

**OKLAHOMA**  
DEPARTMENT OF COMMERCE  
OKcommerce.gov

State of Oklahoma

Five-Year  
E-Consolidated Plan

FY 2014 – FY 2018



Oklahoma Department of Commerce  
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## **Executive Summary**

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

#### **1. Introduction**

The FY 2014-2018 *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 (4) formula grant programs:

**Community Development Block Grant (CDBG);**

**Emergency Solutions Grant (ESG);**

**HOME Investment Partnerships (HOME); and**

**Housing Opportunities for Persons with AIDS (HOPWA)**

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

The Consolidated Plan approach is also the means to meet the federal submission requirements for CDBG, HOME, ESG, and HOPWA. 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 four grant programs covered by the Consolidated Planning rule (CDBG, ESG, HOME, 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 evaluation of past performance comes from several different sources. First, the State's Consolidated Plan itself creates the opportunity for strategic planning and citizen participation to take place in a comprehensive context, and 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, including the larger non-English speaking newspapers and radio stations.

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 Citizen Participant requirements, the State accepted comments up to 30 days after the date of the formal Public Hearing.

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, 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 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.

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, 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	
HOPWA Administrator	OKLAHOMA	Housing Development Team
HOME Administrator	OKLAHOMA	Housing Development Team
HOPWA-C Administrator	OKLAHOMA	

**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 and HOPWA 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, and HOPWA 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**

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

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

**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**

1	<b>Agency/Group/Organization</b>	Oklahoma Association of Regional Councils
	<b>Agency/Group/Organization Type</b>	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
	<b>What section of the Plan was addressed by Consultation?</b>	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

<p><b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>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 fire defense, environmental stewardship and brownfields 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.</p>
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**Table 2 – Agencies, groups, organizations who participated**

**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	
Federal Strategic Plan to End Homelessness	USICH	

**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(I))**

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.

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

**Narrative (optional):**

## **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 *Community Developer* 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 *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 Citizen Participant requirements, the State accepted comments up to 30 days after the date of the formal Public Hearing.

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.

**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	

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	<a href="http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/">http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/</a>

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	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	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 OKLAHOMA CoC would be distributed and awarded in another and	All comments were accepted.	18

**Table 4 – Citizen Participation Outreach**

# Needs Assessment

## NA-05 Overview

### Needs Assessment 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 (4) 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)**

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, 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 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.

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

### Summary of Housing Needs

The Housing Needs Assessment was completed by data supplied in the E-Consolidated by the Department of Housing and Urban Development (HUD).

Demographics	Base Year: 2000	Most Recent Year: 2009	% Change
Population	1,916,154	3,610,073	88%
Households	849,303	1,405,005	65%
Median Income	\$0.00	\$41,861.00	

**Table 5 - Housing Needs Assessment Demographics**

**Data Source:** 2000 Census (Base Year), 2005-2009 ACS (Most Recent Year)

### Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	174,190	172,470	251,270	145,715	
Small Family Households *	56,420	55,020	94,200	436,285	
Large Family Households *	11,460	13,455	22,195	64,100	
Household contains at least one person 62-74 years of age	24,305	32,055	43,940	24,510	111,935
Household contains at least one person age 75 or older	23,005	35,390	37,855	17,310	52,825
Households with one or more children 6 years old or younger *	36,105	32,360	48,745	126,465	
* the highest income category for these family types is >80% HAMFI					

**Table 6 - Total Households Table**

**Data Source:** 2005-2009 CHAS

## Housing Needs Summary Tables

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

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Substandard Housing - Lacking complete plumbing or kitchen facilities	2,010	1,475	1,485	505	5,475	1,215	900	1,140	435	3,690
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	1,330	940	805	350	3,425	350	335	495	300	1,480
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	3,565	3,425	3,525	1,345	11,860	1,145	1,490	2,780	1,765	7,180
Housing cost burden greater than 50% of income (and none of the above problems)	62,885	17,205	2,790	355	83,235	30,580	17,610	11,330	2,585	62,105
Housing cost burden greater than 30% of income (and none of the above problems)	12,685	37,100	27,660	2,740	80,185	13,390	22,070	34,685	17,210	87,355

	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
Zero/negative Income (and none of the above problems)	8,805	0	0	0	8,805	6,135	0	0	0	6,135

**Table 7 – Housing Problems Table**

Data 2005-2009 CHAS

Source:

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

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Having 1 or more of four housing problems	69,785	23,040	8,605	2,560	103,990	33,290	20,330	15,745	5,080	74,445
Having none of four housing problems	30,755	61,895	94,740	43,705	231,095	25,420	67,210	132,180	94,370	319,180
Household has negative income, but none of the other housing problems	8,805	0	0	0	8,805	6,135	0	0	0	6,135

**Table 8 – Housing Problems 2**

Data 2005-2009 CHAS

Source:

### 3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	30,770	22,805	12,655	66,230	12,580	13,370	20,665	46,615
Large Related	6,320	4,505	1,635	12,460	2,815	3,810	4,650	11,275
Elderly	10,490	9,380	4,325	24,195	19,160	16,665	11,340	47,165
Other	33,575	20,640	12,870	67,085	11,085	7,090	10,215	28,390
Total need by income	81,155	57,330	31,485	169,970	45,640	40,935	46,870	133,445

**Table 9 – Cost Burden > 30%**

Data 2005-2009 CHAS  
Source:

### 4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	26,280	7,025	740	34,045	9,955	6,455	4,850	21,260
Large Related	4,990	1,105	30	6,125	1,970	1,425	755	4,150
Elderly	7,075	3,540	1,200	11,815	11,500	6,115	2,970	20,585
Other	28,515	6,100	1,055	35,670	8,355	3,940	2,790	15,085
Total need by income	66,860	17,770	3,025	87,655	31,780	17,935	11,365	61,080

**Table 10 – Cost Burden > 50%**

Data 2005-2009 CHAS  
Source:

### 5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	4,415	3,970	3,610	1,220	13,215	1,330	1,525	2,550	1,455	6,860

	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
Multiple, unrelated family households	360	410	630	320	1,720	200	325	755	580	1,860
Other, non-family households	210	85	180	170	645	0	15	15	45	75
Total need by income	4,985	4,465	4,420	1,710	15,580	1,530	1,865	3,320	2,080	8,795

**Table 11 – Crowding Information – 1/2**

Data Source: 2005-2009 CHAS

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

**Table 12 – Crowding Information – 2/2**

Data Source:  
Comments:

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

This information is not available at this time. The State is drafting a Request for Proposals for a new Statewide Housing Needs Assessment, which upon completion should provide this information.

**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.**

This information is not available at this time. The State is drafting a Request for Proposals for a new Statewide Housing Needs Assessment, which upon completion should provide this information.

**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 in NA-15, in the 30% to 50% of Area Median Income (AMI) category only, Black/African American, Pacific Islander and Hispanic households are slightly more affected. In the 80% to 100% of AMI category, Pacific Islander households are slightly more affected.

**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**

This information is not available at this time. The State is drafting a Request for Proposals for a new Statewide Housing Needs Assessment, which upon completion should provide this information.

**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:**

Not Applicable.

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

This information is not available at this time. The State is drafting a Request for Proposals for a new Statewide Housing Needs Assessment, which upon completion should provide this information.

**Discussion**

The State of Oklahoma is preparing a Request for Proposals to procure a housing market analyst to complete a Statewide Housing Needs Assessment. Additional information will be available once this has been completed.

## 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 was conducted using housing data supplied by the Census Bureau and provided by HUD. 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	129,150	30,100	14,940
White	81,565	20,290	9,365
Black / African American	19,275	3,610	1,780
Asian	2,075	200	430
American Indian, Alaska Native	9,075	2,535	1,525
Pacific Islander	154	10	65
Hispanic	9,635	1,450	930

**Table 13 - Disproportionally Greater Need 0 - 30% AMI**

Data Source: 2005-2009 CHAS

\*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	102,540	69,935	0
White	66,770	51,560	0
Black / African American	12,235	4,680	0
Asian	1,295	450	0

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
American Indian, Alaska Native	6,405	4,975	0
Pacific Islander	95	10	0
Hispanic	9,775	4,220	0

**Table 14 - Disproportionally Greater Need 30 - 50% AMI**

Data Source: 2005-2009 CHAS

\*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	86,690	164,580	0
White	61,350	120,310	0
Black / African American	8,340	11,425	0
Asian	1,700	2,150	0
American Indian, Alaska Native	4,560	10,875	0
Pacific Islander	55	100	0
Hispanic	6,615	11,560	0

**Table 15 - Disproportionally Greater Need 50 - 80% AMI**

Data Source: 2005-2009 CHAS

\*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	27,590	118,125	0
White	20,675	90,315	0

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
Black / African American	2,120	7,430	0
Asian	505	1,445	0
American Indian, Alaska Native	1,235	7,075	0
Pacific Islander	30	30	0
Hispanic	1,895	6,655	0

**Table 16 - Disproportionally Greater Need 80 - 100% AMI**

Data Source: 2005-2009 CHAS

\*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 74%; 30% - 50% AMI calculates to 59%; 50% - 80% AMI calculates to 34%; and 80% - 100% calculates to 19% 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 classes of Black/African American, Pacific Islander, and Hispanic exceed the 10% definition. Under the 80% - 100% AMI category, only the racial 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 was conducted using housing data supplied by the Census Bureau and provided by HUD. 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	103,075	56,175	14,940
White	64,375	37,480	9,365
Black / African American	16,120	6,765	1,780
Asian	1,860	420	430
American Indian, Alaska Native	6,775	4,840	1,525
Pacific Islander	154	10	65
Hispanic	8,095	2,990	930

**Table 17 – Severe Housing Problems 0 - 30% AMI**

Data Source: 2005-2009 CHAS

\*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	43,370	129,105	0
White	27,575	90,760	0
Black / African American	5,675	11,235	0

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Asian	625	1,120	0
American Indian, Alaska Native	2,690	8,690	0
Pacific Islander	55	50	0
Hispanic	4,570	9,425	0

**Table 18 – Severe Housing Problems 30 - 50% AMI**

Data Source: 2005-2009 CHAS

\*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

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	24,350	226,920	0
White	16,540	165,120	0
Black / African American	2,085	17,680	0
Asian	700	3,145	0
American Indian, Alaska Native	1,345	14,090	0
Pacific Islander	44	115	0
Hispanic	2,590	15,590	0

**Table 19 – Severe Housing Problems 50 - 80% AMI**

Data Source: 2005-2009 CHAS

\*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	7,640	138,075	0
White	5,030	105,965	0
Black / African American	665	8,890	0
Asian	200	1,750	0
American Indian, Alaska Native	405	7,900	0
Pacific Islander	30	30	0
Hispanic	965	7,585	0

**Table 20 – Severe Housing Problems 80 - 100% AMI**

Data Source: 2005-2009 CHAS

\*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 30%. Under the 0% - 30% of area medium income (AMI) the number of housing problems as a total calculates to 74%; 30% - 50% AMI calculates to 59%; 50% - 80% AMI calculates to 34%; and 80% - 100% calculates to 19% 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 classes of Black/African American, Pacific Islander, and Hispanic exceed the 10% definition. Under the 80% - 100% AMI category, only the racial class of Pacific Islander exceeds the 10% definition.

## 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 (Housing Cost Burdens) was conducted using housing data supplied by the Census Bureau and provided by HUD. 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	1,032,320	201,775	155,400	15,510
White	813,640	142,730	102,780	9,740
Black / African American	55,315	19,545	22,195	1,800
Asian	12,125	3,035	2,865	455
American Indian, Alaska Native	57,595	11,670	8,925	1,635
Pacific Islander	545	60	135	65
Hispanic	48,640	14,075	10,395	955

**Table 21 – Greater Need: Housing Cost Burdens AMI**

Data Source: 2005-2009 CHAS

### Discussion

Disproportionately greater need was analyzed in relation to housing cost burden. Under the 30% of area medium income (AMI) the number of housing cost burden as a total calculates to 73%; 30% -50% AMI calculates to 59%; 50% - 80% AMI calculates to 34%; and 80% - 100% calculates to 19% 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 classes of Black/African American, Pacific Islander, and Hispanic exceed the 10% definition. Under the 80% - 100% AMI category, only the racial class of Pacific Islander 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 along with the Hispanics show an overall disproportionately greater need in the earlier identified income levels.

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

Not Applicable.

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

As stated earlier, the Consolidated Plan incorporates four (4) HUD funded programs, CDBG, ESG, HOME, 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 neighborhood impact. According to 2010 US 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			Special Purpose Voucher		
				Total	Project - based	Tenant - based	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			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	
# Homeless at admission	0	14	40	122	0	117	5	0	

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	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			Special Purpose Voucher		
				Total	Project - based	Tenant - based	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
Pacific Islander	0	0	26	19	0	19	0	0	0

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 *
Other	0	0	0	0	0	0	0	0	0

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

**Table 24 – Race of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

### Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	7	957	1,116	0	1,084	1	14	5
Not Hispanic	0	160	11,505	22,012	8	21,310	109	175	170

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

**Table 25 – Ethnicity of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

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

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

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

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

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

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

**Discussion:**

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

## NA-40 Homeless Needs Assessment – 91.305(c)

### Introduction:

The following data comes from the 2013 PIT and the 2012 Emergency Solutions Annual State Report. 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 13,000 people or .34 % of the State's population will experience homelessness in 2014. Of the 4,385 people who were counted as homeless during the Point in time count, the chronically homeless count was 613 or 13.9%. Several studies indicate that the chronically homeless are about 10% of the homeless population.

### 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)	287	936	2,403	3,626	0	0
Persons in Households with Only Children	32	127	259	391	0	0
Persons in Households with Only Adults	833	2,151	5,863	8,847	0	0
Chronically Homeless Individuals	357	256	1,204	1,817	0	0
Chronically Homeless Families	17	24	81	122	0	0
Veterans	99	338	859	1,296	0	0
Unaccompanied Child	26	20	90	136	0	0
Persons with HIV	2	33	69	104	0	0

Table 26 - Homeless Needs Assessment

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.

**Data Source Comments:**

Indicate if the homeless population is: Partially Rural Homeless

**Rural Homeless Needs Assessment**

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	244	442	1,348	2,034	0	0
Persons in Households with Only Children	26	86	220	332	0	0
Persons in Households with Only Adults	312	562	1,717	2,591	0	0
Chronically Homeless Individuals	88	81	332	501	0	0
Chronically Homeless Families	17	16	65	98	0	0
Veterans	32	59	179	270	0	0
Unaccompanied Youth	150	86	464	700	0	0
Persons with HIV	2	0	4	0	0	0

**Table 27 - Homeless Needs Assessment**

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.

**Data Source Comments:**

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

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

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

Estimated number of days persons were homeless; data was not collected separated by the categories above. Those responding to the needs assessment survey conducted at the same time as the 2013 Point-in-time Survey, 24% had been homeless for up to 7 days; 25% up to 13 days, 11% up to 30 days, 25.6% up to 3 months, 12% up to 6 months, 4% up to 9 months, 2.4% up to 12 months and 10% over 1 year.

Estimated number exiting homelessness: Based on direct service numbers, an estimated 5000, are being helped out of homelessness. No data is collected on the housing status of those who seek, but do not receive service.

**Nature and Extent of Homelessness: (Optional)**

<b>Race:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
White	4,038	0
Black or African American	976	0
Asian	19	0
American Indian or Alaska Native	532	0
Pacific Islander	18	0
<b>Ethnicity:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
Hispanic	691	0
Not Hispanic	5,918	0

Data Source  
 Comments: Data

**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 400 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; 66.44% were white, 16.06% were African-American; 8.75% were Native American; 7,01% reported themselves as Multiple Races and 1.74% 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

<b>Current HOPWA formula use:</b>	
Cumulative cases of AIDS reported	1,246
Area incidence of AIDS	26
Rate per population	2
Number of new cases prior year (3 years of data)	115
Rate per population (3 years of data)	2
<b>Current HIV surveillance data:</b>	
Number of Persons living with HIV (PLWH)	1,069
Area Prevalence (PLWH per population)	68
Number of new HIV cases reported last year	0

**Table 28 – HOPWA Data**

Data Source: CDC HIV Surveillance

### HIV Housing Need (HOPWA Grantees Only)

<b>Type of HOPWA Assistance</b>	<b>Estimates of Unmet Need</b>
Tenant based rental assistance	1,218
Short-term Rent, Mortgage, and Utility	2,795
Facility Based Housing (Permanent, short-term or transitional)	548

**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 remainder of the cases or 1,615 are scattered throughout the remaining portion of rural Oklahoma and are not a part of a metropolitan statistical area.

**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.

### **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.

salkfskfjsdkfjdkfsd

### **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 (4) 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)**

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, 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 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.

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	1,185,254	73%
1-unit, attached structure	34,097	2%
2-4 units	77,122	5%
5-19 units	119,657	7%
20 or more units	52,957	3%
Mobile Home, boat, RV, van, etc	154,952	10%
<b>Total</b>	<b>1,624,039</b>	<b>100%</b>

Table 30 – Residential Properties by Unit Number

Data Source: 2005-2009 ACS Data

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	1,569	0%	10,200	2%
1 bedroom	15,881	2%	105,665	23%
2 bedrooms	175,072	18%	176,091	39%
3 or more bedrooms	761,712	80%	158,815	35%
<b>Total</b>	<b>954,234</b>	<b>100%</b>	<b>450,771</b>	<b>99%</b>

Table 31 – Unit Size by Tenure

Data Source: 2005-2009 ACS Data

**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.

### Cost of Housing

	Base Year: 2000	Most Recent Year: 2009	% Change
Median Home Value	0	98,800	0%
Median Contract Rent	0	455	0%

Table 32 – Cost of Housing

Data Source: 2000 Census (Base Year), 2005-2009 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	285,239	63.3%
\$500-999	151,089	33.5%
\$1,000-1,499	9,223	2.1%
\$1,500-1,999	2,737	0.6%
\$2,000 or more	2,483	0.6%
<b>Total</b>	<b>450,771</b>	<b>100.0%</b>

Table 33 - Rent Paid

Data Source: 2005-2009 ACS Data

### Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	40,990	No Data
50% HAMFI	139,000	114,700
80% HAMFI	252,930	176,480
100% HAMFI	No Data	297,850
<b>Total</b>	<b>432,920</b>	<b>589,030</b>

Table 34 – Housing Affordability

Data Source: 2005-2009 CHAS

### Monthly Rent

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

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
High HOME Rent	435	437	564	807	831
Low HOME Rent	435	437	564	653	728

**Table 35 – Monthly Rent**

Data Source: HUD FMR and HOME Rents

**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.

### 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 dollar limits for Section 221(d)(3)(ii) 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 221(d)(3) subsidy limit, 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	191,165	20%	178,883	40%

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With two selected Conditions	5,483	1%	10,931	2%
With three selected Conditions	592	0%	879	0%
With four selected Conditions	7	0%	34	0%
No selected Conditions	756,987	79%	260,044	58%
<b>Total</b>	<b>954,234</b>	<b>100%</b>	<b>450,771</b>	<b>100%</b>

**Table 36 - Condition of Units**

Data Source: 2005-2009 ACS Data

### Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	104,466	11%	34,652	8%
1980-1999	284,650	30%	121,291	27%
1950-1979	428,035	45%	226,048	50%
Before 1950	137,083	14%	68,780	15%
<b>Total</b>	<b>954,234</b>	<b>100%</b>	<b>450,771</b>	<b>100%</b>

**Table 37 – Year Unit Built**

Data Source: 2005-2009 CHAS

### Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	565,118	59%	294,828	65%
Housing Units build before 1980 with children present	138,905	15%	69,730	15%

**Table 38 – Risk of Lead-Based Paint**

Data Source: 2005-2009 ACS (Total Units) 2005-2009 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-nine percent (59%) of the Owner-Occupied housing units were built before 1980. Sixty-five percent (65%) 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-nine percent (59%) of the Owner-Occupied housing units were built before 1980 are at risk of containing lead based paint hazards. Sixty-five percent (65%) 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.

## 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						
<b>*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b>									

**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 strategies.

### Discussion:



## MA-30 Homeless Facilities – 91.310(b)

### Introduction

#### 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)	1,084	78	142	10	0
Households with Only Adults	1,114	70	143	0	0
Chronically Homeless Households	147	0	0	145	0
Veterans	16	0	45	117	0
Unaccompanied Youth	43	0	23	0	0

**Table 41 - Facilities Targeted to Homeless Persons**

**Data Source Comments:** Totals based off 2013 Housing Inventory Chart

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

**The State requires that each ESG 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 HPWA 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	24
PH in facilities	0
STRMU	73
ST or TH facilities	0
PH placement	0

Table 42 – HOPWA Assistance Baseline

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

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

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

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

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)**

**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 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.

## 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	59,057	11,562	7	2	-5
Arts, Entertainment, Accommodations	68,147	62,818	8	12	4
Construction	68,583	37,612	8	7	-1
Education and Health Care Services	187,870	144,146	22	27	5
Finance, Insurance, and Real Estate	42,995	29,936	5	6	1
Information	13,708	7,222	2	1	-1
Manufacturing	100,643	27,536	12	5	-7
Other Services	42,443	32,352	5	6	1
Professional, Scientific, Management Services	51,452	17,852	6	3	-3
Public Administration	52,086	49,078	6	9	3
Retail Trade	97,652	74,676	11	14	3
Transportation and Warehousing	49,884	19,308	6	4	-2
Wholesale Trade	25,529	29,090	3	5	2
Total	860,049	543,188	--	--	--

**Table 43- Business Activity**

**Data Source:** 2005-2009 ACS (Workers), 2010 ESRI Business Analyst Package (Jobs)

## Labor Force

Total Population in the Civilian Labor Force	913,603
Civilian Employed Population 16 years and over	860,049
Unemployment Rate	5.86
Unemployment Rate for Ages 16-24	17.49
Unemployment Rate for Ages 25-65	3.23

**Table 44 - Labor Force**

Data Source: 2005-2009 ACS Data

Occupations by Sector	Number of People
Management, business and financial	246,555
Farming, fisheries and forestry occupations	11,503
Service	148,051
Sales and office	205,906
Construction, extraction, maintenance and repair	109,733
Production, transportation and material moving	138,301

**Table 45 – Occupations by Sector**

Data Source: 2005-2009 ACS Data

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	578,018	71%
30-59 Minutes	186,193	23%
60 or More Minutes	47,391	6%
<b>Total</b>	<b>811,602</b>	<b>100%</b>

**Table 46 - Travel Time**

Data Source: 2005-2009 ACS Data

## Education:

### Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	65,636	6,973	64,741
High school graduate (includes equivalency)	243,836	12,206	111,204
Some college or Associate's degree	221,035	9,867	71,284

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Bachelor's degree or higher	153,643	3,161	29,605

**Table 47 - Educational Attainment by Employment Status**

Data Source: 2005-2009 ACS Data

### Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	3,794	7,703	8,043	19,000	34,326
9th to 12th grade, no diploma	35,115	27,260	25,740	49,613	46,547
High school graduate, GED, or alternative	72,874	82,078	95,061	190,476	111,148
Some college, no degree	70,527	57,574	56,617	115,518	51,069
Associate's degree	8,051	18,335	19,440	36,350	9,481
Bachelor's degree	8,238	31,989	35,841	64,668	22,175
Graduate or professional degree	440	7,940	11,726	35,150	16,875

**Table 48 - Educational Attainment by Age**

Data Source: 2005-2009 ACS Data

### 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: 2005-2009 ACS Data

### 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 industries require a skilled and well educated workforce and are able to provide comparably higher wages. Higher wage jobs translate into increased economic stability. Additionally, as shown in the educational table, unemployment levels directly correspond to educational attainment. Unemployment levels are consecutively lower across all age groups for those who have attained a minimum of a high school education and above.

