

## Participating Jurisdiction

Oklahoma Non-Entitlement (Key 409999)

### *Describe the consultation process including methods used and dates of consultation:*

The consultation process to develop the proposed allocation plan consisted of five components: 1) online survey of agency stakeholders, 2) virtual and in-person focus groups with agency stakeholders, 3) online survey of housing insecure and homeless individuals, 4) in-person focus groups with housing insecure and homeless individuals, and 5) a virtual public meeting to share results and garner additional input and guidance. Over 75 organizations were involved in the process; 87 responded to the agency survey, more than 50 attended an in-person or virtual focus group. Additionally, 75 individuals who are unhoused or housing insecure responded to the online survey, and 16 attended one of three focus groups. See Appendix D for a summary of these consultations. 304 individuals registered for the public meeting, 123 individuals attended the public meeting, and 8 individuals submitted comments electronically. See Appendix E for a summary of the public meeting and online submissions.

Agencies were invited to participate via phone and/or email. See Appendix B for materials used to notify and invite stakeholders. Project website information ([iqc.ou.edu/housing](http://iqc.ou.edu/housing)) with meetings and survey links were also shared via email. At each consultation, handouts with links to meeting registration and the survey were provided and participants were encouraged to take and share the handouts within their agency as well as other agencies they work with. Pertaining to stakeholder meetings, 38 community action agencies, 20 community housing development organizations, 84 organizations in SE Coc, 19 organizations in NE CoC, 23 organizations from NC CoC, 44 organizations in the SW COC, and 39 organizations from the NW CoC were contacted and asked to participate.

### *List the organizations consulted:*

#### **Southeast Continuum of Care Region**

Agency/ Organization	Type	Method	Notes
KI BOIS Community Action Supportive Services for Veteran Families (Ada)	At Risk: Veterans	Survey	
KI BOIS Community Action Supportive Services for Veteran Families (Muskogee)	At Risk: Veterans	Survey	
Ki Bois Community Action Foundation Inc. (Stigler)	Other Organizations	Survey	X2 respondents
Ki Bois Community Action Agency (Ada)	Community Action Agency	Survey	
Gospel Rescue Mission (Muskogee)	CoC, Homeless Services/ Shelter	Survey	
Deep Fork Community Action Foundation, Inc. (Okmulgee)	Other Organizations	Survey	

The Grace Center of Southern Oklahoma (Ardmore)	Homeless Services	Survey	
The Chickasaw Nation (Ada)	Other: Tribal Nation	Survey	
Mama T's B&B (Ada)	Homeless Services/ shelter	Survey	X2 respondents
Family Crisis Center (Ada)	At Risk: Domestic Violence	Survey	
Ada Homeless Services, Inc.	Homeless Services	Survey	X2 respondents
Community Youth Services (Ardmore)	At Risk: Youth	Survey	
Green Country Behavioral Health Services, Inc. (Muskogee)	Other: Mental Health	Survey	
Ardmore Schools	Public	Survey	
CREOKS	Other: Mental Health	Survey	X2 respondents
INCA Community Services (Tishomingo)	Other	Survey	
Gospel Rescue Mission (Muskogee)	CoC, Homeless services	Stakeholder Meeting	
KI BOIS	CoC	Stakeholder Meeting	X4 respondents
Creoks Behavioral Health	Other: Mental Health	Stakeholder Meeting	X2 respondents
VA (Muskogee)	At Risk: Veterans	Stakeholder Meeting	
Ada Homeless Services (Ada)	CoC, Homeless Services	Stakeholder Meeting	
Deep Fork Community Action Agency (Okmulgee)	CoC	Stakeholder Meeting	

### Northeast Continuum of Care Region

Agency/Organization	Type	Method	Notes
Dynamic Independence Inc. (Bartlesville)	At-risk: Disabilities	Survey	
Lighthouse Outreach Center (Bartlesville)	Homeless Services	Survey	X2 respondents
Housing Authority of Cherokee Nation (Tahlequah)	Other: Tribal Nation	Survey	
Indian Nations Council of Governments	Other: Tribal Nation	Stakeholder Meeting	

### Northwest Continuum of Care Region

Agency/Organization	Type	Method	
University of Central Oklahoma Center for Counseling and Well-Being (Edmond)	Public	Survey	
Waynoka Mental Health Authority- Northwest Substance Abuse Treatment Center	Other: Addiction/ Substance Abuse	Survey	
City of Shawnee- Homeless Program Coordinator (Shawnee)	Homeless Services	Stakeholder Meeting	
Native American Housing Services (Mcloud)	Other: Tribal Nation	Stakeholder Meeting	

### Northcentral Continuum of Care Region

Agency/Organization	Type	Method	Notes
CDSA, Inc. (Enid)	CoC	Survey	
Enid Street Outreach Services	Homeless Services	Survey	
Veteran Health (Enid)	At-Risk: Veterans	Survey	
United Way of South-Central Oklahoma (Ardmore)	Other	Survey	
Great Salt Plains Health Center	CoC	Stakeholder Meeting	
CDSA	CoC	Stakeholder Meeting	
Dynamic Independence	At Risk: Disabilities	Stakeholder Meeting	
Wings of Hope	CoC	Stakeholder Meeting	
Youth & Family Services North Central	At Risk: Youth	Stakeholder Meeting	
Northern Oklahoma Youth Services	CoC	Stakeholder Meeting	
Hope Outreach	CoC, Homeless Services	Stakeholder Meeting	
Enid Street Outreach	CoC, Homeless Services	Stakeholder Meeting	
Enid Community Clinic	CoC	Stakeholder Meeting	

