventilation systems as required by: Fire protection of system ducts per NFPA 101, Chapter 9.2 b. Balanced mechanical ventilation systems are encouraged. c. Ventilation controls shall be per applicable codes
6. Domestic Hot Water: a. System shall be designed as required for efficiency. b. Install pipe insulation per code.

Q. ELECTRICAL

1. Project electrical design should be done by a licensed electrical engineer, or other qualified professional.
2. Project electrical must be installed by a licensed electrician
3. Design shall be comply with all the applicable codes: a. Oklahoma State and local fire codes. b. NFPA 101, Life Safety Code c. NFPA 70, National Electrical Code, 2011 Edition d. NFPA 72, National Fire Alarm and Signaling Code e. NFPA 20, Standard for the Installation of Stationary Pumps for Fire Protection
4. In general, the electrical system should be new throughout a building: a. Where existing service entrances, disconnects, meters, distribution wiring, panels, and devices are proposed to remain, they will be examined and determined to be in good condition, code compliant and have a remaining useful life of a minimum of 30 years, or covered by a plan to repair or replace during the 30-year affordability period. The designer, in concert with the State electrical inspector, shall examine the system and equipment. Existing components of the electrical system may be reused as appropriate. Substandard or critical non-code compliant components shall be replaced.

5. Utility connections shall be installed per the rules and regulations of the electrical utility.
6. Electrical service and metering: a. the service entrance size shall be calculated to handle the proposed electrical loads. b. Metering and disconnects shall be per code and mounted at approved locations.
7. Elevator wiring shall conform to the ANSI 17.1 as modified by State or local codes.
8. Electrical distribution system: a. Lighting and receptacle circuits shall be designed per code.
b. Locations and layout of devices and lighting to be logical and accessibility compliant where required.
c. Provision shall be made for the wiring of dedicated equipment circuits and connections for heating, ventilation equipment/exhaust fans, pumps, appliances, etc.
9. Artificial Lighting shall be provided using IBC 1205 as a minimum guideline. Developers are encouraged to upgrade to Energy Star® Category.
10. Site lighting with shielded fixtures may be provided to illuminate parking and pedestrian walkways, and will conform to local zoning.
11. Emergency and exit lighting/illuminated signage shall be per the NFPA 101, Life Safety Code.

Appendix F

Section Contents…

- Broadband Initiative

Assessment of Broadband Access

As required in 24 CFR 91.210 (4), the State's Consolidated Plan must incorporate broadband needs into the Housing Marketing Analysis. In total, there are 175 internet providers in Oklahoma. Based on the following data as illustrated below, 89.5% of Oklahomans have access to wireline service. Currently, 74.8% of Oklahomans have access to wired broadband 25 mbps or faster. While speed exceeding 25 mbps may be an issue in some cases, any gap in service can also be filled in part by mobile broadband.

Since 2010, the Oklahoma Broadband Initiative has been awarded $3,815,185 in federal grants for Oklahoma's Broadband Initiative. Another $83,470,346, accounting for 2.4% of all federal infrastructure grants, was awarded to broadband infrastructure projects in Oklahoma. Since 2011, access to a wired connection of at least 10mbps has improved from 73.9% to 82.0% of Oklahomans.

While broadband activities such as Planning are eligible by HUD, the state's declining annual HUD allocations will limit this activity. Citizen Participation related input has indicated that broadband is NOT currently an identified priority among the State's various eligible activities under the programs covered by the State's Consolidated Plan. There are currently other funding mechanisms which continue to advance broadband access throughout the state.

BROADBAND SPEEDS

- 74.8% of Oklahomans have access to wired broadband 25mbps or faster.
- 68.2% of Oklahomans have access to broadband 100mbps or faster.
- 9.6% of Oklahomans have access to 1 gigabit broadband.

WIRED COVERAGE

- 89.5% of Oklahomans have access to wireline service.
- 6.7% of Oklahomans have access to fiber-optic service.
- 71.5% of Oklahomans have access to cable service.
- 83.4% of Oklahomans have access to DSL service.

WIRELESS COVERAGE

- 100.0% of Oklahomans have access to mobile broadband service.
- 65.7% of Oklahomans have access to fixed wireless service.

GOV'T FUNDING

- Since 2010, Oklahoma Broadband Initiative has been awarded $3,815,185 in federal grants for Oklahoma's Broadband Initiative.
- Another $83,470,346, accounting for 2.4% of all federal infrastructure grants, was awarded to broadband infrastructure projects in Oklahoma.
- Since 2011, access to a wired connection of at least 10mbps has improved from 73.9% to 82.0% of Oklahomans.

Appendix G

Section Contents…

- Climate Change Impact Assessment

Assessment of Climate Change Impact, Risk and Vulnerabilities

Under 24 CFR 91.310 (a)(3), the State is required to describe the vulnerability of housing occupied by low- and moderate-income households to increased natural hazard risks due to climate change based on an analysis of data, findings, and methods of handling the issues.

The State has examined predictive and historical climate data and performed a risk based analysis of various types of storm damage. The data and information for this climate assessment was taken from elements of the State of Oklahoma Standard Hazard Mitigation Plan and the US Global Change Research Program. Overall, long-term climate projections suggest more frequent and more intense droughts, severe rainfall events, and heat waves. Communities and individuals can reduce vulnerabilities through the use of new technologies, community-driven policies (building codes, Hazard Mitigation Plans), and the judicious use of limited resources. More immediate short-term threats come from severe weather events such as intense thunderstorms, tornadoes, floods, hailstorms, high winds, and wildfires. Communities that are already the most vulnerable to weather and climate extremes will be stressed even further by more frequent extreme events occurring within an already highly variable climate system. Affordable housing in these communities that are already most socially vulnerable will be further stressed by these weather events.

While infrastructure and housing related activities are eligible by HUD under the State's Consolidated Plan, the state's declining annual HUD allocations will limit the overall availability of such funds given a disaster related event. HUD's current program specific regulations as well as federal regulation compliance will limit the State's ability to respond quickly in a disaster related event. Currently, the State's programs encourage resiliency in their respective programs.

Disaster related mitigation is key to lessening the impact of future disasters. Fortunately, there are currently other funding mechanisms such as the FEMA Hazard Mitigation Grant Program and Pre-Disaster Mitigation program available to address mitigation and resiliency throughout the state. All communities are encouraged to take opportunities to build resilience within their respective projects.

Climate of the Great Plains

Oklahoma is located in the Southern Great Plains. Daily, monthly, and annual changes in the weather can be dramatic and challenging for communities and their commerce. The region experiences multiple climate and weather hazards, including floods, droughts, severe storms, tornadoes, hurricanes, and winter storms. In much of the Great Plains, too little precipitation falls to replace that needed by humans, plants, and animals. These variable conditions in the Great Plains already stress communities and cause billions of dollars in damage; climate change will add to both stress and costs.

Climate projections suggest more frequent and more intense droughts, severe rainfall events, and heat waves, communities and individuals can reduce vulnerabilities through the use of new technologies,

community-driven policies, and the judicious use of resources. Adaptation (means of coping with changed conditions) and mitigation (reducing emissions of heat-trapping gases to reduce the speed and amount of climate change) choices can be locally driven, cost effective, and beneficial for local economies and ecosystem services.

1. ENGERY, WATER, & LAND USE: Rising temperatures are leading to increased demand for water and energy. In parts of the region, this will constrain development, stress natural resources, and increase competition for water among communities, agriculture, energy production, and ecological needs.

2. SUSTAINING AGRICULTURE: Changes to crop growth cycles due to warming winters and alterations in the timing and magnitude of rainfall events have already been observed; as these trends continue, they will require new agriculture and livestock management practices.

3. CONSERVATION & ADAPTATION: Landscape fragmentation is increasing, for example, in the context of energy development activities in the northern Great Plains. A highly fragmented landscape will hinder adaptation of species when climate change alters habitat composition and timing of plant development cycles.

4. VULNERABLE COMMUNITIES: Communities that are already the most vulnerable to weather and climate extremes will be stressed even further by more frequent extreme events occurring within an already highly variable climate system.

5. OPPORTUNITIES TO BUILD RESILIENCE: The magnitude of expected changes will exceed those experienced in the last century. Existing adaptation and planning efforts are inadequate to respond to these projected impacts.

State Climate Overview

As mentioned previously, Oklahoma is located in the Southern Great Plains. Of the 50 states, it ranks 20th in size, with an area of 69,903 square miles, about 1,224 of which are covered by water. The terrain is mostly plains, varying from nearly flat in the west to rolling in the central and near east. The plains are broken by scattered hilly areas that include the Wichita Mountains in the southwest and the Arbuckle Mountains in the south central part of the state. The Ouachita Mountains dominate much of the southeast, with peaks that rise as much as 2,000 feet above their base. Extreme northeastern counties

are part of the Ozark Plateau, which is marked by steep, Rocky River valleys between large areas of hills and rolling plains. The western tip of the panhandle features part of the Black Mesa complex, a fractured terrain featuring large mesas overlooking seasonal creek and riverbeds. Elevations range from 287 feet above sea level where the Little River exits in southeastern Oklahoma to 4,973 feet on Black Mesa near the New Mexico border.

Oklahoma lies entirely within the drainage basin of the Mississippi River. The two main rivers in the state are the Arkansas, which drains the northern two-thirds of the state, and the Red, which drains the southern third and serves as the state's southern border. Principal tributaries of the Arkansas are the Verdigris, Grand (Neosho), Illinois, Cimarron, Canadian and North Canadian. The Washita and Kiamichi serve as the Red's principal tributaries in Oklahoma, with the Little River flowing into the Red River.

Temperature

The mean annual temperature over the state ranges from 62° F along the Red River to about 58° F along the northern border. Temperatures of 90° F or greater occur, on average, about 60-65 days per year in the western panhandle and the northeast corner of the state. Temperatures of 100° F or higher occur, frequently during some years, from May through September, and very rarely in April and October. The western half of the state, excluding most of the Panhandle, averages 15+ days of triple-digit temperatures, ranging from about 35 in the southwest corner to 25 in the northwest area. Years without 100° F temperatures are rare, ranging from about one of every seven years in the eastern half of the state to somewhat rarer in the west. The highest temperature ever recorded in the Oklahoma was 120° F. Temperatures of 32° F or less occur, on average, about 60 days per year in the southeast. The lowest temperature on record is -27° F, set originally at Vinita on February 13, 1905, and tied at Watts on January 18, 1930.

Frozen soil is not a major problem, nor much of a deterrent to seasonal activities. Its occurrence is rather infrequent, of very limited depth, and of brief duration. The average maximum depth that frost penetrates the soil ranges from less than three inches in the southeastern corner of the state to more than 10 inches in the northwestern reaches. Extreme frost penetration ranges from about 10 inches in the southeast to almost 30 inches in the western panhandle.

Precipitation

Although precipitation is quite variable on a year-to-year basis, average annual precipitation ranges from about 17 inches in the far western panhandle to about 56 inches in the far southeast. The greatest annual precipitation recorded at an official reporting station was 84.47 inches at Kiamichi Tower in the southeast in 1957. The least annual rainfall occurred during 1956, when Regnier, in the extreme northwestern panhandle, observed 6.53 inches.

Excessive rainfall occurs at times. Amounts of ten inches or more in 24 hours, while rare, have been recorded. The greatest official rainfall in a 24-hour period is 15.68 inches at Enid on October 11, 1973. Amounts up to 20 inches in a day have also been reported from nonstandard sources.

Snowfall remaining on the ground more than a few days is an uncommon occurrence in northwestern Oklahoma, quite rare in central Oklahoma, and almost unheard of in the southeast. The greatest seasonal snowfall ever recorded in the state was 87.3 inches at Beaver during the winter of 1911-1912.

Freezing rain is a distinct wintertime hazard in Oklahoma. The resulting ice cover can down power lines and limbs, causing millions of dollars in damages and widespread power outages. These events make automobile travel very treacherous, especially on secondary roads, where the hazard can last several days. Significant icing events occur with nearly the same frequency as heavy snow events, especially in the southeastern half or so of the state. While ice accumulation is usually less than an inch, storms that deposit several inches can occur once or more per decade. The consecutive winters of 2000-01 and 2001-02 each featured a major ice storm that deposited more than three inches of ice in 24 hours across much of southeast and central Oklahoma. Two damaging ice storms affected Oklahoma in 2007. The first, in January, affected primarily southern and eastern Oklahoma. The latter, in December, was most severe in central and northeastern Oklahoma. Although ice accumulation in the latter event was generally one inch or less, it caused extensive damage to trees that subsequently took down power lines to more than 600,000 customers.

Floods

Floods of major rivers and tributaries may occur during any season, but they occur with greatest frequency during those spring and autumn months associated with greatest rainfall. Such floods cost many lives and property damage in the first 50 years of statehood, but flood prevention programs have reduced the frequency and severity of such events. Flash flooding of creeks and minor streams remains a serious

threat, especially in urban and suburban areas, where development and removal of vegetation have increased runoff. See the following map depicting lakes and waterways throughout the State of Oklahoma.

Drought

Drought is a recurring part of Oklahoma's climate cycle, as it is in all the plains states. Almost all of Oklahoma's usable surface water comes from precipitation that falls within the state's borders. Therefore, drought in Oklahoma is tied almost entirely to local rainfall patterns (i.e., the influence of upstream events on drought is very small). Western Oklahoma tends to be slightly more susceptible to drought because precipitation there tends to be more variable (percentage-wise) and marginal for dry land farm applications.

Drought episodes can last from a few months to several years. Those that last a few months can elevate wildfire danger and impact municipal water use. Seasonal droughts can occur at any time of the year, and those that resonate with crop production cycles can cause billions of dollars of damage to the farm economy. Multi-season and multi-year episodes can severely impact large reservoirs, stream-flow and groundwater.

Since modern Climatological record keeping began in the late nineteenth century, the state has seen five major multi-year and multi-regional drought events. These occurred in the late 1890s, from 1909-18, 1930-40, 1952-58 and, to a lesser extent, 1962-72. Each of these episodes contained at least one year of above-normal rainfall. The drought of the 1930's is associated with the Dust Bowl of the Great Plains, when socio-economic conditions, agricultural practices and drought forced the largest emigration of Oklahomans in state history. It is yet to be determined if the drought of 2005-2006, while at times more severe than any on record, will be as extensive as these other events.

The agricultural impact of drought is increasingly mitigated on a farm-by-farm and year-by-year basis through irrigation of crops, mostly with fossil water. This practice dominates much of the panhandle and some of the rest of western Oklahoma.

Development of water supplies has aided community resiliency, helped in large measure by the Oklahoma Water Resources Board's Financial Assistance Program. Upgrades to municipal and rural water district water/wastewater systems over the previous two decades allowed communities, which previously may

have run dry under such circumstances, to more effectively manage their water supplies during the most recent drought.

Severe Weather

Thunderstorms occur, on average, about 55 days per year in the east, decreasing to about 45 days per year in the southwest. Late spring and early summer are the peak seasons for thunder, averaging about eight thunderstorms per month per location during these seasons. For the southeastern two-thirds of the state, thunder occurs most often in May. June is the peak month for much of the remainder of the state, while the western panhandle observes the most thunder in July. General thunderstorms are quite common in the summer, but tend to be less organized storms of relatively short duration. These storms can produce locally heavy rain and some hail. Severe weather can occur at any time of day, but the maximum frequency for severe weather is from mid-afternoon to sunset.

Tornadoes

Tornados are a particular hazard, in that the frequency of occurrence per unit area is among the greatest in the world. Since 1950, an average of 54 tornados has been observed annually within the state's borders.

Tornadoes can occur at any time of year, but are the most frequent during springtime. April, May and June represent the months of peak occurrence with these three months accounting for about three-fourths of the observations. May's average of 20 tornado observations per month is the greatest. The winter months each average less than one tornado per month. About 80 percent of tornados are observed between noon and midnight Central Standard Time, with the peak hours being between 4 pm and 8 pm. Most of Oklahoma's tornados travel from the southwest to the north and east.

Although the annual number of tornados striking Oklahoma is increasing, the proportion of those ranking among the most severe has actually been declining. Improved technology and recording practices have improved counts and documentation of those at the weaker end of the spectrum, thus accounting for the increase in overall number. However, the number of significant tornados (those rating as F2 intensity or greater) has declined, particularly since 1982. In fact, the years with the greatest numbers of significant tornados were 1960 and 1961, with 49 and 41, respectively. Declining death tolls and declining numbers of significant tornados does not necessarily mean Oklahoma is becoming less at risk. As the May 3, 1999 tornado showed, one event could forever impact the lives of many Oklahomans.

Earthquakes

The earliest documented earthquake in Oklahoma occurred on October 22, 1882, and while it cannot be precisely located, the strongest shaking, Modified Mercalli Intensity of VIII, was reported at Fort Gibson, Indian Territory. For a more complete list of significant earthquakes in Oklahoma please visit the United States Geological Survey Earthquakes occur in response to forces, which build up over long time periods, and occur when two bodies of rock slide past each other. This slip can be large for big earthquakes (10's of meters) or as small as a millimeter. Earthquakes generally occur on pre-existing weaknesses in the rocks called faults. By far, the majority of the world's earthquakes occur on or near the boundaries of tectonic plates. Large earthquakes tend to be concentrated at plate tectonic boundaries where forces and faults are much larger. Generally, away from plate boundary settings, such as Oklahoma, earthquakes will be smaller with magnitudes generally less than 6.5. Small earthquakes (magnitudes 5 or less) occur nearly everywhere in the world. These types of earthquakes can cause damage and loss of life, but damage is usually moderate and closely concentrated around the epicenter, where the earthquake occurred. Oklahoma earthquakes generally occur at shallow depths ranging from about 5 to 15 kilometers (3-10 miles) depth. Earthquake hazard is the unavoidable risk that an earthquake will disrupt daily activities or cause loss of property or life. Most damage associated with earthquakes is caused by waves generated during the earthquake. Estimates can be made for the chances of how much shaking will occur due to all possible earthquake sources. These estimates use recorded earthquakes and mapped faults to define possible sources and how often these earthquakes occur.

Other Climatic Features

The climate of Oklahoma is continental, as is all of the Great Plains. Summers are long and usually quite hot. Winters are shorter and less rigorous than those of the more northern plains states. Periods of extreme cold are infrequent, and those lasting more than a few days are rare.

Annual average relative humidity ranges from about 60 percent in the panhandle to just over 70 percent in the east and southeast. Average annual lake evaporation varies from 48 inches in the extreme east to 65 inches in the southwest, numbers that far exceed the average yearly rainfall in those areas. Evaporation and percolation preclude use of about 80 percent of Oklahoma's precipitation.

Prevailing winds are southerly to southeasterly throughout most of the state during the spring through autumn months. These prevailing winds veer to south-to-southwest in far western Oklahoma, including

the panhandle. March and April are the windiest months, while July August and September are the calmest.

Climate – State Perspective

Since 1950, Oklahoma's population has gradually increased, and by 2008 it had reached 3,642,361. This figure represents an increase of 5.6 percent over 2000. Population densities generally decline from east to west across the state, and the highest densities are found in the metropolitan areas. The population in metropolitan counties increased by 2.0 percent from the year 2000 to 2006. Non-classified counties saw their populations decline by -0.6 percent. Oklahoma is the 20th largest state and the 28th most populous state in the United States.

The State of Oklahoma does not have adopted ordinances regulating areas of population growth or future development per se. Oklahoma agencies representing the state under authority granted to them by the legislation adopt rules/regulations regarding Storm Water Management or Stream Water Management. Storm Water Management is addressed under the Federal National Pollution Discharge Elimination System (NPDES) program.

The Oklahoma Department of Environmental Quality (DEQ) has received delegation of that Federal program. They have adopted rules and established general and individual permits to require storm water management. Two basic types of storm water management are addressed. One is primarily aimed at sediment control and requires anyone disturbing one acre of ground or more to obtain a general permit and to use Best Management Practices. The other addresses storm water runoff from certain industrial areas. As part of the program, communities with a population of 10,000 or more must have a storm water management program in place (usually includes ordinances) that meets the conditions of the DEQ general permit or an individual permit issued by DEQ.

The water quality of streams in Oklahoma is described in terms of beneficial uses as defined by narrative descriptions and specific constituent numbers by the Oklahoma Water Quality Standards promulgated by the Oklahoma Water Resources Board. DEQ and the other state environmental agencies are required to protect the water quality of Oklahoma streams and lakes by implementing the Water Quality Standard (WQS) in administering their various regulatory responsibilities. For instance, when DEQ issues a wastewater discharge permit, the limits placed on that discharge are based on the WQS for the body of

water that will receive the discharge. The beneficial uses of that body of water cannot be adversely impacted by the discharge.

Areas of future growth and development as they relate to known hazard areas are managed at the local level. Of the 77 counties in Oklahoma, over half of the counties have adopted rules/regulations for zoning management, subdivision management, land use plans, or Floodplain Boards in place.

Additionally, a large percentage of the cities/towns over 1,000 in population have and enforce building and zoning requirements and have procedures in place for enforcing these requirements.

Risk Based Analysis

The following constitutes a comprehensive risk based analysis that identifies and prioritizes the various types of disasters faced by the State of Oklahoma. The analysis uses elements of informational resources taken from Oklahoma Climatological data, Oklahoma Geological data, and the *State Standard Hazard Mitigation Plan* (Update-Feb. 10, 2014) as developed by the Oklahoma Emergency Management.

The current Oklahoma *State Standard Hazard Mitigation Plan* was approved by the Federal Emergency Management Agency Region 6 office. This State Plan addresses all natural hazards that have been identified as a threat to the State of Oklahoma, per the requirement of the federal regulations cited above. This plan meets requirements for a Standard State Plan under Rule 44 CFR 13.11(c), published in the Federal Register by the Federal Emergency Management Agency (FEMA).