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

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

### **Describe any other state efforts to support economic growth.**

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

### **Discussion**

The State CDBG program is the primary 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 underserved needs is the lack of adequate program funding at the federal level. Annual program funding levels have been steadily declining for the State's CDBG program since FY 2010. This trend is expected to continue throughout the duration of this Consolidated Plan cycle.

## **MA-50 Needs and Market Analysis Discussion**

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

From the information we have at this time, it appears that households with multiple housing problems are distributed throughout the State of Oklahoma and not concentrated in one area. Concentrated would be defined as an area where households with multiple housing problems are more than ten percent greater than the statewide average. We will be conducting a new statewide housing market analysis in 2014 to determine the most current statistics.

### **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. 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.

# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

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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, 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 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.

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

### Geographic Area

1	<b>Area Name:</b>	State of Oklahoma
	<b>Area Type:</b>	State Geography
	<b>Other Target Area Description:</b>	State Geography
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	The four HUD programs covered under the State Consolidated Plan (CDBG, ESG, HOME, & HOPWA) operate within the jurisdiction of the State of Oklahoma and no specific geographic neighborhood boundaries are targeted.
	<b>Include specific housing and commercial characteristics of this target area.</b>	
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	The four HUD programs covered under the State Consolidated Plan (CDBG, ESG, HOME, & HOPWA) operate within the jurisdiction of the State of Oklahoma and no specific geographic neighborhood boundaries are targeted.
	<b>Identify the needs in this target area.</b>	
	<b>What are the opportunities for improvement in this target area?</b>	
	<b>Are there barriers to improvement in this target area?</b>	

Table 50 - Geographic Priority Areas

### 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, 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 six (6) 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.

## SP-25 Priority Needs – 91.315(a)(2)

### Priority Needs

<b>1</b>	<b>Priority Need Name</b>	State HOME Program
	<b>Priority Level</b>	High
	<b>Population</b>	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
	<b>Geographic Areas Affected</b>	State Geography
	<b>Associated Goals</b>	State HOME Program

<p><b>Description</b></p>	<p>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.)</p> <p>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.</p> <p>Major market <b>characteristics</b> influencing priority housing needs include:</p> <ul style="list-style-type: none"> <li>• Costs of rental housing</li> <li>• Availability of rental units</li> <li>• Condition of rental units</li> <li>• Price of starter homes within the local market</li> <li>• Age and condition of existing housing stock</li> <li>• Availability of homes</li> <li>• Income Levels</li> </ul> <p>Major housing <b>problems</b> influencing priority housing needs are:</p> <ul style="list-style-type: none"> <li>• Lack of availability of affordable rental units</li> <li>• Lack of availability of for-sale homes</li> <li>• Number of rental vouchers in relation to the demand for assistance</li> <li>• Prevailing sales prices of entry level homes</li> <li>• Condition and operating costs of aging housing units</li> </ul> <p>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.</p> <p>Obstacles to meeting underserved affordable housing needs include limited resources and staffing, lead-based paint issues, and lots of competition for competitive resources</p>
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	<p><b>Basis for Relative Priority</b></p>	<p>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.</p> <p>Major market <b>characteristics</b> influencing priority housing needs include:</p> <ul style="list-style-type: none"> <li>• Costs of rental housing</li> <li>• Availability of rental units</li> <li>• Condition of rental units</li> <li>• Price of starter homes within the local market</li> <li>• Age and condition of existing housing stock</li> <li>• Availability of homes</li> <li>• Income Levels</li> </ul> <p>Major housing <b>problems</b> influencing priority housing needs are:</p> <ul style="list-style-type: none"> <li>• Lack of availability of affordable rental units</li> <li>• Lack of availability of for-sale homes</li> <li>• Number of rental vouchers in relation to the demand for assistance</li> <li>• Prevailing sales prices of entry level homes</li> <li>• Condition and operating costs of aging housing units</li> </ul> <p>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.</p> <p>Obstacles to meeting underserved affordable housing needs include limited resources and staffing, lead-based paint issues, and lots of competition for competitive resources</p>
2	<p><b>Priority Need Name</b></p>	<p>State HOPWA Program</p>
	<p><b>Priority Level</b></p>	<p>High</p>

	<b>Population</b>	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
	<b>Geographic Areas Affected</b>	State Geography
	<b>Associated Goals</b>	State HOPWA Program

	<b>Description</b>	<p>The Program Description and One Year Action Plan (AP) set out a description of all activities the State of Oklahoma will perform with HOPWA Program Funds. The funds will be used to address the priorities outlined in the AP including rental assistance, short term rent, mortgage, utility assistance, and various other supportive services. The Program Description further describes efforts to prevent homelessness and addresses housing needs of persons who are homeless. In addition, the AP outlines specific goals, objectives, and priorities to meet underserved needs.</p> <p>The AP establishes annual HOPWA output goals for the planned number of households to be assisted during the year with all services. The outputs can be used as a resource to measure assessment of client outcomes for achieving housing stability, reducing the risk of homelessness and to improve access to care. The AP further describes how funding has been allocated geographically and the rationale for the allocations and priorities. The information in the plan includes the name of each project sponsor and addresses information with reference to organizational structure.</p> <p>Monitoring requirements are outlined in the Program Description, AP, and the attached Invitation to Bid. Requirements include annual audits and specific measurement of outputs to monitor progress of project sponsors activities to ensure compliance with not only HOPWA rules and regulations, but performance goals as well. Other resources that are reasonably expected to be available are further identified and outlined in the Program Description and AP.</p>
	<b>Basis for Relative Priority</b>	<p>The HOPWA Action Plan (AP) establishes annual HOPWA output goals for the planned number of households to be assisted during the year with all services. The outputs can be used as a resource to measure assessment of client outcomes for achieving housing stability, reducing the risk of homelessness and to improve access to care. The AP further describes how funding has been allocated geographically and the rationale for the allocations and priorities. The information in the plan includes the name of each project sponsor and addresses information with reference to organizational structure.</p> <p>Monitoring requirements are outlined in the Program Description, AP, and the attached Invitation to Bid. Requirements include annual audits and specific measurement of outputs to monitor progress of project sponsors activities to ensure compliance with not only HOPWA rules and regulations, but performance goals as well. Other resources that are reasonably expected to be available are further identified and outlined in the Program Description and AP.</p>
<b>3</b>	<b>Priority Need Name</b>	State CDBG Program
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Non-housing Community Development
	<b>Geographic Areas Affected</b>	State Geography
	<b>Associated Goals</b>	State CDBG Program - Infrastructure State CDBG Program - Econ Dev State CDBG Program - Planning State CDBG Program - State CDBG Admin/TA
	<b>Description</b>	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.
	<b>Basis for Relative Priority</b>	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.
<b>4</b>	<b>Priority Need Name</b>	State ESG Program
	<b>Priority Level</b>	High

<b>Population</b>	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
<b>Geographic Areas Affected</b>	State Geography
<b>Associated Goals</b>	State ESG Program
<b>Description</b>	The Governor’s Interagency Council on Homelessness. (GICH), 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 and implementation of strategies to improve access to services, mainstream resources and developing affordable permanent housing.
<b>Basis for Relative Priority</b>	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.

**Table 51 – Priority Needs Summary**

## **Narrative (Optional)**

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

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

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

Major barriers in providing needed services are as follows:

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

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

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

### Influence of Market Conditions

<b>Affordable Housing Type</b>	<b>Market Characteristics that will influence the use of funds available for housing type</b>
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 insufficient 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	Acquisition will almost exclusively used with rehabilitation, since the cost of acquiring housing units that already meet all of the HOME requirements is very high.

**Table 52 – Influence of Market Conditions**

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

**Introduction**

The State of Oklahoma annually receives federal funding from HUD for the four formula grant programs of CDBG, ESG, HOME, 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.

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	13,115,124	3,000,000	0	16,115,124	0	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	6,144,818	0	0	6,144,818	0	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	248,339	0	1,163,588	1,411,927	2,500,283	The total expected amount available includes five years of HOPWA funding plus program income, and prior year resources that include contributions from organizations such as United Way, Ray White, and various other contributors and fundraisers. It is important to note that these funds (prior year resources) are used mainly to leverage the HOPWA funds and not to actually carry out additional HOPWA eligible services. i.e. Ryan White funding is used in the calculation. However, only a small amount of those funds would be used to provide transportation to a very small amount of HOPWA clients.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	1,471,628	0	0	1,471,628	1,268,344	Each subrecipient is required to provide and track "dollar-for-dollar" match to spend on eligible Emergency Solution activities during the Program period.

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 four formula grant programs of CDBG, ESG, HOME, 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**

**Not Applicable.**

**Discussion**

**Not Applicable.**

## 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
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	X
Legal Assistance		X	
Mortgage Assistance	X		X
Rental Assistance	X	X	X

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Utilities Assistance	X	X	X
<b>Street Outreach Services</b>			
Law Enforcement	X	X	
Mobile Clinics	X		
Other Street Outreach Services	X	X	
<b>Supportive Services</b>			
Alcohol & Drug Abuse	X	X	X
Child Care		X	
Education		X	
Employment and Employment Training		X	
Healthcare			
HIV/AIDS		X	
Life Skills		X	
Mental Health Counseling	X	X	X
Transportation	X	X	X
<b>Other</b>			

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.**

**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 delivery 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 Continuum 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 - Infrastructure	2014	2018	Non-Housing Community Development	State of Oklahoma	State CDBG Program	CDBG: \$10,221,671	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 5000 Households Assisted
2	State CDBG Program - Econ Dev	2014	2018	Non-Housing Community Development	State of Oklahoma	State CDBG Program	CDBG: \$5,000,000	Jobs created/retained: 120 Jobs
3	State CDBG Program - Planning	2014	2018	Non-Housing Community Development	State of Oklahoma	State CDBG Program	CDBG: \$400,000	Other: 1 Other
4	State CDBG Program - State CDBG Admin/TA	2014	2018	Non-Housing Community Development	State of Oklahoma	State CDBG Program	CDBG: \$493,453	Other: 1 Other
5	State HOME Program	2014	2018	Affordable Housing	State of Oklahoma	State HOME Program	HOME: \$6,144,818	Rental units constructed: 40 Household Housing Unit  Rental units rehabilitated: 20 Household Housing Unit  Homeowner Housing Added: 10 Household Housing Unit
6	State HOPWA Program	2014	2018	Non-Homeless Special Needs	State of Oklahoma	State HOPWA Program	HOPWA: \$248,339	Housing for People with HIV/AIDS added: 55 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	State ESG Program	2014	2018	Homeless	State of Oklahoma	State ESG Program	HOME: \$1,471,628	Tenant-based rental assistance / Rapid Rehousing: 1400 Households Assisted  Homeless Person Overnight Shelter: 5000 Persons Assisted  Overnight/Emergency Shelter/Transitional Housing Beds added: 0 Beds  Homelessness Prevention: 900 Persons Assisted

Table 56 – Goals Summary

**Goal Descriptions**

1	<b>Goal Name</b>  <b>Goal Description</b>	State CDBG Program - Infrastructure  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): <u><b>Decent Housing.</b></u> Covers a wide range of housing activities. The objective focuses on housing activities whose purpose is to meet individual family or community housing needs. It does not include programs where housing is an element of a larger effort to make community-wide improvements. <u><b>A suitable living environment.</b></u> Relates to activities that are designed to benefit communities, families, or individuals by addressing issues in their living environment. This objective is related to activities that are intended to address a wide range of issues (physical infrastructure, health care, elderly, etc.) faced by low and moderate income persons. <u><b>Expanded economic opportunity.</b></u> 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: <u><b>Availability/Accessibility</b></u> applies to activities that make services, infrastructure, public facilities, public services, etc available or accessible to low and moderate income persons. <u><b>Affordability</b></u> applies to activities that provide affordability in a variety of ways to low and moderate income people. Affordability is an appropriate objective outcome whenever an activity is lowering the cost, improving the quality, or increasing the affordability of a product or service to benefit a low-income household. <u><b>Sustainability</b></u> applies to activities that are aimed at improving communities or neighborhoods, helping to them more livable or viable. Generally, this outcome focuses on a specific geographic area with numerous activities being undertaken simultaneously. 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 Integrated Disbursement Information System (IDIS) to include grant application forms, contracting documents, and closeout forms.
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2	<b>Goal Name</b>  <b>Goal Description</b>	State CDBG Program - Econ Dev  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): <u><b>Decent Housing.</b></u> Covers a wide range of housing activities. The objective focuses on housing activities whose purpose is to meet individual family or community housing needs. It does not include programs where housing is an element of a larger effort to make community-wide improvements. <u><b>A suitable living environment.</b></u> Relates to activities that are designed to benefit communities, families, or individuals by addressing issues in their living environment. This objective is related to activities that are intended to address a wide range of issues (physical infrastructure, health care, elderly, etc.) faced by low and moderate income persons. <u><b>Expanded economic opportunity.</b></u> 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: <u><b>Availability/Accessibility</b></u> applies to activities that make services, infrastructure, public facilities, public services, etc available or accessible to low and moderate income persons. <u><b>Affordability</b></u> applies to activities that provide affordability in a variety of ways to low and moderate income people. Affordability is an appropriate objective outcome whenever an activity is lowering the cost, improving the quality, or increasing the affordability of a product or service to benefit a low-income household. <u><b>Sustainability</b></u> applies to activities that are aimed at improving communities or neighborhoods, helping to them more livable or viable. Generally, this outcome focuses on a specific geographic area with numerous activities being undertaken simultaneously. 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 Integrated Disbursement Information System (IDIS) to include grant application forms, contracting documents, and closeout forms.
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<b>3</b>	<b>Goal Name</b>	State CDBG Program - Planning
	<b>Goal Description</b>	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). Since 1993, the Oklahoma Department of Commerce/Community Development (ODOC/CD) has funded grants to local governments to develop Capital Improvement Plans (CIP). The process involves the creation of a Geographic Information System (GIS) based, comprehensive mapping and inventory of governmentally owned assets. It also includes the development of a total Capital Needs Summary/5-year strategic plan. Local implementation is essential to planning for the repair and replacement of publicly owned assets in order to maximize the impact on local infrastructure. CIP grantees work with their Substate Planning District (SSPD) to complete a project.
<b>4</b>	<b>Goal Name</b>	State CDBG Program - State CDBG Admin/TA
	<b>Goal Description</b>	State CDBG Program Admin/TA is added as a goal under guidance by HUD OneCPD in order to account for CDBG program administration and technical assistance in the IDIS E-Consolidated Plan system. Beneficiaries are not accounted for under this category. Outcomes and objectives are selected to mirror the overall program since the IDIS E-Consolidated Plan requires an input.  HUD OneCPD Guidance: In order to reconcile the anticipated resources and goals (and/or projects in the Action Plan) you can add a goal for TA/Admin and can use "other" as a goal outcome indicator for that goal and enter a value of "1" as a placeholder for that field.
<b>5</b>	<b>Goal Name</b>	State HOME Program
	<b>Goal Description</b>	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.

6	<b>Goal Name</b>	State HOPWA Program
	<b>Goal Description</b>	<p>Program goals for the state HOPWA Program are set out below:</p> <p><u>Western Oklahoma</u></p> <p>Short-term rent fifteen (15) households  Rent and utility assistance fifteen (15) households  Supportive Services fifteen (15) households</p> <p><u>Eastern Oklahoma</u></p> <p>Short-term rent ten (10) households  Rent and utility assistance fifteen (15) households  Supportive Services fifteen (15) households</p>
7	<b>Goal Name</b>	State ESG Program
	<b>Goal Description</b>	<p>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.</p>

**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 services provided through September, 2013, an estimated 1400 families will be provided housing.**

## **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.



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

### **Barriers to Affordable Housing**

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

In 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.

### **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

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.

## **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**

The GICH is 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.**

- GICH will request that OHFA utilize previously set-aside CoC Construction funds as a source of funding for Section 8 vouchers for the homeless.
- GICH will request that OHFA produce a list of designated homeless units and require the developers/managers to coordinate with Continuum of Care lead agencies the identification of individuals to be served in those units or certify that there are not eligible homeless individuals/families needing placement in that development.
- The GICH will encourage public housing authorities to relax requirements that felons not be allowed to live in Section 8 housing. Agencies within the Continuum of Care in the area should be required to provide case management services to ensure the success of the individual and the program

### **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**

In addition to the Centralized/Coordinated Intake implementation happening in each CoC service area, here are the short-term initiatives the GICH is accomplishing to assist with providing and maintaining permanent housing:

- GICH will request that OHFA utilize previously set-aside CoC Construction funds as a source of funding for Section 8 vouchers for the homeless.
- The GICH will encourage public housing authorities to relax requirements that felons not be allowed to live in Section 8 housing. Agencies within the Continuum of Care in the area should be required to provide case management services to ensure the success of the individual and the program

## **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.

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

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.

## **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:

- 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 and HOPWA programs. Both ODOC and OHFA have developed and implemented a detailed programmatic and financial monitoring strategy for the CDBG, ESG, HOME, 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 four formula grant programs of CDBG, ESG, HOME, 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.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	13,115,124	3,000,000	0	16,115,124	0	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	6,144,818	0	0	6,144,818	0	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	248,339	0	1,163,588	1,411,927	2,500,283	The total expected amount available includes five years of HOPWA funding plus program income, and prior year resources that include contributions from organizations such as United Way, Ray White, and various other contributors and fundraisers. It is important to note that these funds (prior year resources) are used mainly to leverage the HOPWA funds and not to actually carry out additional HOPWA eligible services. i.e. Ryan White funding is used in the calculation. However, only a small amount of those funds would be used to provide transportation to a very small amount of HOPWA clients.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	1,471,628	0	0	1,471,628	1,268,344	Each subrecipient is required to provide and track "dollar-for-dollar" match to spend on eligible Emergency Solution activities during the Program period.