### Southwest Continuum of Care Region

Agency/Organization	Type	Method	Notes
Oklahoma Employment Security Commission (Lawton)	Public	Survey	
Marie Detty New Directions Shelter (Lawton)	At risk: Domestic Violence	Survey	
Cameron University (Lawton)	Public	Survey	
The Salvation Army (Lawton)	Homeless Services	Survey	
Comanche Nation Womens Shelter	At risk: Domestic Violence	Survey	
Unite Us	Public	Survey	
Stepping Stones	Other: Addiction/ Substance Abuse	Survey	
Oklahoma Employment Security Commission	Public	Stakeholder Meeting	
C Carter Crane	Homeless Services	Stakeholder Meeting	
New Directions	At risk: Domestic Violence	Stakeholder Meeting	
SW Oklahoma Community Action	Other	Stakeholder Meeting	
Comanche County Health Department	Public	Stakeholder Meeting	
Catholic Charities	Homeless Services	Stakeholder Meeting	
City of Lawton Housing	Public	Stakeholder Meeting	
MIGHT Lawton	Other	Stakeholder Meeting	

### Oklahoma City, Tulsa, Cleveland County Continuum of Care Regions

Agency/Organization	Type	Method	Notes
Mental Health Association/ Lottie House (OKC)	Homeless Services	Survey	X2 respondents
VA Healthcare System (OKC)	At Risk: Veterans	Survey	
Community Service Council Supportive Services for Veteran Families (Tulsa)	At Risk: Veterans	Survey	
Thunderbird Clubhouse Board, Inc. (Cleveland)	Homeless Services	Survey	
Tulsa Day Center (Tulsa)	Homeless Services	Survey	
Community Service Council (Tulsa)	Other	Survey	



Catholic Charities (Cleveland)	Homeless Services	Survey	
The Homeless Alliance (OKC)	Homeless Services	Survey	
Social Injustice League of Norman (Cleveland)	Homeless Services	Survey	
Northcare (OKC)	Other: Mental Health	Survey	
Griffin Memorial Hospital	Public	Survey	X2 respondents
Family and Children's Services (Tulsa)	At risk: Youth	Survey	
Positive Tomorrow's (OKC)	Homeless Services	Survey	
Catholic Charities	Homeless Services	Survey	
Food & Shelter, Inc. (Cleveland)	Homeless Services	Stakeholder Meeting	
OKC VA (OKC)	At Risk: Veterans	Stakeholder Meeting	
Northcare Housing & Care Navigator (OKC)	Other: Mental Health	Stakeholder Meeting	
Hope Community Services (OKC)	Homeless Services	Stakeholder Meeting	
Northcare VP of Growth (OKC)	Other: Mental Health	Stakeholder Meeting	

### Lived Experiences Data Collection

Method	Participants	Notes
Online Lived Experiences Survey	75 Participants	Administered at agency visits
Focus Group	6 Participants	Gospel Rescue Mission, Muskogee
Focus Group	2 Participants	Lottie House, Oklahoma City
Focus Group	8 Participants	Denver House, Tulsa

### *Summarize feedback received and results of consultation with these entities:*

Across the state, those consulted through this process reported that homelessness was increasing. Many shared that visual observation of cities and communities across Oklahoma suggests a growing urgency to support those who are unhoused and experiencing housing insecurity as unhoused individuals and families are seen in increasingly more places across the state.

Common Themes from consultation in the Southeast region: Challenges working with landlords, need for more supportive services, housing shortage and economic market influence, as well as the need for improved non-profit operating and capacity building. See Appendix for more details.

Common themes from consultation with the Northeast region: Challenges pertaining to veteran homelessness were highlighted, citing mental health, criminal record, disability, eviction history, and behavioral misconduct as contributing factors. Limited housing stock, vouchers becoming less effective, and future housing development were prominent themes identified by participants.

Common themes from consultation in the North Central region: Identifying housing for people with a criminal record and supporting people who are chronically homeless transition to permanent housing were the top challenges. Participants identified transportation, support obtaining documentation, shelter, and mental health services as the top needs. See Appendix for more details.

Common themes from the consultation in the Southwest region: Participants identified rising rents and poorly maintained rental properties as major contributors to homelessness. They also stated housing vouchers were not effective because fewer landlords will accept them. They reported seeing an increase in families being evicted and experiencing homelessness. Additionally, they identified seeing more domestic violence in their CoC because of the location of a large military base. Participants discussed the need for transportation, mental health resources, childcare, access to medical care, and increased legal services. See Appendix for more details.

Common themes from consultation with the remaining part of the state: Participants identified a shortage of housing stock as a main problem. Discussions about sex trafficking and domestic violence and its connection to homelessness was far more prominent with this group than in other CoC's. They also identified challenges with community perception of homelessness as well as difficulties finding housing for people who are in the justice system. See appendix for more details.

Common themes from online stakeholder survey: Interest in building capacity for collaboration between providers, enhancing community engagement, educating the broader community about housing insecurity. The greatest need seen among youth transitioning out of foster care, people experiencing chronic mental health problems, formerly incarcerated people, and people in substandard housing. Respondents suggested housing inventory, housing prices and the lack of access to affordable housing have driven many people, who were previously housed, into homelessness. Service delivery areas identified as those in highest need were safety, security, emergency service, affordable housing access.

Common themes from the lived experience survey and focus groups: Most participants were currently homeless and had been homeless for an extended period. A majority either lived unhoused or with family members when possible. Most are stationary, not moving far to obtain services and support. Housing cost and condition, income and bad credit, landlords and the eviction process, transportation, and accommodations for disabilities, family size, and pets were the most frequently mentioned barriers to housing.

## **Public Participation**

***Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:***

***Date of public notice:*** January 9, 2023

***Public comment period:*** February 1, 2023 – March 2, 2023

***Date of public hearing:*** February 8, 2023

***Describe the public participation process:***

A draft of the allocation plan was posted on the project website ([iqc.ou.edu/housing](http://iqc.ou.edu/housing)) on February 1, 2023 through March 1, 2023 for public review. Email notifications of this posting were sent out to contacts gathered through the Oklahoma Housing Finance Agency, the statewide Continuum of Care network, and those who attended a previous consultation or registered to be notified. Notification of the meeting was sent via email on January 9, 2023 and subsequently posted on both of the project website ([iqc.ou.edu/housing](http://iqc.ou.edu/housing)) and the Oklahoma Housing Finance Agency website ([www.ohfa.org](http://www.ohfa.org)). A reminder was sent via email on February 1, 2023. See Appendix C for public meeting recruitment materials.