The Oklahoma State Standard Hazard Mitigation Plan provides policy guidance for hazard mitigation in the state of Oklahoma. It identifies hazard mitigation goals, objectives, actions and initiatives for state government that will reduce injury and damage from natural hazards. The Plan specifically identifies six categories of possible mitigation priorities and strategies. These priorities and strategies are as follows:

1. Public Education & Awareness – Outreach projects and technical assistance

2. Preventive Measures – Zoning, building codes, storm water management

3. Natural Resource Protection – Wetlands protection, forest/vegetation management

4. Property Protection – Acquisition, retrofitting, relocation, elevation

5. Emergency Services – Warning, sandbagging, evacuation

6. Structural Projects – Dams, reservoirs, retaining walls, safe rooms

The Oklahoma State Standard Hazard Mitigation Plan lists natural hazards that could affect the State of Oklahoma through the Critical Priority Risk Index (CPRI). Each identified hazard was weighted according to the following criteria of probability, magnitude/severity, warning time and duration. The CPRI categories are needed based upon data provided by Oklahoma Climatological, Oklahoma Geological, and Oklahoma Emergency Management. The CPRI factors the elements of risk—Probability (P), Magnitude/Severity (M), Warning Time (WT) and Duration (D) -- to create an index that allows for the prioritization of mitigation activities based on the level of risk. Each hazard is evaluated based on potential or probability using the elements of the index, and a weighting factor to determine the impact, in the following manner:

Weighing Factors			
.45 Probability of Occurrence	.30 Magnitude/Severity Expected of Hazard	.15 Warning Time Possible to Event	.10 Duration Of Event
4 Highly Likely	4 Catastrophic	4 < than 6 hours	4 > 1 week
3 Likely	3 Critical	3 6 – 12 hours	3 ≤ 1 week
2 Possible	2 Limited	2 12 – 24 hours	2 ≤ 24 hours
1 Unlikely	1 Negligible	1 24 + hours	1 ≤ 6 hours

Probability of Occurrence	**Definition**
4 - Highly Likely	Event is probable within the calendar year. Event has a 1 in 1 year chance of occurring.
3 -Likely	Event is probable within the next three years. Event has up to 1 in 3 year's chance of occurring.
2 - Possible	Event is probable within the next 5 years. Event has up to 1 in 5 year's chance of occurring.
1 - Unlikely	Event is possible within the next 10 years. Event has up to 1 to 10 years chance of occurring.

Magnitude / Severity Level	**Characteristics**

Catastrophic	< Multiple deaths. < Complete shutdown of facilities for 30 or more days. < More than 50% of property is severely damaged.
Critical	< Injuries and/or illnesses result in permanent disability. < Complete shutdown of critical facilities for at least two weeks. < More than 25% of property is severely damaged.
Limited	< Injuries and/or illnesses do not result in permanent disability. < Complete shutdown of critical facilities for more than one week. < More than 10% of property is severely damaged.
Negligible	< Injuries and/or illnesses are treatable with first aid. < Minor quality of life lost. < Shutdown of critical facilities and services for 24 hours or less. < Less than 10% of property is severely damaged.

The following set of tables list the Critical Priority Risk Index for each hazard that could affect the State of Oklahoma. The hazards are listed in the order of their Priority Risk. Because there is no way to estimate the probability, severity, warning time or duration of a man-made or special event (because by definition the event is usually unknown) that hazard ranking is a best guess estimate using the CPRI and is less than exact. For that reason, the special event hazard is listed last.

Calculated Priority Risk Index (CPRI)

1. FLOODING

Probability			4 Highly Likely	
Magnitude / Severity			4 Catastrophic	
Warning Time			3 6 - 12 hours	
Duration			3 Less than one week	
Flooding Hazard CPRI (State of Oklahoma)				
Probability	Magnitude	Warning Time	Duration	= CPRI
(4 x .45)	+(4 x .30)	+(3 x .15)	3 x .10)	= 3.75

2. TORNADO

Probability	4 Highly Likely
Magnitude / Severity	4 Catastrophic

Warning Time			4 Less than 6 hours	
Duration			1 Less than 6 hours	
Tornado Hazard CPRI (State of Oklahoma)				
Probability	Magnitude	Warning Time	Duration	= CPRI
(4 x .45)	+(4 x .30)	+(4 x .15)	1 x .10)	= 3.7

3. WINTER STORMS / ICE / FREEZING RAIN

Probability			3 Likely	
Magnitude / Severity			4 Catastrophic	
Warning Time			2 12-24 hours	
Duration			3 Less than one week	
Winter Storm Hazard CPRI (State of Oklahoma)				
Probability	Magnitude	Warning Time	Duration	= CPRI
(3x .45)	+(4 x .30)	+(2 x .15)	3 x .10)	= 3.15

4. DROUGHT

Probability			3 Likely	
Magnitude / Severity			4 Catastrophic	
Warning Time			1 24+ hours	
Duration			4 More than one week	
Drought Hazard CPRI (State of Oklahoma)				
Probability	Magnitude	Warning Time	Duration	= CPRI
(3x .45)	+(4 x .30)	+(1 x .15)	4 x .10)	= 3.1

5. HAIL

Probability			4 Highly Likely	
Magnitude / Severity			2 Limited	
Warning Time			4 Less than 6 hours	
Duration			1 Less than 6 hours	
Hail Hazard CPRI (State of Oklahoma)				
Probability	Magnitude	Warning Time	Duration	= CPRI
(4x .45)	+(2 x .30)	+(4x .15)	1 x .10)	= 3.1

6. HIGH WINDS

Probability			4 Highly Likely	
Magnitude / Severity			2 Limited	
Warning Time			4 Less than 6 hours	
Duration			1 Less than 6 hours	
High Wind Hazard CPRI (State of Oklahoma)				
Probability	Magnitude	Warning Time	Duration	= CPRI
(4x .45)	+(2 x .30)	+(4x .15)	1 x .10)	= 3.1

7. LIGHTNING

Probability			4 Highly Likely	
Magnitude / Severity			1 Negligible	
Warning Time			4 Less than 6 hours	
Duration			1 Less than 6 hours	
Lightning Hazard CPRI (State of Oklahoma)				
Probability	Magnitude	Warning Time	Duration	= CPRI
(4x .45)	+(1 x .30)	+(4x .15)	1 x .10)	= 2.8

8. WILDFIRES

Probability			3 Likely	
Magnitude / Severity			2 Limited	
Warning Time			4 Less than 6 hours	
Duration			2 Less than one day	
Wildfire Hazard CPRI (State of Oklahoma)				
Probability	Magnitude	Warning Time	Duration	= CPRI
(3x .45)	+(2 x .30)	+(4x .15)	2 x .10)	= 2.75

9. DAM FAILURE

Probability	1 Unlikely
Magnitude / Severity	4 Catastrophic
Warning Time	4 Less than 6 hours
Duration	4 More than one week
Dam Failure Hazard CPRI (State of Oklahoma)	

Probability	Magnitude	Warning Time	Duration	= CPRI
(1x .45)	+(4x .30)	+(4x .15)	4 x .10)	= 2.65

10. EXTREME HEAT

Probability	3	Likely
Magnitude / Severity	2	Limited
Warning Time	1	24+ hours
Duration	3	Less than one week

Extreme Heat Hazard CPRI (State of Oklahoma)

Probability	Magnitude	Warning Time	Duration	= CPRI
(3x .45)	+(2x .30)	+(1x .15)	3 x .10)	= 2.4

11. EXPANSIVE SOILS

Probability	3	Likely
Magnitude / Severity	1	Negligible
Warning Time	1	24+ hours
Duration	4	More than one week

Expansive Soils Hazard CPRI (State of Oklahoma)

Probability	Magnitude	Warning Time	Duration	= CPRI
(3x .45)	+(1x .30)	+(1x .15)	4 x .10)	= 2.2

12. SPECIAL EVENTS (TAR CREEK PROJECT)

Probability	2	Possible
Magnitude / Severity	2	Limited
Warning Time	1	24+ hours
Duration	4	More than one week

Special Events Hazard CPRI (State of Oklahoma)

Probability	Magnitude	Warning Time	Duration	= CPRI
(2x .45)	+(2x .30)	+(1x .15)	4 x .10)	= 2.05

13 EARTHQUAKE

Probability	2	Possible
Magnitude / Severity	1	Negligible

Warning Time			4 Less than 6 hours	
Duration			1 Less than 6 hours	
Earthquake Hazard CPRI (State of Oklahoma)				
Probability	Magnitude	Warning Time	Duration	= CPRI
(2x .45)	+(1x .30)	+(4x .15)	1 x .10)	= 1.9

14. SUBSIDENCE

Probability			1 Unlikely	
Magnitude / Severity			2 Limited	
Warning Time			4 Less than 6 hours	
Duration			1 Less than 6 hours	
Subsidence Hazard CPRI (State of Oklahoma)				
Probability	Magnitude	Warning Time	Duration	= CPRI
(1x .45)	+(2x .30)	+(4x .15)	1 x .10)	= 1.75

15. LANDSLIDE

Probability			1 Unlikely	
Magnitude / Severity			1 Negligible	
Warning Time			4 Less than 6 hours	
Duration			1 Less than 6 hours	
Landslide Hazard CPRI (State of Oklahoma)				
Probability	Magnitude	Warning Time	Duration	= CPRI
(1x .45)	+(1x .30)	+(4x .15)	1 x .10)	= 1.45

Appendix H

Section Contents…

- Impediments to Fair Housing / Affirmatively Furthering Fair Housing

State of Oklahoma

Analysis of Impediments to Fair Housing Choice

Prepared in Support of Oklahoma's

Five-Year State Consolidated Plan
April 1, 2019 to March 30, 2023

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I. Executive Summary

The Analysis of Impediments to Fair Housing Choice (AI) is a review of impediments or barriers that affect the rights of fair housing choice. It covers public policies, practices, and procedures affecting housing choice. Impediments to fair housing choice are defined as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin. The AI serves as the basis for fair housing planning, provides essential information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates, and assists in building public support for fair housing efforts. Conducting an analysis of impediments is a required component of certification and involves the following:

- A review of a State or Entitlement jurisdiction's laws, regulations, and administrative policies, procedures, and practices;
- An assessment of how those laws affect the location, availability, and accessibility of housing;
- An evaluation of conditions affecting fair housing choice for all protected classes; and
- An assessment of the availability of affordable, accessible housing in a range of unit sizes.

Data for this Analysis of Impediments to Fair Housing Choice is comprised from multiple cited sources to include both the Decennial and five-year American Community Survey (ACS) from the U.S. Census Bureau.

This Analysis of Impediments to Fair Housing Choice is also comprised in part by the Statewide Affordable Housing Market Study and Fair Housing Survey commissioned by the Oklahoma Department of Commerce (ODOC) in partnership with the Oklahoma Housing Finance Agency (OHFA).

II. Introduction

The availability of housing, especially in rural areas, has been a significant issue to Oklahomans. The importance of home ownership continues to play a motivating role in the lives of all Oklahomans regardless of ethnic or economic circumstances. Programs are developed at the state and local level to address the need to serve a cross-section of the population particularly low-income individuals and families.

In 1968, following the enactment of the Federal Fair Housing Act, the Oklahoma State Legislature adopted its initial Fair Housing Law. This law directed the Oklahoma Human Rights Commission to administer all fair housing related issues. Subsequently, the Oklahoma law has been amended several times, most significantly in 1991, at which time Oklahoma's Fair Housing Law became substantially equivalent to the Federal Fair Housing Amendments Act of 1988.

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and handicap (disability).

A strong commitment to affirmatively further fair housing is not only one of the Department of Housing & Urban Development’s (HUD) guiding principles; it is a requirement for participating in HUD's many housing and community development programs. This strong commitment to furthering fair housing is shared equally

by the State of Oklahoma. The Fair Housing Act specifies that the Secretary of Housing and Urban Development shall administer programs and activities relating to housing and urban development in a manner that affirmatively furthers the policies outlined in section 808 (e) 5. This responsibility is assigned to HUD funded recipients as well, through the:

- ✓ State Consolidated Plan
- ✓ Public Housing Agency Plans

As identified in the State Consolidated Plan, HUD Community Planning and Development (CPD) programs include:

- ✓ Community Development Block Grant (CDBG)
- ✓ Emergency Solutions Grant (ESG)
- ✓ Home Investment Partnership (HOME)
- ✓ Housing Trust Fund (HTF)
- ✓ Housing Opportunities for Persons with AIDS (HOPWA)

HUD funded grant recipients are obligated under federal law not to discriminate in housing or services directly or indirectly on the basis of race, color, religion, sex, national origin, age, familial status, or disability. HUD's non-discrimination requirements are compiled from several different federal laws designed to protect each individual's right to fair housing and equal opportunity.

Some examples of ways to carry out these requirements include:

- Establishing fair housing enforcement organizations in areas where there are no such organizations;

- For public housing agencies, starting a counseling program to help housing choice voucher recipients to find housing outside of minority and/or poverty concentrated areas;

- Outreach to housing providers in non-minority and poverty concentrated areas; Marketing available housing to persons less likely to apply for housing in a metropolitan statistical area;

- Encouraging banks and other lending organizations to operate in areas that are underserved and to provide services to underserved populations; and

- Encouraging banks and other lenders to use non-traditional methods for evaluating credit and loan amount terms, based on cultural differences and other individual factors.

The Housing and Community Development Act of 1974, as amended, is the dominant statute behind the Analysis of Impediments to Fair Housing. It requires that each federal grantee certify to HUD's satisfaction that (1) the awarded grant will be carried out and administered according to the Fair Housing Act, and (2) the grantee will work diligently to affirmatively further fair housing. This certification to HUD is implemented through the Consolidated Plan process.

Under the Consolidated Plan, HUD funded recipients are required to: (1) examine and attempt to alleviate housing discrimination within their jurisdiction; (2) promote fair housing choice for all persons; (3) provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion,

sex, disability, familial status, or national origin; (4) promote housing that is accessible to and usable by persons with disabilities; (5) and comply with the non-discrimination requirements of the Fair Housing Act.

Certification of Affirmatively Furthering Fair Housing:

State and Entitlement recipients are required to sign a certification to affirmatively further fair housing. As part of the jurisdiction's Consolidated Plan, these recipients are required to undertake fair housing planning. Fair Housing Planning consists of the following: (1) an Analysis of Impediments (AI) to fair housing choice; (2) actions to cover the effects of the identified impediments; and (3) maintenance of records to support the affirmatively furthering fair housing certification.

The major purpose of this analysis is to present a discussion of the currently identified factors which may affect or limit the availability of fair housing in rural Oklahoma areas state-wide which fall under the jurisdiction of the CDBG, ESG, HOME, HTF, and HOPWA grant programs. Additionally, potential remedies for minimizing or eliminating such impediments, when feasible, will be addressed.

III. State Funded Jurisdiction (CDBG, ESG, HOME, HTF, HOPWA)

For the purpose of this analysis, it is important to first recognize the State's jurisdictional responsibility. In terms of the CDBG, ESG, HOME, HTF, and HOPWA grant allocations, the State is responsible for the remaining state-wide area which falls outside the boundaries of Oklahoma's ten HUD designated entitlement jurisdictions in what can appropriately be denoted as 'Balance of State'. Oklahoma's entitlement jurisdictions are comprised of Edmond, Enid, Lawton, Midwest City, Moore, Norman, Oklahoma City, Shawnee, and Tulsa as well as the units of local government participating in the Tulsa County Urban County Designation which consists of the following:

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

'Entitlements' are required to prepare both a Consolidated Plan and an Analysis of Impediments to Fair Housing Choice for their respective jurisdictions. In addition, the Metropolitan Tulsa HOME Consortium which was formed in 1995 is also required to prepare both a Consolidated Plan and an Analysis of Impediments to Fair Housing Choice.

The 'Balance of State' jurisdiction encumbered by the State of Oklahoma, according to the population estimates provided by the US Census Bureau, the population for the State of Oklahoma, is 3,930,834. Of that total, 1,607,441 or 41% represents the sum of the populations (City Limits) of all the entitlement cities/county and the Tulsa Consortium. Therefore, it is important to note that this analysis will focus primarily on the remaining 2,143,910 or 57% of the state's population. This effectively denotes those who reside in rural Oklahoma.

Under Oklahoma law, municipalities are divided into two categories: cities, defined as having more than 1,000 residents, and towns, with fewer than 1,000 residents. Both have legislative, judicial, and public power within their boundaries, but cities can choose between a mayor-council, council-manager, or strong mayor form of government, while towns operate through an elected officer system.

A majority of the state's 598 communities have fewer than 1,000 inhabitants. Thus, is it important to note that this analysis will concentrate on jurisdictions with extremely small populations which are predominantly

rural in terms of geographic setting. The scope of housing choices of any type, especially affordable housing, is therefore somewhat more limited than those more readily found in major metropolitan areas.

The state is divided into seventy-seven (77) counties that govern locally, each headed by a three-member council of elected commissioners, a tax assessor, clerk, court clerk, treasurer, and sheriff. While each municipality operates as a separate and independent local government with executive, legislative and judicial power, county governments maintain jurisdiction over both incorporated cities and non-incorporated areas within their boundaries, but have executive power but no legislative or judicial power. Both county and municipal governments collect taxes, employ a separate police force, hold elections, and operate emergency response services within their jurisdiction. Other local government units include school districts, technology center districts, community college districts, rural fire departments, rural water districts, and other special use districts.

Thirty-nine (39) Native American tribal governments are based in Oklahoma, each holding limited powers within designated areas. While Indian reservations typical in most of the United States are not present in Oklahoma, tribal governments hold land granted during the Indian Territory era, but with limited jurisdiction and no control over state governing bodies such as municipalities and counties. Tribal governments are recognized by the United States as quasi-sovereign entities with executive, judicial, and legislative powers over tribal members and functions, but are subject to the authority of the United States Congress to revoke or withhold certain powers. The tribal governments are required to submit a constitution and any subsequent amendments to the United States Congress for approval.

It is important to note when speaking in terms of jurisdictional responsibility that many Native American tribal governments in Oklahoma qualify for and receive funding directly from the Federal government under the Indian Community Development Block Grant (ICDBG) program. This program is run directly through HUD and the State plays no role in ICDBG administration. The ICDBG program provides eligible grantees (comprising of Native American tribes, bands, groups, or nations which have established a relationship to the Federal government as defined in the program regulations) with direct grants for use in housing rehabilitation, land acquisition to support new housing construction, and under limited circumstances, new housing construction primarily for low and moderate income persons.

IV. Funding Structure (CDBG, ESG, HOME, HTF, HOPWA)

With the definition of the State's jurisdiction established, it is now important to address the level or extent of influence on housing in regards to the respective CDBG, ESG, HOME, HTF, and HOPWA programs.

The State's affordable housing programs, which include the HOME Program, the National Housing Trust Fund and the coordination of the Section 8 Rental Assistance program, are administered by OHFA. OHFA serves as the primary housing vehicle among all the fore-mentioned HUD programs. 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. A listing of the Inventory of Homeless Service Providers, which includes several homeless advocacy groups, is included in the Appendix of the Five-Year Strategic Plan.

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.

Additional Housing Supportive Services:

Oklahoma has a network of public and private nonprofit organizations that deliver 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.

In terms of the rural reaches of the state, the Oklahoma Community Action Agencies (CAA's) play a pivotal role in housing and supportive services. The State's Community Action Agencies, established under the Economic Opportunity Act of 1964, are locally controlled non-profit organizations that work to improve the lives of low-income individuals by creating opportunities for increased self-sufficiency and greater participation in the community. These Community Action Agencies serve all of Oklahoma's seventy-seven (77) counties and are in important partner with the State.

One of the strengths of CAA's is their local control and local decision-making. A tripartite board of directors governs each CAA. Each board has at least one-third of its membership representing low-income residents, one-third local elected officials or their designees, and the remainder representing local business, civic organizations, faith-based group, and similar interests in the community. The board's structure allows each local Community Action Agency to determine the most effective programs based on the needs of communities in its service area.

Each Community Action Agency operates a wide variety of programs that are based upon the needs of each local community which are identified through a needs assessment. Of these many programs, housing support components include:

Homebuyer Education
Housing Development
Housing Rehabilitation
Down Payment Assistance
Emergency Home Repair

The local CAA responds to the specific needs of each community the availability and degree of service will be relative to the determined need of the individual CAA's jurisdiction. CAA's receive funding from federal and state appropriations as well as private funding sources. The Federal Community Services Block Grant provides core support funding. It provides administrative and program support to enable Community Action Agencies to partner with other community organizations to provide the needed services.

The following list contains programs administered by the State that bear a direct link to housing.

STATE of OKLAHOMA PROGRAMS (Housing Linked):

1. Single Family (State Level)

New Construction
OHFA Home Investment Partnership Program (HOME)
OHFA Oklahoma Housing Trust Fund
Oklahoma Local Development Act
Oklahoma Rural Housing Incentive District

Rehabilitation
ODOC Weatherization Assistance Program
OHFA Home Investment Partnership Program (HOME)
OHFA Oklahoma Housing Trust Fund
Oklahoma Local Development Act
Oklahoma Rural Housing Incentive District

2. Multifamily Rental (State Level)

New Construction
OHFA Home Investment Partnership Program (HOME)
OHFA National Housing Trust Fund (HTF)
OHFA Oklahoma Housing Trust Fund
OHFA Federal Affordable Housing Tax Credits
OHFA State Affordable Housing Tax Credits
Oklahoma Local Development Act
Oklahoma Rural Housing Incentive District

Rehabilitation
OHFA Home Investment Partnerships Program (HOME)
OHFA National Housing Trust Fund (HTF)
OHFA Oklahoma Housing Trust Fund
OHFA Federal Housing Tax Credits
OHFA State Affordable Tax Credits
Oklahoma Local Development Act
Oklahoma Rural Housing Incentive District

3. Homeownership (State Level)

OHFA Advantage
OHFA Home Investment Partnerships Program (HOME)
OTC Credit or Refund for Property Tax
REI Mortgage Credit Certificate Program
REI Taxable Single Family Mortgage Revenue Bond Program

4. Elderly and Disabled (State Level)

ODOC Community Services Block Grant
OHFA Home Investment Partnerships Program (HOME)

OHFA National Housing Trust Fund (HTF)
OHFA Oklahoma Housing Trust Fund
OHFA State Affordable Housing Tax Credits
OHFA Rental Assistance
Oklahoma Local Development Act
Oklahoma Rural Housing Incentive District
OTC Credit or Refund of Property Tax

V. Demographic Profile

A *demographic profile* analyzes the composition of the population in need of housing. This can be comprised of such information relating to age groups, racial and ethnic status, educational attainment, household income, number of low-income households, people in poverty, elderly and persons with disabilities, etc.

Data reported from the 2010 US Census Bureau shows that Oklahoma has a population count of 3,751,351 residents and a total land area of 68,667 square miles. From a national perspective, Oklahoma ranks as the 28th most populous and the 20th largest state in terms of land area. Oklahoma City and Tulsa serve as Oklahoma's primary population centers with nearly 58% of Oklahomans living within their respective metropolitan statistical areas.

The state's population grew by 300,697 persons during the past decade; an 8.7% growth rate as compared to the previous decade (1990 – 2000) Oklahoma grew 9.7%. This closely mirrors that of the national average in terms of overall population growth.