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 four formula grant programs of CDBG, ESG, HOME, 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 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 - Infrastructure	2014	2018	Non-Housing Community Development	State of Oklahoma	State CDBG Program	CDBG: \$10,221,671	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 5000 Households Assisted
2	State CDBG Program - Econ Dev	2014	2018	Non-Housing Community Development	State of Oklahoma	State CDBG Program	CDBG: \$5,000,000	Jobs created/retained: 120 Jobs
3	State CDBG Program - Planning	2014	2018	Non-Housing Community Development	State of Oklahoma	State CDBG Program	CDBG: \$400,000	Other: 1 Other
4	State CDBG Program - State CDBG Admin/TA	2014	2018	Non-Housing Community Development	State of Oklahoma	State CDBG Program	CDBG: \$493,453	Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	State HOME Program	2014	2018	Affordable Housing	State of Oklahoma	State HOME Program	HOME: \$6,144,818	Rental units constructed: 40 Household Housing Unit Rental units rehabilitated: 20 Household Housing Unit Homeowner Housing Added: 10 Household Housing Unit Homeowner Housing Rehabilitated: 0 Household Housing Unit Direct Financial Assistance to Homebuyers: 20 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 0 Households Assisted
6	State ESG Program	2014	2018	Homeless	State of Oklahoma	State ESG Program	ESG: \$1,471,628	Tenant-based rental assistance / Rapid Rehousing: 1400 Households Assisted Homeless Person Overnight Shelter: 5000 Persons Assisted Homelessness Prevention: 900 Persons Assisted
7	State HOPWA Program	2014	2018	Non-Homeless Special Needs	State of Oklahoma	State HOPWA Program	HOPWA: \$248,339	Housing for People with HIV/AIDS added: 55 Household Housing Unit

Table 58 – Goals Summary

## Goal Descriptions

1	<b>Goal Name</b>  <b>Goal Description</b>	State CDBG Program - Infrastructure  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): <u><b>Decent Housing.</b></u> Covers a wide range of housing activities. The objective focuses on housing activities whose purpose is to meet individual family or community housing needs. It does not include programs where housing is an element of a larger effort to make community-wide improvements. <u><b>A suitable living environment.</b></u> Relates to activities that are designed to benefit communities, families, or individuals by addressing issues in their living environment. This objective is related to activities that are intended to address a wide range of issues (physical infrastructure, health care, elderly, etc.) faced by low and moderate income persons. <u><b>Expanded economic opportunity.</b></u> 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: <u><b>Availability/Accessibility</b></u> applies to activities that make services, infrastructure, public facilities, public services, etc available or accessible to low and moderate income persons. <u><b>Affordability</b></u> applies to activities that provide affordability in a variety of ways to low and moderate income people. Affordability is an appropriate objective outcome whenever an activity is lowering the cost, improving the quality, or increasing the affordability of a product or service to benefit a low-income household. <u><b>Sustainability</b></u> applies to activities that are aimed at improving communities or neighborhoods, helping to them more livable or viable. Generally, this outcome focuses on a specific geographic area with numerous activities being undertaken simultaneously. 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 Integrated Disbursement Information System (IDIS) to include grant application forms, contracting documents, and closeout forms.
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2	<b>Goal Name</b>  <b>Goal Description</b>	State CDBG Program - Econ Dev  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): <u><b>Decent Housing.</b></u> Covers a wide range of housing activities. The objective focuses on housing activities whose purpose is to meet individual family or community housing needs. It does not include programs where housing is an element of a larger effort to make community-wide improvements. <u><b>A suitable living environment.</b></u> Relates to activities that are designed to benefit communities, families, or individuals by addressing issues in their living environment. This objective is related to activities that are intended to address a wide range of issues (physical infrastructure, health care, elderly, etc.) faced by low and moderate income persons. <u><b>Expanded economic opportunity.</b></u> 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: <u><b>Availability/Accessibility</b></u> applies to activities that make services, infrastructure, public facilities, public services, etc available or accessible to low and moderate income persons. <u><b>Affordability</b></u> applies to activities that provide affordability in a variety of ways to low and moderate income people. Affordability is an appropriate objective outcome whenever an activity is lowering the cost, improving the quality, or increasing the affordability of a product or service to benefit a low-income household. <u><b>Sustainability</b></u> applies to activities that are aimed at improving communities or neighborhoods, helping to them more livable or viable. Generally, this outcome focuses on a specific geographic area with numerous activities being undertaken simultaneously. 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 Integrated Disbursement Information System (IDIS) to include grant application forms, contracting documents, and closeout forms.
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3	<b>Goal Name</b>	State CDBG Program - Planning
	<b>Goal Description</b>	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). Since 1993, the Oklahoma Department of Commerce/Community Development (ODOC/CD) has funded grants to local governments to develop Capital Improvement Plans (CIP). The process involves the creation of a Geographic Information System (GIS) based, comprehensive mapping and inventory of governmentally owned assets. It also includes the development of a total Capital Needs Summary/5-year strategic plan. Local implementation is essential to planning for the repair and replacement of publicly owned assets in order to maximize the impact on local infrastructure. CIP grantees work with their Substate Planning District (SSPD) to complete a project.
4	<b>Goal Name</b>	State CDBG Program - State CDBG Admin/TA
	<b>Goal Description</b>	State CDBG Program Admin/TA is added as a goal under guidance by HUD OneCPD in order to account for CDBG program administration and technical assistance in the IDIS E-Consolidated Plan system. Beneficiaries are not accounted for under this category. Outcomes and objectives are selected to mirror the overall program since the IDIS E-Consolidated Plan requires an input.  HUD OneCPD Guidance: In order to reconcile the anticipated resources and goals (and/or projects in the Action Plan) you can add a goal for TA/Admin and can use "other" as a goal outcome indicator for that goal and enter a value of "1" as a placeholder for that field.
5	<b>Goal Name</b>	State HOME Program
	<b>Goal Description</b>	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.

<b>6</b>	<b>Goal Name</b>	State ESG Program
	<b>Goal Description</b>	Due to E-Consolidated Plan system narrative text limitations, more detailed program information is available in the Appendix of the E-Consolidated Plan.
<b>7</b>	<b>Goal Name</b>	State HOPWA Program
	<b>Goal Description</b>	Due to E-Consolidated Plan system narrative text limitations, more detailed program information is available in the Appendix of the E-Consolidated Plan.

## AP-25 Allocation Priorities – 91.320(d)

### Introduction:

The State of Oklahoma annually receives federal funding from HUD for the four formula grant programs of CDBG, ESG, HOME, 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 - Infrastructure (%)	State CDBG Program - Econ Dev (%)	State CDBG Program - Planning (%)	State CDBG Program - State CDBG Admin/TA (%)	State HOME Program (%)	State ESG Program (%)	State HOPWA Program (%)	Total (%)
CDBG	64	30	3	3	0	0	0	100
HOME	0	0	0	0	100	0	0	100
HOPWA	0	0	0	0	0	0	100	100
ESG	0	0	0	0	0	100	0	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 four formula grant programs of CDBG, ESG, HOME, and HOPWA. Each of the four formula grant programs independently sets its own allocation priorities based on feedback during the Citizen Participation phase of the Consolidated Plan. 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 four formula grant programs of CDBG, ESG, HOME, and HOPWA. Due to complexity and textbox narrative size limitations, detailed program distribution descriptions and funding allocation amounts can be found in the Program Descriptions / One-Year Action Plans, which are included in this Consolidated Plan. Each of the four formula grant programs

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

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

### Introduction:

The State of Oklahoma has not set aside or reserved dollar amounts of assistance specifically for geographic areas within the State for the CDBG, ESG, HOME, or 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, or HOPWA programs.

Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provide summary information in this textbox section. As identified earlier, the State E-Consolidated Plan encompasses a majority of the state (Geographic Distribution) and includes four HUD funded programs comprised of the CDBG, ESG, HOME, 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

1	<b>State Program Name:</b>	State of Oklahoma Non-Entitlement Program (CDBG, ESG, HOME, HOPWA)
	<b>Funding Sources:</b>	CDBG HOPWA HOME ESG

<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provide summary information in this textbox section. As identified earlier, the State E-Consolidated Plan encompasses a majority of the state (Geographic Distribution) and includes four HUD funded programs comprised of the CDBG, ESG, HOME, 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: <a href="http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/">http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/</a></p>
<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provide summary information in this textbox section. As identified earlier, the State E-Consolidated Plan encompasses a majority of the state (Geographic Distribution) and includes four HUD funded programs comprised of the CDBG, ESG, HOME, 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: <a href="http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/">http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/</a></p>
<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State CDBG program Action Plan can only provide summary information in this section. As identified earlier, the State E-Consolidated Plan encompasses a majority of the state (Geographic Distribution) and includes four HUD funded programs comprised of the CDBG, ESG, HOME, and HOPWA programs. Given the large geographic distribution and the multiple set-asides contained within the State CDBG program, complete detail cannot be provided in this textbox section. A detailed State CDBG Action Plan has been uploaded as Appendix A in this HUD E-Consolidated Plan. The State CDBG Action Plan can also be viewed on the Oklahoma Department of Commerce website located at: <a href="http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/">http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/</a></p>

<p><b>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)</b></p>	<p>The State ESG program is a competitive program and geographic distribution is based on applications received and the results of the project selection process. The eligible applicants are units of general local government 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: <a href="http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/">http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/</a></p>
<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>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: <a href="http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/">http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/</a></p>
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provide summary information in this textbox section. As identified earlier, the State E-Consolidated Plan encompasses a majority of the state (Geographic Distribution) and includes four HUD funded programs comprised of the CDBG, ESG, HOME, 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: <a href="http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/">http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/</a></p>

<p><b>Describe threshold factors and grant size limits.</b></p>	<p>Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provide summary information in this textbox section. As identified earlier, the State E-Consolidated Plan encompasses a majority of the state (Geographic Distribution) and includes four HUD funded programs comprised of the CDBG, ESG, HOME, 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: <a href="http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/">http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/</a></p>
<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>Due to textbox character limitations imposed by the online HUD E-Consolidated Plan at this time, the State's program Action Plans can only provide summary information in this textbox section. As identified earlier, the State E-Consolidated Plan encompasses a majority of the state (Geographic Distribution) and includes four HUD funded programs comprised of the CDBG, ESG, HOME, 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: <a href="http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/">http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/</a></p>

**Table 60 - Distribution Methods by State Program**

**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, or 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, or 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.

#	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**

## **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?**

Yes

#### **Available Grant Amounts**

The Section 108 Loan Guarantee Program (108) is a provision of the Community Development Block Grant (CDBG) program that provides a source of financing for economic development and housing rehabilitation projects. This use of the 108 loan proceeds must meet the HUD program objective of benefit to low and moderate income persons.

The application to HUD for a 108 loan must include the pledge of future grant allocations from the State of Oklahoma issued by the Oklahoma Department of Commerce. This pledge is titled a Commitment to Pledge. The city, town, or county wishing to make application to HUD for a 108 loan must first apply to the Oklahoma Department of Commerce for a Commitment to Pledge from the State of Oklahoma.

The final loan terms, conditions, and collateral requirements of the 108 loan will be set by HUD after negotiations between HUD and the applying city, town, or county.

**All Projects:** The following requirements are applicable to both economic development and housing rehabilitation projects.

- An Application for a Commitment to Pledge shall be made to the Oklahoma Department of Commerce, Community Development (ODOC/CD), Community and Economic Development Programs.
- The Application for a Commitment to Pledge shall be made following the requirements in the Section 108 Application for a Commitment to Pledge guide available from ODOC/CD at 1/800-879-6552, extension 5359.
- The minimum commitment to pledge amount is \$500,000; the maximum commitment to pledge amount is \$2,500,000.
- The total outstanding amount of Section 108 commitment to pledges to be issued by the State of Oklahoma shall not exceed \$10,000,000.
- Section 108 loan proceeds cannot constitute more than 50% of the total project costs.
- The local unit of government where the project is located must participate by a contribution of at least 10% of the amount of the Section 108 loan. This permanent contribution is to be in the form of cash, land, buildings, other fixed assets, or permanent infrastructure improvements.
- The project cannot be located in the entitlement cities of Edmond, Enid, Lawton, Midwest City, Moore, Norman, Oklahoma City, Shawnee, and Tulsa.

**Economic Development:** Economic development projects have the following additional threshold requirements.

- Assistance is limited to companies that sell at least 50% of their Oklahoma produced products and/or services outside the State of Oklahoma.
- Each project must include at least 10% equity in the form of a permanent investment.
- Each project must project to create at least one new job for each \$3,000 of 108 loan proceeds being requested.
- Of the new jobs to be created, at least 51% of the jobs will be made available to low and moderate income persons.

**Housing Rehabilitation:** Housing rehabilitation projects have the following additional threshold requirements.

- Projects are limited to rehabilitation only, new construction is ineligible.
- The housing units rehabilitated with 108 loan proceeds will be made available to low and moderate income persons.
- Financial assistance is limited to a \$40,000 average per housing unit for the 108 portion of the project.
- A minimum of 13 housing units will be rehabilitated with 108 loan proceeds.

### **Acceptance process of applications**

The Application for a Commitment to Pledge is based upon the documentation required by HUD for an application for a 108 loan. A thorough review of this information is imperative for the following reasons:

- The State of Oklahoma, by agreeing to issue a Commitment to Pledge for a 108 loan, is pledging future allocations of grant resources to the State of Oklahoma, as the ultimate security for the loan.
- The State of Oklahoma has a responsibility, as a steward of public resources, to ensure that the projects that are sponsored have a high likelihood of success, so future grant allocations are not impaired or eliminated.

**The application process is as follows:**

- The applying city, town, or county prepares and submits an Application for a Commitment to Pledge. The Application for a Commitment to Pledge is submitted to ODOC/CD.
- Once all of the information required in the Application for a Commitment to Pledge has been received by ODOC/CD, a decision of either denial or approval of a Commitment to Pledge will be made within 45 days.
- If the Application for a Commitment to Pledge has been approved, ODOC/CD will forward a Commitment to Pledge to the applicant. The applicant will include the Commitment to Pledge

in their Section 108 loan application packet to be sent to HUD.

- If the Application for a Commitment to Pledge has been denied, the applicant will be advised of the denial decision.

## **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, 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 six (6) 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.

### 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, 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, 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.

## 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.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	4,000
Non-Homeless	900
Special-Needs	55
Total	4,955

**Table 63 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	60
Rehab of Existing Units	20
Acquisition of Existing Units	20
Total	100

**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 acquisition and rehabilitation of existing units will be funded through the HOME Program. These goals include only HOME units and not any other units in the HOME-assisted projects.

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

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

### **Introduction:**

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

### **Actions planned during the next year to address the needs to public housing**

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

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

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

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

HUD has advised OHFA that no public housing authorities are considered troubled at this time.

If any public housing authorities are designated as “troubled” during Program Year 2014, 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 stream organizations and to assure as little duplication of services as possible.

## **Discussion**

**AP-70 HOPWA Goals – 91.320(k)(4)**

<b>One year goals for the number of households to be provided housing through the use of HOPWA for:</b>	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	30
Tenant-based rental assistance	21
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	4
Total	55

## **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 four of the HUD funded programs (CDBG, ESG, HOME, 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 should be following state and federal regulations prohibiting the use of lead based paint (LBP). Subrecipients are relied upon to advise households receiving federal assistance.

### **Actions planned to reduce the number of poverty-level families**

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

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

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

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

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

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

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

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

- Attaining an adequate education
- Making better use of available income
- Obtaining and maintaining adequate housing and suitable living environments
- Obtaining emergency assistance through loans or grants

- Removing obstacles and solving personal problems that block the achievement of self-sufficiency
- Achieving greater participation in the affairs of the community
- Undertaking family planning consistent with family goals, religious and moral convictions
- Obtaining emergency assistance and conservation and weatherization services

The major accomplishments of the CAAs include:

- Approximately 16,000 children participate in the CAA-sponsored Head Start and Early Head Start Programs each year
- More than 9,000 individuals housed in emergency shelters
- More than 400,000 meals served to senior citizens at 58 nutrition centers
- Providing services and assistance to 112,671 individuals and 47,489 families

### **Actions planned to develop institutional structure**

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

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

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

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

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, HOME, and ESG 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	750,000
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
<b>Total Program Income:</b>	<b>750,000</b>

#### 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

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 2014, 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 where feedback is encouraged regarding client needs and ideas to make the program better.

5. Describe performance standards for evaluating ESG.

ODOC Project Representatives monitor the ESG contracts at least once during the contract period. 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.

**Discussion:**

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



# Appendices

## Contents...

- App A: CDBG Action Plan
- App B: ESG Action Plan
- App C: HOME Action Plan
- App D: HOPWA Action Plan
- App E: Citizen Participation
- App F: SF-424's & Certs



# Appendix A

Section Contents...

- CDBG Action Plan

**OKLAHOMA**  
DEPARTMENT OF COMMERCE  
OKcommerce.gov

**CDBG STATE PLAN**  
**FY 2014**

**For Administration of the Small Cities  
Community Development Block Grant (CDBG)**



Oklahoma Department of Commerce  
900 N Stiles Ave.  
Oklahoma City, OK 73104-3234  
800-879-6552

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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 (ODOC), 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 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 for Fiscal Year 2014 will rely on systems which permit local communities to request assistance through the submittal of a formal application packet. The Oklahoma Department of Commerce/Community Development (ODOC/CD) shall conduct an evaluation of applications to ensure compliance with the National Objectives, all thresholds and program requirements.

## **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 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

**GRANT ALLOCATION**

Funding for the Fiscal Year 2014 CDBG program:

Estimated Allocation	\$13,115,124
Less State administrative allowance	\$362,302
Less State technical assistance	\$131,151
<b>Total available for distribution:</b>	<b>\$12,621,671</b>

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CDBG Set-Aside Funding Distribution:

<b>Public Facility and Improvements</b>		<b>\$10,221,671</b>
Water and Wastewater Engineering Phase I	\$150,000	
Water and Wastewater Construction Phase II	\$2,701,671	
Water and Wastewater Construction Competitive	\$3,000,000	
Community Revitalization	\$1,500,000	
CDBG-REAP	\$1,500,000	
Small Cities	\$1,370,000	
 <b>Planning (CIP Updates)</b>		 <b>\$400,000</b>
 <b>Economic Development</b>		
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 \$3,000,000. 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. Such adjustments shall be the minimum amount necessary to fund projects efficiently.

## **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. As evidence of this capacity, towns and cities (counties exempt) must provide, at the time of application, a copy of their **FY 2013** audit or Agreed Upon Procedures (11 O.S. § 17-105 B) by the application submission deadline. **NO APPLICATION WILL BE CONSIDERED FOR REVIEW OR FUNDING THAT DOES NOT MEET THIS STANDARD.**

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. 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.

### **Application Submission Requirements**

1. City/Town Applicants: City/Towns may submit **only one (1) grant application per Program Year** selecting from Small Cities, Water/Wastewater Engineering, Water/Wastewater Construction, Community Revitalization, or Rural Economic Action Plan (REAP). **Exclusions:** Economic Development Infrastructure Financing (EDIF), Capital Improvement Planning (CIP).
2. County Applicants: Counties may submit a maximum of two grant applications per Program Year selecting from Water/Wastewater Engineering, Water/Wastewater Construction, Community Revitalization, or Rural Economic Action Plan (REAP). **Exclusions:** Economic Development Infrastructure Financing (EDIF), and Capital Improvement Planning (CIP). **(Limitation: Counties may ONLY have two (2) open grants and still make an application.) This open total includes BOTH County sponsored contracts and those directly on the County's behalf.** In meeting the maximum of two applications, a County could be a Sponsor of two applications or a County could be a Sponsor of an application while also submitting one application where they have direct jurisdiction.

Counties may submit applications in two forms:

- (a) Applications where they have direct jurisdiction (roads, bridges, County barn, County hospital, etc.), or;
- (b) Counties 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.

County Combinations Permitted: (Limitation: Counties may ONLY have two (2) open grants and still make an application.)

- (a) A county may submit an application on their behalf (direct jurisdiction) and sponsor an application, or;

(b) A County may submit two sponsored applications.

**NON-COMPETITIVE WATER & WASTEWATER PHASE II CONSTRUCTION**

The recipients below were funded under the FY 2013 Phase I Engineering Program. Each award recipient must achieve Release of Funds and their construction permit by **August 30, 2014**. 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 **August 30<sup>th</sup>** 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. Avant                  | 8. Rogers County RWD #16    |
| 2. Carney                 | 9. Seminole Co. RWS/SWMD #3 |
| 3. Drumright              | 10. Slick                   |
| 4. Dustin                 | 11. Temple                  |
| 5. Glencoe                | 12. Verden                  |
| 6. Mill Creek             | 13. Waurika                 |
| 7. Okfuskee County RWD #1 | 14. Wynona                  |

## **WATER & WASTEWATER ENGINEERING**

This program is for those eligible applicants that do not have engineering completed. Applicants submitting under the engineering program may elect to either have (1) CDBG funds pay for the engineering, administration and other costs associated with securing a construction permit with ODEQ; (2) may choose other sources of funds to pay for these costs; or (3) provide a combination of CDBG funds and other funds to pay for these costs. Those successfully competing under this program that have CDBG funds budgeted for engineering, administration, and permitting will be awarded appropriate amounts in each category. Allowable engineering costs will be based on the USDA-RD sliding scale. Once the ODEQ permit and ODOC/CD release of funds requirements are complete (regardless of the source of funds) a construction award will be issued in the next program year for the remaining amount under the non-competitive program.

The total Grant Maximum is \$350,000 for single applicants. All projects shall be single purpose, either water or wastewater that will focus on some of the most serious problems in the state.

For individual water and wastewater projects the maximum amount of CDBG funds that may be used for project administration is 8% of the total CDBG funds awarded.

Applications will be available online **January 31, 2014**. The deadline for application submission is **May 2, 2014**.

### **THRESHOLD REQUIREMENTS FOR WATER & WASTEWATER ENGINEERING**

1. Requests for funds must address at least one or more of the Primary National Objectives of the CDBG program:
  - A. Provide a direct benefit (fifty-one percent [51%] or more) principally for persons of low income;
  - B. Aid in the prevention or elimination of slums or blight; and
  - C. Address a particular urgent need posing a serious and immediate threat to the health or welfare of a community.
2. Cities, Towns and Counties with previous CDBG funding **must have close-out documents submitted by January 31, 2014**. As part of the close-out documents, the Final Inspection Report along with the Board or Council approval must also be submitted.

#### **Close-out Exceptions:**

- Counties may have two (2) open grants and still remain eligible for application submission.
  - Open Economic Development and CIP grants do NOT count against application submission eligibility.
3. A proper sponsor for Water/Wastewater Engineering projects is defined as a Unit of Local government with direct jurisdiction over the majority (60%) of the proposed project beneficiaries.
  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, 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.
6. The CDBG grant request cannot exceed \$2,000 per beneficiary.
7. 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.
8. **TOWNS AND CITIES (COUNTIES ARE EXEMPT) MUST SUBMIT A COPY OF THEIR FY 2013 AUDIT OR THE AGREED UPON PROCEDURES BY THE APPLICATION DEADLINE. NO APPLICATION WILL BE CONSIDERED FOR REVIEW OR FUNDING THAT DOES NOT HAVE THE FY 2013 AUDIT OR AGREED UPON PROCEDURES COMPLETE AND SUBMITTED AT THE TIME OF APPLICATION DEADLINE.**

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 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.

**RATING CRITERIA FOR WATER & WASTEWATER ENGINEERING**

Water and Wastewater applications, which meet threshold criteria, will be ranked for funding utilizing the following criteria (58 total points):

1. **Project Benefit to Low to Moderate Income Persons (2-15 points).** Projects awarded under these criteria will be awarded 1-10 points for percentage of LMI, and 1-5 points for total number of LMI.

<u>LMI%</u>	<u>Points</u>	<u>LMI%</u>	<u>Points</u>	<u>#of LMI Persons</u>	<u>Points</u>
51-55	1	76-80	6	0-250	1
56-60	2	81-85	7	251-500	2
61-65	3	86-90	8	501-750	3
66-70	4	91-95	9	751-1000	4
71-75	5	96-100	10	Over 1000	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 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 (0-10 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 +10 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**

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 wastewater service, 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:**

<u>Cost Per 5,000 gallons</u>	<u>Points</u>
\$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:**

<u>Cost of connection/month</u>	<u>Points</u>
\$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:**

<u>Cost Per 5,000 gallons</u>	<u>Points</u>
\$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

4. **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:

$$FP = AR(0.1102)^c$$

(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

<u>Ability to Finance Project Through Loan</u>	<u>Points</u>
\$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

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

Due to the limited amount of funds, ODOC/CD encourages the smallest grant possible. For Consolidation projects, it will be an average of all applicants.

<u>Grant Request</u>	<u>Points</u>
\$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 \$350,000	1

6. **Strategic Planning Programs (0–3 Points)**

Points awarded to CDBG-CIP and other local planning programs as applicable.