A virtual public meeting was held on February 8, 2023, 10:00 a.m. to 12:00 p.m. Central Time. The meeting provided an overview of the HOME-ARP Allocation Plan Process, the range of eligible activities, and a summary of the findings contained in this report. Public comments were gathered orally as well as via typed messages and questions submitted via chat. Participants were also encouraged submit comments via the website up to 15 days following posting of the plan.

***Describe efforts to broaden public participation:***

The public hearing was held virtually to reduce barriers and broaden opportunities for engagement across the large geographic area (76 counties or parts of counties) of the participating jurisdiction. Opportunities to participate in the formulation of this allocation plan were publicized via a website ([iqc.ou.edu/housing](http://iqc.ou.edu/housing)) and on the Oklahoma Housing Finance Agency website (<https://www.ohfa.org/2022/07/oklahoma-home-arp-allocation-plan/>). Email notices were sent to agency contacts gathered through the Oklahoma Housing Finance Agency and the statewide Continuum of Care network. Opportunities for housing insecure and homeless individuals to participate were advertised via fliers with QR codes through coordination with agencies and service providers. The project team also made presentations of the allocation plan process and ongoing activities at two meetings of the Governor's Interagency Council on Homelessness (February 15, 2022 and August 16, 2022) and at the Oklahoma Statewide Housing Conference (September 28, 2022).

Additionally, OHFA promoted the public meeting through its website ([www.ohfa.org](http://www.ohfa.org)) which received 21,000 visits in January 2023. They also posted the public meeting information via blogpost and on social media (Facebook: 4,562 followers; LinkedIn: 1,001 followers) on January 20, 2023 and February 1, 2023.

***Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:***

Comments received in the public meeting suggested a preference to fund the planning, development, and construction of more affordable housing. To this end, amounts allocated were adjusted to reduce by 5% monies allocated to supportive services and tenant based rental assistance and reallocate those to support the development of affordable rental housing. Additional comments requested additional information about the HOME-ARP funding availability including the timeline for distribution of funds, process for applying, and reporting requirements for those funded. Minutes from the public meeting can be found in Appendix E of this document.

***Summarize any comments or recommendations not accepted and state the reasons why:***

OHFA received one public comment requesting preference for racial and ethnic populations disproportionately represented in unhoused and housing insecure populations. OHFA recognizes the elevated risk factors and outcomes associated with some groups but decided not to prioritize particular qualifying populations or subpopulations to allow organizations to best address the specific needs of communities they serve.

## Needs Assessment and Gaps Analysis

Homeless Need Inventory and Gap Analysis Table

	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults		Vets					Family		Adults	
	Beds	Units	Beds	Units	Beds	Family HHs	Adult HHs (No child)	Vets	VDM	Beds	Units	Beds	Units
Emergency Shelter	903	224	1,693	N/A	22								
Transitional Housing	269	78	364	N/A	490								
Permanent Supportive Housing	555	235	1,362	N/A	490								
Other Permanent Housing						0	0	0	0				
Sheltered Homeless						286	1,591	148	359				
Unsheltered Homeless						21	1,091	122	158				
Current Gap										-	230	737	-

Non-Homeless			
	Current Inventory (Units)	Level of Need (Households)	Gap Analysis
Total Rental Units	536,805		
Rental Units Affordable to HH at 30% AMI (At Risk for Homelessness)	81,270		
Rental Units Affordable to HH at 50% AMI (Other Populations)	234,465		
0%-30% AMI Renter HH w/1 or more severe housing problems (At Risk for Homelessness)		67,970	
30%-50% AMI Renter HH w/1 or more severe housing problems (Other Populations)		30,230	
Current Gaps			98,200

***Describe the size and demographic composition of qualifying populations within the PJ's boundaries:***

### ***Homeless***

Approximately 3,754 individuals (3,063 households) in Oklahoma were unhoused in 2022 according to the most recent US Department of Housing and Urban Development Continuum of Care Homeless Populations and Subpopulations reports (HUD 2022b). Of these:

- 1,317 (35.1%) individuals (1,173 households) were unsheltered,
- 536 (14.3%) individuals (359 households) were in transitional housing, and
- 1,901 (50.6%) individuals (1,531 households) were housed in emergency shelters.
- 458 (12%) were youth, under the age of 18,
- 1,334 (36%) were believed to be chronically homeless,
- 960 (26%) experienced severe mental illness,
- 835 (22%) experienced chronic substance abuse, and
- 28 (<1%) were living with HIV/AIDS.

Several agencies consulted during this process commented on the potential undercounting of unhoused and housing insecure individuals and families this calendar year due to inclement weather and the ongoing pandemic. These concerns were not unique to Oklahoma, as noted in the most recent Annual Homelessness Assessment Report to Congress (HUD 2022a).

The count suggests an unhoused population in Oklahoma that is approximately 59% male, 40% female, and 1% transgendered/gender non-conforming. Gender identity differs slightly for unsheltered individuals, those in transitional housing, and those in emergency shelters:

- Unsheltered:
  - 68% male, 31% female, and 1% transgendered/gender non-conforming
- Transitional Housing:
  - 44% male, 54% female, and 2% transgendered/gender non-conforming
- Emergency Shelter:
  - 57% male, 42% female, and <1% transgendered/gender non-conforming

As Table 1 illustrates, the race and ethnicity of unhoused and housing insecure individuals and families differs slightly from the overall characteristics of the the state. Greater percentages of Black and American Indian or Alaskan Native individuals are counted among the unhoused and the housing insecure. These disparities are particularly pronounced when looking more closely at the percent of the overall population who are unsheltered.