Table-1 Oklahoma Historical Population

Census	Pop.	%±
1890	258,657	—
1900	790,391	205.6%
1910	1,657,155	109.7%
1920	2,028,283	22.4%
1930	2,396,040	18.1%
1940	2,336,434	−2.5%
1950	2,233,351	−4.4%
1960	2,328,284	4.3%
1970	2,559,229	9.9%
1980	3,025,290	18.2%
1990	3,145,585	4.0%
2000	3,450,654	9.7%
2010	3,751,351	8.7%

Source: U.S. Census Bureau; 2010 Census

Historical events have greatly influenced Oklahoma's population growth. The Dust Bowl conditions during the 1930's created an exodus from states like Oklahoma, Texas, and the surrounding Great Plains to adjacent regions which is reflective in the following 1940 decennial census. Notably, the state's population growth soared during the 1980's and significantly slowed during the 1990's. The State suffered a major downturn in the oil industry during the 1980's. According to US Census data, Oklahoma has 598

incorporated places including three cities over 100,000 in population and forty-three over 10,000. Two of the fifty largest cities in the United States are located in Oklahoma, Oklahoma City and Tulsa, and approximately 58% of Oklahomans live within their metropolitan areas, or spheres of economic and social influence defined by the US Census Bureau as a metropolitan statistical area (MSA). Oklahoma City, the state's capital and largest city, has the largest metropolitan area in the state, with 1,269,907 people, and the metropolitan area of Tulsa has 905,755 residents.

Of the state's ten largest cities, only three are outside the metropolitan areas of Oklahoma City and Tulsa, and only Lawton has a metropolitan statistical area of its own as designated by the US Census Bureau, although the metropolitan statistical area of Fort Smith, Arkansas extends into the state. Oklahoma's ten largest cities include:

Table-2 State Population Concentration by City

	City	Population	HUD Designation
1.	Oklahoma City	579,999	(Entitlement)
2.	Tulsa	391,906	(Entitlement)
3.	Norman	110,925	(Entitlement)
4.	Broken Arrow	98,850	(Tulsa Urban County Entitlement)
5.	Lawton	96,867	(Entitlement)
6.	Edmond	81,405	(Entitlement)
7.	Moore	55,081	(Entitlement)
8.	Midwest City	54,371	(Entitlement)
9.	Enid	49,379	(Entitlement)
10.	Stillwater	45,688	(State Jurisdiction)

Source: US Census Bureau; 2010 Census

Table-3 Oklahoma Demographic Composition

	STATE OF OKLAHOMA	
	Population estimates, July 1, 2018, (V2018)	3,943,079
	Population estimates base, April 1, 2010, (V2018)	3,751,583
	Population, percent change - April 1, 2010 (estimates base) to July 1, 2018, (V2018)	5.10%
	Population, Census, April 1, 2010	3,751,351
	Persons under 5 years, percent	6.70%
	Persons under 18 years, percent	24.40%
	Persons 65 years and over, percent	15.30%
	Female persons, percent	50.50%
	White alone, percent	74.30%
	Black or African American alone, percent	7.80%
	American Indian and Alaska Native alone, percent	9.20%
	Asian alone, percent	2.30%
	Native Hawaiian and Other Pacific Islander alone, percent	0.20%
	Two or More Races, percent	6.10%
	Hispanic or Latino, percent	10.60%
	White alone, not Hispanic or Latino, percent	65.70%
	Veterans, 2013-2017	276,948

	Foreign born persons, percent, 2013-2017	5.90%
	Housing units, July 1, 2018, (V2018)	1,743,069
	Owner-occupied housing unit rate, 2013-2017	65.70%
	Median value of owner-occupied housing units, 2013-2017	$125,800
	Median selected monthly owner costs -with a mortgage, 2013-2017	$1,181
	Median selected monthly owner costs -without a mortgage, 2013-2017	$383
	Median gross rent, 2013-2017	$766
	Building permits, 2017	11,092
	Households, 2013-2017	1,468,971
	Persons per household, 2013-2017	2.58
	Living in same house 1 year ago, percent of persons age 1 year+, 2013-2017	82.80%
	Language other than English spoken at home, percent of persons age 5 years+, 2013-2017	10.10%
	Households with a computer, percent, 2013-2017	84.90%
	Households with a broadband Internet subscription, percent, 2013-2017	72.80%
	High school graduate or higher, percent of persons age 25 years+, 2013-2017	87.50%
	Bachelor's degree or higher, percent of persons age 25 years+, 2013-2017	24.80%
	With a disability, under age 65 years, percent, 2013-2017	11.40%
	Persons without health insurance, under age 65 years, percent	16.60%
	In civilian labor force, total, percent of population age 16 years+, 2013-2017	60.80%
	In civilian labor force, female, percent of population age 16 years+, 2013-2017	55.50%
	Total accommodation and food services sales, 2012 ($1,000)	7,121,153
	Total health care and social assistance receipts/revenue, 2012 ($1,000)	22,795,438
	Total manufacturers' shipments, 2012 ($1,000)	74,295,394
	Total merchant wholesaler sales, 2012 ($1,000)	71,892,946
	Total retail sales, 2012 ($1,000)	50,256,231
	Total retail sales per capita, 2012	$13,174
	Mean travel time to work (minutes), workers age 16 years+, 2013-2017	21.5
	Median household income (in 2017 dollars), 2013-2017	$49,767
	Per capita income in past 12 months (in 2017 dollars), 2013-2017	$26,461
	Persons in poverty, percent	15.80%
	Total employer establishments, 2016	93,232
	Total employment, 2016	1,360,379
	Total annual payroll, 2016 ($1,000)	57,193,626
	Total employment, percent change, 2015-2016	-0.80%
	Total nonemployer establishments, 2016	280,292
	All firms, 2012	327,229
	Men-owned firms, 2012	174,395
	Women-owned firms, 2012	105,168
	Minority-owned firms, 2012	64,875
	Nonminority-owned firms, 2012	249,027

	Veteran-owned firms, 2012	36,273
	Nonveteran-owned firms, 2012	273,491
	Population per square mile, 2010	54.7
	Land area in square miles, 2010	68,594.92

Source: US Census Quick Facts (2018) / https://www.census.gov/quickfacts/fact/table/OK/PST045218

The following narratives identify minority concentrations throughout the state. Each identified federally protected class is examined and the highest ten (10) counties will be identified in each class. These top ten concentrations could also be viewed as an identified "priority" area in terms of this Analysis to Impediments to Fair Housing Choice.

American Indian or Alaskan Native:

The *American Indian or Alaskan Native* demographic ranks as the largest of all the federally identified racial census *minority* classes (one race) having a census population of 321,687 persons living within the State. Oklahoma has a substantial number of Native American residents when compared to the US overall. *The American Indian or Alaskan Native* class comprises 9.2% of the State's overall population while only comprising 0.9% of the overall US population.

Counties having the greatest number and percentage of the *American Indian or Alaskan Native* demographic are illustrated in Table-4 and graphically illustrated by county breakout on Figure-2. Notably, both the American Indian and Black demographics in Oklahoma remain very close in terms of total population. Unlike the other minority classes in Oklahoma, the *American Indian or Alaskan Native* demographic is considerably more spread throughout the state although the highest concentrations still exist within the Oklahoma City and Tulsa MSA's. Counties in the northeastern part of the state exhibit the highest concentrations located outside of the Oklahoma City and Tulsa MSA's. A more evenly patterned distribution is then followed through the southwestern and southeastern parts of the state.

Table-4 Minority Concentration – American Indian or Alaskan Native

	County	Population Percentage %	
1.	Adair	43.3%	
2.	Cherokee	34.0%	
3.	Caddo	24.5%	
4.	Delaware	22.4%	
5.	Mayes	21.4%	
6.	Sequoyah	20.8%	
7.	Latimer	20.4%	
8.	Craig	20.4%	
9.	Okfuskee	19.7%	
10.	Nowata	19.1%	

Source: US Census Bureau; 2010 Census

Black or African American:

The *Black or African American* demographic ranks as the 2nd largest of all the federally identified racial census *minority* classes (one race) having a census population of 277,644 persons living within the State. Oklahoma has a lower percentage of *black or African American* residents on average when compared to the US overall. The *Black or African American* class only comprises 7.8% of the State's overall population while comprising 12.6% of the overall US population.

Counties having the greatest number and percentage of the *Black or African American* class are illustrated in Table-4 and graphically illustrated by county breakout on Figure-1. As noted in earlier discussion, the majority of this demographic resides within either the Oklahoma City or Tulsa MSA's. One notable exception to this lies with Comanche County. The county contains the City of Lawton as well as the Army's Ft. Sill military installation.

Table-5 Minority Concentration – Black or African American

	County	Population Percentage %	
1.	Comanche	17.5%	
2.	Oklahoma	15.4%	
3.	Osage	11.4%	
4.	Muskogee	11,3%	
5.	Choctaw	10.9%	
6.	Tulsa	10.7%	
7.	Logan	9.1%	
8.	Okmulgee	8.7%	
9.	McCurtain	8.7%	
10.	Okfuskee	8.3%	

Source: US Census Bureau; 2010 Census

Asian:

The *Asian* demographic ranks as the 2nd smallest of all the federally identified racial census *minority* classes (one race) having an estimated 65,076 persons living within the State. Oklahoma has a lower percentage of *Asian* residents on average when compared to the US overall. The *Asian* class comprises only 2.3% of the State's overall population while comprising 4.8% of the overall US population.

Counties having the greatest number and percentage of the *Asian* class are illustrated in Table-6 and graphically illustrated by county breakout on Figure-3. Oklahoma City has the largest concentrated Asian population in the state. Outside of the Oklahoma City and Tulsa MSA's, data indicates that this class tends to be more dominate in areas that are in close proximity to higher educational facilities or in close proximity to military installations.

Table-6 Minority Concentration - Asian

	County	Population Percentage %	
1.	Cleveland	3.8%	
2.	Payne	3.5%	
3.	Canadian	3.0%	
4.	Oklahoma	3.0%	
5.	Tulsa	2.3%	
6.	Comanche	2.2%	
7.	Texas	1.6%	
8.	Wagoner	1.4%	
9.	Delaware	1.3%	
10.	Jackson	1.2%	

Source: US Census Bureau; 2010 Census

Native Hawaiian or Pacific Islander:

The *Native Hawaiian or Pacific Islander* demographic ranks as the smallest of all the federally identified racial census *minority* classes (one race) having an estimated 4,369 persons living within the State. Oklahoma mirrors the percentage of *Native Hawaiian or Pacific Islander* residents on average when compared to the US overall. The *Native Hawaiian or Pacific Islander* class comprises 0.1% of the State's overall population while comprising 0.2% of the overall US population. Counties having the greatest number and percentage of the *Native Hawaiian or Pacific Islander* class include:

Counties having the greatest number and percentage of the *Native Hawaiian or Pacific Islander* class are illustrated in Table-7 and graphically illustrated by county breakout on Figure-4. Outside of the Oklahoma and Tulsa MSA's, data indicates that this class tends to be more dominate in areas that are in close proximity to higher educational facilities or in close proximity to military installations although this assumption is generally harder to make given the extremely low population counts present.

Table-7 Minority Concentration – Native Hawaiian or Pacific Islander

	County	Population Percentage %	
1.	Garfield	1.8%	
2.	Ottawa	0.9%	
3.	Comanche	0.6%	
4.	Jackson	0.2%	
5.	Cotton	0.2%	
6.	Texas	0.2%	
7.	Okfuskee	0.1%	
8.	Craig	0.1%	
9.	Oklahoma	0.1%	
10.	Greer	0.1%	

Source: US Census Bureau; 2010 Census

Hispanic or Latino:

Hispanics or Latinos are those who classified themselves in one of the specific Spanish, Hispanic, or Latino categories listed on the US Census questionnaire -"Mexican, Mexican Am., Chicano," "Puerto Rican," or "Cuban"-as well as those who indicate that they are "other Spanish/Hispanic/Latino." Persons who indicated that they are "other Spanish/Hispanic/Latino" include those whose origins are from Spain, the Spanish-speaking countries of Central or South America, the Dominican Republic or people identifying themselves generally as Spanish, Spanish-American, Hispanic, Hispano, Latino, and so on.

Hispanic or Latino origin can be viewed as the heritage, nationality group, lineage, or country of birth of the person or the person's parents or ancestors before their arrival in the United States.

People who identify their origin as Spanish, Hispanic, or Latino may be of any race. Thus, the percent Hispanic are not be added to percentages for racial categories. *NonHispanic White* persons are those who responded "No, not Spanish/Hispanic/Latino" and who reported "White" as their only entry in the race question located on the 2010 US Census questionnaire.

Those who report as *Hispanic* or Latino had an estimated 332,007 persons living within the State. The Hispanic or Latino origin population more than doubled from 86,160 in 1990 to 179,304 in 2000. This dramatic increase continued from 2000 to 2010. The 2010 Census shows that the Hispanic or Latino origin population has again almost doubled climbing from 179,304 in 2000 to 332,007 in 2010. *Hispanics* comprise 10.6% of the State's overall population while comprising 16.3% of the overall US population. The State's largest concentrations of *Hispanics or Latinos* are located in counties which border Texas. Counties

having the greatest number and percentage of the *Hispanic* ethnicity are illustrated in Table-8 and graphically illustrated by county breakout on Figure-5.

Table-8 Minority Concentration – Hispanic or Latino

	County	Population Percentage %	
1.	Texas	42.0%	
2.	Harmon	25.9%	
3.	Blaine	24.1%	
4.	Tillman	22.3%	
5.	Jackson	20.9%	
6.	Cimarron	20.8%	
7.	Beaver	20.1%	
8.	Harper	17.5%	
9.	Oklahoma	15.1%	
10.	Marshall	14.0%	

Source: US Census Bureau; 2010 Census

Table below provides a breakdown *Hispanic* ethnicity in terms of overall composition. The US Census shows that *Hispanic* ethnicity in Oklahoma comprises four major groups. These four groups consist of Mexican heritage, Puerto Rican heritage, Cuban heritage, and an “Other" category which incorporates all remaining Hispanic or Latino ethnicities.

Table-9 Hispanic Ethnicity Breakdown

	Mexican	Puerto Rican	Cuban	Other
	81.0%	15.0%	1.0%	3.0%

Source: US Census Bureau; Census 2010

Handicapped or Disabled:

The US Census Bureau American Community Survey (ACS) defines *disability* as a “long-lasting physical, mental, or emotional condition. This condition can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.” From this definition, it should be pointed out that a *disability* may not necessarily manifest in an outwardly identifiable condition. In addition to affordability issues, this protected class additionally often suffers from accessibility issues as well.

According to the National Fair Housing Alliance (NFHA), the *Handicapped or Disabled* protected class suffers from the highest rate of discrimination nationally out of all the protected classes, even surpassing racial discrimination complaints. The NFHA further cites that half of all HUD complaints regarding discrimination of the protected classes are *Handicapped or Disabled* related. A majority of these stem from rental related complaints. The NFHA suggests that there are several reasons for this. First, a landlord’s or rental owner’s reluctance or refusal to provide handicapped modifications for disabilities is easier to detect than other forms of discrimination. Second, according to the NFHA, millions has been spent funding the HUD supported Fair Housing Accessibility FIRST program which attempts to educate architects and builders about their Fair Housing responsibilities by providing comprehensive and detailed instruction programs, useful online web resources, and a toll-free information line for technical guidance and support.

Elderly:

According to the US Department of Health & Human Service's Association on Aging (AOA), almost 37.9 million Americans nationally were age 65 and over. Three in five people in this age group are women. The AOA predicts that over the next forty years, the number of people age 65 and older is expected to double and the number of people age 85 and older is expected to triple. This is due in part to gains in the average life expectancy. Oklahoma has total of 603,291 citizens who are age 65 and over. Oklahoma is proportionally equal to the percentage of age 65 and over residents on average when compared to the US overall. This class comprises 15.3% of the State's overall population.

Poverty:

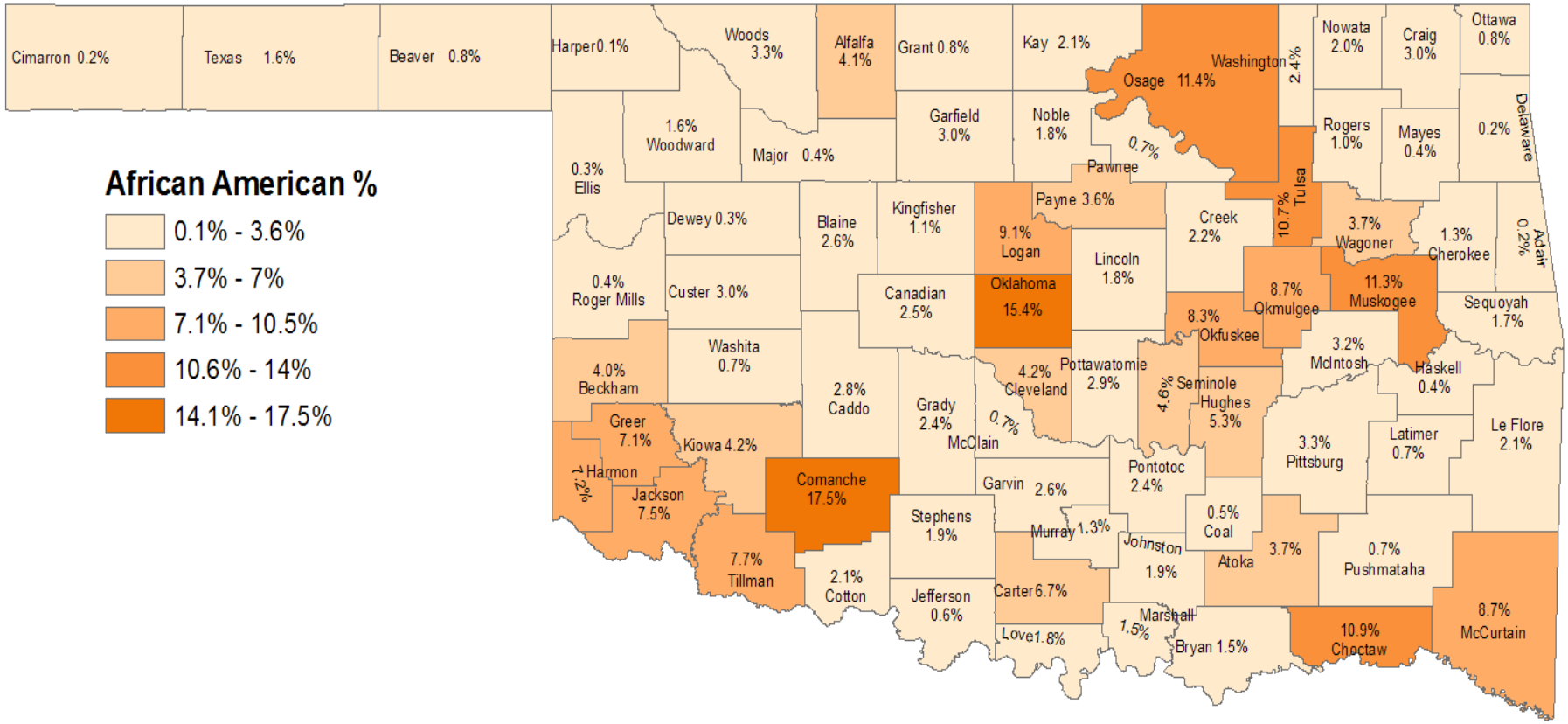
The US Census Bureau classifies *poverty* thresholds based on family size and number of related children under the age of eighteen years. A typical family comprised of a family size of four with two children would be classified as in poverty with an annual income of $24,860. Based on 2017 US Census Bureau, American Community Survey (ACS) estimates, Oklahoma exceeds the 12.3% national average in terms of poverty (all ages) with an estimated 15.8%. These figures indicate that poverty continues to be on the rise in Oklahoma. According to these estimates, 603,864 of Oklahomans live in poverty.

Although widespread throughout the State, the greatest concentration of poverty outside of the Oklahoma City, Tulsa, and Lawton MSA's occurs in the eastern part of the State with the I-35 corridor serving as a line of division.

The percentage of working-age men (ages 18-64) who had incomes below the poverty line in 2017 was 13.2% and the percentage of working-age women (ages 18-64) who had incomes below the poverty line was 17.2%. The percentage of children under 18 in related families who had incomes below the poverty line rates at 21.2%. For persons over the age of 65, the poverty rate in Oklahoma is 17.9%, which is slightly higher than the state's overall poverty rate.