## **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 \$350,000. All projects shall be single purpose, either water or wastewater that will focus on some of the most serious problems in the state.

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 funds awarded.

Applications will be available online **January 31, 2014**. The deadline for application submission is **May 2, 2014**.

### **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 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. 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.
3. All cost estimates derived from professional sources, and submitted with the application. Water and Wastewater projects must have certified cost estimates from a professional engineer licensed to work in Oklahoma.
4. Applications must include a resolution passed by the current governing body requesting that particular assistance.
5. The CDBG grant request cannot exceed \$2,000 per beneficiary.
6. A proper sponsor of water and wastewater project is defined as a unit of general local government with direct jurisdiction over the majority (60%) of the proposed project beneficiaries.
7. **TOWNS AND CITIES (COUNTIES ARE EXEMPT) MUST SUBMIT A COPY OF THEIR FY 2013 AUDIT OR THE AGREED UPON PROCEDURES BY THE APPLICATION DEADLINE. NO APPLICATION WILL BE CONSIDERED FOR REVIEW OR FUNDING THAT DOES**

**NOT HAVE THE FY 2013 AUDIT OR AGREED UPON PROCEDURES COMPLETE AND SUBMITTED AT THE TIME OF APPLICATION DEADLINE.**

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.

8. Documentation of Final Plans and Specifications or Construction Permit issued by the Oklahoma Department of Environmental Quality (ODEQ).
9. Cities, Towns and Counties with previous CDBG funding **must have close-out documents submitted by 5:00 p.m. January 31, 2014.** As part of the close-out documents, the Final Inspection Report along with the Board or Council approval must also be submitted.

**Close-out Exceptions:**

- Counties may have two (2) open grants and still remain eligible for application submission.
- Open Economic Development and CIP grants do NOT count against application submission eligibility.

10. Applicant must provide a response to all application questions and satisfy all documentation requirements delineated in the Guidelines and Application package including, but not limited to, income survey results; survey maps; certifications; Section 102 Disclosures; 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 (73 total points):

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.

<u>LMI%</u>	<u>Points</u>	<u>#of LMI Persons</u>	<u>Points</u>
51-60	1	0-250	1
61-70	2	251-500	2
71-80	3	501-750	3
81-90	4	751-1000	4
91-100	5	Over 1000	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:

	<b>Legal Enforceable Orders</b>	
Low Severity		5.0 points
Medium Severity		7.5 points
High Severity		10.0 points
	<b>Documented Hazards</b>	
Invalid		0 points
Low Severity		2.5 points
Medium Severity		5.0 points
High Severity		7.5 points

Severity of Need (0-10 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 +10 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**

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:**

<u>Cost Per 5,000 gallons</u>	<u>Points</u>
\$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:**

<u>Cost Per 5,000 gallons</u>	<u>Points</u>
\$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:**

<u>Cost of connection/month</u>	<u>Points</u>
\$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

**4. 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

<u>Ability to Finance Project Through Loan</u>	<u>Points</u>
\$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

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

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

<u>Grant Request</u>	<u>Points</u>
\$ 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 \$350,000	1

**6. 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. A maximum of 10 points is available for leverage. The leverage score will be calculated as follows:*

**Formula:**

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

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

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

$$\frac{\$62,500}{\$100,000} \times 10 = 6.25 \text{ points}$$

7. **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

8. **Strategic Planning Programs (0–3 Points)**

Points awarded to CDBG-CIP and other local planning programs as applicable.

## **COMMUNITY REVITALIZATION**

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. Starting back in FY 2012, CR applications were NO longer separated into the following categories: Buildings, Streets/Drainage, Emergency Equipment, and All Other Public Facilities as was the case in previous program years.

The maximum amount of CDBG funds that may be used for Community Revitalization project administration is six percent (6%) of the total award.

Applications will be available online **January 31, 2014**. The deadline for application submission is **March 28, 2014**.

## **THRESHOLD REQUIREMENTS FOR COMMUNITY REVITALIZATION**

All Community Revitalization Projects must meet the following threshold criteria:

1. Each individual project selected must address at least one or more of the Primary National Objectives of the CDBG program:
  - A. Provide a direct benefit (fifty-one percent [51%] or more) principally for persons of low income;
  - B. Aid in the prevention or elimination of slums or blight; and
  - C. Address a particular urgent need posing a serious and immediate threat to the health or welfare of a community.
2. A proper sponsor for 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 under this grant.

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, 2014.** As part of the close-out documents the Final Inspection Report along with Board/Council approval must also be submitted.

**Close-out Exceptions:**

- Counties may have two (2) open grants and still remain eligible for application submission.
  - Open Economic Development and CIP grants do NOT count against application submission eligibility.
7. Grant request cannot exceed \$2,000 per beneficiary for all projects.
  8. Applicants must provide a response to all application questions and satisfy all documentation requirements delineated in the Guidelines and Application package including, but not limited to: Resolution, income survey results, survey maps, certifications, Section 102 Disclosures, project budget, etc.
  9. **TOWNS AND CITIES (COUNTIES ARE EXEMPT) MUST SUBMIT A COPY OF THEIR FY 2013 AUDIT OR THE AGREED UPON PROCEDURES BY THE APPLICATION DEADLINE. NO APPLICATION WILL BE CONSIDERED FOR REVIEW OR FUNDING THAT DOES NOT HAVE THE FY 2013 AUDIT OR AGREED UPON PROCEDURES COMPLETE AND SUBMITTED AT THE TIME OF APPLICATION DEADLINE.**

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 dollars it will be properly insured for the life of the asset. Proper insurance for buildings includes property and liability insurance coverage. When the project includes vehicles proper insurance will include liability, comprehensive and collision coverage.
11. Applicants are responsible for accomplishing online application corrections/revisions along with any applicable application upload corrections/revisions as directed by ODOC 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.

**RATING CRITERIA FOR COMMUNITY REVITALIZATION**

Applications which meet threshold requirements will be ranked for funding utilizing the following criterion: (78 total points)

1. **Project Benefit to Low to Moderate Income Percentage (2 - 30 points)**

<u>LMI%</u>	<u>Points</u>	<u># of LMI Persons</u>	<u>Points</u>
51-55	1	0-100	1
56-60	2	101-200	2
61-70	4	201-300	4
71-80	6	301-400	6
81-90	8	401-500	8
91-100	10	501-600	10
		601-700	12
		701-800	14
		801-900	16
		901-1000	18
		Over 1000	20

2. **Strategic planning Programs (0 – 3 points)**

Points awarded to CDBG-CIP and other local planning programs as applicable.

3. **Population Growth Rate (.5 – 10 points)**

Applicants are **NOT** required to submit their own demographic data for establishing “Demographic Need”. The population growth rate is based on the most recent data obtained by the Oklahoma Department of Commerce from the U.S. Census Bureau and is consistent at the same point in time for all applicants.

Population growth rate points are based on census data and assessed as follows:

<b>Positive Growth Rate %</b>	<b>Points</b>	<b>Negative Growth Rate %</b>	<b>Points</b>
0.0 – 5.9	1	0.0 – (-5.9)	.5
6.0 – 10.9	2	-6.0 – (-10.9)	1
11.0 – 15.9	3	-11.0 – (-15.9)	1.5
16.0 – 20.9	4	-16.0 – (-20.9)	2
21.0 – 25.9	5	-21.0 – (-25.9)	2.5
26.0 – 30.9	6	-26.0 – (-30.9)	3
31.0 – 35.9	7	-31.0 – (-35.9)	3.5
36.0 – 40.9	8	-36.0 – (-40.9)	4
41.0 – 50.9	9	-41.0 – (-50.9)	4.5
Over – 50.9	10	Over – (-50.9)	5

4. **Leverage (0 – 30 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 (MAX \$100,000 x.5 = \$50,000) will be recognized as cash. A maximum of 30 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 population numbers compiled by the U.S. Census Bureau and the U.S. Department of Housing and Urban Development. Moreover, if the applicant is a county submitting on behalf of an unincorporated area, the maximum variable allowed (2) will automatically be applied.

**Applicants with population of 1,500 or less will receive a variable of two (2). Those with a population of 1,501 to 3,500 will receive a variable of one and a half (1.5). Finally, if the applicant has a population of 3,501 and above; the variable applied will be one (1).**

The leverage score will be calculated as follows:

**Formula:**

$$\begin{array}{rclcl}
 \text{Cash Leverage} & \$ \underline{\hspace{2cm}} & \times & 1 = & \$ \underline{\hspace{2cm}} \\
 \text{In-Kind Leverage} & \$ \underline{\hspace{2cm}} & \times & .5 = & \$ \underline{\hspace{2cm}} \\
 \text{Total Cash Leverage Allowed for Rating} & & & & \$ \underline{\hspace{2cm}}
 \end{array}$$

$$\frac{\text{Total Leverage}}{\text{Grant Request Amount}} \times 30 = \text{Leverage Points}$$

*EXAMPLE:*

Grant Amount Requested	\$150,000				
Cash Leverage	\$50,000	x	1	=	\$50,000
In-Kind Leverage	\$50,000	x	.5	=	<u>\$25,000</u>
Total Leverage Allowed For Rating					<u>\$75,000</u>

$$\frac{\$75,000}{\$150,000} \times 30 = 15$$

Example A: ***The applicant has a population of 2,750 people. 15 x 1.5 = 22.5 points awarded.***

Example B: ***The application has a population of 1,200 people. 15 x 2.0 = 30 points awarded.***

**5. Previous Grant (0 or 5 points)**

If the city, town or county has received a CDBG Award (excluding EDIF or CIP) in the last three (3) program years the applicant will receive zero (0) points. If the applicant has not received a CDBG award in the last three (3) program years, they will receive five (5) points.

## **CDBG/RURAL ECONOMIC ACTION PLAN (REAP)**

The total funding amount for the REAP category 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 CDBG funds that may be used for CDBG REAP project administration is six percent (6%) of the total award.

Applications will be available online **January 31, 2014**. The deadline for application submission is **February 28, 2014**.

### **The SSPD Areas Estimated Allocations are listed below:**

1. ACOG	\$145,668	7. KEDDO	\$139,660
2. ASCOG	\$140,861	8. NODA	\$123,737
3. COEDD	\$149,414	9. OEDA	\$112,920
4. EODD	\$150,725	10. SODA	\$136,235
5. GGEDA	\$149,370	11. SWODA	\$122,312
6. INCOG	\$129,098		

### **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 REAP eligible as identified by the Substate Planning District and in accordance with 62 O.S. § 2001 et al as amended.
2. CDBG funds must be matched dollar for dollar by REAP. For example, if a project is \$80,000 it must be \$40,000 CDBG and \$40,000 REAP.
3. Requests for funds must address at least one or more of the Primary National Objectives of the CDBG program:
  - A. Provide a direct benefit (fifty-one percent [51%] or more) principally for persons of low income;
  - B. Aid in the prevention or elimination of slums or blight; and
  - C. Address a particular urgent need posing a serious and immediate threat to the health or welfare of a community.
4. Cities, Towns, and Counties with previous CDBG funding **must have close-out documents submitted by January 31, 2013.**

**Close-out Exceptions:**

- Counties may have two (2) open grants and still remain eligible for application submission.
  - Open Economic Development and CIP grants do NOT count against application submission eligibility.
5. A proper sponsor 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 grant request cannot exceed \$2,000 per beneficiary.
  9. 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.
  10. **TOWNS AND CITIES (COUNTIES ARE EXEMPT) MUST SUBMIT A COPY OF THEIR FY 2013 AUDIT OR THE AGREED UPON PROCEDURES BY THE APPLICATION DEADLINE. NO APPLICATION WILL BE CONSIDERED FOR REVIEW OR FUNDING THAT DOES NOT HAVE THE FY 2013 AUDIT OR AGREED UPON PROCEDURES COMPLETE AND SUBMITTED AT THE TIME OF APPLICATION DEADLINE.**

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.

11. Applicants must certify that if the proposed project is funded by CDBG 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.
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.

## 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 2014 Small Cities category. Oklahoma’s entitlement cities are Edmond, Enid, Lawton, Midwest City, Moore, Norman, Oklahoma City, Shawnee, and Tulsa as well as the units of local government participating in the CDBG Urban County Designation for Tulsa County which consists of the following:

City of Bixby	City of Jenks	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	

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).

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:

	2014 Allocation	
1.	Ada	\$80,234
2.	Altus	\$79,409
3.	Ardmore	\$80,784
4.	Bartlesville	\$74,737
5.	Bethany	\$72,813
6.	Chickasha	\$75,836
7.	Claremore	\$62,368
8.	Del City	\$72,538
9.	Duncan	\$69,515
10.	Durant	\$81,333
11.	El Reno	\$61,819
12.	McAlester	\$72,263
13.	Muskogee	\$94,801
14.	Mustang	\$57,696
15.	Ponca City	\$85,456
16.	Stillwater	\$97,550
17.	Tahlequah	\$86,281
18.	Yukon	\$64,567
		<b>\$1,370,000</b>

### 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 2010 Small Cities Award expended
- 100% of 2011 Small Cities Award expended
- 50% of 2012 Small Cities Award expended

If the above expenditure requirements have not been met, the community will not be allowed to participate in the FY 2014 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 Community Development (CD) set-aside during the FY 2014 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 affidavit of publication.
6. 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.
7. Applications must include a Resolution passed by the current governing body requesting the particular assistance.
8. Grant request cannot exceed \$2,000 per beneficiary for all projects.
9. **TOWNS AND CITIES (COUNTIES ARE EXEMPT) MUST SUBMIT A COPY OF THEIR FY 2013 AUDIT OR THE AGREED UPON PROCEDURES BY THE APPLICATION DEADLINE. NO APPLICATION WILL BE CONSIDERED FOR REVIEW OR FUNDING THAT DOES**

**NOT HAVE THE FY 2013 AUDIT OR AGREED UPON PROCEDURES COMPLETE AND SUBMITTED AT THE TIME OF APPLICATION DEADLINE.**

Applications will be released online **January 31, 2014**. The deadline for application submission is **July 18, 2014**.

## **ECONOMIC DEVELOPMENT**

The Economic Development (ED) program has a total of **\$2,000,000** available. The objective of the Economic Development 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 2014 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, or educational institutions;
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.
- 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.

### **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. 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)**

Since 1993, the Oklahoma Department of Commerce/Community Development (ODOC/CD) has funded grants to local governments to develop Capital Improvement Plans (CIP). The process involves the creation of a Geographic Information System (GIS) based, comprehensive mapping and inventory of governmentally owned assets. It also includes the development of a total Capital Needs Summary/5-year strategic plan. Local implementation is essential to planning for the repair and replacement of publicly owned assets in order to maximize the impact on local infrastructure. CIP grantees work with their Substate Planning District (SSPD) to complete a project.

The total allocation for the FY 2014 CIP Program will be **\$400,000**. Applications will be available **January 31, 2014**. The deadline for application submission is **July 3, 2014**. There is no grant maximum for an individual project. Grant amounts will be based on the criteria set forth in the CDBG application packet. Each SSPD should determine their priority list of projects. FY 2014 CIP funds will be available after 60% of the FY 2013 projects have been completed. Each local government must update compliance with meeting the National Objective of benefiting at least 51% of persons who are low to moderate income.

### **THRESHOLD REQUIREMENTS FOR CIP**

1. Application Summary & Certification attesting to the accuracy and completeness of the application. All forms must be complete when submitted.
2. Proof that citizen participation requirements have been met, as evidenced by an application phase public hearing and written Citizen Participation Plan.
3. A proper sponsor of CIP project is defined as a unit of local government with direct jurisdiction over the majority (60%) of the proposed beneficiaries.
4. Requests for funds must provide a direct benefit (51% or more) principally for persons of low income.
5. Applicants must provide responses to all application form questions and satisfy all documentation requirements delineated in the Guidelines and Application package including, but not limited to, income survey results, survey maps, certifications, Section 102 Disclosures, prior projects audit form, etc.
6. **TOWNS AND CITIES (COUNTIES ARE EXEMPT) MUST SUBMIT A COPY OF THEIR FY 2013 AUDIT OR THE AGREED UPON PROCEDURES BY THE APPLICATION DEADLINE. NO APPLICATION WILL BE CONSIDERED FOR REVIEW OR FUNDING THAT DOES NOT HAVE THE FY 2013 AUDIT OR AGREED UPON PROCEDURES COMPLETE AND SUBMITTED AT THE TIME OF APPLICATION DEADLINE.**

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 may apply on their behalf, if the County chooses to do so. Nothing contained herein mandates a County to act as an accommodating party.

## **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 US 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.

### **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 pool 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.

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 plan for the individual set-aside.

### **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 eligible activities.

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

## **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 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.

### ***Close-Out***

Cities, towns and counties with previous CDBG funding **must have close-out documents submitted to Oklahoma Department of Commerce by 5:00 p.m. January 31, 2014.**

### ***Financial Leverage/Project Definition/EDIF***

New money contributed for the express purpose of implementing the proposed project. The source of the new money may be cash or other asset resources (and, bank loans, proceeds from the sale of stock or bonds, or loans from other public agencies). Net worth and existing assets are generally not new money leveraged into a project; this form of "old money" cannot be considered as leverage. Commitments in writing are generally required to document financial leverage. A "Project" is the cumulative activities that the CDBG-ED resources are an integral part thereof. Said activities could include, but not be limited to, new construction improvements, machinery and equipment, land, engineering, etc.

### ***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.

### ***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 assessed for in-kind leverage not materializing.

### ***Same Activity***

For Economic Development projects, the State defines Section 104(i), "Same Activity," as the same purpose as the original award.

***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 18 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 AGATE online application system. 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, then your 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 went into effect at the beginning of the 1998 CDBG Fiscal Year on April 1, 1998.**

## **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 Water and Wastewater, Community Revitalization, Small Cities, and CDBG/REAP), 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.



# Appendix B

Section Contents...

- ESG Action Plan

**Emergency Solutions Grant (ESG)**  
**2014 Annual 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 Shelter 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).

<b>Date</b>	<b>Description</b>
April 1, 2014	Application Webinar
April 1 – May 30, 2014	Applications entered into OK Grants
June – July, 2014	Continua score, rank and recommend
August – September, 2014	ODOC verifies eligibility of potential subrecipients
First Week of September, 2014	Approximate Date for Award Notification
October 1, 2014	ESG Contract Start Date
March 31, 2016	ESG 2014 contract end date. All funds must be expended by this date.
May 31, 2016	ESG 2014 Closeout Documentation and Annual Report Due to ODOC.

### **FY 2014 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) 10-year Plan adopted by the Oklahoma Department of Commerce/ Community Development (ODOC/CD) continues 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 two options:

1. Private Nonprofits who have a yearly independent audit may directly apply for an ESG grant without sponsorship.

2. Shelters may seek sponsorship from either a unit of general local government or the Community Action Agency (CAA) operating in that jurisdiction. A unit of general local government or CAA may retain prevention or administrative funds to carry out those 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. 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. 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.

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.

### **Threshold Requirements for the Emergency Solutions Grant:**

All Emergency Solutions Applicants must meet the following threshold criteria:

- Sponsor / 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 24/7
- Sponsor / Shelter must provide evidence of active involvement in Continuum of Care planning and coordination of service efforts.
- Sponsor / Shelter must provide evidence they are collecting service data through their Continuum of Care HMIS database.
- All outstanding monitoring findings or unresolved issues about previous ESG grants must be resolved.
- All required certifications must be received and signed by the appropriate signatory.
- 100% of funds including match must have been expended on current or past ESG contracts.
- 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 follow all General Record Keeping Requirements; both for financial and client files.

### **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 and Point-In-Time Count Survey. 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 six (6) 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 Care Authority of the ESG Program:

- The CoC Governing Board may create 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 may create 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.

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 2014 Program Design**

The 2014 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.

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 \$150,000, 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. Based on the 2014 HUD allocation of \$ 1,471,628.00(minus the ODOC admin of \$55,186.00) the 2014 Continuum of Care allocations will be as follows:

CoC	Allocation with Base of \$150,000.
CLEVELAND	\$171,868
North Central	\$206,313
Northeast	\$243,236
Northwest	\$243,178
Southeast	\$309,897

Southwest	\$241,950
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The formula used for ESG project funding:

- a. 10% - 2011 Estimated Total Population
- b. 30% - Weighted Median Income Measure
- c. 30% - July 2012 Quintile Tiering Based on Unemployment Rate
- d. 30% - 2006 - 2010 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 to create their own policies and procedures pertaining to funding amounts and division of funding eligible activities. If a CoC does not have such guidance the minimum guidelines for Funding opportunities are as follows:

	<b>Shelter/Outreach</b>	<b>Housing (Prevention and Rapid Rehousing)</b>
<i>min./max. awards</i>	\$50,000 max.	\$50,000 max.
<i>Provider Type:</i>	Shelters providing emergency shelter and street outreach services	Shelters providing primarily rapid rehousing and prevention services along with an emergency shelter component
<i>Minimum service provision:</i>	Must have an emergency shelter component	Must provide Tier I services, or have Tier 1 partnership and provide rapid rehousing and prevention services
<i>Additional Requirements</i>	Must demonstrate community need	Must demonstrate community need and availability of housing

**Explanation**

**Rehabilitation activities are eligible in all Funding Opportunities.**

**If Applying for both Shelter/Outreach and Housing funding, Applicant may use the Housing budget criteria)**

**Shelter/Outreach**

Funds available (\$50,000 maximum per award) for Street Outreach and Shelter Services including case management as well as other activities that meet the basic needs of an individual or family, immediate

provision of shelter, food, clothing, assistance in obtaining other federal and state assistance. (A minimum of **40% of Grant Funds awarded must be spent on Prevention and/or Rapid Rehousing Services**)

### **Housing (Prevention and Rapid Rehousing)**

Funds are available (\$50,000 maximum per award) for organizations that provide rapid rehousing and homelessness prevention services including case management. Eligible organizations must have an emergency shelter component. (**60% of Grant Funds awarded may be spent on Prevention and/or Rapid Re-Housing Services**)

### **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.
- 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 rehousing 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.

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.

Maintenance of effort.

- (1) 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.

## **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 child care 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, child care, 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.
- (1) 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.
- (R) 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.