Table 1. Race and Ethnicity Estimates of Unhoused and Housing Insecure Population in Oklahoma

	Percent of State of Oklahoma Population <sup>1</sup>	Percent of Total Unhoused Population		Percent in Emergency Shelter	Percent in Transition al Housing	Percent who are Unsheltered
Total				51%	14%	35%
American Indian or Alaskan Native	10%	14%		10%	11%	21%
Asian	3%	1%		1%	<1%	1%
Black	8%	21%		23%	27%	16%
Native Hawaiian or Pacific Islander	<1%	1%		2%	<1%	<1%
Other	7%	8%		9%	7%	6%
White	73%	55%		55%	54%	56%
Hispanic or Latinx	12%	9%		10%	7%	8%

<sup>1</sup> United States Census Bureau, 2020 Decennial Census

### ***At risk for being unhoused***

As Table 2 illustrates, there is an increased need to address the cost of housing among the lowest income residents of Oklahoma. For those living on approximately 30% (17,087) or less of the state median income (\$56,956), 81% are paying more than 30% of their income to cover the cost of housing. Rates decrease with income for each tier. Renters tend to be overly overrepresented among those in each of the two lowest income tiers, making up 62% (110,714) of those in the lowest income tier and 64% (76,075) in the second to lowest income tier.

Table 2. Monthly Housing Cost as a Percentage of Household Income in the Past 12 Months

	Total Occupied Housing Units	Total Paying 30 percent or more in monthly housing costs	Owner Occupied Paying 30 percent or more in monthly housing costs	Renter Occupied Paying 30 percent or more in monthly housing costs
Oklahoma	1,485,397	401,899 (26%)	177,701 (12%)	224,198 (15%)
Household Income				
Less than \$20,000	218,591	177,421 (81%)	66,707	110,714
\$20,000 - \$34,999	219,266	118,892 (54%)	42,817	76,075
\$35,000 – \$49,999	202,377	56,313 (28%)	30,554	25,759
\$50,000 - \$74,999	285,192	33,871 (12%)	24,275	9,596
\$75,000 or more	559,971	15,402 (3%)	13,348	2,054

Source: 2020 American Community Survey Dataset S2503

Does not include zero or negative income and no cash rent units.

### ***Fleeing domestic violence, dating violence, sexual assault, or human trafficking***

Over 1/3 of survey respondents to the lived experience survey said they were experiencing housing insecurity because of domestic violence, stalking, or human trafficking. Approximately 525 (14%) of the unhoused and housing insecure individuals counted in 2022 point in time counts were considered victims of domestic violence (HUD, 2022b). Victims of domestic violence and victims of sexual assault and human trafficking were mentioned in two of the consultation meetings with stakeholders.

A unique theme pertaining to domestic violence is being able to find future housing, with cooperative landlords, who are respectful of the anonymity of the tenants. At a stakeholder meeting, one participant who works at a domestic violence shelter stated, “...some of the challenges have been, (1) for permanent landlords or current landlords, having to do the landlord verification, being willing to not do that for a victim of DV because it may not be safe for them to contact because their perpetrator can find out where they are trying to get rehoused again and that can increase some serious safety risk. And then, also, (2) if they have been evicted because of past DV and now it is on their record, [the landlord] being willing, too, to take a chance, and rent to them again” is often not certain.



Female survivors of domestic violence and those with children experienced additional discrimination from “motherhood penalties.” These penalties are results of stigmas placed by society on women with children and research shows it contributes specifically to obstacles with wages, hiring, housing choice, and residential stability as well as sociable relationships (Dana, 2022). This increased barrier is reflected in participants who spoke about the challenges of employment pertaining to victims of domestic violence. One stakeholder shared an example of a woman who was unable to find stable employment because her children were unable to stay in a shelter unattended. As a result, finding employment with flexible and understanding employers was a challenge for individuals and mothers like her, who have experienced domestic violence.

According to the Oklahoma Domestic Violence Fatality Review Board (2021), 119 Oklahomans were killed in acts of domestic violence in 2020 with the members of the black community (21%) and American Indian Citizens (15%) overly represented among victims compared to overall state representation. According to the Violence Policy Center, Oklahoma ranks second in the number of women murdered by men, 78% knew the person who murdered them and 67% were spouses, ex-spouses, or significant others of the perpetrator (2021).

### ***Veterans***

Approximately 273 (7%) veterans were counted during point in time counts in Oklahoma according to the US Department of Housing and Urban Development Continuum of Care Homeless Populations and Subpopulations report (HUD 2022b). The CoC stakeholder consultation meetings identified varying types of people and demographics that experienced housing instability and homelessness. Some regions have seen an increase in homelessness among families while both Oklahoma City and Tulsa described a homeless population that is primarily single men.

Homelessness among veterans was a prominent topic through most community stakeholder meetings. At the Lawton stakeholder meeting, one participant who works at Veteran Affairs stated, *“A lot of the times when they get out of the military they aren’t prepared. They don’t have a job. So that’s a lot of what we have seen in the last year.”* Alongside a lack of preparedness, stakeholders spoke about untreated mental illness in veterans, specifically those experiencing homelessness. In Claremore, one stakeholder stated, *“most of the homeless veterans that we work with, they have some type of diagnosis, chronic mental health.”*

When asked about unique needs of veterans who are experiencing homelessness, one stakeholder stated, *“they have a hard time... keeping housing. So, they have a past eviction, or they have criminal background, the mental piece, or behavioral, and so a lot of times we’re dealing with all that with one veteran trying to get them housed, and that is, the problem and difficulty we’re facing right now.”* Furthermore, a community stakeholder at the Norman meeting indicated that veterans experiencing homelessness has radically increased over the past few years. Highlighting this, she stated, *“we used to see come through our walk-in screening process at the VA maybe like 1-6 housing screenings a week and we are now seeing closer to 12 every week so it has doubled, at least.”*

The US Department of Veterans Affairs approximates that Oklahoma is home to 291,315 veterans (2020). Although the most recent Annual Homelessness Report to Congress suggests the overall number of unhoused and housing insecure veterans is declining, disparities observed in the number of veterans of color, particularly Black veterans, who are without safe and secure housing is troubling (HUD 2022a). According to the National Center for Homeless Veterans individuals who are increasingly younger service members from more recent wars, often enlisted at lower pay grades, and frequently suffer from mental illness and substance abuse.