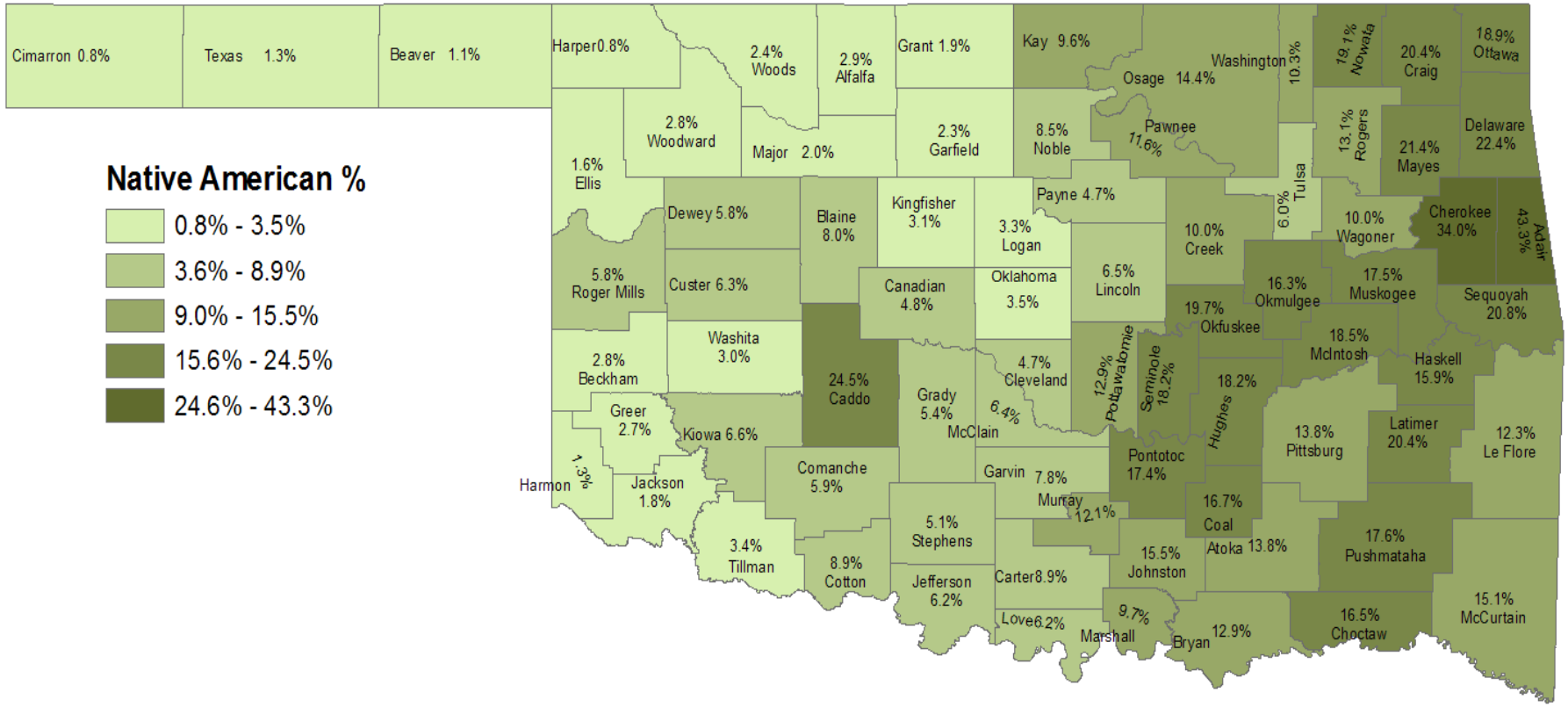
Figure – 1

Oklahoma Black or African American Population Percentage by County



Source: US Census Bureau; 2010 Census

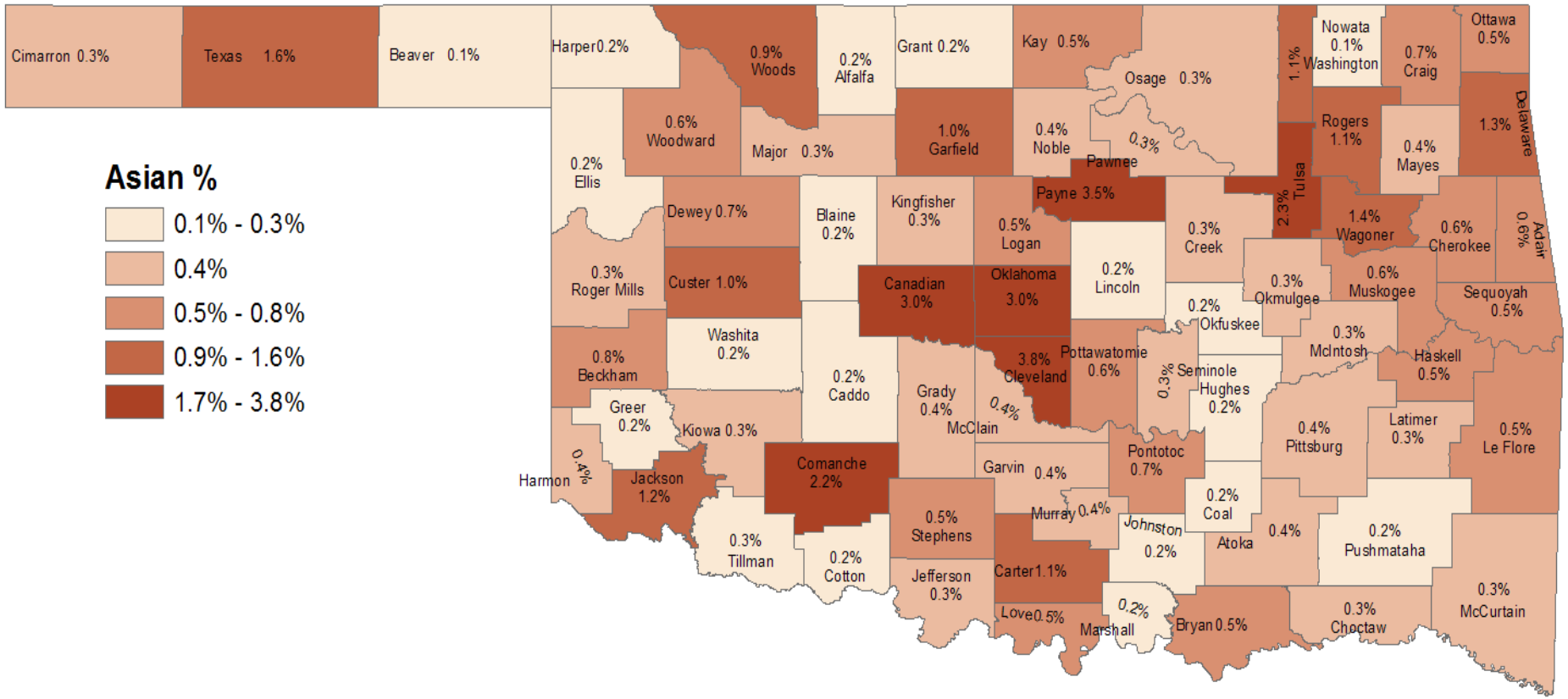
Figure – 2
Oklahoma American Indian or Alaskan Native Population by County



Source: US Census Bureau; 2010 Census

Figure - 3

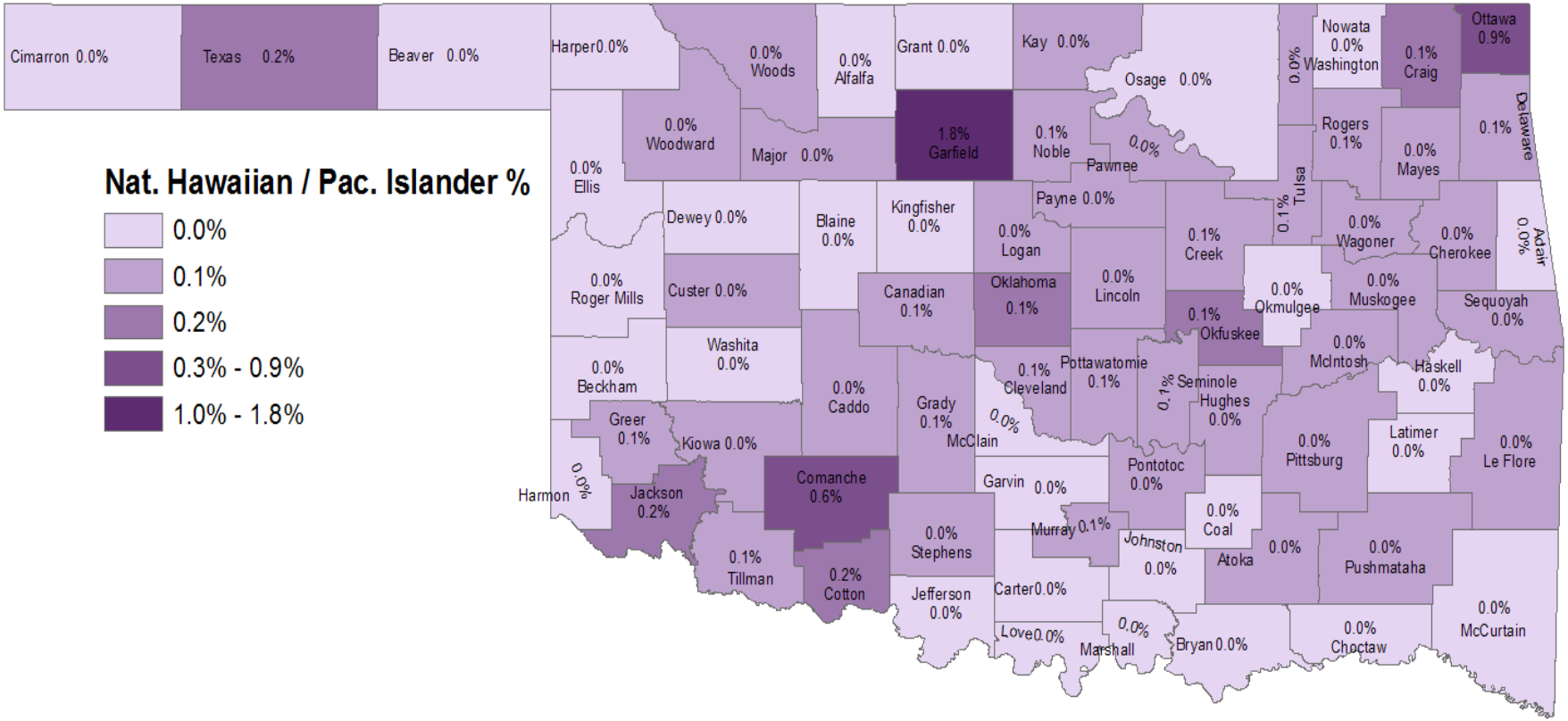
Oklahoma Asian Population Percentage by County



Source: US Census Bureau; 2010 Census

Figure – 4

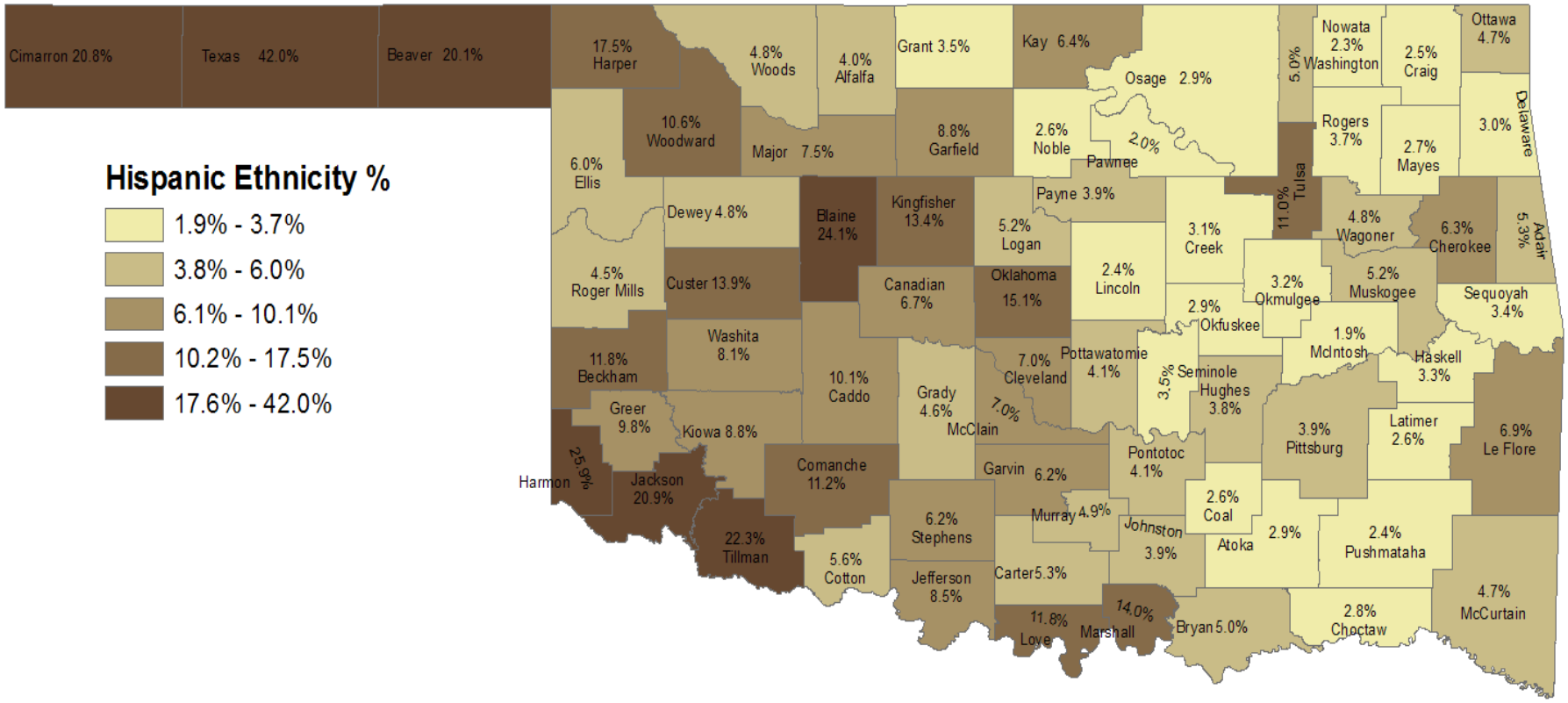
Oklahoma Native Hawaiian or Pacific Islander by County



Source: US Census Bureau; 2010 Census

Figure - 5

Oklahoma Hispanic Ethnicity Population by County



Source: US Census Bureau; 2010 Census

VI. Housing Profile

Data indicates many renters in Oklahoma are extremely low income. Extremely low-income households are identified as households with income less than the poverty guideline or 30% of the area median income (AMI), whichever is higher. There is a deficit of rental homes both affordable and available to extremely low-income households, many of whom face significant housing cost burdens. The National Low Income Housing Coalition using U.S. Census ACS data shows that 34% of the households Oklahoma are rental units. Approximately, 134,675 or 26% of these renter households are extremely low income. The annual income that a full-time worker must earn to afford a two-bedroom rental unit at HUD's Fair Market Rent is $30,732. Roughly, 65% of the extremely low renter households are classified as having a severe cost burden.

Overall, the following affordable and available rental units composition is as follows:

- Income at or below 30% AMI - shortage 69,768 units
- Income at or below 50% AMI - shortage 65,592 units
- Income at or below 80% AMI - surplus 17,353 units

Household Income

The Oklahoma State Comprehensive Housing Affordability Strategy (CHAS) table follows and outlines facts concerning the target market. Income classifications are as follows:

- Extremely Low Income = 30% of Area Median Income
- Very Low Income = 31% - 50% of Area Median Income
- Low Income= 51% - 80% of Area Median Income
- Middle Income= 81% - 100% of Area Median Income

The CHAS data combine ACS microdata with HUD-adjusted Median Family Incomes (HAMFIs) to create estimates of the number of households that would qualify for HUD assistance. The CHAS data also incorporate household characteristics (such as race and ethnicity, age, and family size) and housing unit characteristics (such as number of bedrooms and rent or owner costs). These characteristics are combined into a series of cross-tabulations, each of which has a particular focus. CHAS data is comprised of a series of tables that estimate the affordability of the housing stock and the extent to which affordable units are available to lower income households.

The following tables incorporate specific data for households in three Median Family Income (MFI) brackets: less than 30% MFI, 31% to 50% MFI and 51% to 80% MFI. Each of these three classes is designated as low income. The Comprehensive Housing Affordability Strategy (CHAS) data series provided by HUD was the primary source of data used.

Table-10 Income Distribution Overview

Income Distribution Overview	Owner	Renter	Total
Household Income <= 30% HAMFI	66,095	115,250	181,345
Household Income >30% to <=50% HAMFI	90,515	92,995	183,510
Household Income >50% to <=80% HAMFI	152,900	105,720	258,620
Household Income >80% to <=100% HAMFI	99,210	50,395	149,605

Household Income >100% HAMFI	555,855	121,185	677,040
Total	**964,575**	**485,545**	**1,450,115**

In the table below, the four identified housing problems are: incomplete kitchen facilities; incomplete plumbing facilities; more than 1 person per room; and cost burden greater than 30%.

Table-11 Housing Problems Overview

Housing Problems Overview	Owner	Renter	Total
Household has at least 1 of 4 Housing Problems	197,590	211,525	409,115
Household has none of 4 Housing Problems	758,925	261,870	1,020,795
Cost burden not available - no other problems	8,060	12,150	20,210
Total	**964,575**	**485,545**	**1,450,115**

In the table below, the four identified severe housing problems are: incomplete kitchen facilities; incomplete plumbing facilities; more than 1 person per room; and cost burden greater than 50%.

Table-12 Severe Housing Problems Overview

Severe Housing Problems Overview	Owner	Renter	Total
Household has at least 1 of 4 Severe Housing Problems	89,025	121,575	210,600
Household has none of 4 Severe Housing Problems	867,490	351,820	1,219,310
Cost burden not available - no other problems	8,060	12,150	20,210
Total	**964,575**	**485,545**	**1,450,115**

Housing Affordability

In general, housing is considered “affordable” if the tenants pay no more than 30% of their household income toward housing costs. Many of the CHAS tables use this standard approach to affordability and provide estimates of the number of households with cost burden (paying more than 30% of income for housing) or severe cost burden (paying more than 50% of income for housing). In the table below, cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs" which includes mortgage payment; utilities; association fees; insurance; and real estate taxes.

Table-13 Housing Cost Burden Overview

Housing Cost Burden Overview	Owner	Renter	Total
Cost Burden <=30%	777,465	279,030	1,056,495
Cost Burden >30% to <=50%	111,500	95,830	207,330
Cost Burden >50%	67,345	97,570	164,915
Cost Burden not available	8,265	13,105	21,370
Total	**964,575**	**485,545**	**1,450,115**

Table-14 Income by Housing Problems (Owners and Renters)

Income by Housing Problems (Owners and Renters)	Household has at least 1 of 4 Housing Problems	Household has none of 4 Housing Problems	Cost Burden not available - no other housing problems	Total
Household Income <= 30% HAMFI	131,535	29,600	20,210	181,345
Household Income >30% to <=50% HAMFI	113,775	69,735	0	183,510
Household Income >50% to <=80% HAMFI	92,480	166,140	0	258,620
Household Income >80% to <=100% HAMFI	28,625	120,975	0	149,605
Household Income >100% HAMFI	42,700	634,345	0	677,040
Total	**409,115**	**1,020,795**	**20,210**	**1,450,115**

Table-15 Income by Housing Problems (Renters Only)

Income by Housing Problems (Renters Only)	Household has at least 1 of 4 Housing Problems	Household has none of 4 Housing Problems	Cost Burden not available - no other housing problems	Total
Household Income <= 30% HAMFI	85,505	17,595	12,150	115,250
Household Income >30% to <=50% HAMFI	69,265	23,730	0	92,995
Household Income >50% to <=80% HAMFI	41,235	64,485	0	105,720
Household Income >80% to <=100% HAMFI	7,780	42,610	0	50,395
Household Income >100% HAMFI	7,740	113,450	0	121,185
Total	**211,525**	**261,870**	**12,150**	**485,545**

Table-16 Income by Housing Problems (Owners Only)

Income by Housing Problems (Owners Only)	Household has at least 1 of 4 Housing Problems	Household has none of 4 Housing Problems	Cost Burden not available - no other housing problems	Total
Household Income <= 30% HAMFI	46,030	12,005	8,060	66,095
Household Income >30% to <=50% HAMFI	44,510	46,005	0	90,515
Household Income >50% to <=80% HAMFI	51,245	101,655	0	152,900
Household Income >80% to <=100% HAMFI	20,845	78,365	0	99,210
Household Income >100% HAMFI	34,960	520,895	0	555,855
Total	**197,590**	**758,925**	**8,060**	**964,575**

Table-17 Income by Cost Burden (Owners and Renters)

Income by Cost Burden (Owners and Renters)	Cost burden > 30%	Cost burden > 50%	Total
Household Income <= 30% HAMFI	128,085	101,845	181,345
Household Income >30% to <=50% HAMFI	108,375	41,335	183,510
Household Income >50% to <=80% HAMFI	82,890	14,945	258,620
Household Income >80% to <=100% HAMFI	23,500	3,395	149,600
Household Income >100% HAMFI	29,400	3,405	677,040
Total	**372,250**	**164,925**	**1,450,115**

Table-18 Income by Cost Burden (Renters)

Income by Cost Burden (Renters Only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income <= 30% HAMFI	83,260	69,700	115,250
Household Income >30% to <=50% HAMFI	66,125	22,580	92,995
Household Income >50% to <=80% HAMFI	35,690	3,995	105,720
Household Income >80% to <=100% HAMFI	5,300	835	50,395
Household Income >100% HAMFI	3,025	460	121,185
Total	**193,400**	**97,570**	**485,545**

Table-19 Income by Cost Burden (Owners Only)

Income by Cost Burden (Owners Only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income <= 30% HAMFI	44,820	32,140	66,095
Household Income >30% to <=50% HAMFI	42,245	18,750	90,515
Household Income >50% to <=80% HAMFI	47,195	10,945	152,900
Household Income >80% to <=100% HAMFI	18,210	2,565	99,210
Household Income >100% HAMFI	26,375	2,945	555,855
Total	**178,845**	**67,345**	**964,575**

Mobility and Self-Care Limitation

The following chart summarizes housing problems for households that are classified as having mobility and self-care limitations. According to HUD, this category includes all households in which one or more persons has a long-lasting condition that substantially limits one or more basic physical activities, such as walking, climbing stairs, reaching, lifting, or carrying and/or a physical, mental, or emotional condition lasting more than six months that creates difficulty with dressing, bathing, or getting around inside the home.

Table-20 Income and Disability Status

Income and Disability Status	Household Member - Hearing or Vision Impairment	Household Member - Ambulatory Limitation	Household Member - Cognitive Limitation	Household Member - Self-Care or Independent Living Limitation	Household Member - None of the Above Limitations	Total
Household Income <= 30% HAMFI	32,940	50,590	35,280	35,950	107,190	261,950
Household Income >30% to <=50% HAMFI	36,395	50,320	28,780	35,025	110,765	261,285
Household Income >50% to <=80% HAMFI	44,700	53,845	32,960	37,775	172,800	342,080
Household Income >80% HAMFI	108,040	111,415	63,885	71,900	621,975	977,215
Total	**222,075**	**266,170**	**160,905**	**180,650**	**1,012,730**	**1,842,530**

Elderly

The following tables summarize housing problems for households that are classified as elderly. According to HUD, “Elderly” households are defined as 1 or 2 member households with either person between 62 and 74 years old. “Extra Elderly” households include 1 or 2 member households with either person 75 years or older.