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 of time 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.
    - (d) Project-based rental assistance. If the subrecipient identifies a permanent housing unit that meets ESG requirements and becomes available before a program participant is identified to lease the unit, the subrecipient may enter into a rental assistance agreement with the owner to reserve the unit and subsidize its rent in accordance with the following requirements:
  - (5) The rental assistance agreement may cover one or more permanent housing units in the same building. Each unit covered by the rental assistance agreement ("assisted unit") may only be occupied by program participants, except as provided under paragraph (i)(4) of this section.
  - (6) The subrecipient may pay up to 100 percent of the first month's rent, provided that a program participant signs a lease and moves into the unit before the end of the month for which the first month's rent is paid. The rent paid before a program participant moves into the unit must not exceed the rent to be charged under the program participant's lease and must be included when determining that program participant's total rental assistance.
  - (7) The subrecipient may make monthly rental assistance payments only for each whole or partial month an assisted unit is leased to a program participant. When a program participant moves out of an assisted unit, the subrecipient may pay the next month's rent, i.e., the first month's rent for a new program participant, as provided in paragraph (i)(2) of this section.
  - (8) The program participant's lease must not condition the term of occupancy to the provision of rental assistance payments. If the program participant is determined ineligible or reaches the maximum number of months over which rental assistance can be provided, the subrecipient must suspend or terminate the rental assistance payments for the unit. If the payments are suspended, the individual or family may remain in the assisted unit as permitted under the lease, and the subrecipient may resume payments if the individual or family again becomes eligible and needs further rental assistance. If the payments are terminated, the rental assistance may be transferred

to another available unit in the same building, provided that the other unit meets all ESG requirements.

- (9) The rental assistance agreement must have an initial term of one year. When a new program participant moves into an assisted unit, the term of the rental assistance agreement may be extended to cover the initial term of the program participant's lease. If the program participant's lease is renewed, the rental assistance agreement may be renewed or extended, as needed, up to the maximum number of months for which the program participant remains eligible. However, under no circumstances may the subrecipient commit ESG funds to be expended beyond the expenditure deadline in § 576.203 or commit funds for a future ESG grant before the grant is awarded.

(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 recipient may use up to 7.5 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 subrecipient must establish written standards for providing ESG assistance. These 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 evaluation in accordance with the CoC's centralized or coordinated assessment requirements (Once the assessment tool is implemented)

- 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 or 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

- 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

**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 be 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 2014 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 reflected on the monthly expenditure report submitted to ODOC on the 20<sup>th</sup> of each month. The following are examples of what can be used as match:

- Cash
- The value or fair rental value of any building used for program purposes (in-kind)
- Donated material (in-kind)
- The value of building lease (match may be used only one time)
- Salary paid to staff to carry out the program of the recipient
- Volunteer time (@ \$5/hour)

### **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 December 9, 2011:

([http://www.hudhre.info/documents/HEARTH\\_HomelessDefinition\\_FinalRule.pdf](http://www.hudhre.info/documents/HEARTH_HomelessDefinition_FinalRule.pdf)).

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.

Reports due to ODOC using data from approved data collection methods are as follows:

<b>Monthly Progress</b> - Due the 20 <sup>th</sup> of each following month.	For example, the January monthly report would be due no later than February 20 <sup>th</sup> .
<b>Mid-year Progress Report</b> – Report providing unduplicated numbers due 30 days after each semi-annual period; October – March and April – September.	Period ending March 30 <sup>th</sup> – Due April 30 <sup>th</sup> Period ending September 30 <sup>th</sup> – Due October 30 <sup>th</sup>
<b>Annual Performance Report</b> – Due 30 days after the end of the contract year for each fiscal year in which ESG funds are expended.	Due October 30 <sup>th</sup>

**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; an advance may be requested for no more than one month’s expenses at a time. Regulations state that request for funds must be made at a minimum on a quarterly basis.

**Deadline for Using Grant Amounts**

ESG funds must be obligated within 60 days of the date on which the award was made available to the units of general local government/CAA. The initial 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. It is not customary to grant extensions. The State will grant such extension only in situations where the circumstances are an exception.

**Obligated**

The Oklahoma Department of Commerce/Community Development (ODOC/CD) considers funds obligated when the sponsor shelter agreement is signed by the unit of general local government or the Community Action Agency (CAA). In the case where the shelter is owned by the CAA, funds are obligated when a summary of the financial and programmatic responsibilities the CAA/shelter will assume is in writing and signed. Funds may not be expended until ODOC/CD receives an Environmental Review (if applicable), Sponsor Shelter Agreement or summary and a Request for Release of Funds. Upon receipt of these documents, ODOC will return to the unit of general local government or CAA 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 2001** – 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 any and 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 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, then your contract may be unable to draw funds unless a good cause is shown and approved by ODOC/CD.

### **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**

The State reserves the right to recapture Emergency Solution Grant funds under the following circumstances:

- Failure to obligate and spend within the time periods specified.
- Failure, without approved modification, to implement the project as set forth in the approved ESG grant application.
- Failure to meet the specified performance measures.

## **Application Procedures, Submission and Selection Requirements**

### **Continuum of Care Scoring Process:**

1. CoC scorers will be given a login to OK Grants and instructions to score their assigned applications online. A Webinar will be scheduled to show people how to use the score sheet in OK Grants. 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 verify that all recommended applicants are eligible for funding.
5. ODOC will send award letters to subrecipients with final instructions regarding how contracts are initiated in OK Grants.

### **Submission Requirements**

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 question I-1 of the application.

### **Application Workshop**

An application webinar has been scheduled for April 1, 2014. Webinar participation is optional. However, only questions of a clarifying nature will be answered after the Webinar has been held. ODOC will not answer any questions regarding the Emergency Solutions program or provide technical assistance during the application process.

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.**

## **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 2014 Emergency Shelter 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.

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, congregate shelters, and transitional housing); 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.

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.

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: Any State, territory, metropolitan city, or urban county, or in the case of reallocation, any unit of general purpose local government that is approved by HUD to assume financial responsibility and enters into a grant agreement with HUD to administer assistance under this part.

Rehabilitation: Labor, materials, tools, and other costs of improving the building, including repair directed toward an accumulation of deferred maintenance; replacement of principal fixtures and components of existing buildings; installation of security devices; and improvements through alterations or incidental additions to or enhancement of, existing buildings including improvements to increase the efficient use of energy. Rehabilitation includes the conversion of a building to an emergency shelter where the costs of conversion and any rehabilitation do not exceed 75 percent of the cost of the building before rehabilitation, and includes structural changes necessary to make a facility accessible to persons with physical handicaps. The facility must be used as an emergency shelter for a period of not less than three years after the ESG contract is closed or the applicant may be required to repay grant funds.

*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 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.

**Rating Details and Scoring:**

The following Criteria is used for Scoring the Questions Below. The “Look for” to the left of each question is the Optimum of what needs to be seen in order to get full credit.

Scoring Options		
100% Points if:	Up to 50% Points if:	No Points if:
<p><b>Without a doubt.</b> The questions are answered clearly and with details. The shelter shows a clear knowledge and understanding of the plans and process they follow.</p>	<p><b>Likely.</b> The questions are answered with general information. No details or specific program data is given. Also, if generic or data that could be found on the Internet is used versus providing local/regional data. The applicant provides a realistic and/or likely (but not proven) description of their understanding of the community needs and the program they propose to remedy mentioned needs.</p>	<p><b>Confusing/Not Included:</b> The community / client needs and the programs proposed to resolve community needs are loosely or not at all defined. It appears that the writers of the grant have little to no idea of what their target clients need. No statistical data is discussed when talking about the needs of the community. Key requests or questions that are not answered or talked “around” should receive no points.</p>

Look for:	Section I Community Needs (15 Pts)	Maximum Possible Points:
The shelter has a targeted and clearly demonstrated need.	I-1) Describe the need for homeless assistance services in your area	10
The shelter’s services will make a significant impact on the community in alleviating homelessness.	I-2) How was data showing proof of need collected?	5

Look for:	Section II Proposed Use of Funds (50 pts)	Points Possible:
<p>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</p>	<p>II-1. What sub-population(s) does the shelter serve (check all that apply)  <input type="checkbox"/> Children and Youth  <input type="checkbox"/> Chronic Substance Abusers  <input type="checkbox"/> Co-Occurring Disorder (see definition)  <input type="checkbox"/> Expectant Mothers  <input type="checkbox"/> Persons with HIV/Aids  <input type="checkbox"/> Mentally Ill  <input type="checkbox"/> Veterans  <input type="checkbox"/> Victims of Domestic Violence  <input type="checkbox"/> Other (specify)            II-2 Describe the organization's Emergency Shelter Component?            II-3. Describe the organization's Street Outreach Services.            I-4 Describe the shelter's hours of operation and 24/7 availability.            II-5 . What is the maximum length of stay?            II-6 Does your shelter charge a fee for services? If yes, provide explanation.</p>	<p>15</p>
<p>Thorough description of how prevention funds can be accessed and how client's program eligibility is determined as well as indication of what documentation is collected/verified</p>	<p>II-7) Describe how clients will access requested Rapid Rehousing and/or prevention funds; including what documentation is collected / verified regarding the client's program eligibility.</p>	<p>5</p>
<p>Proposed process is well described and easily relates to the need of the clients described in II-1. All key positions are described in relation to program implementation and operation.</p>	<p>II-8) Describe what level of case management clients receive at the Shelter.            ➤ Identify the person(s) responsible for carrying out case management activities.</p>	<p>15</p>
<p>Applicant describes process of how clients enter into transitional and/or permanent housing and describes the detailed steps taken to move a client from homelessness to living in permanent housing.</p>	<p>II-9) Describe steps clients take to enter transitional and/or permanent housing</p>	<p>10</p>
	<p>II-10) How will the services proposed address the needs of the households served allowing them to become self sufficient in order to maintain permanent housing? 10 pts</p>	<p>10</p>

Look for:	Section III Performance Measures	Points
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	<b>(30 Pts)</b>	<b>Possible:</b>
<p>Goals 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 II-1</p> <p>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.</p>	III_1) List local Program Performance Measures and Outcomes. How will achieving the local performance measures help achieve the State Performance Measures?	<b>15</b>
	III-2) List the number of clients to be served.	<b>10</b>
	III-3) How will the data be collected?	<b>5</b>
<b>Look for:</b>	<b>Section IV Community and Local Government Commitment (5 Pts)</b>	<b>Points Possible:</b>
<p>Shelter enjoys a high level of community and local government commitment with multiple fund-raising activities identified.</p> <p>Volunteers are numerous and are well utilized by the shelter</p> <p>Financial resources are identified and their relationship to program support is clear (they have identified how these dollars are used to support the program i.e. operations, case management, etc.).</p> <p><b>Note: Match must be available during 2014 program year</b></p>	<p>IV-1) Applicants able to provide documentation of community and local government commitment through the availability of matching funds to support this project. Eligible forms of match include but are not limited to:</p> <ul style="list-style-type: none"> <li>• The value of the time and services contributed by volunteers to carry out the program at a rate of \$5.00 per hour.</li> <li>• Volunteers providing professional services such as medical or legal services valued at the reasonable and customary rate in the community.</li> <li>• The value of any donated material or building. The value of any building lease using a method to reasonably calculate fair market value.</li> </ul> <p>IV-2) Applicants able to document cash match from these entities. Eligible forms of match include but are not limited to:</p> <ul style="list-style-type: none"> <li>• The value of salary paid to staff to carry out the ESG Program.</li> <li>• Award letters from foundations, organizations, private individuals, and other government sources.</li> </ul>	<p><b>Match Required</b></p> <p><b>Community Support &amp; Volunteers 5pts</b></p>
<b>Looking for:</b>	<b>Section V Continuum of Care Requirements (50 Pts)</b>	<b>Points Possible:</b>

<p><b>Continuum of Care:</b> Shelter provides a clear understanding of the Continuum of Care approach (moving from emergency to transitional to permanent) and explained the plan by which their clients will make these transitions. The services identified earlier in the application are all focused and relevant to helping clients achieve self-sufficiency and permanent housing.</p>	<p>V-1) Explain how services proposed fit into the local CoC's Action Plan to end homelessness? ➤ Provide CoC Agreement for HMIS Data Entry</p> <ul style="list-style-type: none"> <li>• If exempt from using HMIS, describe how method for collecting data is comparable to HMIS.</li> </ul>	<p><b>15</b></p>
<p><b>Mainstream Services:</b> Mainstream services and the process by which shelter clients are connected to those services is thoroughly described and seems do-able. Shelter frequently communicates with other local providers regarding services available and actively avoids service duplication. Shelter works with local law enforcement and mental health facilities regarding discharge planning</p>	<p>V-2) Describe the mainstream services available in your area and the process for connecting shelter clients to these services.</p>	<p><b>15</b></p>
<p>Homeless/formerly homeless are members of the shelter's governing body.</p>	<p>V-3) What agencies in your area do you collaborate with to provide better care for your clients and to prevent duplication of services?</p>	<p><b>15</b></p>
	<p>V-4) Describe how homeless and/or formerly homeless persons participate in the operations, planning, development, and/or policy making at your shelter.</p>	<p><b>5</b></p>



# Appendix C

Section Contents...

- HOME Action Plan

**Home Investment Partnerships Program (HOME) Program  
Annual Action Plan  
Program Year 2014**

**Oklahoma Housing Finance Agency  
Housing Development Team  
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Oklahoma City, OK 73126-0720  
(405) 419-8263**

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## HOME Program: One-Year Action Plan

Introduction: At the time of publication of this plan, the State of Oklahoma's 2014 allocation of HOME funds has not been determined. A Fiscal Year 2014 estimate has not yet been published by the U.S. Department of Housing and Urban Development (HUD). The range of activities planned for 2014 is similar to that of Program Year 2013, but some changes have been made. Some set-asides have been adjusted, revised or eliminated.

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.

On July 24, 2013, a revised version of 24 CFR Part 92 (the "new Final Rule") was published in the Federal Register. Most of the provisions of the new Final Rule were effective August 23, 2013, 30 days after publication. OHFA has made every effort to incorporate all of the required changes into the State's HOME Program.

### **Participating Jurisdiction Service Area**

Applications for HOME funds will be accepted from all parts of the State 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.

### **New Emphasis on Affordable Rental Housing**

**OHFA is proposing to continue its 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.

## 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 from the set-aside for Rental Activities Undertaken in Conjunction with Affordable Housing Tax Credits. **They are ineligible to apply for HOME funds from any of the other set-asides.**

## 2. HOME Funding Activities

### Homeowner Rehabilitation

OHFA does not intend to use any of its 2014 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.**

**For the first six months of Program Year 2014, OHFA will not accept applications for Homeownership activities, except for Homeownership activities in conjunction with the Rural Development Self-Help Program.** Program Year 2014 begins April 1, 2014, and OHFA will begin accepting applications for most activities on or about April 1, 2014. Therefore, OHFA will not accept applications for Homeownership activities until October 1, 2014. There are some exceptions to this rule:

1. OHFA will accept Homeownership activities in conjunction with the RD Self-Help Program, so long as the amount of the HOME funds does not exceed \$10,000 per unit
2. OHFA will accept applications for CHDO Pre-Development Loans for potential future Homeownership activities

This is in accordance with the stronger emphasis OHFA will be placing on Rental activities due to the high demand for affordable rental units shown in the two surveys conducted by OHFA and the Affordable Housing Committee. Also, in the past several years OHFA has modified numerous Homeownership contracts and converted them to Rental activities. In all of these instances, the CHDOs or sub-recipients advised OHFA that there were no qualified buyers for the homes. Statistical evidence indicates that the demand for homebuyer units is down and the demand for rental units has risen sharply.

### **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.** However, some CHDOs may have received an award of CHDO Set-Aside funds in Program Year 2013 at a time when there were no CHDO Operating Assistance funds available. CHDOs that fall into this category will be permitted to apply for CHDO Operating Assistance as a stand-alone application. **CHDO Operating Assistance funds will only go to CHDOs that are currently receiving HOME funds for a CHDO activity.**

**OHFA believes that CHDO Operating Assistance was never intended to be a permanent, ongoing source of operating assistance.** CHDOs should, over time, develop the capacity and financial wherewithal to fund all of their own operating costs. The best use of this limited resource is to provide operating assistance to newly formed CHDOs, or small CHDOs that need more time to develop capacity. OHFA defines “newly formed CHDOs” as CHDOs that have been certified by OHFA for no more than three years.

**For that reason, a preference will be given to CHDOs applying for operating assistance for the first time.** Such preference will be in the form of a tie-breaker for CHDO Operating Assistance applications. Due to the fact that OHFA is no longer scoring applications for CHDO Operating Assistance, this tie-breaker and other tie-breakers will be used in the event that there are insufficient Operating Assistance funds for all of the applications received.

### **3. HOME Program Funds Allocation**

Oklahoma's HOME allocation for Program Year 2013 was \$5,832,546. Based upon the information currently available, OHFA believes its allocation of HOME funds for Program Year 2014 will be approximately \$5,800,000. However, it is possible that Congress will cut the funding for the HOME Program even further. OHFA will use the funds allocated for Program Year 2014 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. However, OHFA intends to apply to HUD for a waiver of the ten percent (10%) limit on administrative funding, due to the recent tornado-related disasters. OHFA understands that such a waiver, if granted, could permit administrative funding of as much as twenty percent (20%) of the annual allocation. If any waiver is granted, the additional administrative funding will be taken one half (1/2) from the Other Rental/Homeownership Set-Aside and one half (1/2) from the Rental Activities Undertaken in Conjunction with Affordable Housing Tax Credits Set-Aside.

#### **CHDO Operating**

No more than five percent (5%), of the State PJ's annual allocation will be available for CHDO operating assistance. **For the 2014 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 2014 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 percent (20%) 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. **For the first six months of Program Year 2014, only applications for CHDO Rental activities will be accepted, except for CHDO activities in conjunction with the RD Self-Help Program (if the amount of HOME funds per unit does not exceed \$10,000), and applications for CHDO Pre-Development Loans for potential CHDO Homeownership projects.**

OHFA intends to begin accepting applications for 2014 HOME Program funds on or about April 1, 2014, and therefore will consider "the first six months of Program Year 2014" to be April 1, 2014 through October 1, 2014. If there are funds remaining in this set-aside as of October 1, 2014, OHFA will begin accepting applications for any CHDO-eligible activity from any OHFA-certified CHDO.

The amount of HOME funds to be allocated to an eligible rental activity will be limited to no more than \$500,000. If there are funds remaining after the first six months of Program Year 2014, the amount of HOME funds to be allocated to an eligible homebuyer activity will be limited to no more than \$400,000. The amount of HOME funds to be allocated to a CHDO activity in conjunction with the RD Self-Help Program will be \$200,000.

#### **Rental Activities Undertaken in Conjunction with Affordable Housing Tax Credits**

**Forty percent (40%)** of the annual allocation shall be used for Rental activities undertaken in conjunction with Affordable Housing Tax Credits (AHTCs). **The amount of HOME funds to be allocated to an eligible activity being undertaken in conjunction with AHTCs will be limited to no more than \$500,000.**

#### **Other Rental/Homeownership**

**Twenty-five percent (25%)** 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**. **For the first six months of Program Year 2014, only applications for Rental activities will be accepted, except for homebuyer activities in conjunction with the RD Self-Help Program (if the amount of HOME funds per unit does not exceed \$10,000.)**

OHFA intends to begin accepting applications for 2014 HOME Program funds on or about April 1, 2014, and therefore will consider “the first six months of Program Year 2014” to be April 1, 2014 through October 1, 2014. If there are funds remaining in this set-aside as of October 1, 2014, OHFA will begin accepting applications for any eligible Homeownership or Rental activity from any eligible applicant.

The amount of HOME funds to be allocated to an eligible rental activity will be limited to no more than \$500,000. If there are funds remaining after the first six months of Program Year 2014, the amount of HOME funds to be allocated to an eligible homebuyer activity will be limited to no more than \$400,000. The amount of HOME funds to be allocated to an activity in conjunction with the RD Self-Help Program will be \$200,000.

#### **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. In the event OHFA’s current HOME Program project funds are depleted prior to receiving its next Program Year funding, OHFA may elect to make future funding commitments, within its authority, pursuant to 24 CFR Part 92.212 or suspend the acceptance of applications.

#### **Program Income**

Grantees 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 grantees to retain program income. **Exceptions may be made for grantees that are currently reusing program income derived from contracts 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.

If OHFA receives a substantial amount of program income during Program Year 2014, OHFA will distribute the program income through a special allocation. For this special allocation, OHFA will accept applications only from Community Housing Development Organizations (CHDOs), and only for CHDO activities. OHFA will not accept applications for activities to be undertaken in conjunction with Affordable Housing Tax Credits (AHTCs). The eligible CHDO activities will be:

- Acquisition and/or rehabilitation of rental housing
- New construction of rental housing
- Acquisition and/or rehabilitation of homebuyer properties
- New construction of homebuyer properties
- Direct financial assistance to purchasers of HOME-assisted housing sponsored or developed by a CHDO with HOME funds

#### **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 will 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 exceptions are as follows:

- CHDO Pre-Development Loans
- For non-profit developers or for-profit developers receiving an award of funds for an activity in conjunction with Affordable Housing Tax Credits, OHFA will loan the funds to the ownership entity. Principal and interest payments may be required during the term of the loan. The loan will be for a minimum term that is at least as long as the period of affordability, and in some cases for a longer term.

#### **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-contract 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 new 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 that are in conjunction with applications for Affordable Housing Tax Credits may receive a contingent HOME commitment, since they may be considered prior to a reservation of Tax Credits. Contingent HOME commitments will be withdrawn should an applicant be unable to obtain a reservation of Tax Credits 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 new Final Rule states that no written agreement can be executed without a specific address.** Therefore, for these projects, the written agreement will be executed once the 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, 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 contracts that any one entity may have at any given time. This includes contracts for which said entity is either the awardee or the administrator.** OHFA defines an open HOME contract as one that has not been 100% expended and all close-out documents submitted to OHFA. **This limit will not include CHDO Operating Assistance contracts.**

A large number of open contracts represents a possible capacity issue, especially should key staff leave before the contracts 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) contract 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 contract funding in order to affect timely expenditure, performance, and project completion.