### ***Families***

Approximately 252 of the unhoused or housing insecure households were families with children under the age of 18, 6% were unhoused, 58% in an emergency shelter, and 36% in transitional housing. (HUD 2022b). According to the most recent Point in Time Counts, these households are comprised of 788 individuals, 458 (58%) of whom are children under the age of 18.

Providers expressed their concerns for growing numbers of homeless families and data supports the correlation between increased eviction rates and families with children. According to the Children's Legal Rights Journal, having children is the single greatest predictor of whether someone will face eviction. The study conducted found that despite all other qualities being equal, tenants with children were 17% more likely to receive an eviction judgment in court as opposed to their peers without children in like circumstances (Dana, 2022).

Homelessness experienced by families, and the unique challenges associated, was a consistent theme pulled from the stakeholder meetings. One challenge specifically discussed by participants was the mental health challenges that can permeate throughout an entire family system, with parents modeling behaviors for their children. One participant stated, *"- so when you have multigenerational families, you have multigenerational problems. You have multigenerational stresses—you have all of these issues and these coping skills that are destructive that are multigenerational."*

Alongside this, many participants spoke about how after previous evictions, or in efforts to prevent eviction, family units are rooming together but are ultimately ending up with another eviction. The reasoning behind the decision to group together was explained by a stakeholder, *"because they thought that if they all got together then they could hold it down but we are seeing all of the gambit- all races, there is not a racial issue at all, so we are seeing families, especially the multi-generational families, when they get evicted, you are talking about grandma, auntie, children who are disabled—you're talking about the whole gambit of the most needy of our population who are being affected by this."* The result of families banding together, and the aftereffects of intergenerational eviction leave lasting mental and physical effects mentioned above as well as contributing to the family housing shortage.

Participants spoke about the challenges of finding both shelter and housing for families, specifically large families. One stakeholder spoke about how at the shelter she operates, which is the only night shelter in the town, she does not have the capacity to house an entire family, stating, *"We had a family, a lady with 5 children. We didn't have room for them. I mean, we just don't have the space."* Other participants in the room were quick to chime in, adding that they too had received calls from the same family seeking assistance. Additionally, locating housing

that is sufficient for the needs of large family systems was indicated to be nearly impossible. When asked about types of housing needed, specifically the number of bedrooms, one stakeholder stated, “*I’ve seen families from two kids to seven in the family. That’s just the kids, that is not momma and grandma and significant others and all of that. So, I think we need all sizes but four, four bedrooms are the hardest to find.*”

***Describe the unmet housing and service needs of qualifying populations, including but not limited to 1) Sheltered and unsheltered homeless populations, 2) Those currently housed populations at risk for homelessness, 3) Families requiring services or housing assistance to prevent homelessness, and 4) Those at greatest risk of housing instability or in unstable housing situations***

Increasing the affordability of housing remains an important priority in Oklahoma. The National Low Income Housing Coalition (NLIHC) suggests that approximately 71,000 affordable housing units are needed to create housing security for very low-income renters, the majority of whom are in the labor force (40%), disabled (25%), or elderly (18%) (2020). Agency/CoC stakeholders confirmed the need for more affordable housing. They cited housing that is large enough for multi-generational families as well as one bedroom or efficiency apartments that are accessible for people with disabilities. As illustrated in Table 3, agency and non-profit stakeholders were most focused on affordable housing access, followed by other service gaps like transportation, substandard housing programs, mental health services, transitional housing, and substance abuse treatment followed at the second level.

Table 3. Response to survey question: Where are the most problematic gaps in your region in terms of providing services and supports to unhoused and housing insecure individuals?

Item	Rank	Votes
Affordable housing access	1	40
Transportation	2	26
Substandard housing programs	3	26
Mental health services	4	25
Transitional housing	5	24
Substance abuse treatment and support	6	24
Emergency and temporary shelter	7	19
Economic assistance	8	18
Housing subsidies	9	15
Education/ job training	10	14
Eviction assistance	11	14
Disability services and support	12	12
Elder care/ aging support	13	12
Hygiene services (laundry/ bathing)	14	11
Health services	15	10
Safety, security, and emergency protocols and policies	16	8
Domestic violence/ abuse services and support	17	6
Food/ feeding programs	18	2

Following the CoC stakeholder and Lived Experience consultation meetings, the top 5 concerns per the agency consultation meetings were (1) the need for increased supportive and wrap around services, (2) the negative perception of homelessness in communities, (3) inadequate housing stock and lack of housing up to code that will pass inspection, (4) issues with landlords, and (5) the unique needs of specific populations at risk for homelessness.

*1. Need for increased supportive and wrap around services*

Stakeholders recognized the need for increased services and wrap-around care for unhoused and housing insecure Oklahomans and Tribal Citizens. During one meeting held in Norman, a participant voiced that a system like that of the Veteran Affairs wrap-around care would be most beneficial and useful. In the Southwest Continuum of Care meeting, which was held in Lawton, the topic of supportive services was heavily discussed. Participants indicated that in many rural, Oklahoman towns, services are sparse, nonexistent, or located in another town (sometimes being more than an hour commute away). Participants continued to indicate staffing issues stating, *“they (service providers) are having a hard time with staffing and therefore, they're not able to provide services.”* Stakeholders further discussed the limited services available pertaining to mental health, stating, *“A lot of them suffer from mental health disorders or special needs, or undiagnosed special needs. I think that's the great problem right there. There is just no help for them, or they don't know where to go to get the help.”*

During the Zoom stakeholder meeting, conducted on August 2, 2022, one participant stated, *“I think supportive services goes a long way. So, if we can get rent paid, that's just one part of the puzzle, right? Like that's one piece. Rent was paid, that doesn't mean that individual is being successful in a program or even working towards their community engagement and being an individual in a house at some point. So supportive services goes a long way and that should include transportation, mental health and substance use care, general case management, utility assistance, because they're all wrapped up into a bigger piece. So, I'd say supportive services are the most important part of it or one of them.”* The need for increased services was referenced in every CoC meeting, with participants indicating transportation, housing-based services, mental health care, and life skills courses as prominent gaps in current services.