Table-21 Income: Elderly Occupants (Renters Only)

Income: Elderly Occupants (Renters Only)	Household contains at least 1 person age 62 – 74 but no one age 75+	Household contains at least 1 person age 75+	Household contains no one age 62+	Total
Household Income <= 30% HAMFI	12,820	7,620	97,270	117,710
Household Income >30% to <=50% HAMFI	12,400	9,760	71,810	93,970
Household Income >50% to <=80% HAMFI	11,305	71,810	78,485	161,600
Household Income >80% to <=100% HAMFI	4,840	2,690	43,935	51,465
Household Income >100% HAMFI	11,045	4,595	107,860	123,500
Total	**52,410**	**96,475**	**399,360**	**548,245**

Table-22 Income: Elderly Occupants (Owners Only)

Income: Elderly Occupants (Owners only)	Household contains at least 1 person age 62 – 74 but no one age 75+	Household contains at least 1 person age 75+	Household contains no one age 62+	Total
Household Income <= 30% HAMFI	16,985	14,625	36,900	68,510
Household Income >30% to <=50% HAMFI	27,835	24,665	39,810	92,310
Household Income >50% to <=80% HAMFI	43,400	31,730	88,835	163,965
Household Income >80% to <=100% HAMFI	26,960	14,925	56,270	98,155
Household Income >100% HAMFI	134,215	44,650	370,370	549,235
Total	**249,395**	**130,595**	**592,185**	**972,175**

Racial Disparities

An analysis of CHAS tables for the Oklahoma State Program (HOME) for five different minority races/ethnicities shows disproportionately greater need for persons in certain categories. The following table summarizes the CHAS data, for owners and renters, for all household sizes.

A note regarding racial composition data for housing: According to HUD's 3-5 Year Strategic Plan Guidance, under Housing Needs (91.205) item number '2' states "to the extent that any racial or ethnic group has a disproportionately greater need for any income category in comparison to the needs of that category as a whole, the jurisdiction must complete an assessment of that specific need. For this purpose, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category as a whole."

The data used to compile the table was the most recent CHAS data available for the State of Oklahoma, so there is confidence that it is both current and accurate. The information used was provided from several different CHAS tables and, rather than providing many confusing charts with only pieces of applicable information, an attempt was made to build a table in a similar format where all of the information could be displayed together in one place. The CHAS gave data for five specific racial/ethnic groups. They were Black non-Hispanic, Hispanic, Native American non-Hispanic, Asian non-Hispanic, and Pacific Islander non-Hispanic. The applicable information from each of these tables was gathered and presented together in the Table 1 format and then the "ten percent" analysis was run on it. The HUD guidance instructs to point out those whose housing problems were ten percent greater than the category as a whole (10% test), which for this purpose would be the State of Oklahoma as a whole. Therefore, the narrative accompanying this table only pointed out those that qualified under this criterion and showed the percentage amount of the difference. For example, it was stated that Hispanic renters with incomes greater than 50% but less than 80% MFI have 11.9% greater housing problems than the populace as a whole. This can be seen on the chart when you find that under the Renter Households table the Hispanic 50 to 80% with any housing problems row (under line item #4) shows this category at 37.9% whereas the same line item under the "All Households" column, (the State as a whole) is at 26.0%. The 11.9% difference (37.9% minus 26.0%) is what was stated in the narrative.

Table-23 Minority Renter & Owner Households

Renter Households

	All Households	Black, Non-Hispanic	Hispanic	Native-American	Asian	Pacific Islander
1. Household Income <=50% MFI	87,914	7,434	3,571	9,073	1,119	34
2. Household Income <=30% MFI	46,957	4,391	1,853	5,140	766	16
% with any housing problems	66.9%	68.6%	68.9%	68.2%	57.6%	75.0%
3. Household Income >30 to <=50% MFI	40,957	3,043	1,718	3,933	353	18
% with any housing problems	57.7%	64.9%	60.6%	52.0%	67.1%	77.8%
4. Household Income >50 to <=80% MFI	46,032	2,905	2,382	4,524	382	47
% with any housing problems	26.0%	31.6%	37.9%	23.9%	36.6%	61.7%
5. Household Income >80% MFI	75,740	3,802	3,223	6,883	762	20
% with any housing problems	8.6%	8.5%	23.7%	11.2%	19.0%	0.0%
6. Total Households	209,686	14,141	9,176	20,480	2,263	101
% with any housing problems	35.1%	44.1%	43.4%	36.2%	42.6%	54.5%

Owner Households

	All Households	Black, Non-Hispanic	Hispanic	Native-American	Asian	Pacific Islander
1. Household Income <=50% MFI	106,244	4,138	2,662	10,081	227	24
2. Household Income <=30% MFI	47,605	2,205	1,213	4,887	113	8
% with any housing problems	65.5%	69.5%	74.4%	64.8%	69.9%	100.0%
3. Household Income >30 to <=50% MFI	58,639	1,933	1,449	5,194	114	16
% with any housing problems	43.9%	48.1%	58.5%	43.1%	56.1%	75.0%
4. Household Income >50 to <=80% MFI	94,307	2,791	2,396	7,509	220	16
% with any housing problems	29.6%	32.4%	42.9%	29.4%	60.9%	50.0%
5. Household Income >80% MFI	355,335	7,563	5,962	23,149	1,263	88
% with any housing problems	8.5%	11.3%	19.8%	11.1%	19.4%	25.0%
6. Total Households	555,866	14,492	11,020	40,739	1,710	128
% with any housing problems	20.7%	29.1%	35.9%	25.0%	30.5%	39.1%

MFI = Median Family Income

Renters with Incomes <=30% MFI:
There is no significantly greater need among minority races/ethnicities in this income group among renters.

Renters with Incomes >30 to <=50% MFI:
In this income category, Pacific Islander households have 20.1% greater housing problems than the populace as a whole.

Renters with Incomes >50 to <=80% MFI:
In this income category, Hispanic households have 11.9% greater housing problems than the populace as a whole. Asian households have 10.6% greater problems, and Pacific Islander households have 35.7% greater problems.

Total Renter Households:
Among all income categories Pacific Islander households have 19.4% greater housing problems than the populace as a whole.

Owners with Incomes <=30% MFI:
In this income category, Pacific Islander households have 34.5% greater housing problems than the populace as a whole.

Owners with Incomes >30 to <=50% MFI:

In this income category, Hispanic households have 14.6% greater housing problems than the populace as a whole. Asian households have 12.2% greater housing problems, and Pacific Islander households have 31.1% greater problems.

Owners with Incomes >50 to <=80% MFI:
In this income category, Hispanic households have 13.3% greater housing problems than the populace as a whole. Asian households have 31.3% greater housing problems, and Pacific Islander households have 20.4% greater problems.

Total Owner Households
Among all income categories Hispanic households have 15.2% greater housing problems than the populace as a whole. Pacific Islander households have 18.4% greater problems.

VII. Disparities in Access to Community Assets – Fair Housing

Having access to good schools, safe streets, quality jobs, effective public transportation, recreation and other social services helps facilitate a good quality of life and improved life outcomes. Unfortunately, research has shown that racial and ethnic minorities, individuals with disabilities, and other protected classes often have less ability to access these vital amenities.

As stated earlier, this Analysis of Impediments to Fair Housing Choice (AI) is comprised in part of a Statewide Affordable Housing Market Study commissioned by the Oklahoma Department of Commerce (ODOC) in partnership with the Oklahoma Housing Finance Agency (OHFA. It was funded by the U.S. Department of Housing and Urban Development (HUD) through the Community Development Block Grant – Disaster Recovery program (CDBG-DR). This study was conducted by a public/private partnership between Integra Realty Resources – Tulsa/OKC, the University of Oklahoma College of Architecture, Division of Regional and City Planning, and DeBruler Inc. IRR-Tulsa/OKC.

The data for this report was compiled from a variety of sources including the United States Census, the University of Oklahoma Center for Spatial Analysis, and primary data collected as part of ongoing research efforts at the University of Oklahoma. The complete report can be accessed on the Oklahoma Housing Finance Agency website located at: http://www.ohfa.org or at http://oklahomahousingneeds.org. The following narratives are directly taken or summarized from this report.

The findings from the report are intended to aid the Oklahoma Housing Finance Agency (OHFA) determine the location of new affordable housing in relation to vulnerable populations and explore ways to expand the opportunities available to help communities of existing affordable housing achieve self-sufficiency.

Key Findings:

- 70% of affordable housing units are located in census tracts marked by poverty.
- 62% of affordable housing is located in census tracts where a majority of the residents are not white.
- 13% of affordable housing units have no access to transit services and 56% have access to limited service to on-demand transit.
- 7.8% of affordable housing units are located in food deserts.

- 2.6% of affordable housing units have limited access to a hospital.

Recommendations:

The report emphasized that continued efforts to improve the quality of life for affordable housing residents and reduce discrimination associated with affordable housing will likely need to include strategies that integrate new affordable housing as well as support existing communities of affordable housing. Furthermore, the report states that this will likely include public policies and funding designed to integrate low-income and workforce housing into a more diverse set of communities. Additionally, those living existing affordable housing communities need increased opportunities to stay in place, become self-sufficient, and participate in determining the future of their neighborhood. OHFA may consider partnering with other state, non-profit, and for-profit agencies to explore strategies for helping communities thrive economically, socially, and environmentally.

In Oklahoma, a combination of federal and state programs work to support the opportunities provided to individuals and families in an apartment or home. Publicly available data is used for units that are part of the Low Income Housing Tax Credit (LIHTC) Program, the Rural Rental Housing Loans, or OHFA administered programs such as Oklahoma Affordable Housing Tax Credit (AHTC), the HOME investment partnership program, the Section 8 Housing Choice Voucher Program, and multi-family bonds. Collectively, these programs represent state efforts to assist individuals who are unable to afford housing.

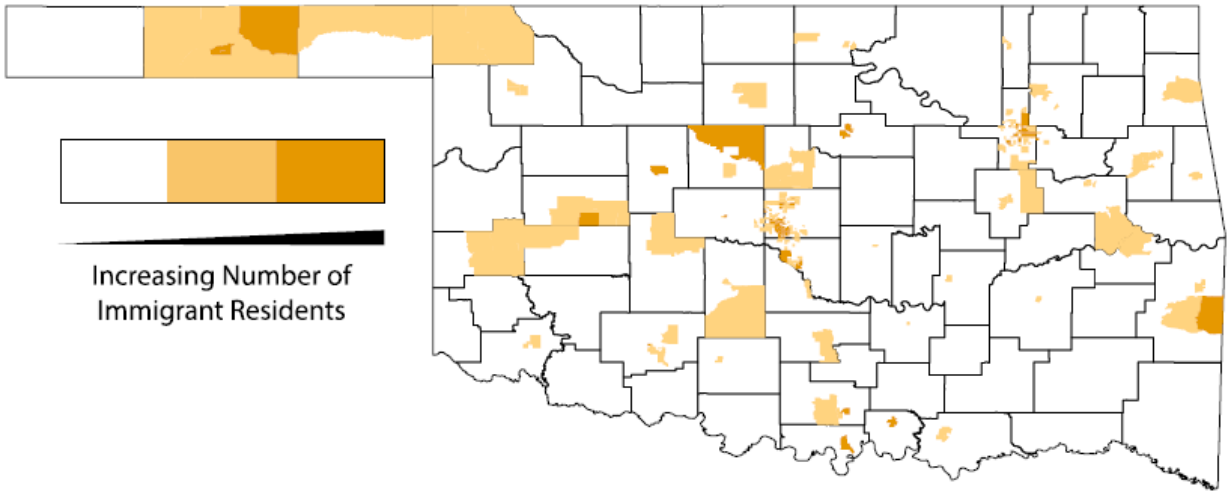
Findings Overview:

1. Urban/Rural: A majority of the affordable housing in Oklahoma is situated in rural communities. Urban communities including Edmond, Lawton, Norman, Oklahoma City, and Tulsa are home to just over 1/3 of the affordable housing units in the state.

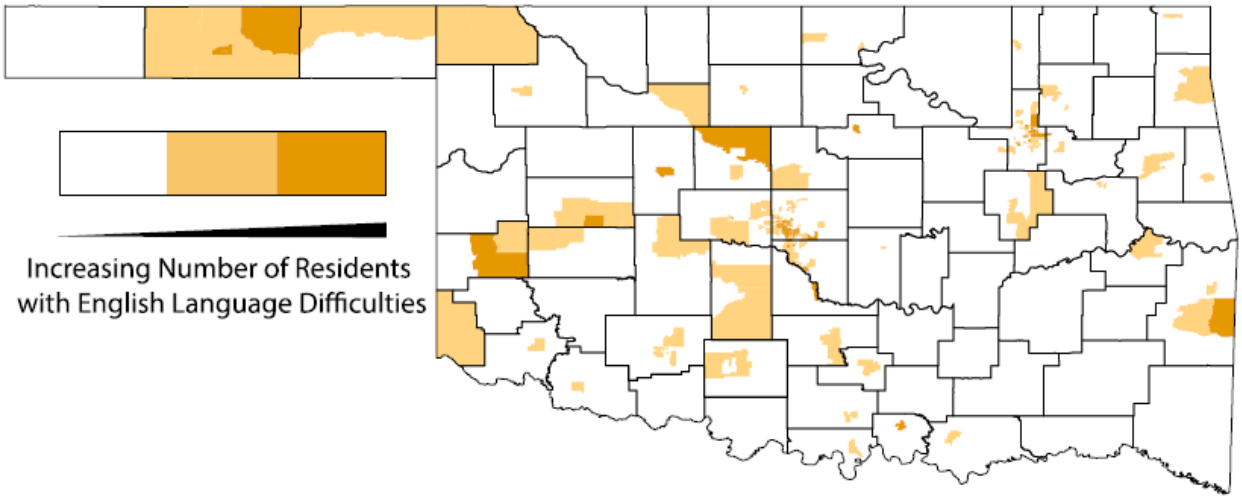
2. Poverty: Approximately 70% of affordable housing units in Oklahoma are located in census tracts where the number of residents living in poverty is above the state average. About half of these units are located in areas of extreme poverty.

3. Non-White Enclaves: Just over 60% of affordable housing units in Oklahoma are located in census tracts where a majority of the residents are non-white. With just fewer than 24% of the total affordable housing units in census tracts heavily populated with residents who are not white.

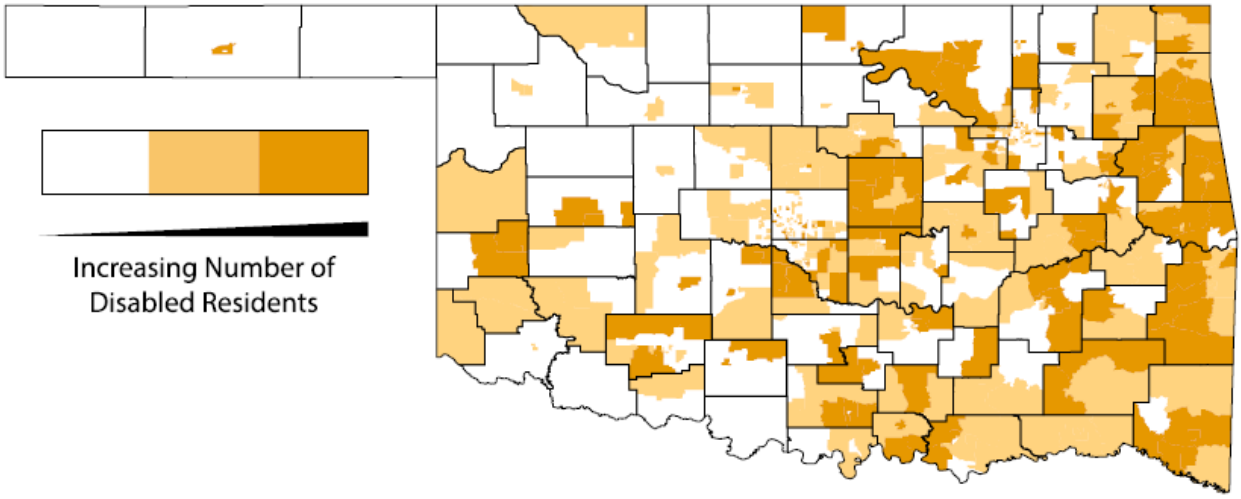
4. Immigrant Enclaves: One-third of affordable housing units in Oklahoma are located in census tracts where more than the average number of residents are immigrants. About half of these units are located in areas dense with immigrants.



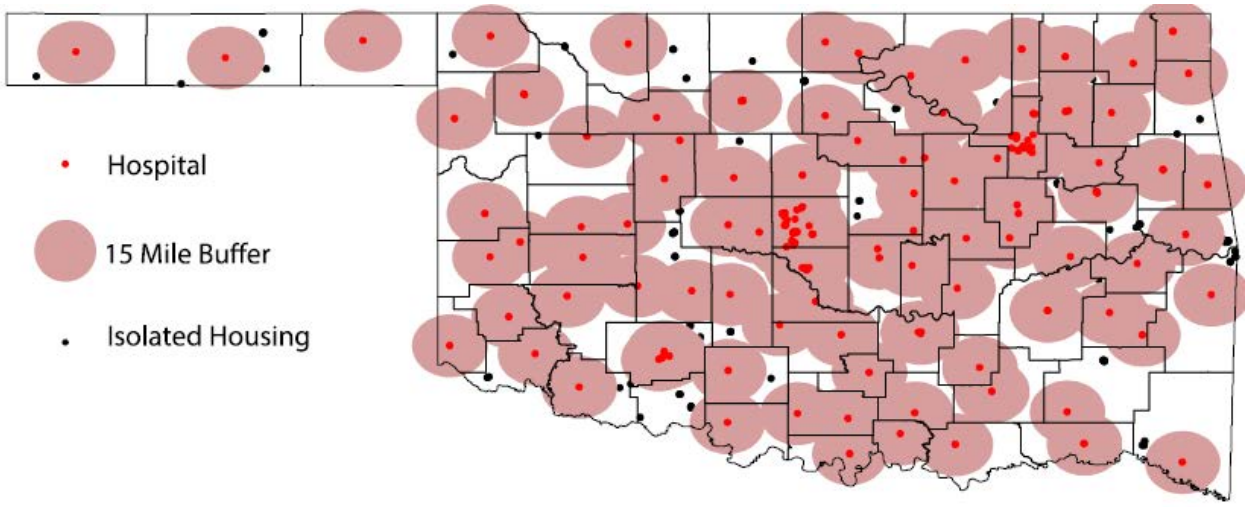
5. Limited English Proficiency: Almost 17,000 existing affordable housing units in Oklahoma are located in census tracts where more residents than average do not speak English very well. A little more than half of these units are located in areas dense with individuals with limited English proficiency.



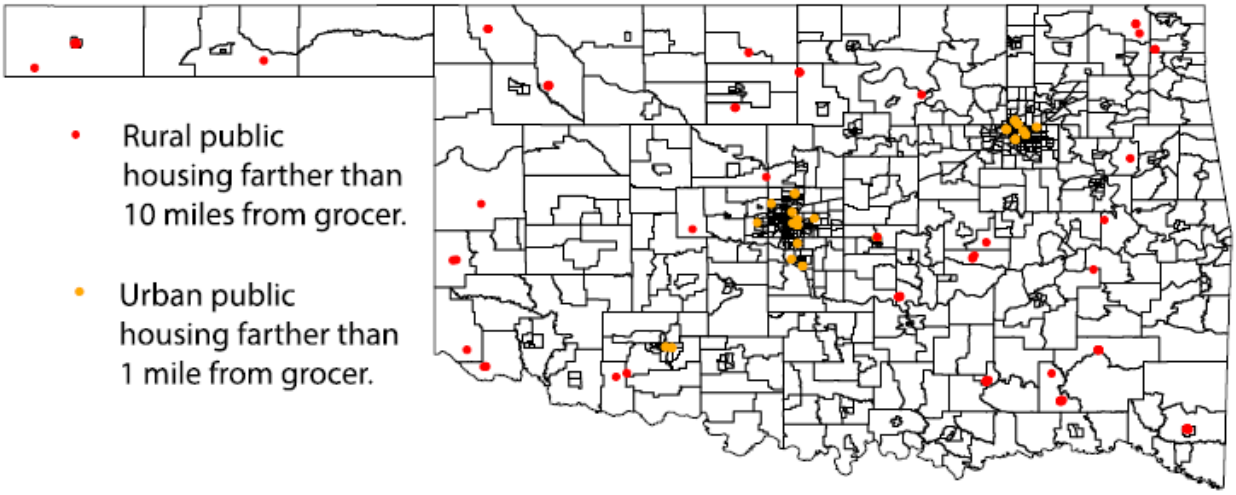
6. Disability: Almost 60% of existing affordable housing units in Oklahoma are located in census tracts where more residents than average have a disability. A little more than half of these units are located in areas dense with individuals with a disability.



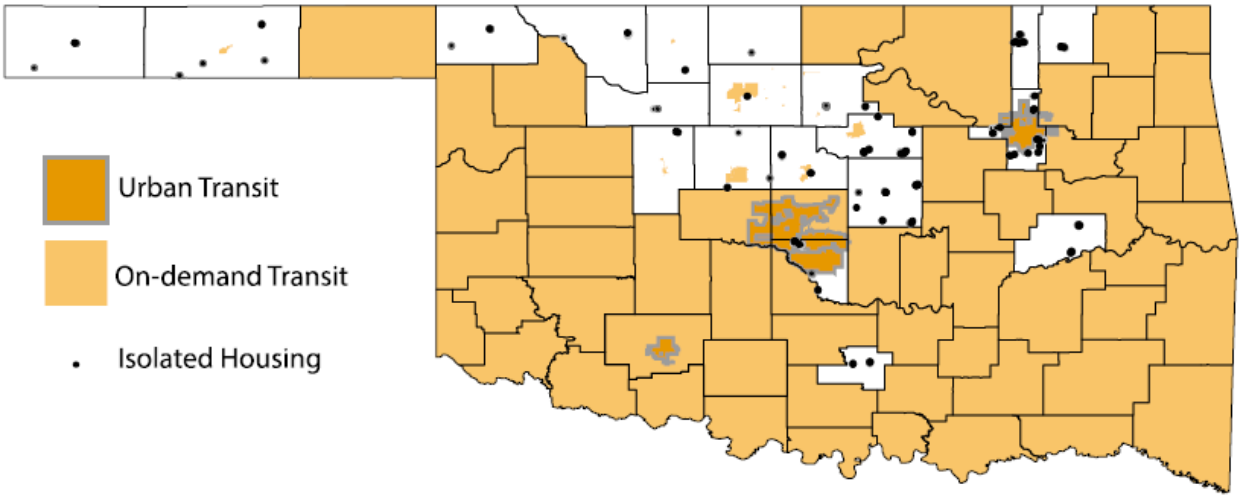
7. Hospital Access: There are no affordable housing units more than 30 miles from a hospital. Approximately 2.6% of affordable housing units are farther than 15 miles from the nearest hospital. As indicated by the larger percentage of Rural Rental Housing Loan units, most of these are located in rural areas.