Satisfactory HOME written agreement performance is a threshold requirement for all applications for new allocations of HOME funds. The 2014 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 owner of a low-income housing project is maintaining records for each qualified low-income building 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 inspect all HOME projects as prescribed by HUD regulations and will inspect the low-income certification, the documentation the owner has received to support that certification, and the rent records in those projects. For homeownership projects, OHFA will inspect the documentation the awardee has received to support the eligibility of the homebuyers, and the liens, mortgages or covenants filed to protect the period of affordability.

D. The owner must allow OHFA to perform an on-site inspection of any low-income building in the project through the end of the compliance period. This inspection may be separate or in conjunction with any review of tenant files under Paragraph C and will include habitability requirements.

E. OHFA will promptly notify the owner in writing if OHFA is not permitted to inspect and review as described in Paragraphs C and D, or otherwise discovers that the project does not comply with the HOME Regulations. In such event, the owner will be allowed a correction period to supply missing documentation or to correct noncompliance. This correction period begins the date of notification.

F. OHFA will notify HUD of an owner's noncompliance or failure to certify no later than 45 days after the end of the time allowed for correction and no earlier than the end of the correction period.

G. During programmatic monitoring activities, OHFA shall review Program contractors' affirmative marketing, minority outreach, and fair housing activities to ascertain compliance with standards established by HUD's Fair Housing Office.

H. **Compliance with requirements of the HOME Regulations is the responsibility of the awardee.** 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.

I. The new Final Rule requires that participating jurisdictions maintain stricter oversight of HOME projects during the construction and sale or lease-up phases. OHFA will therefore be increasing awardee reporting requirements, including a requirement for quarterly progress reports during these stages. OHFA will also conduct construction inspections and other site visits as required.

J. OHFA reserves the right to assess monetary penalties for an owner's noncompliance. Such monetary penalties have not yet been incorporated into OHFA's HOME Program Rules, Title 330, Chapter 55, and are therefore not currently allowed. However, OHFA may add such monetary penalties in the future.

K. The new Final Rule for the HOME Program permits participating jurisdictions to charge compliance monitoring fees for all projects funded after the new Final Rule goes into effect. OHFA intends to charge a small monitoring fee for such 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 2014.

## 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 contractors. 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 contractors 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 contracts, 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.

**Contract 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](http://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.

**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 dollar limits for Section 221(d)(3)(ii) defined by jurisdiction. The limits are further 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 221(d)(3) subsidy limit, or the financial gap as determined by a subsidy layering analysis.**

**The maximum for HOME Down-payment Assistance is \$10,000 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.**

## 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 2014, 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

#### **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%) matching requirement. Waivers granted by HUD will not affect this requirement.**

OHFA will make available to all applicants a portion of the Match credit OHFA has earned or will earn on its affordable housing bond program. All applicants will receive a waiver of twenty-five percent (25%) of their twenty-five (25%) Match requirement upon request. Waivers will not be granted unless specifically requested in the Application. Thus, applicants will be allowed to structure their proposals based on an eighteen and three-quarters percent (18.75%) Match requirement. OHFA will supply the remaining six and one-quarter percent (6.25%) match from the credit earned on its affordable housing bond program. **This Match can only be provided to funded applicants, and only to applicants who actually incur a Match liability.** HOME Program limitations on the amount of Match liability that can be satisfied by affordable housing bond Match prevent OHFA from increasing the amount of the waiver. **Due to these limitations, the Match credit for the affordable housing bond program cannot be banked by the Applicant.**

**In addition, applicants that do not have sufficient banked match to cover the remainder of their match liability may utilize OHFA’s banked match for up to ten percent (10%) of the HOME funds requested. This would mean that these applicants would only be required to provide local match of as little as eight and three-quarters percent (8.75%) of the HOME funds requested.**

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 construction financing, except HOME, paying development budget costs are eligible for leverage. Assistance for Homebuyers, such as a first mortgage, is not considered leverage. Also, permanent financing will not be used in the leverage calculation.

In relation to the leveraging analysis, HOME resources are to be used to address a project's financial gap. Applicants should consider that financial gaps can be very large, depending on the size of any given project. Therefore, the HOME Program may not be capable of filling all financial short falls without being combined with other gap resources. It may be necessary to use HOME assistance in combination with other public and private resources, such as Rural Housing Incentive Districts, CDBG, AHP, LIHTC, Historic Tax Credits, USDA-RD, USHUD, foundation funds, and private capital.

**Any leveraged funds will require a commitment letter to be attached to the application.**

## 16. Troubled Public Housing Authorities

HUD has advised OHFA that no public housing authorities are considered troubled at this time.

If any public housing authorities are designated as “troubled” during Program Year 2014, 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.**

## 17. Projected Production

The following chart details the units the OHFA is projecting will be produced with the 2013 HOME allocation. This projection is based upon the actual numbers from prior years and the anticipated reduction in the total allocation for the State. It is also adjusted for the new emphasis on rental activities and the restriction on applying for homeownership activities for the first six months of Program Year 2014. It includes only HOME units and not any other units in the HOME-assisted projects:

<u>Activity</u>	<u>HOME</u>	<u>Leveraged</u>
Rental	60	40
Homeownership	10	10
TBRA	0 tenants	0

## 18. Application Process

The HOME program operates on a continuous application basis, except for Rental Activities in Conjunction with AHTCs. Applications for Rental Activities in Conjunction with AHTCs will be accepted for a limited period of time only due to the demand level. In addition, applications for Homebuyer activities will not be accepted until October 1, 2014.

In spite of the fact that applications for most 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 2014 Application Packet and guidelines are currently being drafted, and will be released for comment and public input at a later date. 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 2014, all eligible entities wishing to submit an application for Rental Activities in Conjunction with AHTCs must submit their applications on or before July 2, 2014.** All of the applications for Rental Activities in Conjunction with AHTCs will be considered at either the September or November 2014 meeting of the OHFA Board of Trustees. It is OHFA's intent to consider them at the September 2014 Board meeting if possible. **Applications for Rental Activities in Conjunction with AHTCs will only be accepted in conjunction with applications for AHTCs for the Second Funding Period of 2014.**

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 2014 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.

**If a sufficient number of applications fail to meet all threshold requirements such that at the end of the application process for Rental Activities in Conjunction with AHTCs some of the set-aside funds remain unallocated, OHFA intends to utilize those funds for eligible activities in the Other Rental/Homeownership Set-Aside.** However, OHFA reserves the right to use the remaining set-aside funds for any other eligible activities as set forth herein.

### **Application timeline:**

1. The current (2013) HOME Program Application will be reviewed and evaluated.
2. A draft of the proposed 2014 HOME Program Application Packet, including all application and scoring evaluation criteria will be presented for comments. The draft will be posted on the OHFA website, [www.ohfa.org](http://www.ohfa.org), by February 28, 2014.
3. An informal public input session on the 2014 HOME Application will be held during March 2014, time, date and place to be determined. Once the time, date and place have been determined OHFA will make a general announcement to all interested parties and post a notice on its website, [www.ohfa.org](http://www.ohfa.org). The final version of the 2014 HOME Application Packet will be available by March 31, 2014.
4. OHFA will hold a training session on the 2014 HOME Program Application Packet during April 2014, date, time and place to be determined. Once the date,

time and place have been determined, OHFA will make a general announcement to all interested parties and post a notice on its website, [www.ohfa.org](http://www.ohfa.org).

This timeline is OHFA's best estimate as of the date of publication of the 2014 Action Plan draft. OHFA staff will make every effort to meet this timeline. In all cases, the actual dates for each step of the application process as set forth in the above timeline will be announced on OHFA's website as soon as they are determined. The web address is [www.ohfa.org](http://www.ohfa.org). All prospective applicants and interested parties are encouraged to check the website frequently for updated information concerning important dates.

#### **2014 Program Year – Important Dates**

- **March 31, 2014 – Final version of 2014 HOME Application Packet available**
- **April 1, 2014 – OHFA will begin accepting applications for the 2013 Program Year for all eligible activities except Homeownership activities and Rental Activities in Conjunction with AHTCs.**
- **May 1, 2014 – CHDO Recertification Applications due**
- **July 2, 2014 – Applications for Rental Activities in Conjunction with AHTCs are due**
- **October 1, 2014 – OHFA will begin accepting applications for Homeownership activities if any funds are remaining for such activities**

**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  
Income Targeting  
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.**

Applications to be considered at the next OHFA Board of Trustees meeting must be submitted by the deadlines listed in OHFA's 2014 Application Packet. Applicants are encouraged to access the 2014 HOME Program Application Packet available on OHFA's web-site at [www.ohfa.org](http://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 2014 HOME Application Packet will be used to determine funding.

**Applications for CHDO Operating Assistance will not be scored.** If insufficient funds remain to award to all applications for CHDO Operating Assistance, tie-breakers as set forth in the 2014 HOME Application will be used to determine which applications will be funded ahead of others.

#### **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. In addition, **OHFA requires annual recertification of all CHDOs.** A CHDO Recertification Application Packet will be made available to all CHDOs. Detailed application instructions will be provided in the Application Packet.

At the time an organization receives certification from OHFA as a CHDO, it is judged to meet all of the eligibility criteria for funding under the HOME regulations. **Each year OHFA will recertify all CHDOs.** At that time OHFA will request that CHDOs complete a recertification application and provide appropriate support documentation. After reviewing this information, OHFA may decertify a CHDO that ceases to meet certification criteria, fails to participate in the recertification process, or does not meet the requirements of being a CHDO.

### **The Recertification Application for Program Year 2014 will be due May 1, 2014.**

**CHDO status is not permanent or guaranteed.** It is OHFA's responsibility as the State PJ to qualify certain organizations as CHDOs. It is also OHFA's responsibility to ensure that all CHDOs are performing under the HOME CHDO regulations and serving their intended purpose. The recertification process will result in CHDOs being fully recertified, partially recertified, placed on probation, or decertified.

**Full Recertification:** The CHDO continues to meet all of the HOME criteria, has developed at least one OHFA CHDO-eligible activity within the past four (4) years in one of its CHDO certified counties, and has undertaken an affordable housing activity within each of its CHDO geographical service area counties. The four-year period is defined as four years prior to the date of the submission of the recertification application. To have "developed at least one CHDO-eligible activity" is defined by OHFA as having received an award of OHFA HOME CHDO funds. OHFA will compare the submission date of the recertification application with the last date the CHDO received an award of OHFA HOME CHDO funds for a CHDO activity. This period must not exceed four years.

**Partial Recertification:** The CHDO continues to meet all of the HOME criteria. It has developed at least one OHFA CHDO-eligible activity within the past four (4) years; however, the CHDO has not undertaken an affordable housing activity within each of its CHDO geographical service area counties within this timeframe. The CHDO will be given 12 months in which to begin an affordable housing activity within the inactive geographical service area county or counties. If it is unable to complete an affordable housing activity in any service area county, the inactive county will be removed from its geographical service area.

**Probation:** The CHDO continues to meet all of the HOME criteria for certification. However, it has not undertaken a CHDO-eligible activity in any of its certified counties within the last four (4) years. The CHDO will be given 12 months in which to begin at least one CHDO-eligible activity in any of its certified counties, and if it is unable to do so, the CHDO will be decertified.

A CHDO may not be decertified if it can show that it applied for OHFA CHDO funds for an eligible CHDO activity in a timely manner, but did not receive funding due to a lack of available HOME funds. **A good faith effort to apply for HOME funds must be made in order to be considered for this exception.** Applying for HOME funds after the 2014 HOME Program allocation has been exhausted, or applying for a development that is clearly not a viable project may not be considered by OHFA to be a good faith effort, and the CHDO may be decertified.

**A CHDO may also be placed on probation due to excessive findings in regard to contract performance.**

**Decertification:** The CHDO no longer meets all of the HOME criteria for certification, and/or has not actively pursued an OHFA CHDO-eligible activity as set forth above. The organization will no longer be eligible to apply for OHFA HOME funding as a CHDO and will not be able to reapply for CHDO certification within 12 months of the decertification date. **A CHDO may also be decertified due to excessive findings in regard to contract performance.**

A CHDO may not be decertified if it can show that it applied for OHFA CHDO funds for an eligible CHDO activity in a timely manner, but did not receive funding due to a lack of available HOME funds, as set forth above.

## **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 2014, and the outcome and objective for each of those activities:

Rental/Homeownership:	Affordability for the purpose of providing Decent Housing
TBRA:	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.**

<b><u>Contract Performance Measurement</u></b>			
<i>Time Period</i>	<i>% Expended</i>	<i>Action</i>	<i>Performance</i>
12 months from contract begin date	If 0% expended	send letter	<b>Concern</b>
18 months from contract begin date	0% expended	Determine contract <b>feasibility</b> (i.e. cancel/extend)	
18 months from contract begin date	< 25% expended and no explanation	send letter	<b>Finding</b>
24 months from contract begin date	< 50% expended	send letter	<b>Concern</b>

36 months from contract 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 grantee may have to pay back HOME funds** (Plan must be approved by OHFA)

0 – 60 days after contract end date                      Need closeout documents; Will send a letter 1-month before contract 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**

<i>Time Period</i>	<i>% Expended</i>	<i>Action</i>	<i>Performance</i>
9 months after IDIS setup	0%	Send letter to request reimbursement request	<b>Concern</b>
12 months after IDIS setup	0%	Activity flagged and cancelled in IDIS	<b>Concern</b>
12 months between drawdowns		Activity flagged; need explanation from Grantee to continue	<b>Concern</b>
90 days from last drawdown	100%	Send letter if no activity completion report received	<b>Concern</b>
120 days from last drawdown drawdowns	100%	Activity flagged; Need completion report to continue processing drawdown requests	<b>Finding</b>

**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) Action Plan- Five-Year Strategic Plan for FY 2014-2018 Beginning with Fiscal Year 2014**

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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 approximately \$235,842 available during the program year April 1, 2014, to March 31, 2015 (FY2014). 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. In the recent past OHFA has administered HOPWA formula grant funding for the City of Oklahoma City and the City of Tulsa. However, the state funding is no longer combined with either city grant. 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 calendar year 2010 OHFA initiated an Invitation To Bid (ITB), thereby announcing to all eligible applicants the program availability, guidelines, etc. for FY2010. 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. Program Administrators are required to submit monthly

program reports and funds are distributed to the Program Administrators from the State Grantee based upon actual expenditure of funds. Program Administrators selected in FY 2010 to administer the HOPWA Program for the State of Oklahoma beginning in FY 2011 are eligible for an annual extension for the next five years, through FY 2016, based upon performance. Those extensions are subject to approval by the OHFA Board of Trustees. OHFA is not recommending a change for Program Year 2014.

## **2014 Program Goals**

Program goals for the state plan were modified last year based upon program funding decreases and we do not recommend any changes to the goals established last year. The decreases in funding are discussed throughout the HOPWA portion of the Consolidated Plan and program goals are as follows:

### Western Oklahoma

Short-term rent fifteen (15) households  
Rent and utility assistance fifteen (15) households  
Supportive Services fifteen (15) households

### Eastern Oklahoma

Short-term rent ten (10) households  
Rent and utility assistance fifteen (15) households  
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 2014 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:**

Oklahoma received its first report of an AIDS case in January 1983. Through December 2012, 5,804 cases of AIDS have been reported to the Oklahoma State Department of Health. Of these reported cases, 43 percent (2,473) are living and potentially in need of housing and supportive services.

HIV infections, reportable since 1983 in Oklahoma, reached a cumulative total of 3,240 as of December 2012. Based on two studies (Visiting Nurses Association, San Francisco and National Association for People with AIDS) which projected the percentage of persons living with AIDS in need of housing assistance as between 10 to 20 percent, we are estimating approximately 15 percent of our state's diagnosed AIDS cases will need these services. No data was found stating projections for HIV-infected individuals or family members. We have estimated approximately five percent of the reported persons with HIV infection would potentially need services. This is based on the greater likelihood that, in general, persons with HIV infections would be healthier and more able to maintain employment and housing.

The epidemic profile of HIV/AIDS cases in Oklahoma differs somewhat from the national picture. White males aged 20 to 50 represent 63 percent all diagnosed in Oklahoma. Recent HIV/AIDS infection demographic data supports that Oklahoma is trending towards the more diversified national profile. However, a large number of cases among white males still exists and is due to not only men having sex with men, but injection drug use.

**Distribution of HIV/AIDS Cases Reported by Age, Race, or Ethnicity and Gender through December 2012:**

Age	Number	Percent
Under 5	35	.5
5-12	44	.5
13-19	259	3
20-29	2,860	31
30-39	3,353	37
40-49	1,679	19
50-59	605	7
60+	194	2
<b>Race/Ethnicity</b>		
White	5,727	63.3
Black	1,950	21.6
Asian/Pacific Island	58	0.6
American Indian/Alaska Native	572	6.3
Multi Race	184	2
Hispanic (All races)	553	6.1
Unknown	0	0
<b>Gender</b>		
Male	7,684	85
Female	1,360	15
Unknown	0	0

Although the greatest percentage of AIDS and HIV cases are reported among white individuals, African Americans are the most disproportionately affected by this epidemic.

Oklahoma, home of the largest non-reservation American Indian population, faces unique challenges in the delivery of HIV direct care services to this culturally diverse group. Over 37 different tribes are geographically integrated throughout the state, each with varying degrees of health care resources. One out of every seven reported AIDS cases in the nation among Native Americans is from Oklahoma.

Geographic distribution of HIV and AIDS cases is a critical consideration in developing any effective service delivery system in a rural state such as Oklahoma. Although Oklahoma's census population estimate from 2012 was 3,814,820, it is the eighteenth largest of the 50 states with approximately 70,000 square miles and ranks twenty-eighth in population by state.

Oklahoma population is concentrated in two areas, the Oklahoma City Metropolitan Statistical Area (MSA) (1,296,565) and the Tulsa MSA (951,880). HIV/AIDS cases reported from the Oklahoma City MSA and the Tulsa MSA represents 84.4% of all reported cases. The remaining 15.6% of cases are distributed throughout rural Oklahoma.

Sponsors of eligible activities will be 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:

Income eligibility will be based on *Federal Poverty Guidelines*. Eligible individuals can not have a gross monthly income of more than 150% of the 2013 *Federal Poverty Guidelines* after out-of-pocket documented medical expenses are deducted from their gross monthly income.

**2013 Federal Poverty Guidelines:**

<b><u>Family Size</u></b>	<b><u>Poverty Level*</u></b>	<b><u>150% Poverty Level**</u></b>	<b><u>Monthly</u></b>
1	\$11,170	\$16,755	\$1,396.00
2	\$15,130	\$22,695	\$1,891.00
3	\$19,090	\$28,635	\$2,386.00
4	\$23,050	\$34,575	\$2,881.00

\*Add \$3,960 for each additional dependent

\*\*Add \$5,820 for each additional dependent

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 expects to be awarded a total of \$235,842 HOPWA funds for use in FY 2014. Analysis of epidemiological data has been utilized to determine an equitable distribution of funds. Currently \$496,106 is expected to be made available by the City of Oklahoma City for Oklahoma City which is located in Western Oklahoma. These funds will be used exclusively by the program administrator in the MSA associated with the Oklahoma City HOPWA Formula Grant.

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.

The following is a list of State HOPWA funds projected to be available for FY 2014:

<b><u>Eligible Activity</u></b>	<b><u>HOPWA Funds</u></b>
• Grantee Administration (Not to exceed 3% of HOPWA Award)	\$ 7,075
• Rental Assistance & Utilities	89,048
• Short-term Rent	47,888
• Contractor Administration (Not to exceed 7% of HOPWA Award)	16,508
• Supportive Services	75,323
<b>TOTAL</b>	<b>\$235,842</b>

## **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 FY 2014 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.

**Program Administrators Selection/Process:**

Program Administrators were selected in 2010 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. Program Administrators contracts are renewable for up to five additional years.

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. Administrators 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 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 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									75,323		75,323	
Housing Information												
Resources Identification												
Rental Assistance								89,048			89,048	
Short Term Rent, Mortgage, & Utility Payments								47,888			47,888	
Grantee Administrative Expenses								7,075			7,075	
Project Sponsor Admin. Expenses								16,508			16,508	
Totals								160,519		75,323	235,842	
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)		235,842	
									Total Other Funds			
									Total Program Funds		235,842	

## **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...

- Citizen Participation

## FY 2014 – FY 2018 Five Year Consolidated Plan Cycle

<b>Jun 20, 2013</b>	ESG / Cleveland County CoC, Norman
<b>Jul 10, 2013</b>	HOME / Housing Public Input Session, OHFA - Oklahoma City
<b>Jul 11, 2013</b>	ESG / Southwestern CoC, Lawton
<b>Jul 23, 2013</b>	CDBG / Non-Housing Community Dev. Public Input Session, Weatherford
<b>Jul 25, 2013</b>	CDBG / Non-Housing Community Dev. Public Input Session, Okmulgee
<b>Jul 30, 2013</b>	CDBG / Non-Housing Community Dev. Public Input Session, Oklahoma City
<b>Aug 1, 2013</b>	ESG / North Central CoC, Enid
<b>Aug 6, 2013</b>	ESG / Northwestern CoC, Bethany
<b>Aug 7, 2013</b>	HOME / Housing Public Input Session, OHFA - Oklahoma City
<b>Aug 8, 2013</b>	ESG / Northeast CoC, Claremore
<b>Sep 5, 2013</b>	<b>PUBLIC INPUT SESSION</b> (all components) Metro Technology Center – Springlake Campus, Oklahoma City
<b>Oct 7, 2013</b>	<b>PUBLIC HEARING</b> (all components) Metro Technology Center – Springlake Campus, Oklahoma City
<b>Nov 1, 2013</b>	ESG / Southeastern CoC, Stigler
<b>Nov 7, 2013</b>	Last Day to Receive Written Public Comments on Consolidated Plan <i>(Regulations mandate that the Public Comment period last at least 30 days from the date of the Public Hearing)</i>
<b>Feb 14, 2014</b>	Consolidated Plan submitted to HUD <i>(Regulations mandate that the Plan be submitted at least 45 days in advance of program year)</i>
<b>April 1, 2014</b>	Annual program year begins

## CITIZEN PARTICIPATION AND CONSULTATION

The State has adopted a Citizen Participation and Consultation Plan for the Consolidated Plan. A copy of the plan can be found in the Appendix. All meetings are held in fully accessible facilities. Meeting announcements are sent to media outlets throughout the state, including the larger non-English speaking newspapers and radio stations.