*2. Negative perception of homelessness in communities*

A prominent theme throughout the research, highlighted by both the stakeholder and lived-experience meetings, was how homelessness is perceived. Stakeholders stressed the need for increased levels of community engagement and the need for efforts to educate the broader community about unhoused Oklahomans and housing insecurity. This includes building collaborations and partnerships among homeless-serving organizations and other community service organizations outside the sector. Common elements of community perception include stigma, community disapproval, and abuse (verbal, physical) against the homeless. During a stakeholder meeting in Norman, which was open to all state regions, a stakeholder recalled that most of the aggression toward unhoused people came from housed community members. Another participant spoke about stereotyping happening within his community stating, *“My community is overall very, very negative. If you're homeless, it's because you deserve it you chose it.”* Furthermore, another participant indicated that there is, *“pushback from the*

*community wanting nothing to do with the helping the homeless people, just put them on a bus and send them to California attitude.”* Participants indicated that individuals within their community lack understanding and empathy when engaging with homeless individuals.

From the lived-experience meetings, this theme was further reiterated by individuals who had experienced homelessness. One participant spoke about how individuals frequently scoff at him, citing an experience where a local church threatened to kick him out for merely attending a service. Another participant shared that a woman had verbally harassed him that very morning, shouting names and threatening to call the police while he was at a local gas station. Participants with lived-experience shared sentiments of discrimination experienced in encounters with service providers, landlords, the police, and community members. A participant with lived experience stated, *“stigmas are judging a person based on what they went through and that determines who they are. And that is totally false. Totally false. So, really, uh, yeah. If stigmas would disappear, and the only way stigmas disappear is if people stop believing everything they see on television. Plain and simple.”* Another resident highlighted the strengths of those experiencing homelessness, even though facing stigma, *“People expect us to get a job super quick- ‘why can’t you get a job?’ for other people that’s easy... grace in that area would be really awesome. Cause we’re really hard workers, probably the hardest workers you’ve ever met, you know? If we get the opportunity.”* Negative community perception of those facing homelessness adds social barriers which further compound with the pre-existing economic challenges impacting those experiencing homelessness.

### 3. *Inadequate housing stock and lack of housing up to code that will pass inspection*

Housing stocking, available housing, and housing that is up to code was a reoccurring theme throughout the consultations. During the CoC stakeholder meeting conducted in Claremore, the community perception was that there is not enough housing stock. Highlighting this, one stakeholder stated, *“There’s about a shortage of 4,000 to 5,000 housing units in this part of the state to address affordable housing right now and vulnerable populations, there’s never enough.”* Alongside this, stakeholders at the CoC meeting in Enid validated that there is not enough housing stock but highlighted that the available housing is no longer affordable. Participants stated that some of the individuals experiencing homelessness do not see the value in using most of their income on housing, stating that *“after they pay their rent and the utilities, they have nothing. So they’re like why would I go and do this when I’m going to have nothing anyway? Maybe I’ll have a house, but I’ll have nothing in it, I won’t have no food to eat.”*

Lack of housing being up to code was highlighted during the lived experience meeting in Muskogee, with one participant stating, *“we, people in poverty, we don’t advocate for ourselves, we don’t speak up for ourselves, we would rather just live with the bedbugs and the roach infested because we believe that’s what we deserve.”* Many participants agreed with this sentiment, and many indicated that they lack the knowledge of how to live alone/maintain a residence. This lack of understanding results in challenges that could easily be eradicated had they been given the necessary skills. Finally, a prominent theme pertaining to housing stock and housing not being up to code is directly correlated to landlord apathy, and overall lack of willingness.

#### 4. Issues with landlords

Landlords remained one of the most prevalent topics throughout the CoC stakeholder meetings, with participants indicating that landlords in their community are charging egregious amounts of application fees, late rent fees, increasing rent, and not maintaining properties/making necessary repairs. In the CoC meeting conducted in Lawton, one stakeholder who works primary with the Hispanic community spoke about landlords frequently taking advantage of this populations, stating that landlords are over-charging for utilities, rent, and refusing to make repairs, and when challenged by the tenants, landlords will threaten to evict, or even deport, the inhabitants. Alongside this, participants at varying stakeholder meetings spoke about landlords being quick to evict tenants, with minimal mercy or flexibility. One individual stated, *“I think before COVID, the landlords were already real quick to evict and it’s gotten even worse since COVID. Cause people are not working, nor have the finances, so they’re doing it much quicker.”* Participants also indicated that housing vouchers have become increasingly ineffective, with landlords no longer willing to accept, or even consider, participants using tenant-based rental assistance.

Most of the individuals with lived experience shared their grievances with current or past landlords. When asked about experiences with landlords, one participant stated, *“they’re slumlords, not landlords.”* Other individuals elaborated and spoke to their experiences with landlords refusing to make repairs, living in other cities, neglecting the needs of their tenants, and being apathetic in providing support. One individual stated, *“They live in the cities and have no idea, don’t care, what’s happening here. They don’t care.”* Most meeting participants elaborated on the theme of their landlords living in other cities, states, and even countries, with one individual stating, *“It’s almost like landlords are from the mob... She didn’t have the money for rent and her landlord was so intimidating that he showed up at her door with a bat expecting the rent... And here, we don’t talk to the police, we don’t make phone calls- it’s scary to us... She was scared and she left and now she’s in the streets. That happens a lot in situations.”*

#### 5. Unique needs of unhoused and housing insecure Oklahomans

Participants in the Lived Experience focus groups discussed the need for more housing, landlords who will work with them, as well as better training for police and social service staff who interact with them. The survey of those who are currently unhoused or who have experienced housing insecurity in the past suggests that most respondents advised that they do not move, migrate, or travel to seek or access services or support and rely largely on nearby services to assist them. Respondents suggested the most significant reasons for their housing insecurity were financial. Respondents advised that they could not afford housing or the deposits needed. Following closely behind, respondents advised the conditions of available housing were unfit and unsafe, that transportation was not available so they could access affordable housing, and landlord problems kept them from acquiring long-term housing. Respondents also listed a lack of disability accommodations, availability for their family size, and the inability to take their pets with them as barriers housing choice. Other barriers experienced by respondents were related to having bad or no credit, problems with rising rents, late fees, the absence of landlords accepting vouchers, and income requirements, and the quickness of the eviction process and discriminatory behaviors on the part of landlords. Those with lived experience being unhoused or housing insecure specifically spoke of the need for increased engagement with landlords, police, and social service staff who interact with them on specific needs and approaches to address those needs.

***Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, tenant based rental assistance (TBRA), and affordable and permanent supportive rental housing:***

The US Department of Housing and Urban Development Continuum of Care Homeless Assistance Programs Housing Inventory Count Report (HUD 2021) details the most recent inventory of bed availability statewide. As of 2021, Continuums of Care reported 5,331 total year-around beds, including:

- 606 Family units
- 1,746 Family beds
- 3, 532 Adult-only beds
- 53 Child-only beds

A subset of this inventory is available for:

- those experiencing chronic homelessness (705 beds)
- Veterans (1,103 beds)
- Youth, 24 years of age and younger (274 beds)

As Table 4 suggests, there are approximately 5,331 year-around beds available in Oklahoma. Among the total space for unhoused and housing insecure individuals and families, 66% are adult-only beds, 33% are family beds, 11% are family units, and <1% are child-only beds (HUD 2021). Shelter services cluster in particular areas of Oklahoma with the largest number of total year-around beds in Oklahoma City (31%), Tulsa (30%), and Southeast Oklahoma (20%) (HUD 2021). Similar patterns are seen looking more closely by type of accommodation.

Table 4. Available shelter for housing insecure and unhoused Oklahomans, 2021

	Family Units	Family Beds	Adult-only Beds	Child-only Beds	Total Year Around Beds
Cleveland County	75	139	181	3	323 (6%)
Northeast Oklahoma	4	27	46	0	73 (1%)
North Central Oklahoma	92	155	105	11	271 (5%)
Oklahoma City	103	351	1,287	6	1,644 (31%)
Oklahoma Other	40	109	145	0	254 (5%)
Southeast Oklahoma	152	540	501	23	1,064 (20%)
Southwest Oklahoma	19	53	39	0	92 (2%)
Tulsa City & County	121	372	1,228	10	1,610 (30%)
Total	606	1,746	3,532	53	5,331

As table 5 illustrates, the availability of beds for the chronically unhoused, veterans, and youth are similarly distributed. Beds specifically for the chronically unhoused are clustered almost exclusively in Oklahoma City (48%) and Tulsa and Tulsa County (43%) with the remaining beds found in Southeast Oklahoma and Oklahoma Balance of State. Beds for veterans are clustered primarily in Oklahoma City (42%), Tulsa and Tulsa County (28%), and Southeast Oklahoma (22%). Youth beds are less concentrated in Oklahoma City (15%) and Tulsa and Tulsa County (28%) and spread a bit more widely across six of the eight Continuum of Care regions of the state including Cleveland County (13%), North Central Oklahoma (26%), Oklahoma Balance of State (9%), and Southeast Oklahoma (8%).

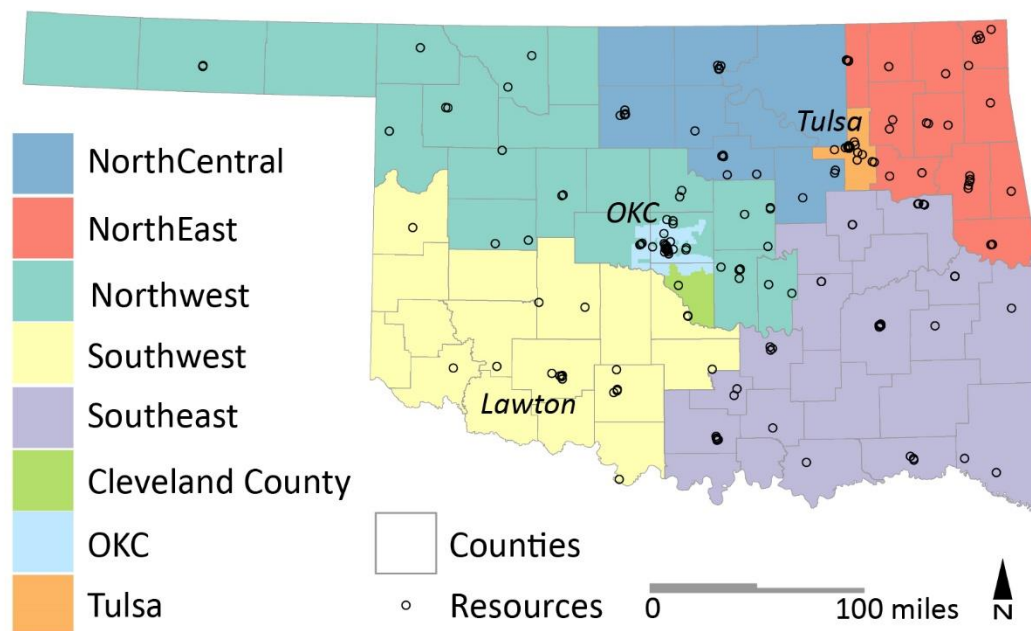
Table 5. Available shelter for housing insecure and unhoused subpopulations, 2021.

	Beds for Chronically Unhoused	Beds for Veterans	Beds for Youth
Cleveland County	0	67	36
Northeast Oklahoma	0	5	0
North Central Oklahoma	2	13	71
Oklahoma City	338	460	41
Oklahoma Balance of State	56	9	26
Southeast Oklahoma	6	240	23
Southwest Oklahoma	0	0	0
Tulsa City & County	303	309	77
Total	705 (13%)	1,103 (21%)	274 (5%)

Lists compiled from web search and administrative records obtained through the Oklahoma Housing Finance Agency and the Oklahoma Continuum of Care collaborators were georeferenced to illustrate the availability of resources for unhoused and housing insecure individuals. As figure 1 shows, similar to the clustering of shelter beds, the availability of resources for unhoused and housing insecure individuals and families are most prominent in the urbanized Continuum of Care regions of Tulsa and Oklahoma City. Outside these areas, resources tend to cluster in smaller cities and towns across the state creating a network of locations that support the quality of life for unhoused Oklahomans. In addition to legal services, housing agencies, mental health providers, non-profit and governmental agencies that support those experiencing housing insecurity, service providers also mentioned the importance of libraries and bus stations in the lives of the unhoused and housing insecure. These resources provide shelter, technological (via internet access) and physical (via transportation) access to family, friends, and resources.