8. Grocery Store Access: Approximately 7.8% of affordable housing units are in areas that are classified as food deserts. According to the United States Department of Agriculture, food deserts exist in urban environments further than 1 mile from a grocery store and in rural environments further than 10 miles from a grocery store.



9. Transit Access: A little over 69% of affordable housing in Oklahoma is located in a census tract with limited or no access to transit services. This includes 8,367 affordable housing units in areas that lack public transit services all together as well as 36,363 units that are situated in areas that have on-demand transportation services that often have limited operation times and may only serve elderly and disabled populations or those going to a medical appointment.



VIII. Demographic and Housing Data Conclusions:

In rural areas of Oklahoma, especially as distances from Metropolitan Statistical Areas become more distant, the various combinations of population, income, poverty, education, employment, and housing appear to impact each other to a greater degree.

While fair housing issues continue to be brought to the attention of local jurisdictions by state and federal government agencies, the availability of affordable housing stocks still remains the primary concern of local officials. However, affordable housing and fair housing choice do have a direct relationship with one another.

Community Action Agencies (CAAs) and Community Housing Development Organizations (CHDOs) have been identified as the principal non-profit organizations delivering low-income housing through a network of providers that covers all seventy-seven (77) of Oklahoma's counties through such programs as the Home Investment Partnerships Program (HOME).

Based on relevant data: (1) Housing needs, both new construction and rehabilitation of existing units, are high but cost prohibitive; (2) The income levels of a majority of residents in towns of less than 5,000 cannot support new housing starts or upward mobility from renter to home-owner; (3) Economic development opportunities are directly impacted by limited housing; (4) In small, rural communities, household income levels play an integral role as either an advantage or an obstacle to housing options.

Oklahoma faces an affordable housing supply problem. Having a range of affordable housing options for all segments of the population should be a primary concern for all Oklahoma communities.

Regardless of future economic conditions in Oklahoma, the need for affordable housing will not disappear. Housing costs continue to rise, and affordable housing vacancy rates are low. Finding solutions to this housing challenge requires collaboration among a great many stakeholders.

IX. State Impediments to Fair Housing Choice Survey

In an attempt to go beyond what conclusions might be drawn from the demographic, economic and housing data available, the Oklahoma Housing Finance Agency (OHFA) and the Oklahoma Department of Commerce (ODOC) conducted a survey of their stakeholders in April of 2018. Links to the electronic survey were directly sent to 285 housing related entities as well as linked via the OHFA website and Facebook.

The survey asked respondents to give specific examples of impediments to fair housing choice, and to choose the most important and challenging impediments from a comprehensive list. The specific examples given closely matched the greatest obstacles identified from the comprehensive list. Eighty-five (85) stakeholders responded to the survey.

The respondents could choose multiple impediments to fair housing choice from the comprehensive list, but were asked to try to focus on the main impediments. The most frequently cited impediments are listed below. It should be noted that the percentages do not total to 100%, since respondents could select multiple answers:

1. A lack of affordable housing for rent	68.2%
2. Financial cost burden of low incomes or high rents	61.5%
3. Unemployment or underemployment	56.8%
4. A lack of accessible housing (for the disabled)	44.6%
5. A lack of affordable housing in general	39.2%
6. Racial bias, prejudice or stereotyping	25.7%

(All other possible impediments were chosen by less than 25% of respondents)

The survey reinforces the conclusions that have been drawn from the available demographic, economic and housing data. It is clear that the availability of affordable housing and the ability of low-income individuals to pay the rents and utilities of even the most affordable units both have a direct and profound impact on most individuals and households that fall within the protected classes under the Fair Housing Act. Minorities, families with children (including single-parent families), and persons with disabilities are overrepresented in low-income data and are most in need of affordable housing. As a result, all barriers to affordable housing can in turn be understood to be impediments to fair housing choice.

A question and response breakdown of the impediments survey is included below. Each question is presented and summary results are presented followed by a narrative comment regarding the results. It should be noted as mentioned earlier, the survey counts may not total 100% in all instances due to some respondents skipping certain questions or providing multiple answers which is the case in survey question number four (4).

Survey Question #1: Name, Organization, and Contact Information.

The survey reached a wide variety of people and organizations. Responses were received by:

- ✓ Community Action Agencies
- ✓ Housing Authorities
- ✓ Housing Service Consultants
- ✓ Multiple Towns and Cities
- ✓ Mental Health Centers
- ✓ Aging Service Providers
- ✓ Faith Based Organizations
- ✓ Youth Services
- ✓ Family Crisis Centers
- ✓ Housing Management Organizations
- ✓ Housing Developers
- ✓ Misc. Non-Profits
- ✓ Realtors
- ✓ Private Citizens

Survey Question #2: Do you believe that significant impediments or barriers to Fair Housing choice exist in the State of Oklahoma?

Response	Response %	Response Count
Yes	**58.23%**	**46**
No	41.77%	33

The survey response here clearly shows the top response was “YES” to the question among respondents. The 58.23% “YES” response is significant. However, the difference between the two responses is only 16.46%.

Survey Question #3: Please list any impediments or barriers that you are aware of.

This was an open ended survey question intended to gain insight into any additional impediments that the State was not currently aware of. The answers to this question varied greatly among respondents,

however; a majority of the responses reinforced housing and economic related issues (affordable housing, financial cost burden, unemployment, etc.) as the leading impediments or barriers to Fair Housing.

Survey Question #4: What do you believe to be the main cause or causes of impediments to Fair Housing choice? Select all that apply, but please focus on the main causes:

Impediment	Response %	Response Count
Lack of affordable housing for rent	64.00%	48
Financial cost burden due to low incomes and/or high rents	61.33%	46
Lack of accessible housing	48.00%	36
Lack of affordable housing for sale	48.00%	36
Unemployment or underemployment	29.33%	22
Lack of information regarding Fair Housing laws and protections	28.00%	21
Language or cultural issues	26.67%	20
Racial bias, prejudice or stereotyping	26.67%	20
Bias against individuals with disabilities	22.67%	17
Lack of job training opportunities	17.33%	13
Lending practices	17.33%	13
Insufficient data collection	14.67%	11
Actions of Homeowners Associations	13.33%	10
Age Discrimination	12.00%	9
Gender bias	5.33%	4
Local regulations	5.33%	4
Foreclosure practices	2.67%	2

This question served as the most insightful among all other survey questions in terms of overall impediment identification. The respondents could choose multiple impediments to fair housing choice from the comprehensive list, but were asked to try to focus on the main impediments. The most frequently cited impediments are listed below. Please note that the percentages do not total to 100% since respondents could select multiple answers:

1. Lack of affordable housing for rent 64.00%
2. Financial cost burden due to low incomes and/or high rents 61.33%
3. Lack of accessible housing 48.00%
4. Lack of affordable housing for sale 48.00%
5. Unemployment or underemployment 29.33%
6. Lack of information regarding Fair Housing laws and protections 28.00%
7. Language or cultural issues 26.67%

8. Racial bias, prejudice or stereotyping 26.67%

(All other listed impediments received less than a 25% response rate)

Survey Question #5: Are you personally aware of any situation that appeared to restrict the free and equal access to housing in Oklahoma?

Response	Response %	Response Count
Yes	29.17%	21
No	**70.83%**	**51**

Survey Question #6:* (*If yes), Please briefly describe the situation.

Again, as with question #3, this was an open ended question intended to gain insight into any additional impediments that the State was not currently aware of. The answers to this question, as with question #3, varied greatly among respondents. However, a majority of the responses reinforced economic related issues (affordable housing, unemployment, etc.) as the leading impediments or barriers to Fair Housing.

Survey Question #7: **Are you aware of where to go to get assistance with Fair Housing questions and/or concerns?**

Response	Response %	Response Count
Yes	**77.27%**	**17**
No	22.73%	5

The percentage or strength of the positive "YES" response to this question would indicate that clearly most respondents know how to get Fair Housing assistance. However, given the 77.27% response, it can be concluded that there is a need for continuing education efforts in regard to Fair Housing.

Survey Question #8*: *Please share the names of any organizations you are aware of that assist with Fair Housing issues.

This open ended survey question provided some good feedback on avenues of Fair Housing assistance used. Not surprisingly, HUD was the most common response. Metro Fair Housing and Housing Agencies rounded out most of the remainder of the list of responses. While most did not have actual fair housing enforcement capacity, they were reliable sources that could further direct complaints to either HUD or other legal resources.

Survey Question #9*: *Please share any additional information that you believe would help OHFA and ODOC understand the impediments and/or barriers to Fair Housing in the State of Oklahoma.

This open ended survey question provided feedback regarding several Fair Housing related incidents or situations. Results varied greatly. Again, the results under question number four (4) were further reinforced by the respondents' answers.

X. Impediments to Fair Housing Choice (State Jurisdictional Review)

The Housing Priorities and Strategies component in the State's Consolidated Plan identifies the need to minimize barriers to affordable housing from the state perspective. Before there is further discussion regarding the impediments of fair housing choice, one must first understand that the availability of and the ability to obtain affordable housing has a direct impact on those classified as 'protected classes' under the Fair Housing Act. Demographic, employment, and income data show that minorities, families with children (including single parent families), and persons with disabilities are proportionally overrepresented in low-income data and constitute those who are most often in need of affordable housing. It is this connection that one should understand that many barriers to affordable housing can in turn be understood to be an impediment to fair housing choice.

Conclusions drawn from the survey, demographic, economic, and housing related information reveal that these areas share some common themes which also qualify as impediments to fair housing. A discussion of these impediments (deterrents) follows. Each discussion concludes with an action plan outlining what steps the State of Oklahoma will take to try to diminish or eliminate these impediments.

A. Impediment – Lack of Affordable of Housing for Rent

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.

The primary funding source for affordable rental housing over the last several decades has been the federal Affordable Housing Tax Credit Program, formerly known as the Low Income Housing Tax Credit Program. While this program has helped ease the severe shortage of affordable rental housing to some degree, the available funding has been far less than what has been needed to meet the increasing demand for such housing. For years now OHFA has received three to five times the number of applications than it has had the available credits to fund.

- ✓ **Action -** *(Lack of Affordable of Housing for Rent)*

  The bipartisan federal funding bill for Fiscal Year 2018 will provide addition funding for two of the programs that help produce affordable rental housing, the Affordable Housing Tax Credit Program and the HOME Investment Partnerships Program (HOME Program). The Affordable Housing Tax Credit Program will receive a 12.5% increase for the next five years. The HOME Investment Partnerships Program will see a 43% increase for 2018. For Program Year 2017 OHFA received approximately $5.7 million. For Program Year 2018 OHFA anticipates receiving approximately $8 million.

  OHFA will continue to use as much as possible of the HOME Program funds for rental housing projects. This emphasis has been in place since the HOME Program funding was reduced a number of years ago. OHFA strongly encourages the production of rental housing through the HOME Program, including pairing the funds with Affordable Housing Tax Credits to produce more units. OHFA also permits eligible nonprofit organizations to use HOME funds for Tenant Based

Rental Assistance. The current Final Rule for the HOME Program places a strong emphasis on rental housing.

OHFA will also make every effort to encourage builders and developers to use Oklahoma Housing Trust Fund (OHTF) monies as part of their development funding for rental properties. The OHTF provides very low interest construction financing for both rental and homeownership projects, especially in the rural areas of the State. OHFA has made recent changes to the OHTF Program to allow for larger loans that allow eligible developers to build bigger, more cost-effective properties. All of the changes to the OHTF have been made to encourage more rental housing production. Once again, the amount of these funds is extremely limited, and the State legislature is no longer providing ongoing funding for the program. OHFA has only the existing funds, less than $5 million, to assist these projects.

B. Impediment – Financial Cost Burden of Low incomes or High Rents

This impediment is another one that was heavily emphasized in both surveys. Financial cost burden has been identified in prior analyses as a major impediment to fair housing choice. Incomes have not been rising at the same rate as rents, causing rental housing to be less affordable every year.

Financial cost burden can pose a substantial impediment to the protected classes. Affordable units are generally defined as housing available to households at a cost that is no more than 30% of the total household income. Paying more than 30% of monthly income, sometimes substantially more, for rent/mortgage payments and utilities severely handicaps the members of the protected classes, who predominantly tend to have only lower income opportunities.

Local property tax has been identified as increasing the cost of housing for many Oklahomans across the state. Local governments are placing an increasing portion of the total tax burden on property taxes. This tax shift is occurring because the property tax is the only tax most local governments and school districts have flexibility to modify. High property taxes affect the cost of housing for both renters and homeowners.

Rental assistance and utility assistance payments represent the only viable way to alleviate the situation. However, all of the public housing authorities (PHAs) in the State of Oklahoma are oversubscribed in the area of rental and utility assistance. Most if not all of the PHAs have very long waiting lists for this assistance, and have closed their waiting lists due to the length of time it would take any new applicant to receive assistance. In light of the current political and economic climate, it is not anticipated that there will be any increase in the Section 8 Housing Choice Voucher Program, or any of the other federal and/or State sources of rental and utility assistance.

Action – *(Financial Cost Burden of Low incomes or High Rents)*

OHFA has very limited resources available to use to relieve the high cost of rent. OHFA will make available HOME Program funding for Tenant Based Rental Assistance, which can be used by eligible nonprofit organizations to provide help with rent and utilities. For the National Housing Trust Fund Program (HTF), OHFA gives priority to developments that have some form of rental assistance for the tenants. Funding for the Housing Opportunities for Persons With Aids Program (HOPWA) has been increased by about 15% over the last few years, providing rental assistance to this limited population. The Veterans Affairs Supportive Housing Program (VASH) has recently provided additional rental assistance for low-income military veterans and their families.

C. Impediment - General Lack of Affordable Housing

This impediment is closely tied to Impediment 'A', a lack of affordable rental housing. It is evident from the survey responses and from the demographic, economic and housing data that all types of affordable housing are in short supply. Although rental housing appears to be the greatest need, affordable housing units for homeownership are also greatly needed.

Construction costs are rising, forcing the cost of homes for sale to increase. The average cost of homes for sale has risen at a greater rate than incomes have increased. To make matters worse, stricter lending practices still in place since the last recession have made it much more difficult for households with small down-payments and less than stellar credit to be approved for the purchase of a home. The protected classes are disproportionately represented in the lower income strata, and are more likely to face great difficulties in becoming homeowners due to the conditions mentioned.

- ✓ **Action –** *(General Lack of Affordable Housing)*

  Due to the limited amount of HOME Program funds available, and the changes that will be proposed to the HOME Program set-asides in order to address other impediments to fair housing choice, it will not be possible to use HOME funds to address the lack of affordable housing for homeownership. As previously mentioned, OHFA will propose using HOME funds to help alleviate the shortage of other forms of affordable housing, such as housing units for rent.

  To address the shortage of affordable housing for homeownership, OHFA will make every effort to educate the public regarding its Single Family Homeownership Program (SFHP). OHFA Homebuyer Down-payment Assistance is a program offered through the SFHP Program. OHFA Homebuyer Down-payment Assistance offers 30 year, fixed rate, low-interest home loans with 3.5% or 5.00% down payment assistance to homebuyers, Statewide. These products are available for eligible homebuyers to purchase any new or existing home: Gold (most homebuyers), OHFA Shield (Police Officers & Fire Fighters) and OHFA 4Teachers (Educators). To qualify for OHFA Homebuyers Down-payment Assistance, households need only contact a participating lender. Homebuyers must meet income, purchase price and credit score guidelines. The maximum purchase price is $276,100 and a minimum credit score of 640.

  OHFA will also make every effort to encourage builders and developers to make us of the previously mentioned Oklahoma Housing Trust Fund. The OHTF provides low-interest construction loan financing for both affordable housing for sale and affordable housing for rent. The HTF is an especially good source of funding for affordable housing for sale, since it can finance 100% of the construction costs of homes for sale.

D. Impediment – Lack of Accessible Housing for the Disabled

Affordable, accessible housing is not readily available for many people with developmental disabilities. People who need accessible housing often have trouble finding it or obtaining the funds to modify existing housing. The lack of affordable housing in general only makes this situation worse. Many Oklahomans with developmental disabilities have Supplemental Security Income (SSI) as their only source of income. SSI payments are inadequate to pay market rents, and there are long waiting lists for housing subsidies. Many individuals with developmental disabilities require some support services to enable them to live independently. For a number of reasons, it is frequently difficult to fund appropriate levels of flexible services to provide this support.

Oklahomans with developmental disabilities who need accessible housing have a difficult time finding appropriate units. Many developers, including developers of public housing, are only willing to develop accessible units if there is specific demand at the time the units are built. Furthermore, landlords often are

not willing to leave accessible units open for those who need them, and will rent those units to people who do not need accessible housing. These actions contribute to a shortage of accessible housing.

Even low-income housing is frequently too expensive for people with developmental disabilities who live on SSI. Section 8 Housing vouchers have provided the primary subsidy for very low-income individuals living in community housing. Unfortunately, decreasing support for low income housing programs at the local, state, and federal level have made the problem of finding affordable housing for people with developmental disabilities even worse.

- ✓ **Action -** *(Lack of Accessible Housing for the Disabled)*

  Developers of AHTC properties are not required to provide any accessible units, as the AHTC Program does not mandate compliance with Section 504 of the Rehabilitation Act, which requires a certain minimum number of accessible units. However, the AHTC Application awards points to developers who provide accessible units to persons with mental or physical disabilities. These points are often necessary in order to receive AHTC funding. OHFA has added this point category in order to address the lack of accessible housing for the disabled. This means that many new rental developments that will place in service over the next several years will have accessible units for disabled individuals or households.

  The availability of units is only part of the problem, however. Disabled households must be able to pay the cost of rent and utilities for those units. As previously mentioned, OHFA makes available part of its HOME Program allocation for TBRA. OHFA will look at requiring any TBRA activity to give preference to disabled individuals and households, similar to the preference given to such individuals and households by the Section 8 Housing Choice Voucher Program currently administered by OHFA.

E. Impediment - Unemployment or Underemployment

This impediment ties directly to Impediment ‘B’ listed above. Unemployment and underemployment contribute to the financial cost burden of rent, mortgage payments and/or utilities facing individuals or households in the protected classes. If the able-bodied adult members of these households are unable to find employment at a salary equivalent to their skills and abilities, or are unable to find employment of any kind, the problem of financial cost burden becomes much worse. Larger amounts of assistance are required to help these families.

All of the public housing authorities (PHAs) in the State of Oklahoma are oversubscribed in the area of rental and utility assistance. Most if not all of the PHAs have very long waiting lists for this assistance, and have closed their waiting lists due to the length of time it would take any new applicant to receive assistance. In light of the current economic slump and the political situation at the federal level, it is not anticipated that there will be any increase in the Section 8 Housing Choice Voucher Program, or any of the other federal and/or State sources of rental and utility assistance.

- ✓ **Action –** *(Unemployment or Underemployment)*

  OHFA makes part of its HOME Program allocation available for Tenant Based Rental Assistance as previously stated. The HOPWA Program provides most of its funding for short-term rent and utility assistance. Unless the Section 8 Housing Choice Voucher Program receives additional funding, the State does not have any other funding sources available for rent and utility assistance. For the National Housing Trust Fund, the State incentivizes the provision of local sources of rent

and utility assistance by giving preference to those applicants who find and provide such sources of rent and utility assistance to their tenants.

F. Impediment - Racial bias, Prejudice or Stereotyping

Racial bias, prejudice or stereotyping impediments can be most difficult to address and can originate by various means. The lack of knowledge or education regarding fair housing laws and protections can sometimes serve as an impediment source for protected class members. This can include both those persons offering housing and persons seeking housing. Typically, a landlord's only sources of information regarding fair housing issues are general media reports, or possibly occasional housing presentations. Although many housing groups provide education to their members, not all of the landlords belong to these groups. This is holds especially holds true in the rural areas served by the State. Additionally, a vast majority of fair housing claims emanate from the two largest cities, thus indicating that residents in more remote communities (1) are less familiar with fair housing laws and complaint procedures; (2) are unwilling to travel the distances required to pursue action; and (3) perceive that the laws apply only to the metropolitan areas.

There have been many changes to fair housing law since 1968 and the information that many have been using may simply be out of date. The problem of outdated information affects not only private parties, but also has impacted some local government agencies charged with enforcing fair housing laws. Outdated information may result persons seeking housing to become victims of misinformation or result in a lack of information about their housing rights. It is difficult to combat housing discrimination if people who are discriminated against are not aware that the practice is illegal.

Action – *(Racial bias, Prejudice or Stereotyping)*

- ✓ **Action:** As stated before, while unlawful, prejudice and stereotyping can be the most pervasive and are difficult to correct. Bigotry is not hereditary but a learned behavior stemming from early childhood or through negative life experiences. Educational awareness as mentioned previously is the best available tool but it ultimately remains up to the individual to act upon the new behavior. The State will continue to train funding recipients to recognize housing discrimination or direct clients who encounter housing problems and then to refer them to agencies that can help them remedy the issue or file a complaint with HUD or the OHRC.

- ✓ **Action:** Community Action Agencies and/or other community-based non-profit organizations are encouraged to remain proactive in regard to fair housing. These agencies are more readily accessible at the local level and are key players in rural housing advocacy. These local resources are encouraged to develop media campaigns which recognize the most opportune methods of reaching rural citizens, such as weekly or bi-weekly newspapers, county extension programs, or posters at the county fairgrounds, for example. Such public relations efforts might emphasize the concept that fair housing is indeed an issue on a statewide basis and not just limited to the most highly populated areas.

- ✓ **Action:** The State is now using online survey technology as part of its overall public outreach strategy. This allows for a more direct method to reach rural Oklahoma in order to identify existing impediments. The initial results of using online survey methodology have been very promising. This online survey method provides many benefits over older postal mailing methods. First, emailing surveys or links to online survey questionnaires is very cost effective in an era of diminishing federal funding. Second, it is anticipated that the ease of use and accessibility to the survey will generate more responses than through previous postal mailing formats. The State sees this as a continually evolving process. As technology changes, survey delivery will adapt and change accordingly.

Additionally, the questions themselves will change and be refined based on previous survey responses. Simply put, there is a continuous learning curve built in which will allow improved targeting and provide for getting the most accurate fair housing related data possible.

- ✓ **Action:** Programs which are administered by ODOC all require that grantees certify their compliance with fair housing laws, regulations, and standards. Implementation manuals which accompany the programs include the following requirements in regard to fair housing provisions for state-funded jurisdictions. By contractual requirement; contractors shall administer the program to affirmatively further fair housing in compliance with Public Law 88-352, Public Law 90-284, and 24 CFR Part 570.601 and 570.904(c). Fair housing requirements apply to all communities irrespective of size, with or without minority residents. For each fiscal year the contractor has received a contract from ODOC, the contractor must provide documentation of the steps taken to affirmatively further fair housing.