A summary of the activities for the development of the **FY 2014 – FY 2018** 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 on September 5, 2013 at the Metro Technology Center, Springlake Campus 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 on October 7, 2013 at the Metro Technology Center, Springlake Campus in Oklahoma City. As with the Public Input Session, the hearing was publicized through the resources mentioned above.

### Citizen Participation Schedule:

Jul. — Aug. 2013	Informal meetings (program-specific public input sessions and focus groups)
Sept. 5, 2013	Public Input Session (CDBG, ESG, HOME, & HOPWA programs)
Sept. 19, 2013	Draft of Proposed Consolidated Plan posted online for public review at: <a href="http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/">http://okcommerce.gov/community-resources/grants-and-funding-programs/consolidated-plan/</a>
Oct. 7, 2013	Formal Public Hearing (CDBG, ESG, HOME, & HOPWA programs)
Oct. 7, 2013 – Nov. 7, 2013	Public Comment Period
Feb. 14, 2014	Consolidated Plan submitted to US Dept of HUD

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.

## SUMMARY OF PUBLIC COMMENTS AND RESPONSES

The following is a compilation of all comments received as a result of the Public Hearing and the public comment period, which spanned October 7, 2013 to November 7, 2013. The comments received and their respective responses are grouped by topic and are followed by the response of the agency (either the Oklahoma Department of Commerce or the Oklahoma Housing Finance Agency).

### Consolidated Plan – General Comments

#### Topic – Draft Version of Consolidated Plan

**Comment:** (Wanda Debruler, DeBruler Inc.) As you know, the Consolidated Plan is designed to help states assess their affordable housing and community development needs and market conditions, and, to make data-driven, place-based investment decisions.

The following comments are based on my 25+ years' experience in housing and community development, consulting with local units of government and nonprofits, and, collecting best practices.

Framework. According to HUD, the planning process is supposed to serve as the framework for a community-wide dialogue to identify housing and community development priorities that align and focus funding from the four CPD formula block grant programs.

Comment: The formatting of the draft plan keeps each program segregated. Nowhere in the plan is there reference on how these programs are aligning much less focusing resources with each other or local HUD grantees in the State outside their own programs. Does the State's Plan collaborate and/or partner with local HUD Entitlement efforts? There is much that can be done when we approach a problem holistically.

5-Yr Consolidated Strategic Plan. This is the first year of a Five-year plan for the State. The plan on-line is the draft 2014 Annual Update to a five-year strategic plan.

**Response:** (Steven Hoover, ODOC) For this question, I'm assuming that it does not relate to the preparation/composition of the posted "Draft" ConPlan but the overall program coordination of combined objectives (funding, housing, etc.). In terms of the CDBG Program, combining objectives with the HOME, HOPWA, and ESG programs is difficult due to funding limitations and the public demand for activities which are not available in the other programs. True to some extent, the allowance of housing type activities are a similar shared component in all four programs (CDBG, HOME, HOPWA, and ESG). In regard to the CDBG program, public input for the program explicitly demands the funding be used for projects such as water/wastewater, street/road, emergency equipment, community/senior center and ADA accessibility. As mentioned earlier, unlike the other programs, CDBG provides for opportunities to do activities in addition to housing. These types of activities suffer from various budget cuts in regard to other funding sources and CDBG funding sometimes allows for the only funding opportunity. Keep in mind that our State CDBG funding has dropped by approximately 25% since 2010 so it has become increasingly difficult to run multiple funding set-asides within our CDBG program. Housing related activities have never traditionally been a top priority when working with rural Oklahoma towns and counties in terms of State's CDBG public support structure.

Speaking in terms of the overall Consolidated Plan, we follow all required HUD requirements in terms of Consolidated Plan development. As you know citizen participation plays a big role in the Consolidated Plan process, however, funding availability and the public's performance expectations in each of the respective programs often limits a more combined approach. We will continue to evaluate this option in the future.

**Comment:** Where does one find the five-year strategic plan with multiyear goals based on assessment of housing and community development needs, an analysis of housing and economic market conditions and available resources?

**Response:** (Steven Hoover, ODOC) First, I really appreciate the fact that you took the time to review the "Draft" and provide comments. As I stated in an earlier email to you, the creation and submission of the Consolidated Plan has gone to an all electronic (web based) process. This new process/system has been created by HUD and is required to be updated directly through the HUD IDIS system. The basic components are still the same (Needs Assessment, Strategic Plan, Action Plan, etc.) in the ConPlan, however, the general format or presentation is totally different than before. The format of the ConPlan is set by the HUD IDIS E-ConPlan system and we have no control over the format. In order for the public to view the ConPlan, it has to be converted from the online IDIS E-ConPlan system format into a MS Word document and made available online via our ODOC Consolidated Plan webpage. The State along with other states have commented quite extensively to HUD on the system induced shortfalls of the current IDIS E-ConPlan presentation capability to the general public in both the "Draft" and "Final" stages of development.

In regards to the initial "Draft" composition, it was decided given the current system issues and time constraints to provide the "Draft" format that you see posted online which focuses on each core program under the ConPlan. This was done to allow people to have the base level knowledge required to adequately comment on the programs in time for the Consolidated Plan Public Hearing. The poor printing capability and various screen issues made for much of the additional sections to remain blank when the system conversion printing was attempted. Keep in mind the final version will have all the sections (Needs Assessment, Strategic Plan) that you have noticed as missing in the "Draft" version of the ConPlan. Please note that the format of these sections will be presented by the system quite differently than during previous years while using the paper format. We are continuously working with HUD in order to overcome the various system problems but this is just taking time.

As referenced earlier, the overall format of this new electronic online ConPlan is not optimum for printing or subsequent public viewing as it was in the past when it was strictly paper based. For one thing, the printed HUD IDIS E-ConPlan does not contain a table of contents. The system is new and not without problems. HUD has identified this and will be working in future releases to correct these problems. The IDIS E-ConPlan is a series of screens with questions and text boxes used for completing the answers. One of the difficult factors is that each text box has a very limited character input limitation. This does not allow for much program detail so we will have to add a PDF as an appendix to explain each program (CDBG, HOME, HOPWA, and ESG Action Plans) in greater detail. Unfortunately, this is a work around solution to circumvent the lack of available space to adequately present our program information within the system. The system does not allow editing of the print format. It will only print to what the design of the IDIS E-ConPlan system will allow. It has been discovered that the appendix section which will contain the detailed "Action Plans" will NOT print when the overall ConPlan is converted for printing even though it uploads into the online system and can be viewed from within the system. We

have to “post” process the printed plan so that this section will be added to the PDF when uploaded for public viewing on the ODOC ConPlan webpage.

In addition to the earlier mentioned issues surrounding this new system, some of the various online screens and HUD supported data charts have been found not to work properly in terms of formatting and numerical calculation. Another issue developed early on in terms of access to the system. Both ODOC and OHFA operate under separate administrators in terms of gaining access to the system. Neither agency has administrative control over the other in terms of the IDIS system. OHFA had problems getting certain people access as required when preparing the draft version of the plan.

Many system issues and limitations continue to this day and we have been forced to channel our requests for assistance through HUD OneCPD. As you can imagine, this all takes time. To date, we have been able to create an improvised work around for the final version of the E-Consolidated Plan. Again, this new presentation of the data and narrative formats will be totally different than with the previous “paper” versions. We cannot control the presentation format of the E-Consolidated Plan. The online IDIS based E-Consolidated Plan is under the control of HUD. We can only present data and narratives to meet the limits set forth with the system design. As part of our improvised work around, we will be adding the Annual Action Plans as a PDF attachment to the online plan. This is NOT a requirement but a way to offset the system restraints on data and text entry. This gives us better flexibility in presenting our program design to the public. Outside viewers cannot view the online plan through HUD’s IDIS system. In the future, we will continue to work to improve communication with the public regarding the Consolidated Plan.

In closing, we appreciate your patience while the new IDIS E-ConPlan system is being implemented for use by the State. We will continue to adapt and overcome the limitations presented by the new IDIS E-ConPlan system. This learning curve, combined with fact that this is a Five Year Plan, created additional issues because so many IDIS E-ConPlan screens were involved. Again, we appreciate your patience until these issues can be corrected.

## **Community Development Block Grant Program**

### **Topic – CDBG Housing Rehab**

**Comment:** Jean Cooper (Northeast OK CAA) Since this is the first year of the new five-year Consolidated Plan, it is an opportune time to provide input about major changes that have occurred in recent years and provide input about how the plan might be changed in this year or subsequent years to better serve the needs of the state as expressed through these programs. One of the major changes that has occurred has been the significant cuts in the HOME program. Oklahoma Housing Finance Agency has elected to drop housing rehabilitation because of these reductions. In past years the CDSG program established partial rehabilitation as a separate set-aside that did not impose limitations on the local governments concerning the total number of open grants. Although housing rehabilitation is still an allowable activity. Many local communities are not in a position to pursue community revitalization when they have such pressing wastewater projects. Allowing housing rehabilitation to be allowed in addition to other CDSG projects would make this a viable program Now that the full rehabilitation option in the HOME program has been eliminated, there is no alternative to allow communities to improve housing stock in their area. Incorporating the original program into the Consolidated Plan would

help not only those low-income homeowners but would also assist communities in making their communities more vibrant and prosperous.

**Response:** (Scott Myers, ODOC) We appreciate your comment. This fiscal year as with the previous fiscal years, we are continuing to see a decline in federal funding for the CDBG program. We must maximize the CDBG funding to best benefit all communities throughout Oklahoma. At this time, CDBG funding levels are too low to permit multiple CDBG awards for any single city or town. We will continue to evaluate this option in the future should CDBG funding levels start to increase.

### **Topic – Documented Hazards**

**Comment:** (Barbara Albritton INCOG) In reviewing the draft state plan, I had one thought based on the experience we had with Hominy's application. Would it be possible to give the documented hazard points to the regulatory agency appropriate for the project rather than to only DEQ. Since Hominy's project was a repair to their spillway and OWRB is the agency charged with dam safety, could such applications be given to OWRB for review rather than to DEQ? I realize this may not be a common occurrence, but it would seem the potential of losing the spillway at the city's water supply lake would get more than zero points. Just a thought.

**Response:** (Scott Myers, ODOC) Hominy's spillway project represents a very unique case and does not represent a statewide need. Overall, ODEQ remains the best overall authority to rate Documented Hazards. There is considerable time added to the application rating process and the overall award time increases considerably when dealing with external agencies. Timeliness of CDBG funding is a very critical issue in terms of HUD CDBG program performance and remains at the forefront of our CDBG program design.

### **Topic – Points for Water Projects Involving State Revolving Fund Loans**

**Comment:** (Barbara Albritton, INCOG) The other item which might provide a greater differentiation in points is in the case of projects which are using State Revolving Fund loans for a portion of their project budgets. In those cases, an entity receives a draft permit to construct which is issued 30 days prior (with a comment period) to the issuance of the final permit. If those projects which had a draft permit were given some number of points – say, 7 or 8 – which would be greater than just having submitted plans and specs (5), but less than having the final permit to construct (10).

**Response:** (Scott Myers, ODOC) CDBG water and wastewater applications which are utilizing State Revolving Funds and have received a draft permit are an infrequent occurrence during the application process. From a statewide perspective, we do not feel it is necessary to provide additional points for those application's that may have draft permits. Timeliness of CDBG funding is a critical issue in terms of HUD CDBG program performance and our focus will be on funding projects that are already permitted by the ODEQ.

## **Emergency Solutions Grant Program**

### **Topic – No Comments**

**Comment:** NA

**Response:** NA

## **Housing Opportunities for Persons with AIDS**

**Topic – No Comments**

**Comment:** NA

**Response:** NA

## **HOME Investment Partnerships Program**

**Topic – HOME Program Changes**

**Comment:** Progressive Independence (PI), in partnership with the Metropolitan Fair Housing Council of Oklahoma, Inc. (MFHC), is respectfully submitting comments on the 2013 HOME Program Proposed Changes.

PI is a consumer-controlled, non-residential, non-profit, community-based, Federally-Funded Center for Independent Living, that provides the four core services of advocacy, information and referral, peer support, and independent skills training to Oklahomans with disabilities in counties of Cleveland, Oklahoma, McClain, Pottowattomie, and Canadian. PI's mission is to "encourage and facilitate self-sufficient, independent lifestyles and to enhance the quality of life for individuals with disabilities in central Oklahoma."

Our fair housing partner, the Metropolitan Fair Housing Council of Oklahoma, Inc. is the only private, non-profit, full-service fair housing advocacy and enforcement organization in Oklahoma. MFHC offers client services to victims of housing discrimination and persons alleging unfair treatment by their housing providers. Client services include fair housing, fair lending and renter's rights counseling, fair housing complaint investigation, fair housing testing, advocacy and housing discrimination complaint referral to the Department of Housing & Urban Development for enforcement remedy,. MFHC also provides in-house landlord/tenant complaint mediation and legal referral to public legal assistance programs or an attorney participating in the MFHC Cooperating Attorney Program. MFHC conducts fair housing educational seminars for the general public, housing providers, social service, community and faith-based organizations. MFHC's mission includes being "dedicated to the creation of racially and economically integrated communities and the elimination of housing discrimination."

Finding safe, integrated, accessible, affordable and fair housing remains to be a primary concern of PI and MFHC. We are pleased that the Oklahoma Housing and Finance Agency (OHFA) is considering establishing a work-group on new construction standards and would like to, along with PI and MFHC be part of the work-group as a strategy to increase the availability of housing to Oklahomans with disabilities.

PI and MFHC are concerned however, that there is very little emphasis placed on increasing strategies to affirmatively further fair housing under OHFA's Analysis of Impediments to Fair Housing Choice. PI, along with MFHC strongly suggests that OHFA consider working with said agencies to establish effective outreach strategies to increase the availability of safe, affordable, accessible, integrated, and fair housing to include the following:

1. Develop a data-base of existing accessible units that meet Federal standards with annual updates on new construction
2. Convert that that accessible unit database to a "Guide to Accessible, Affordable Housing in Oklahoma." Make the guide available statewide in hard copy, on-line, electronically and adapted for persons with hearing and visual disabilities, consistent with Section 508 of the Rehabilitation Act of 1973.
3. Provide quarterly training to housing providers on Fair Housing, ADA, ANSI, and 504 requirements with training rotated to OHFA's statewide service delivery area outside of Oklahoma City to have a better impact on reaching those providers.
4. Implement established visibility/universal design policies on Fair Housing, ADA, ANSI, and 504 requirement standards for new construction in compliance with those acts. Implement an accessibility inspection/monitoring/testing process of those properties to measure compliance with those acts prior to completion of the project. . This will prevent a claim against a housing provider for being in violation of the Federal Fair Housing Act (Title VIII of the Civil Rights Act of 1968-1988 Amendments) and Section 504 Of the Rehabilitation Act of 1973.
5. There is a severe lack of accessible and affordable housing units in Oklahoma. OHFA should implement policies which require that a HOME Program housing provider set-aside, advertise and rent accessible units to persons with access needs to prevent a housing provider from renting the accessible unit to a non-disabled person with no identified or requested access needs. This will prevent a claim against a housing provider for being in violation of the Federal Fair Housing Act (Title VIII of the Civil Rights Act of 1968-1988 Amendments) and Section 504 Of the Rehabilitation Act of 1973.

**Response:** (Darcy Green, OHFA) Thank you for your comment. OHFA strongly supports your effort to encourage and facilitate self-sufficient, independent lifestyles and to enhance the quality of life for individuals with disabilities in central Oklahoma.

HOME funds are federal funds, and HOME-funded projects must comply with the Federal Fair Housing Act (Title VIII of the Civil Rights Act of 1968-1988 Amendments) and Section 504 Of the Rehabilitation Act of 1973. OHFA's Compliance Monitoring Staff checks for compliance with Fair Housing and Section 504. Beginning with Program Year 2012, OHFA has contracted with a construction inspection firm to inspect all of its HOME-funded projects. One of the duties of this construction inspection firm will be to ensure compliance with Fair Housing and Section 504 during the construction phase of the projects.

When the time comes to form a working group regarding OHFA's Rental New Construction Standards, OHFA would be pleased to include someone from Progressive Independence and/or

the Metropolitan Fair Housing Council, if they have expertise in the design of accessible affordable housing.

Due to the severely reduced funding for the HOME Program, OHFA does not currently have the available manpower to undertake all of these suggestions. However, they are all excellent ideas and may be undertaken in the future if time and funding permits.

**Comment:** Support the continued emphasis on rental given current market conditions.

**Response:** (Darcy Green, OHFA) Thank you for your comment.

**Comment:** Support the elimination of homeowner rehabilitation activities. While I appreciate the “need” for rehabilitation, it yields a very low return on investment. Plus, no research has been conducted to determine the effectiveness and quality of unit years after rehabilitation. For the first time in decades Oklahoma’s economy is very robust while the rest of the nation continues to suffer at the hands of a downturn. Investors are coming to the state in large numbers, as are new jobs. This interest and expansion must be supported in the near term with affordable housing growth.

If and when homeowner rehabilitation is undertaken in the future, it should be narrowly targeted at the elderly and disabled and designed similar to USDA-RD’s Section 504 Program; as a grant only with demonstrated need otherwise as a loan with repayments based on individuals’ abilities to repay.

**Response:** (Darcy Green, OHFA) Thank you for your comment.

**Comment:** Support the use of HOME for TBRA as proposed by the agency.

**Response:** (Darcy Green, OHFA) Thank you for your comment.

**Comment:** Support the set-aside amount for tax credits. As stated above, the state’s economy is very robust. There is an active investor interest in our state. Therefore, it is imperative that we support new investments with an expansion of our affordable housing stock.

We suggest OHFA consider ways entice tax credit developers to very small rural communities (5,000 population and less) in order address their housing needs by perhaps encouraging scattered community developments.

**Response:** (Darcy Green, OHFA) Thank you for your comment. We will consider ways to incentivize Tax Credit development in very small rural communities.

**Comment:** Support opening the program to for-profit developers. We suggest a maximum loan amount of \$450,000 and that for-profit borrowers be subject to the Single Audit Act.

**Response:** Thank you for your comment. We have, in response to this suggestion, reduced the maximum loan amount to \$500,000. We are seriously considering incorporating the Single Audit Act requirement into our 2013 Application Packet.

**Comment:** Support the proposed design (limiting applications to Rental activities only for the first six months of Program Year 2013.) Support the proposed design change (eliminating the sharing of Administration funding) given the proposed programmatic changes and significant cut in annual allocation. Support the proposed design change (to continue the 15% CHDO Set-Aside) given the proposed programmatic changes and significant cut in annual allocation.

**Response:** (Darcy Green, OHFA) Thank you for your comment.

**Comment:** I support the proposed design change (in the method of awarding CHDO Operating Assistance funds) given the proposed programmatic changes and significant cut in annual allocation.

We suggest OHFA eliminate its limitation on the amount of CHDO proceeds that can be used for operating funds for those CHDOs with retained proceeds. This will allow CHDOs with proceeds to capitalize on their use by identifying new projects that can also be funded with retained proceeds rather than seeking new funding during a time of austere annual allocations. In tandem with this, OHFA should institute a use it or lose it policy applicable to CHDOs with large sums of unused proceeds or make those CHDOs ineligible for new HOME funds until they have exhausted their accumulated proceeds. The handful of CHDO with large sums of proceeds has not put those resources to work in a timely manner and appear to be hoarding resources unnecessarily. These CHDOs were allowed to retain their proceeds years ago on the premise they would reinvest the resources in concert with new HOME funds or other affordable housing resources. This has happened only on a very limited basis and, in fact, is in violation of CPD Notice 97-09, which clearly states a timeline for retaining proceeds must be part of the written agreement allowing proceeds to be retained.

**Response:** (Darcy Green, OHFA) Thank you for your comment. OHFA is looking at ways to incentivize the use of retained CHDO Proceeds. Although no specific change was included in the 2013 Action Plan, OHFA is looking at changes to the 2013 HOME Application Packet that would incentivize the use of these funds.

**Comment:** Support the proposed change (allowing small lease-up reserve accounts to be funded with HOME funds).

**Response:** (Darcy Green, OHFA) Thank you for your comment.

**Comment:** We support the proposed change (separating developer fees from other soft costs, and increasing the maximum developer fee allowed) and suggest the maximum developer fee be set at 20% and soft costs remain at 15% along with the use of a scaled rating criterion that awards points for developers proposing less than the maximum allowable soft cost percentage.

**Response:** (Darcy Green, OHFA) Thank you for your comment. We gave your comment serious consideration. OHFA ultimately decided to set the maximum developer fee for 2013 at 15%, and the soft cost limit at 7% of the HOME funds awarded. We will continue to assess the impact of these changes and make adjustments in the future if necessary.

**Comment:** We support the proposed change (from awarding the HOME funds through grants to the use of forgivable loans.) Such a change mirrors other affordable housing resources such as FHLB's AHP.

**Response:** (Darcy Green, OHFA) Thank you for your comment. After further consideration, only the awards made to for-profit developers will be in the form of loans. CHDOs and other non-profit developers will continue to receive grants. This change was based on oral comments that loans would be carried on the books of non-profits as liabilities, therefore skewing their balance sheets. We will assess the success of using loans when working with for-profits, and may expand the use of loans to other entities in future program years.

**Comment:** We support the proposed change (to continue with its small, two percent (2%) set-aside for HOME funds to be paired with Continuum of Care funds.)

**Response:** (Darcy Green, OHFA) Thank you for your comment.

**Comment:** We support the use of a work group (to help develop Written New Construction Standards as required by the new Final Rule, and to review the current Written Rehabilitation Standards to determine if revisions should be made to certain items.)

**Response:** (Darcy Green, OHFA) Thank you for your comment.



# Appendix F

Section Contents...