  The following excerpt below is incorporated into the CDBG monitoring checklists. It verifies that grantees have met the following conditions in regards to fair housing.

  a. Does Grant Recipient have an Ordinance? _____or Resolution?_____
  Date: _____
  How Enforced? _____
  b. Have Complaints been received?_____
  Is there documentation describing process to handle discrimination complaints (i.e. complaint form)? _____
  c. Identify steps taken to further fair Housing (there must be one (1) step for each FY CDBG's have been received).
  Year _____ Step _____ Year _____ Step _____
  Year _____ Step _____ Year _____ Step _____
  d. Were CDBG funds expended to further fair housing? _____
  Findings/Comments:
  _____

XI. Fair Housing Act

HUD has played a lead role in administering the Fair Housing Act since its adoption in 1968. The 1988 amendments, however, have greatly increased the Department's enforcement role. First, the newly protected classes have proven significant sources of new complaints. Second, HUD's expanded enforcement role took the Department beyond investigation and conciliation into the area of mandatory enforcement.

Complaints filed with HUD are investigated by the Office of Fair Housing and Equal Opportunity (FHEO). If the complaint is not successfully conciliated, FHEO determines whether reasonable cause exists to believe that a discriminatory housing practice has occurred. Where reasonable cause is found, the parties to the complaint are notified by HUD's issuance of a Determination, as well as a Charge of Discrimination, and a hearing is scheduled before a HUD administrative law judge. Either party - complainant or respondent - may cause the HUD scheduled administrative proceeding to be terminated by electing instead to have the matter litigated in Federal court. Whenever a party has so elected, the Department of Justice takes over HUD's role as counsel seeking resolution of the charge on behalf of aggrieved persons, and the matter proceeds as a civil action. Either form of action – HUD's Administrative Law Judge's (ALJ) proceeding or the civil action in Federal court - is subject to review in the U.S. Court of Appeals.

Significant Recent Changes

The Housing for Older Persons Act of 1995 (HOPA) makes several changes to the 55 and older exemption. Since the 1988 Amendments, the Fair Housing Act has exempted from its familial status provisions properties that satisfy the Act's 55 and older housing condition.

First, it eliminates the requirement that 55 and older housing have "significant facilities and services" designed for the elderly. Second, HOPA establishes a "good faith reliance" immunity from damages for persons who in good faith believe that the 55 and older exemption applies to a particular property, if they do not actually know that the property is not eligible for the exemption and if the property has formally stated in writing that it qualifies for the exemption. HOPA retains the requirement that senior housing must have one person who is 55 years of age or older living in at least 80 percent of its occupied units. It also still requires that senior housing publish and follow policies and procedures that demonstrate housing intent for persons 55 and older.

An exempt property will not violate the Fair Housing Act if it includes families with children, but it does not have to do so. Of course, the property must meet the Act's requirements that at least 80 percent of its occupied units have at least one occupant who is 55 or older, and that it publish and follow policies and procedures that demonstrate intent for 55 and older housing.

A Department of Housing and Urban Development rule published in the April 2, 1999, Federal Register implements the Housing for Older Persons Act of 1995, and explains in detail those provisions of the Fair Housing Act that pertain to senior housing.
Changes were made to enhance law enforcement, including making amendments to criminal penalties in section 901 of the Civil Rights Act of 1968 for violating the Fair Housing Act.
Changes were made to provide incentives for self-testing by lenders for discrimination under the Fair Housing Act and the Equal Credit Opportunity Act. See Title II, subtitle D of the Omnibus Consolidated Appropriations Act, 1997, P.L. 104 - 208 (9/30/96).

What Housing Is Covered?

The Fair Housing Act covers most housing. In some circumstances, the Act exempts owner-occupied buildings with no more than four units, single-family housing sold or rented without the use of a broker, and housing operated by organizations and private clubs that limit occupancy to members.

Units Covered by the Fair Housing Act

The Fair Housing Act design and construction requirements apply to "covered multifamily dwellings" designed and constructed "for first occupancy" after March 13, 1991. A building was <u>not</u> designed or constructed for first occupancy if:

- It was occupied by March 13, 1991
- If the last building permit or renewal of a building permit was issued on or before June 15, 1990 Buildings where the last building permit was issued on or before June 15, 1990 are not covered by the design and construction requirements. Even if the last building permit was issued after June 15, 1990, if the property was occupied before March 13, 1991, it is not covered. HUD adopted these dates to allow time for the requirements to be considered during the design and construction phase of new properties.

The "first occupancy" language in the statute has been defined in HUD's Fair Housing Act regulations as "a building that has never before been used for any purpose." This means buildings that are rehabilitated

are not covered by the design and construction requirements even if the rehabilitation occurs after March 13, 1991 and even if it is substantial rehabilitation.

A dwelling unit includes:

- A single-family unit in buildings with four or more units
- An apartment
- A room in which people sleep even if they share kitchens or bathrooms, like transitional housing
- The design and construction requirements apply to "covered multifamily dwellings". Covered multifamily dwellings are:
- All dwelling units in buildings containing four or more dwelling units if the buildings have one or more elevators AND
- All ground floor units in other buildings containing four or more units, without an elevator.
  This includes housing that is for rental or for sale and applies whether the housing is privately or publicly funded.

Condominiums and apartment buildings are covered by the design and construction requirements. So are time-shares, dormitories, transitional housing, homeless shelters that are used as a residence, student housing, assisted living housing, and others.

What Is Prohibited?

In the Sale and Rental of Housing: No one may take any of the following actions based on race, color, national origin, religion, sex, familial status or handicap:

- Refuse to rent or sell housing
- Refuse to negotiate for housing
- Make housing unavailable
- Deny a dwelling
- Set different terms, conditions or privileges for sale or rental of a dwelling
- Provide different housing services or facilities
- Falsely deny that housing is available for inspection, sale, or rental
- For profit, persuade owners to sell or rent (blockbusting) or
- Deny anyone access to or membership in a facility or service (such as a multiple listing service) related to the sale or rental of housing.

In Mortgage Lending: No one may take any of the following actions based on race, color, national origin, religion, sex, familial status or handicap (disability):

- Refuse to make a mortgage loan
- Refuse to provide information regarding loans
- Impose different terms or conditions on a loan, such as different interest rates, points, or fees
- Discriminate in appraising property
- Refuse to purchase a loan or
- Set different terms or conditions for purchasing a loan.

In Addition: It is illegal for anyone to:

- Threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise that right
- Advertise or make any statement that indicates a limitation or preference based on race, color, national origin, religion, sex, familial status, or handicap. This prohibition against discriminatory advertising applies to single-family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.

Additional Protection if You Have a Disability

If you or someone associated with you:

- Have a physical or mental disability (including hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex and mental retardation) that substantially limits one or more major life activities
- Have a record of such a disability or
- Are regarded as having such a disability

your landlord ***may not*:**

- Refuse to let you make reasonable modifications to your dwelling or common use areas, at your expense, if necessary for the disabled person to use the housing. (Where reasonable, the landlord may permit changes only if you agree to restore the property to its original condition when you move.)
- Refuse to make reasonable accommodations in rules, policies, practices or services if necessary for the disabled person to use the housing.
  Example: A building with a "no pets" policy must allow a visually impaired tenant to keep a guide dog.
  Example: An apartment complex that offers tenants ample, unassigned parking must honor a request from a mobility-impaired tenant for a reserved space near her apartment if necessary to assure that she can have access to her apartment.

However, housing need not be made available to a person who is a direct threat to the health or safety of others or who currently uses illegal drugs.

General Fair Housing Requirements

In order to be in compliance with the Fair Housing Act, there are seven basic *design and construction requirements* that must be met. These requirements are:

1. An accessible building entrance on an accessible route

All covered multifamily dwellings must have at least one accessible building entrance on an accessible route unless it is impractical to do so because of the terrain or unusual characteristics of the site.

An accessible route means a continuous, unobstructed path connecting accessible elements and spaces within a building or site that can be negotiated by a person with a disability who uses a wheelchair, and that is also safe for and usable by people with other disabilities.

An accessible entrance is a building entrance connected by an accessible route to public transit stops, accessible parking and passenger loading zones, or public streets and sidewalks.

2. Accessible public and common use areas.

Covered housing must have accessible and usable public and common-use areas. Public and common-use areas cover all parts of the housing outside individual units. They include -- for example -- building-wide fire alarms, parking lots, storage areas, indoor and outdoor recreational areas, lobbies, mailrooms and mailboxes, and laundry areas.

3. Usable doors (usable by a person in a wheelchair).

All doors that allow passage into and within all premises must be wide enough to allow passage by persons using wheelchairs.

4. Accessible route into and through the dwelling unit.

There must be an accessible route into and through each covered unit.

5. Light switches, electrical outlets, thermostats and other environmental controls in accessible locations.

Light switches, electrical outlets, thermostats and other environmental controls must be in accessible locations.

6. Reinforced walls in bathrooms for later installation of grab bars.

Reinforcements in bathroom walls must be installed, so that grab bars can be added when needed. The law does not require installation of grab bars in bathrooms.

7. Usable kitchens and bathrooms.

Kitchens and bathrooms must be usable - that is, designed and constructed so an individual in a wheelchair can maneuver in the space provided.These requirements for new buildings do not replace any more stringent standards in State or local law.

Housing Opportunities for Families

Unless a building or community qualifies as housing for older persons, it may not discriminate based on familial status. That is, it may not discriminate against families in which one or more children under 18 live with:

- A parent
- A person who has legal custody of the child or children or the designee of the parent or legal custodian, with the parent or custodian's written permission.

Familial status protection also applies to pregnant women and anyone securing legal custody of a child under 18.

Exemption: Housing for older persons is exempt from the prohibition against familial status discrimination if:

The HUD Secretary has determined that it is specifically designed for and occupied by elderly persons under a Federal, State or local government program; or it is occupied solely by persons who are 62 or

older; or it houses at least one person who is 55 or older in at least 80 percent of the occupied units and adheres to a policy that demonstrates intent to house persons who are 55 or older.

A transition period permits residents on or before September 13, 1988, to continue living in the housing, regardless of their age, without interfering with the exemption.

XII. Fair Housing Enforcement and Advocacy

Housing discrimination based on your race, color, national origin, religion, sex, family status, or disability is illegal by federal law. Anyone who has been trying to buy or rent a home or apartment and believes their rights have been violated may file a fair housing complaint. Fair Housing enforcement will be examined at both the State and Federal level.

A. State Level Fair Housing Enforcement

In 1968, following the enactment of the Federal Fair Housing Act, the Oklahoma State Legislature adopted its initial Fair Housing Law. This law directed the Oklahoma Human Rights Commission (OHRC) to administer all fair housing related issues for the state. Subsequently, the Oklahoma law has been amended several times, most significantly in 1991, at which time Oklahoma's Fair Housing Law became substantially equivalent to the Federal Fair Housing Amendments Act of 1988.

The Oklahoma Fair Housing Law (Title 25, article 4A, Section 1451 through article 5, Section 1508) prohibits discrimination in the rental, sales, financing, appraisal, insurance of housing and other housing-related transactions based on the following categories or "protected classes" including race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and handicap (disability). The Oklahoma Fair Housing Law also has "Age" as a "protected class".

The Oklahoma Office of the Attorney General is the state agency empowered to enforce the Oklahoma Fair Housing Law through the Office of Civil Rights Enforcement (OCRE). To file a complaint under the state fair housing law, call (405) 521-2029, or download the applicable employment, housing, or public accommodation related complaint form at http://oag.publishpath.com/.

Upon receipt of a filed complaint, the OCRE reviews the complaint to determine if it was timely filed and if it states a legal claim that warrants investigation. If it is untimely or fails to state a valid legal claim, OCRE will issue a notice of dismissal.

If the complaint is timely and states a valid claim, the OCRE must send a copy of the complaint to the respondent, which is the party accused of wrongdoing. The OCRE will also promptly assign an investigator to investigate the complaint. The investigator will contact the complainant as soon as possible to assist the complainant in preparing a formal “Charge of Discrimination.” A Charge of Discrimination is a legal document signed by the complainant under oath that summarizes the complainant’s factual allegations and legal claims.

The OCRE will send a copy of the Charge of Discrimination to each respondent. The OCRE will also request that the respondent submit a “statement of position” in response to the complainant’s allegations and claims, along with evidence that supports the respondent’s position.

The investigator will interview witnesses identified by the complainant and the respondent; will gather evidence from the complainant, respondent, and other relevant sources; will analyze the evidence; and will determine whether there is reasonable cause to believe discrimination occurred.

Once the investigator has made a determination, the parties will receive notice of the determination. If the investigator finds there is not sufficient evidence to conclude there is reasonable cause to believe discrimination occurred, then the parties will receive notice of dismissal of the complaint.

If the OCRE finds that the evidence establishes reasonable cause to believe discrimination occurred, the OCRE will notify the parties of its determination. At that point, the OCRE may issue the parties notice of the complainant's right to file suit in State court or the OCRE may elect to file its own enforcement action to obtain appropriate relief on behalf of the State of Oklahoma and the victim of discrimination.

At any time in during the investigative process, the parties may attempt to settle the complaint through free conciliation or mediation facilitated by the OCRE and the Attorney General's Office. By law, the OCRE must review and approve the terms and conditions of all settlement agreements entered into by the parties.

B. Private Non-Profit Fair Housing Enforcement and Advocacy

Metropolitan Fair Housing Council of Oklahoma, Inc.

Since 1979, the Metropolitan Fair Housing Council (MFHC) has served as a qualified, full-service, private non-profit, 501(c)(3) fair housing enforcement and advocacy organization serving alleged victims of housing discrimination as their fair housing advocate in the state of Oklahoma. MFHC's founder, the late Kathleen A. (Kathy) Silovsky and a group of housing rights activists in Oklahoma established MFHC in 1978, after participating in a national audit to measure housing discrimination practices titled "Measuring Racial Discrimination in American Housing, the Housing Market Practices Study." Kathy was hired to supervise the audit or study in the greater metropolitan Oklahoma City Statistical Area OKC/MSA), which was one of 40 sites chosen by HUD. As a result of the findings of the HUD Audit that showed a disparity in treatment in rental and sales practices based on race (Black) in the metropolitan Oklahoma City MSA, the Urban League Housing Sub-Committee attempted to establish a fair housing organization to address housing discrimination by opening the Urban League Housing Assistance Program (ULHAP) from September to December 1977. Unable to secure fair housing funding, ULHAP closed its doors in January 1978 while the Urban League continued on with its housing counseling services. Kathy however, continued as well on her fight for equal and open housing by founding MFHC.

In August 1978, Kathy was chosen as Executive Director and on and on December 12, 1978 MFHC submitted Articles of Incorporation and By-Laws to the Oklahoma Office of Secretary of State for certification. In May 1979, MFHC received approval from the Internal Revenue Service as a 501 (c)(3) private non-profit fair housing enforcement and advocacy organization and began fair housing operation primarily in central Oklahoma with Kathy in the leadership role until October 1987, when she joined HUD's Oklahoma City Office of Fair Housing & Equal Opportunity as an Equal Opportunity Specialist.

In 2009, MFHC amended its name to Metropolitan Fair Housing Council of Oklahoma, Inc., to reflect its ability to provide fair housing advocacy throughout the state of Oklahoma, thanks to funding from a HUD Fair Housing Initiatives Program, Private Enforcement Initiatives grant.

MFHC has worked to "affirmatively further fair housing" by providing fair housing enforcement remedies to consumers in Oklahoma, including providing counseling on rights and remedies under the Fair Housing Act (FHA) - Title VIII of the Civil Rights Act of 1968 (1988 Amendments) and other federal and state housing

acts and executive orders. MFHC is led by a diverse and long-serving board of directors and a team of diverse, trained fair housing staff.

MFHC conducts fair housing testing and other evidence gathering methods during investigations of allegations of unfair housing practices and serves as the alleged victim's advocate by filing Housing Discrimination Complaints/Enforcement Proposals with HUD under the FHA and/or providing legal resources including mediation and litigation through our law department. For almost forty (40) years, MFHC has responded to complaints of unfair treatment by housing providers from low-income persons, the elderly, the disabled, families with children, LGBT persons, minorities, persons with English as a second language and historically segregated and underserved persons from low-opportunity areas throughout Oklahoma.

The Cities of Oklahoma City, Edmond, Moore, Norman and Midwest City are (5) five Oklahoma CDBG Entitlement cities that support the need for fair housing enforcement and equal opportunity advocacy by funding MFHC under their CDBG grants to eliminate barriers to fair housing choice as reflected in their Consolidated Plans and Analysis of Impediments to Fair Housing Choice.

HUD is a "facially neutral third-party" and does not serve as advocate for the Complaining Party (CP) or alleged victim of housing discrimination. MFHC, as the advocate, assists alleged victims through conducting fair housing testing (where volunteers pose as persons needing to rent or buy a dwelling), systemic and complaint-based investigations, fair housing counseling with the alleged victim, filing complaints with HUD where we serve as their fair housing advocate throughout the HUD process, as Complaining Parties (CP) generally do not have financial access to attorneys and we provide legal resources through our Cooperating Attorney Referral Program, where attorneys in private practice agree to accept a claim of housing discrimination for litigation. MFHC serves as the "link" in bringing fair housing enforcement to underserved communities and underserved persons.

Metropolitan Fair Housing Council of Oklahoma, Inc.

Address: 312 NE 28th Street, Suite 112,
Oklahoma City, OK 73105

Telephone: Local (405) 232-3247
Toll Free 1-866-677-7541

Website: www.metrofairhousing.org

MFHC's Enforcement Activities (FY 2004 to Current)

- MFHC staff processed thirteen thousand seven-hundred sixty-five (13,765) Housing Complaint Intakes/Inquiries from consumers throughout the state of Oklahoma with complaints of unfair treatment in a housing-related transaction. Fair housing intakes/inquiries receive fair housing counseling, investigation by MFHC enforcement staff to establish standing under the FHA and other laws, processed and referred in-house for Fair Housing Testing, preparation and submission of Requests for Reasonable Accommodation or Reasonable Modification to housing providers (landlords) for disabled persons. Bona Fide Complaints were filed with HUD FHEO and/or referred to an MFHC Cooperating Attorney for litigation efforts or other remedies covered under the FHA. MFHC provides fair housing counseling through individual telephone sessions or through walk-in counseling sessions.

- MFHC staff filed more than seven hundred forty-seven (747) Housing Discrimination Complaints on behalf of Oklahomans alleging unfair treatment in a housing-related transaction with HUD FHEO for processing under the FHA and other applicable laws. MFHC serves as the fair housing representative for the Complaining Party (CP) until resolution.

- MFHC's enforcement efforts have secured more than one million ninety-nine thousand, nine-hundred sixty-four dollars ($1,099,964.00) in Monetary Recovery for victims of housing discrimination. This number includes $850,000.00 through litigation conducted by MFHC Cooperating Attorneys, $138,698 through HUD Conciliations (Settlements) and $111,266.00 through mediations conducted by MFHC staff. MFHC Cooperating Attorneys recover their fees from the lawsuit. The MFHC Legal Revolving Fund (LRF) is available to cooperating attorneys to assist with costs associated with litigation, with fund reimbursement to the LRF upon successful recovery. MFHC's Law Clerks assist MFHC Cooperating Attorneys with legal research upon request.

- MFHC staff recruited and trained four hundred sixty-one (461) diverse volunteers to serve as fair housing testers during the investigation of housing discrimination complaints. Those volunteers conducted more than one-thousand three-hundred (1300) fair housing tests.

- MFHC staff prepared and submitted more than seven-hundred (700) Requests for Reasonable Accommodation or Reasonable Modification to housing providers (landlords) for disabled persons to allow them equal opportunity to use and enjoy their dwelling and prevent homelessness. Section 804(f)(3)(B) of the Fair Housing Act defines one type of discrimination against disabled persons as "a refusal to make reasonable accommodations in rules, policies, practices or services, when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling..." In summary, a housing provider is required by federal law to make reasonable accommodations in rules, policies, and procedures, to allow disabled persons equal opportunity to use and enjoy their dwelling. Section 804(f)(3)(A) of the Fair Housing Act requires a housing provider to allow a disabled tenant, at their expense, to make reasonable modifications of existing premises if they may be necessary to afford such person full enjoyment of the premises or dwelling. Modification means a change to a structure that will allow physical access to a person with a disability. This requirement is applicable to the interior of a disabled person's dwelling as well as public and common use areas of an apartment complex. Such modifications may be requested at any time; it is not necessary that they be requested at the beginning of a tenancy. Note: The Fair Housing Act makes clear that such modifications will be the financial responsibility of the disabled person making the request. A person seeking reasonable modifications must seek approval from their housing provider before making the modifications. In addition, a housing provider can require the following before approving the modification.

<u>MFHC's Fair Housing Education and Outreach Activities</u>

- Fair Housing Month Events: - Oklahomans celebrated the 50th Anniversary of the Civil Rights Act of 1968 (the Fair Housing Act) at the fourth annual Fair Housing & Health Equity and Regional Housing Forum on April 19, 2018 at the Oklahoma History Center in Oklahoma City and in Enid, Oklahoma at the Central National Bank Event Center on May 17, 2018. The Oklahoma Health Equity Network, Metropolitan Fair Housing Council, Progressive Independence Center for Independent Living, the Oklahoma Coalition for Affordable Housing and the City of Enid, Oklahoma Community Development Department partnered to produce the training events, along with the Tulsa Area Fair Housing Partnership which produced a Fair Housing FIRST Accessibility Policy Training in Tulsa on May 1, 2018. A collaboration of Oklahoma public and private groups,

organizations and government departments served as partners or sponsors of these free regional housing forums, including the Community Development Block Grant Programs (CDBG) from the Cities of Oklahoma City, Norman, Edmond, Midwest City, and Moore, Oklahoma, the Oklahoma Housing Finance Agency, Oklahoma City Housing Authority, Neighborhood Housing Services, Community Action Agencies of Oklahoma City and Oklahoma & Canadian Counties, Hispanic Chamber of Commerce, Project G.R.A.C.E., Oklahoma Chapter of the National Association of Housing & Redevelopment Officials (NAHRO), Oklahoma Public Health Association, Midwest City-Del City-Moore Board of REALTORS, Central Oklahoma Commercial Association of REALTORS, Midwest Housing Equity Group, SDG Architects, Humphrey Abstract, LW Architects, Northwest Oklahoma Association of REALTORS, Oklahoma City Branch NAACP, Prime Lending, Guarantee Abstract, DeBruler, Inc., Legal Aid Services of Oklahoma, Tulsa Area Fair Housing Partnership and Civil Rights Enforcement Unit Office of the Oklahoma Attorney General.

- MFHC conducts fair housing-fair lending training at first-time homebuyer's workshops presented by the Oklahoma Housing Finance Agency, Community Action Agency of Oklahoma and Canadian County and Neighborhood Housing Services.

- MFHC conducts fair housing training to landlords participating in Section 8 (Housing Choice Voucher Program) presented by the Oklahoma Housing Finance Agency, Oklahoma City Housing Authority, and the Tulsa Housing Authority. MFHC also conducts fair housing educational seminars for consumers and recipients or holders of Section 8 Vouchers and residents in public housing to advise them on their housing rights and remedies under state and federal laws.

- MFHC began as a community-based organization and we conduct fair housing educational workshops in partnership with community organizations, social service and faith-based organizations. MFHC also partners with organizations such as the Oklahoma Coalition for Affordable Housing and the Oklahoma National Association of Redevelopment Officials (NAHRO) to provide fair housing education to those involved in the housing industry to prevent housing discrimination claims.

C. Federal Level Fair Housing Enforcement

From a federal perspective, HUD is committed to assist with any problem involving housing discrimination. Complaints filed with HUD are investigated by the Office of Fair Housing and Equal Opportunity (FHEO). If the complaint is not successfully conciliated, the FHEO determines whether reasonable cause exists to believe that a discriminatory housing practice has occurred. Anyone who believes their rights have been violated has several options available in which to file a complaint. Those who feel that they have been discriminated against may complete an online complaint form and submit, or write HUD a letter, or simply telephone the HUD office nearest to them. Regardless of the method of contact, all complaints must be filed on later than one year after an alleged violation. HUD encourages all complaints to be filed it as soon as possible.

The following information was taken directly from HUD's website located at: www.hud.gov and outlines HUD's Fair Housing complaint process.

Required Information by HUD:

- Name and address (Your contact Information)
- The name and address of the person the complaint is against (the respondent)
- The address or other identification to the housing involved

- A short description to the alleged violation (the event that caused you to believe your rights were violated)
- The date(s) of the alleged violation

Contact Information:

Send the Housing Discrimination Complaint form or a letter to the nearest HUD office or call that office directly. For Oklahoma, Arkansas, Louisiana, New Mexico, and Texas:

Fort Worth Regional Office of FHEO
US Department of Housing and Urban Development
801 Cherry Street, Unit #45 Suite 2500
Fort Worth, Texas 76102
Telephone - (817) 978-5900, Toll Free 1-800-669-9777 or TTY (817) 978-5595

Disabled Contact Information:

HUD also provides a toll-free TTY phone for the hearing impaired: 1-800-927-9275. HUD can provide interpreters along with furnishing tapes and Braille materials as required.

Complaint Process:

HUD will notify you when it receives your complaint. Normally, HUD also will:

- Notify the alleged violator of your complaint and permit that person to submit an answer
- Investigate your complaint and determine whether there is reasonable cause to believe the Fair Housing Act has been violated
- Notify you if it cannot complete an investigation within 100 days of receiving your complaint

Conciliation

HUD will try to reach an agreement with the person your complaint is against (the respondent). A conciliation agreement must protect both you and the public interest. If an agreement is signed, HUD will take no further action on your complaint. However, if HUD has reasonable cause to believe that a conciliation agreement is breached, HUD will recommend that the Attorney General file suit.

Complaint Referrals

If HUD has determined that your State or local agency has the same fair housing powers as HUD, HUD will refer your complaint to that agency for investigation and notify you of the referral. That agency must begin work on your complaint within 30 days or HUD may take it back.

What if You Need Help Quickly?

If you need immediate help to stop a serious problem that is being caused by a Fair Housing Act violation, HUD may be able to assist you as soon as you file a complaint. HUD may authorize the Attorney General to go to court to seek temporary or preliminary relief, pending the outcome of your complaint, if:

- Irreparable harm is likely to occur without HUD's intervention
- There is substantial evidence that a violation of the Fair Housing Act occurred

Example: A builder agrees to sell a house but, after learning the buyer is black, fails to keep the agreement. The buyer files a complaint with HUD. HUD may authorize the Attorney General to go to court to prevent a sale to any other buyer until HUD investigates the complaint.

What Happens after a Complaint Investigation?

If, after investigating your complaint, HUD finds reasonable cause to believe that discrimination occurred, it will inform you. Your case will be heard in an administrative hearing within 120 days, unless you or the respondent wants the case to be heard in Federal district court. Either way, there is no cost to you.

The Administrative Hearing:

If your case goes to an administrative hearing HUD attorneys will litigate the case on your behalf. You may intervene in the case and be represented by your own attorney if you wish. An Administrative Law Judge (ALA) will consider evidence from you and the respondent. If the ALA decides that discrimination occurred, the respondent can be ordered:

- To compensate you for actual damages, including humiliation, pain and suffering.
- To provide injunctive or other equitable relief, for example, to make the housing available to you.
- To pay the Federal Government a civil penalty to vindicate the public interest. The maximum penalties are $16,000 for a first violation and $65,000 for a third violation within seven years.
- To pay reasonable attorney's fees and costs.

Federal District Court

If you or the respondent chooses to have your case decided in Federal District Court, the Attorney General will file a suit and litigate it on your behalf. Like the ALA, the District Court can order relief, and award actual damages, attorney's fees and costs. In addition, the court can award punitive damages.

You May File Suit: You may file suit, at your expense, in Federal District Court or State Court within two years of an alleged violation. If you cannot afford an attorney, the Court may appoint one for you. You may bring suit even after filing a complaint, if you have not signed a conciliation agreement and an Administrative Law Judge has not started a hearing. A court may award actual and punitive damages and attorney's fees and costs.

Other Tools to Combat Housing Discrimination:

If there is noncompliance with the order of an Administrative Law Judge, HUD may seek temporary relief, enforcement of the order or a restraining order in a United States Court of Appeals.
The Attorney General may file a suit in a Federal District Court if there is reasonable cause to believe a pattern or practice of housing discrimination is occurring.

XIII. Fair Housing Laws & Executive Orders:

A. Fair Housing Laws

Fair Housing Act

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national

origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and handicap (disability).

Title VI of the Civil Rights Act of 1964

Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.

Section 504 of the Rehabilitation Act of 1973

Section 504 prohibits discrimination based on disability in any program or activity receiving federal financial assistance.

Section 109 of Title I of the Housing and Community Development Act of 1974

Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs and activities receiving financial assistance from HUD's Community Development and Block Grant Program.

Title II of the Americans with Disabilities Act of 1990

Title II prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

Architectural Barriers Act of 1968

The Architectural Barriers Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 must be accessible to and useable by handicapped persons.

Age Discrimination Act of 1975

The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.

Title IX of the Education Amendments Act of 1972

Title IX prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance.

B. Fair Housing Related Presidential Executive Orders:

Executive Order 11063

Executive Order 11063 prohibits discrimination in the sale, leasing, rental, or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.

Executive Order 11246

Executive Order 11246, as amended, bars discrimination in federal employment because of race, color, religion, sex, or national origin.

Executive Order 12892

Executive Order 12892, as amended, requires federal agencies to affirmatively further fair housing in their programs and activities, and provides that the Secretary of HUD will be responsible for coordinating the effort. The Order also establishes the President's Fair Housing Council, which will be chaired by the Secretary of HUD.

Executive Order 12898

Executive Order 12898 requires that each federal agency conduct its program, policies, and activities that substantially affect human health or the environment in a manner that does not exclude persons based on race, color, or national origin.

Executive Order 13166

Executive Order 13166 eliminates, to the extent possible, limited English proficiency as a barrier to full and meaningful participation by beneficiaries in all federally-assisted and federally conducted programs and activities.

Executive Order 13217

Executive Order 13217 requires federal agencies to evaluate their policies and programs to determine if any can be revised or modified to improve the availability of community-based living arrangements for persons with disabilities.

XIV. Final Comments

The various data and survey results presented earlier in this AI clearly demonstrate that Oklahoma needs additional affordable housing and this especially holds true for the protected classes. Given this, the Federal government should, as a minimum, seek to maintain current program funding levels if not to increase program funding. Understandably, given the nation's debt crisis and continual budgetary issues, the hope for additional funding is probably not a reality in the foreseeable future. Identification of housing needs and Fair Housing impediments serves little purpose if adequate funding is not available to address such issues.

It has been identified that both the Oklahoma Department of Commerce (ODOC) and Oklahoma Housing Finance Authority (OHFA) have limited authority within the State of Oklahoma's governmental structure. Both ODOC and OHFA have no direct fair housing enforcement capacity. As indicated earlier in this AI, the State of Oklahoma Attorney General's Office has the responsibility for fair housing enforcement within the State. Therefore, the identification of impediments to fair housing choice and plan of action is limited to those areas that are within ODOC's and OHFA's jurisdiction. However, within the parameters that ODOC and OHFA operate, both ODOC and OHFA are working and will continue to work in order to improve Fair Housing Choice in Oklahoma.

Given the limited enforcement authority and diminishing federal and state funding resources as discussed earlier, local officials and residents living in rural communities throughout Oklahoma must come to terms

with the realization that they also play a pivotal role in regard to housing issues within their respective rural communities. Local officials need to foster the development of comprehensive affordable housing strategies and need to encourage their respective residents to work together in order to address housing shortfalls. Ultimately this will provide for a better identification of community needs and resources, reliable data collection, community backing to deter NIMBYism (Not In My Backyard) through complete public access to the decision-making process, and participation of citizens at various levels.

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APPENDIX – A

Oklahoma Association of Community Action Agencies:

Big Five Community Services 1502 N. First St. P.O. Box 1577 Durant, OK 74702 (580) 924-5331 Fax: (580) 920-2004 www.bigfive.org Counties Served: Bryan, Carter, Coal, Love and Pontotoc	**Community Action Resource & Development** 522 W. Will Rogers P.O. Box 947 Claremore, OK 74018 (918) 341-5000 Fax: (918) 343-3663 www.cardcaa.org Counties Served: Mayes, Rogers, Nowata, Wagoner and Washington	**Delta Community Action Foundation** 308 S.W. 2nd Lindsay, OK 73052 (405) 756-1100 Fax: (405) 756-1104 Counties Served: Garvin, McClain and Stephens	**Northeast Oklahoma Community Action Agency** 856 E. Melton Dr., Suite C P.O. Box 603 Jay, OK 74346 (918) 253-4683 Fax: (918) 253-6059 www.neocaa.org Counties Served: Craig, Delaware and Ottawa
Central Oklahoma Community Action Agency 429 N. Union P.O. Box 486 Shawnee, OK 74802 (405) 275-6060 Fax: (405 214-4326 www.cocaa.org Counties Served: Cleveland, Lincoln, Logan, Payne, Pottawatomie and Seminole	**Community Development Support Association** 2615 E. Randolph Enid, OK 73701 (580) 242-6131 Fax: (580) 242-3554 Counties Served: Garfield and Grant	**Great Plains Improvement Foundation** 2 S.E. Lee P.O. Box 926 Lawton, OK 73502 (580) 353-2364 Fax: (580) 353-1952 www.gpif-caa.org County Served: Comanche	**Opportunities, Inc.** 117 E. Russworm P.O. Box 569 Watonga, OK 73772 (580) 623-7283 Fax: (580) 623-7290 www.opportunities-inc.org Counties Served: Alfalfa, Beaver, Blaine, Cimarron, Custer, Dewey, Ellis, Harper, Kingfisher, Major, Texas, Woods and Woodward
Community Action Agency of Oklahoma City and Oklahoma/Canadian Counties 319 S.W. 25th Oklahoma City, OK 73109 (405) 232-0199 Fax: (405) 232-9074 www.caaofokc.org Counties Served: Canadian and Oklahoma	**Cooksons Hills Community Action Foundation** 212 S. Water P.O. Box 745 Tahlequah, OK 74464 (918) 456-0571 Fax: (918) 456-6847 www.cooksonhillscommunityaction.com Counties Served: Adair, Cherokee and Sequoyah	**INCA Community Services** 202. S. Capitol St., Suite 2 P.O. Box 68 Tishomingo, OK 73460 (580) 371-2352 Fax: (580) 371-0277 Counties Served: Atoka, Johnston, Marshall and Murray	**Southwest Oklahoma Community Action Group** 900 S. Carver Rd. P.O. Drawer 1088 Altus, OK 73521 (580) 482-5040 Fax: (580) 482-5433 www.geocities.com/socag2004/ Counties Served: Greer, Harmon and Jackson
Community Action Development Corporation 105 S. Main St. P.O. Box 989 Frederick, OK 73542 (580) 335-5588 Fax: (580) 335-3092 www.cadcconnection.com Counties Served: Beckham, Cotton, Jefferson, Kiowa, Roger Mills, Tillman and Washita	**Deep Fork Community Action Foundation** 223 W. 6th St. P.O. Box 670 Okmulgee, OK 74447 (918) 756-2826 Fax: (918) 756-6829 www.deepforkcommunityaction.org Counties Served: Hughes, McIntosh, Okfuskee and Okmulgee	**KI BOIS Community Action Foundation** 200 S.E. A St. P.O. Box 727 Stigler, OK 74462 (918) 967-3325 Fax: (918) 967-8660 www.kibois.org Counties Served: Haskell, Latimer, LeFlore and Pittsburg	**United Community Action Program** 501 Sixth St. Pawnee, OK 74058 (918) 762-3041 Fax: (918) 762-3418 Counties Served: Creek, Kay, Noble, Osage and Pawnee
Little Dixie Community Action Agency 209 N. 4th	**Washita Valley Community Action Council** 205 W. Chickasha Ave.	**Oklahoma Association of Community Action Agencies**	

Hugo, OK 74743 (580) 326-3351 Fax: (580) 326-2305 www.littledixie.org Counties Served: Choctaw, McCurtain and Pushmataha	P.O. Box 747 Chickasha, OK 73023 (405) 224-5831 Fax: (405) 222-4303 www.washitavalleycac.com Counties Served: Caddo and Grady	2800 N.W. 36th St., Suite 221 Oklahoma City, OK 73112 (405) 949-1495 Fax: (405) 949-0955 www.okacaa.org	

APPENDIX – B

Oklahoma Population of Race & Ethnicity by County

Geography	Population By Race							Hispanic Ethnicity		
	Total Population	White Alone	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some Other Race alone	Total Population	Hispanic or Latino	Not Hispanic or Latino:
Oklahoma	3,751,351	2,706,845	277,644	321,687	65,076	4,369	154,409	3,751,351	332,007	3,419,344
Incorporated Cities & Towns	2,856,936	2,017,344	263,621	203,111	60,662	4,022	142,326	2,856,936	299,845	2,557,091
Unincorporated	894,415	689,501	14,023	118,576	4,414	347	12,083	894,415	32,162	862,253
Adair	22,683	9,757	55	9,823	130	1	532	22,683	1,197	21,486
Alfalfa	5,642	5,042	229	162	14	-	75	5,642	224	5,418
Atoka	14,182	10,460	529	1,964	55	7	158	14,182	409	13,773
Beaver	5,636	4,664	44	61	7	-	686	5,636	1,135	4,501
Beckham	22,119	18,805	876	615	178	2	1,017	22,119	2,619	19,500
Blaine	11,943	9,518	313	950	26	3	681	11,943	2,873	9,070
Bryan	42,416	32,316	652	5,492	217	11	732	42,416	2,107	40,309
Caddo	29,600	18,668	820	7,262	72	14	977	29,600	2,995	26,605
Canadian	115,541	96,058	2,933	5,549	3,483	70	2,696	115,541	7,794	107,747
Carter	47,557	35,380	3,208	4,249	506	9	1,066	47,557	2,528	45,029
Cherokee	46,987	24,567	598	15,987	272	16	1,248	46,987	2,952	44,035
Choctaw	15,205	9,866	1,658	2,504	41	-	126	15,205	427	14,778
Cimarron	2,475	2,097	6	19	8	-	300	2,475	514	1,961
Cleveland	255,755	202,811	10,848	11,978	9,698	188	5,974	255,755	17,892	237,863
Coal	5,925	4,402	29	990	10	-	32	5,925	152	5,773
Comanche	124,098	79,996	21,669	7,266	2,777	686	3,671	124,098	13,896	110,202
Cotton	6,193	5,035	128	551	13	13	115	6,193	344	5,849
Craig	15,029	10,017	449	3,061	105	17	108	15,029	370	14,659
Creek	69,967	55,764	1,544	7,001	230	45	734	69,967	2,152	67,815
Custer	27,469	21,456	831	1,742	277	12	2,081	27,469	3,830	23,639
Delaware	41,487	27,811	92	9,277	519	30	450	41,487	1,248	40,239

Geography	Population By Race							Hispanic Ethnicity		
	Total Population	White Alone	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some Other Race alone	Total Population	Hispanic or Latino	Not Hispanic or Latino:
Dewey	4,810	4,285	16	277	33	-	47	4,810	231	4,579
Ellis	4,151	3,920	11	67	8	-	77	4,151	251	3,900
Garfield	60,580	50,807	1,811	1,377	588	1,101	2,760	60,580	5,353	55,227
Garvin	27,576	22,462	705	2,156	103	7	778	27,576	1,713	25,863
Grady	52,431	44,994	1,268	2,841	196	36	792	52,431	2,405	50,026
Grant	4,527	4,210	35	85	9	1	77	4,527	158	4,369
Greer	6,239	5,181	441	167	11	6	212	6,239	609	5,630
Harmon	2,922	2,138	210	39	12	-	402	2,922	756	2,166
Harper	3,685	3,219	3	28	6	1	344	3,685	645	3,040
Haskell	12,769	9,560	56	2,029	68	2	155	12,769	426	12,343
Hughes	14,003	9,543	742	2,549	28	6	201	14,003	530	13,473
Jackson	26,446	19,255	1,985	479	312	56	3,075	26,446	5,538	20,908
Jefferson	6,472	5,461	42	400	22	-	245	6,472	552	5,920
Johnston	10,957	8,015	212	1,702	27	1	129	10,957	423	10,534
Kay	46,562	37,332	962	4,486	235	16	1,190	46,562	2,992	43,570
Kingfisher	15,034	12,707	170	465	42	-	1,176	15,034	2,022	13,012
Kiowa	9,446	7,573	401	622	30	3	397	9,446	832	8,614
Latimer	11,154	7,825	83	2,279	31	1	71	11,154	293	10,861
Le Flore	50,384	37,827	1,034	6,180	265	24	2,035	50,384	3,454	46,930
Lincoln	34,273	29,426	615	2,218	65	12	203	34,273	838	33,435
Logan	41,848	33,886	3,804	1,380	195	20	839	41,848	2,170	39,678
Love	9,423	7,426	168	586	45	-	736	9,423	1,113	8,310
Major	7,527	6,846	33	149	26	3	281	7,527	565	6,962
Marshall	15,840	11,690	245	1,533	29	1	1,391	15,840	2,212	13,628
Mayes	41,259	28,044	169	8,823	147	16	327	41,259	1,097	40,162
McClain	34,506	29,168	239	2,218	127	9	929	34,506	2,400	32,106
McCurtain	33,151	22,259	2,894	5,017	112	4	807	33,151	1,552	31,599
McIntosh	20,252	14,238	647	3,756	68	7	87	20,252	390	19,862

Geography	Population By Race							Hispanic Ethnicity		
	Total Population	White Alone	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some Other Race alone	Total Population	Hispanic or Latino	Not Hispanic or Latino:
Murray	13,488	10,515	178	1,638	48	8	262	13,488	662	12,826
Muskogee	70,990	42,467	8,030	12,403	396	24	1,829	70,990	3,688	67,302
Noble	11,561	9,740	204	984	45	7	104	11,561	300	11,261
Nowata	10,536	7,267	208	2,016	7	3	54	10,536	240	10,296
Okfuskee	12,191	7,848	1,009	2,401	20	15	100	12,191	356	11,835
Oklahoma	718,633	464,387	110,890	25,119	21,454	780	57,946	718,633	108,543	610,090
Okmulgee	40,069	26,366	3,501	6,526	131	6	321	40,069	1,293	38,776
Osage		31,327	5,401	6,858	133	11	363	47,472	1,366	46,106
Ottawa	31,848	21,969	245	6,007	158	299	756	31,848	1,499	30,349
Pawnee	16,577	13,363	118	1,926	48	6	96	16,577	336	16,241
Pittsburg	45,837	33,745	1,525	6,310	189	20	577	45,837	1,786	44,051
Pontotoc	37,492	26,687	902	6,512	244	17	425	37,492	1,523	35,969
Pottawatomie	69,442	52,969	2,014	8,961	385	44	682	69,442	2,878	66,564
Pushmataha	11,572	8,675	77	2,037	25	5	95	11,572	280	11,292
Roger Mills	3,647	3,276	13	213	11	1	48	3,647	165	3,482
Rogers	86,905	65,415	865	11,382	932	53	1,212	86,905	3,229	83,676
Seminole	25,482	17,450	1,167	4,638	68	18	315	25,482	903	24,579
Sequoyah	42,391	28,204	735	8,816	206	20	477	42,391	1,438	40,953
Stephens	45,048	38,328	870	2,286	221	14	1,169	45,048	2,790	42,258
Texas	20,640	15,617	336	269	325	34	3,479	20,640	8,659	11,981
Tillman	7,992	5,876	613	274	21	4	876	7,992	1,783	6,209
Tulsa	603,403	417,413	64,779	36,392	14,066	429	35,255	603,403	66,582	536,821
Wagoner	73,085	55,340	2,720	7,303	1,006	27	1,289	73,085	3,488	69,597
Washington	50,976	39,929	1,231	5,247	554	16	891	50,976	2,556	48,420
Washita	11,629	10,263	80	353	25	2	416	11,629	944	10,685
Woods	8,878	7,850	290	213	77	4	203	8,878	424	8,454

Geography	Population By Race							Hispanic Ethnicity		
	Total Population	White Alone	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some Other Race alone	Total Population	Hispanic or Latino	Not Hispanic or Latino:
Woodward	20,081	17,419	317	562	115	8	1,129	20,081	2,128	17,953

Source: US Census Bureau; 2010 Census, Redistricting Data