- Signed SF-424's



# CDBG SF 424

**Application for Federal Assistance SF-424**

Version 02

\*1. Type of Submission:

- Preapplication
- Application
- Changed/Corrected Application

\*2. Type of Application

- New
- Continuation
- Revision

\* If Revision, select appropriate letter(s)

\*Other (Specify) \_\_\_\_\_

3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

\*5b. Federal Award Identifier:

**State Use Only:**

6. Date Received by State:

7. State Application Identifier:

**8. APPLICANT INFORMATION:**

\*a. Legal Name: State of Oklahoma

\*b. Employer/Taxpayer Identification Number (EIN/TIN):

73-6017987

\*c. Organizational DUNS:

824700058

**d. Address:**

\*Street 1: 900 N. Stiles

Street 2: \_\_\_\_\_

\*City: Oklahoma City

County: Oklahoma

\*State: OK

Province: \_\_\_\_\_

\*Country: USA

\*Zip / Postal Code 73104-3234

**e. Organizational Unit:**

Department Name:

Oklahoma Department of Commerce

Division Name:

Community Development

**f. Name and contact information of person to be contacted on matters involving this application:**

Prefix: Mr

\*First Name: W.

Middle Name: Vaughn

\*Last Name: Clark

Suffix: \_\_\_\_\_

Title: Community Development Director

Organizational Affiliation:

\*Telephone Number: 405-815-5370

Fax Number: 405-815-5344

\*Email: vaughn\_clark@okcommerce.gov

**Application for Federal Assistance SF-424**

Version 02

**\*9. Type of Applicant 1: Select Applicant Type:**

A.State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\*Other (Specify)

**\*10 Name of Federal Agency:**

U.S. Department of Housing and Urban Development (HUD)

**11. Catalog of Federal Domestic Assistance Number:**

14-228 \_\_\_\_\_

CFDA Title:

Community Development Block Grant \_\_\_\_\_

**\*12 Funding Opportunity Number:**

\_\_\_\_\_

\*Title:

\_\_\_\_\_

**13. Competition Identification Number:**

\_\_\_\_\_

Title:

\_\_\_\_\_

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

State

**\*15. Descriptive Title of Applicant's Project:**

Community Development Block Grant / State's Program

**Application for Federal Assistance SF-424** Version 02

**16. Congressional Districts Of:**  
\*a. Applicant: 1-5 Statewide \*b. Program/Project: 1-5 Statewide

**17. Proposed Project:**  
\*a. Start Date: 4/1/2014 \*b. End Date: 3/31/2015

**18. Estimated Funding (\$):**

*a. Federal	\$13,115,124
*b. Applicant	_____
*c. State	_____
*d. Local	_____
*e. Other	_____
*f. Program Income	\$3,000,000
*g. TOTAL	\$16,115,124

**\*19. Is Application Subject to Review By State Under Executive Order 12372 Process?**  
 a. This application was made available to the State under the Executive Order 12372 Process for review on \_\_\_\_\_  
 b. Program is subject to E.O. 12372 but has not been selected by the State for review.  
 c. Program is not covered by E. O. 12372

**\*20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation.)**  
 Yes  No

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U. S. Code, Title 218, Section 1001)  
 \*\* I AGREE  
\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions

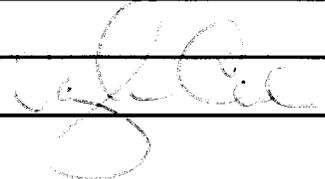
**Authorized Representative:**

Prefix: Mr. \*First Name: W.  
Middle Name: Vaughn  
\*Last Name: Clark  
Suffix: \_\_\_\_\_

\*Title: Community Development Director

\*Telephone Number: 405-815-5370 Fax Number: 405-815-5334

\* Email: vaughn\_clark@okcommerce.gov

\*Signature of Authorized Representative:  \*Date Signed: 3. 24. 14

**Application for Federal Assistance SF-424**

Version 02

**\*Applicant Federal Debt Delinquency Explanation**

The following should contain an explanation if the Applicant organization is delinquent of any Federal Debt.



# ESG

# SF 424

**Application for Federal Assistance SF-424**

Version 02

*1. Type of Submission:		*2. Type of Application		* If Revision, select appropriate letter(s)
<input type="checkbox"/> Preapplication		<input checked="" type="checkbox"/> New		
<input checked="" type="checkbox"/> Application		<input type="checkbox"/> Continuation		*Other (Specify)
<input type="checkbox"/> Changed/Corrected Application		<input type="checkbox"/> Revision		_____

3. Date Received:	4. Applicant Identifier:
-------------------	--------------------------

5a. Federal Entity Identifier:	*5b. Federal Award Identifier:
--------------------------------	--------------------------------

**State Use Only:**

6. Date Received by State:	7. State Application Identifier:
----------------------------	----------------------------------

**8. APPLICANT INFORMATION:**

\*a. Legal Name: State of Oklahoma

*b. Employer/Taxpayer Identification Number (EIN/TIN): 73-6017987	*c. Organizational DUNS: 824700058
--	---------------------------------------

**d. Address:**

\*Street 1: 900 N. Stiles

Street 2: \_\_\_\_\_

\*City: Oklahoma City

County: Oklahoma

\*State: OK

Province: \_\_\_\_\_

\*Country: USA

\*Zip / Postal Code 73104-3234

**e. Organizational Unit:**

Department Name: Oklahoma Department of Commerce	Division Name: Community Development
---	---

**f. Name and contact information of person to be contacted on matters involving this application:**

Prefix: Mr                      \*First Name: W.

Middle Name: Vaughn

\*Last Name: Clark

Suffix: \_\_\_\_\_

Title: Community Development Director

Organizational Affiliation:

\*Telephone Number: 405-815-5370                      Fax Number: 405-815-5344

\*Email: vaughn\_clark@okcommerce.gov

**Application for Federal Assistance SF-424**

Version 02

**\*9. Type of Applicant 1: Select Applicant Type:**

A.State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\*Other (Specify)

**\*10 Name of Federal Agency:**

U.S. Department of Housing and Urban Development (HUD)

**11. Catalog of Federal Domestic Assistance Number:**

14-231 \_\_\_\_\_

CFDA Title:

Emergency Solutions Grant \_\_\_\_\_

**\*12 Funding Opportunity Number:**

\_\_\_\_\_

\*Title:

\_\_\_\_\_

**13. Competition Identification Number:**

\_\_\_\_\_

Title:

\_\_\_\_\_

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

State

**\*15. Descriptive Title of Applicant's Project:**

Emergency Solutions Grant / State's Program

**Application for Federal Assistance SF-424** Version 02

**16. Congressional Districts Of:**  
\*a. Applicant: 1-5 Statewide \*b. Program/Project: 1-5 Statewide

**17. Proposed Project:**  
\*a. Start Date: 4/1/2014 \*b. End Date: 3/31/2015

**18. Estimated Funding (\$):**

*a. Federal	\$1,471,628
*b. Applicant	_____
*c. State	_____
*d. Local	_____
*e. Other	_____
*f. Program Income	_____
*g. TOTAL	\$1,471,628

**\*19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on \_\_\_\_\_

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E. O. 12372

**\*20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation.)**

Yes  No

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U. S. Code, Title 218, Section 1001)

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions

**Authorized Representative:**

Prefix: Mr. \*First Name: W.

Middle Name: Vaughn

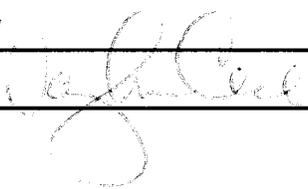
\*Last Name: Clark

Suffix: \_\_\_\_\_

\*Title: Community Development Director

\*Telephone Number: 405-815-5370 Fax Number: 405-815-5334

\* Email: vaughn\_clark@okcommerce.gov

\*Signature of Authorized Representative:  \*Date Signed: 3-24-14

**Application for Federal Assistance SF-424**

Version 02

**\*Applicant Federal Debt Delinquency Explanation**

The following should contain an explanation if the Applicant organization is delinquent of any Federal Debt.



# HOME SF 424

**Application for Federal Assistance SF-424**

Version 02

<b>*1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	<b>*2. Type of Application</b> * If Revision, select appropriate letter(s) <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision  *Other (Specify) _____
--	---

<b>3. Date Received:</b>	<b>4. Applicant Identifier:</b>
--------------------------	---------------------------------

<b>5a. Federal Entity Identifier:</b>	<b>*5b. Federal Award Identifier:</b>
---------------------------------------	---------------------------------------

**State Use Only:**

<b>6. Date Received by State:</b>	<b>7. State Application Identifier:</b>
-----------------------------------	---

**8. APPLICANT INFORMATION:**

<b>*a. Legal Name:</b> State of Oklahoma	
<b>*b. Employer/Taxpayer Identification Number (EIN/TIN):</b> 73-0999618	<b>*c. Organizational DUNS:</b> 086997202

**d. Address:**

<b>*Street 1:</b>	<u>100 NW 63<sup>rd</sup> St. Ste 200</u>
<b>Street 2:</b>	_____
<b>*City:</b>	<u>Oklahoma City</u>
<b>County:</b>	<u>Oklahoma</u>
<b>*State:</b>	<u>OK</u>
<b>Province:</b>	_____
<b>*Country:</b>	<u>USA</u>
<b>*Zip / Postal Code</b>	<u>73116-8208</u>

**e. Organizational Unit:**

<b>Department Name:</b> Oklahoma Housing Finance Agency	<b>Division Name:</b> Housing Development
--	--

**f. Name and contact information of person to be contacted on matters involving this application:**

<b>Prefix:</b> <u>Mr</u>	<b>*First Name:</b> <u>John</u>
<b>Middle Name:</b> <u>A.</u>	
<b>*Last Name:</b> <u>Marshall</u>	
<b>Suffix:</b> _____	

<b>Title:</b> Housing Development Team Leader
---

<b>Organizational Affiliation:</b>
------------------------------------

<b>*Telephone Number:</b> 405-419-8263	<b>Fax Number:</b> 405-419-9263
--	---------------------------------

<b>*Email:</b> john.marshall@ohfa.org
---------------------------------------

**Application for Federal Assistance SF-424**

Version 02

**\*9. Type of Applicant 1: Select Applicant Type:**

A.State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\*Other (Specify)

**\*10 Name of Federal Agency:**

U.S. Department of Housing and Urban Development (HUD)

**11. Catalog of Federal Domestic Assistance Number:**

14-239 \_\_\_\_\_

CFDA Title:

Home Investment Partnerships Program \_\_\_\_\_

**\*12 Funding Opportunity Number:**

\_\_\_\_\_

\*Title:

\_\_\_\_\_

**13. Competition Identification Number:**

\_\_\_\_\_

Title:

\_\_\_\_\_

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

State

**\*15. Descriptive Title of Applicant's Project:**

Home Investment Partnerships Program

**Application for Federal Assistance SF-424**

Version 02

**16. Congressional Districts Of:**

\*a. Applicant: 1-5 Statewide

\*b. Program/Project: 1-5 Statewide

**17. Proposed Project:**

\*a. Start Date: 4/1/2014

\*b. End Date: 3/31/2015

**18. Estimated Funding (\$):**

*a. Federal	_____	6,144,818
*b. Applicant	_____	
*c. State	_____	
*d. Local	_____	
*e. Other	_____	
*f. Program Income	_____	
*g. TOTAL	_____	6,144,818

**\*19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on \_\_\_\_\_
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E. O. 12372

**\*20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation.)**

- Yes
- No

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U. S. Code, Title 218, Section 1001)

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions

**Authorized Representative:**

Prefix: Mr. \_\_\_\_\_ \*First Name: Dennis \_\_\_\_\_  
Middle Name: \_\_\_\_\_  
\*Last Name: Shockley \_\_\_\_\_  
Suffix: \_\_\_\_\_

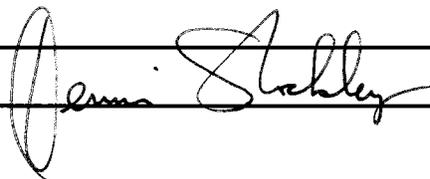
\*Title: Executive Director

\*Telephone Number: 405-419-8145

Fax Number: 405-419-9275

\* Email: dennis.shockley@ohfa.org

\*Signature of Authorized Representative:



\*Date Signed: 3-20-14

**Application for Federal Assistance SF-424**

Version 02

**\*Applicant Federal Debt Delinquency Explanation**

The following should contain an explanation if the Applicant organization is delinquent of any Federal Debt.



# HOPWA SF 424

Application for Federal Assistance SF-424		Version 02
<b>*1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		<b>*2. Type of Application</b> * If Revision, select appropriate letter(s) <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision  *Other (Specify) _____
3. Date Received:	4. Applicant Identifier:	
5a. Federal Entity Identifier:		*5b. Federal Award Identifier:
<b>State Use Only:</b>		
6. Date Received by State:	7. State Application Identifier:	
<b>8. APPLICANT INFORMATION:</b>		
*a. Legal Name: State of Oklahoma		
*b. Employer/Taxpayer Identification Number (EIN/TIN): 73-0999618		*c. Organizational DUNS: 086997202
<b>d. Address:</b>		
*Street 1:	<u>100 NW 63<sup>rd</sup> St. Ste 200</u>	
Street 2:	_____	
*City:	<u>Oklahoma City</u>	
County:	<u>Oklahoma</u>	
*State:	<u>OK</u>	
Province:	_____	
*Country:	<u>USA</u>	
*Zip / Postal Code	<u>73116-8208</u>	
<b>e. Organizational Unit:</b>		
Department Name: Oklahoma Housing Finance Agency		Division Name: Housing Development
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
Prefix:	<u>Mr</u>	*First Name: <u>Phillip</u>
Middle Name:	<u>L.</u>	
*Last Name:	<u>Elzo</u>	
Suffix:	_____	
Title:	HOPWA Manager	
Organizational Affiliation:		
*Telephone Number: 405-419-8275		Fax Number: 405-419-9275
*Email: phil.elzo@ohfa.org		

**Application for Federal Assistance SF-424**

Version 02

**\*9. Type of Applicant 1: Select Applicant Type:**

A.State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\*Other (Specify)

**\*10 Name of Federal Agency:**

U.S. Department of Housing and Urban Development (HUD)

**11. Catalog of Federal Domestic Assistance Number:**

14-241 \_\_\_\_\_

CFDA Title:

Housing Opportunities for Persons with AIDS \_\_\_\_\_

**\*12 Funding Opportunity Number:**

\_\_\_\_\_

\*Title:

\_\_\_\_\_

**13. Competition Identification Number:**

\_\_\_\_\_

Title:

\_\_\_\_\_

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

State

**\*15. Descriptive Title of Applicant's Project:**

HOPWA Formula Grant Assistance for Housing Opportunities for Persons with AIDS

**Application for Federal Assistance SF-424**

Version 02

**16. Congressional Districts Of:**

\*a. Applicant: 1-5 Statewide

\*b. Program/Project: 1-5 Statewide

**17. Proposed Project:**

\*a. Start Date: 4/1/2014

\*b. End Date: 3/31/2015

**18. Estimated Funding (\$):**

*a. Federal	_____	248,339
*b. Applicant	_____	
*c. State	_____	
*d. Local	_____	
*e. Other	_____	
*f. Program Income	_____	
*g. TOTAL	_____	248,339

**\*19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on \_\_\_\_\_
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E. O. 12372

**\*20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation.)**

- Yes
- No

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U. S. Code, Title 218, Section 1001)

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions

**Authorized Representative:**

Prefix: Mr. \_\_\_\_\_ \*First Name: Dennis \_\_\_\_\_  
Middle Name: \_\_\_\_\_  
\*Last Name: Shockley \_\_\_\_\_  
Suffix: \_\_\_\_\_

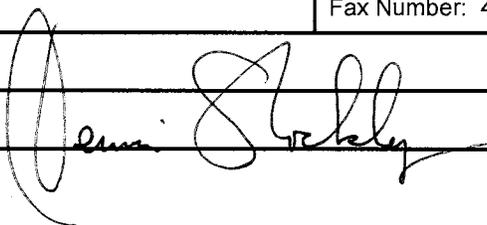
\*Title: Executive Director

\*Telephone Number: 405-419-8145

Fax Number: 405-419-9275

\* Email: dennis.shockley@ohfa.org

\*Signature of Authorized Representative:



\*Date Signed: 3-20-14

**Application for Federal Assistance SF-424**

Version 02

**\*Applicant Federal Debt Delinquency Explanation**

The following should contain an explanation if the Applicant organization is delinquent of any Federal Debt.

## APPENDIX TO CERTIFICATIONS

### INSTRUCTIONS CONCERNING LOBBYING AND DRUG-FREE WORKPLACE REQUIREMENTS:

#### A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

#### B. Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. For grantees other than individuals, Alternate I applies. (This is the information to which jurisdictions certify).
4. For grantees who are individuals, Alternate II applies. (Not applicable jurisdictions.)
5. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
6. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).

7. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph five).
8. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

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Check if there are workplaces on file that are not identified here; The certification with regard to the drug -free workplace required by 24 CFR part 24, subpart F.

9. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:  
"Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C.812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);  
"Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;  
"Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;  
  
"Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All "direct charge" employees; (ii) all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and (iii) temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

## STATE CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the State certifies that:

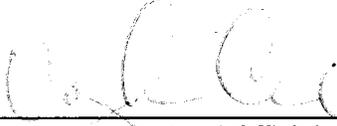
**Affirmatively Further Fair Housing** -- The State will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the state, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

**Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

**Drug Free Workplace** -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about –
  - (a) The dangers of drug abuse in the workplace;
  - (b) The grantee's policy of maintaining a drug-free workplace;
  - (c) Any available drug counseling, rehabilitation, and employee assistance programs; and
  - (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will –
  - (a) Abide by the terms of the statement; and
  - (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

A handwritten signature in dark ink, appearing to be "W. L. Lee", written over a horizontal line.

Signature/Authorized Official

A handwritten date "3-24-14" written over a horizontal line.

Date

Community Development Director

Title

## SPECIFIC CDBG CERTIFICATIONS

The State certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR §91.115 and each unit of general local government that receives assistance from the State is or will be following a detailed citizen participation plan that satisfies the requirements of 24 CFR §570.486.

**Consultation with Local Governments** -- It has or will comply with the following:

1. It has consulted with affected units of local government in the non-entitlement area of the State in determining the method of distribution of funding;
2. It engages in or will engage in planning for community development activities;
3. It provides or will provide technical assistance to units of local government in connection with community development programs; and
4. It will not refuse to distribute funds to any unit of general local government on the basis of the particular eligible activity selected by the unit of general local government to meet its community development needs, except that a State is not prevented from establishing priorities in distributing funding on the basis of the activities selected.

**Local Needs Identification** -- It will require each unit of general local government to be funded to identify its community development and housing needs, including the needs of low-income and moderate-income families, and the activities to be undertaken to meet these needs.

**Community Development Plan** -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objectives of Title I of the Housing and Community Development Act of 1974, as amended. (See 24 CFR 570.2 and 24 CFR part 570)

**Use of Funds** -- It has complied with the following criteria:

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. **Overall Benefit.** The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2009, and 2013 (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;

3. **Special Assessments.** The state will require units of general local government that receive CDBG funds to certify to the following:

It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It will require units of general local government that receive CDBG funds to certify that they have adopted and are enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

**Compliance With Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

**Compliance with Laws** -- It will comply with applicable laws.

  
\_\_\_\_\_  
Signature/Authorized Official

3-24-14  
\_\_\_\_\_  
Date

Community Development Director  
Title

## ESG CERTIFICATIONS

### ESG Certifications

Each State that seeks funding under the Emergency Solutions Grants Program must provide the following certifications:

**Matching Funds** – The State will obtain any matching amounts required under 24 CFR 576.201 in a manner so that its subrecipients that are least capable of providing matching amounts receive the benefit of the exception under 24 CFR 576.201(a)(2).

**Discharge Policy** – The State will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

**Confidentiality** – The State will develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter. The State will ensure that its subrecipients comply with the following criteria:

**Major rehabilitation/conversion** – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

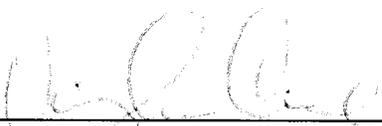
**Essential Services and Operating Costs** – If ESG funds are used for shelter operations or essential services related to street outreach or emergency shelter, the subrecipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the applicant serves the same type of persons (e.g., families with children, unaccompanied youth, veterans, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The subrecipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

**Homeless Persons Involvement** – To the maximum extent practicable, the subrecipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted ESG.

**Consolidated Plan** – All activities the subrecipient undertakes with assistance under ESG are consistent with the State's current HUD-approved consolidated plan.

  
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Signature / Authorized Official

  
\_\_\_\_\_  
Date

Community Development Director  
Title

**SPECIFIC HOME CERTIFICATIONS**

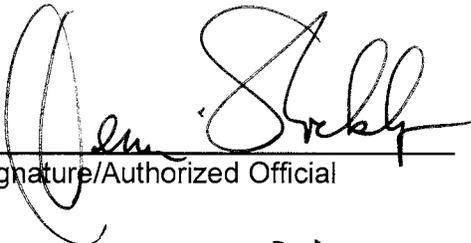
The State certifies that:

**Tenant Based Rental Assistance** -- If it intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the State's consolidated plan.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through §92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Appropriate Financial Assistance** -- Before committing any funds to a project, the State or its recipients will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing.

  
\_\_\_\_\_  
Signature/Authorized Official

3-24-14  
Date

Exec. Dir.  
Title

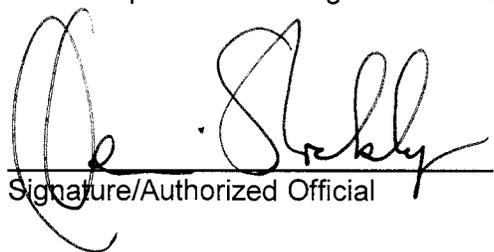
**HOPWA CERTIFICATIONS**

The State HOPWA grantee certifies that:

**Activities** -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

**Building** -- Any building or structure assisted under the program shall be operated for the purpose specified in the plan:

1. For at least 10 years in the case of any building or structure purchased, leased, rehabilitated, renovated, or converted with HOPWA assistance,
2. For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

  
Signature/Authorized Official

3-24-14  
Date

Exec. Dir.  
Title