Figure 1. Map of services available to housing insecure and unhoused Oklahomans, 2021



***Identify any gaps within the current shelter and housing inventory as well as the service delivery system:***

In summary, gaps exist in the current shelter and housing inventory because in 2022 at least:

- 3,754 Oklahomans remained unhoused,
- 1,317 Oklahomans were unsheltered,
- 525 of the unhoused and housing insecure individuals were fleeing or victims of violence,
- 273 of the unhoused and housing insecure individuals were veterans,
- 177,421 Oklahomans in the lowest income tier pay over 30% of their income for housing, and
- Black individuals and American Indian or Alaskan Native Citizens are disproportionately represented among the housing insecure and unhoused.

Among the unhoused and housing insecure, consultation with agencies and organizations serving the unhoused and homeless in Oklahoma suggest highest need exists among:

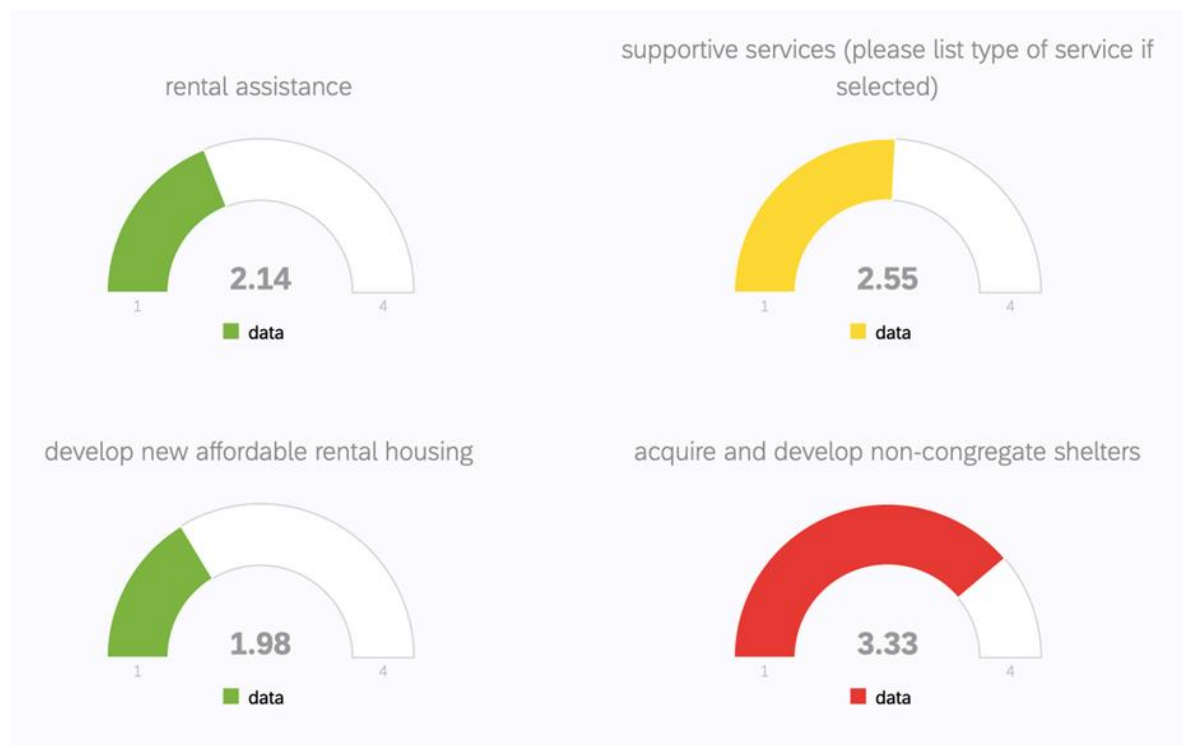
- youth transitioning out of foster care,
- people experiencing chronic mental health problems,
- formerly incarcerated people, and
- people residing in substandard housing.

Additionally, gaps identified via consultation with agencies and organization serving the unhoused and housing insecure, include the need for:

- more supportive and wrap around services,
- approaches to address negative perception of unhoused individuals and affordable housing,
- more housing stock and housing that meets health and safety standards,
- landlord engagement, and
- recognition of unique needs of specific populations at risk for homelessness in Oklahoma.

As Figure 1 suggests, when asked to rank preferences about the use of HOME-ARP funds in Oklahoma, there was a clear consensus that developing affordable rental housing and expanding rental assistance were seen as priorities (1= highest ranking, 4= lowest ranking). Supportive services were ranked third with the acquisition and development of non-congregate shelters considered a lower priority.

Figure 1, relative ranking of preferences for HOME-ARP funds in Oklahoma, lower score equals higher preference.



***Explain how the level of needs and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:***

The data gathered through this consultation process, including interviews and a survey of service providers, interviews, and a survey of those who are or were unhoused or housing insecure, and a synthesis of available data were used to compile this report and set goals and objectives for the allocation of HOME-ARP funds.

***Identify priority needs for qualifying populations:***

Priority needs identified through this process appear to be: increasing availability of affordable housing options, improving the health, safety, and accessibility of existing affordable housing, increasing the capacity of agencies to provide wrap around services to unhoused and housing insecure individuals, and families, engaging landlords in ways to address shortcomings in the rental and evictions processes that disadvantage unhoused and housing insecure Oklahomans, and improving community perception of the unhoused and housing insecurity.

***Explain how the PJ determined the level of need and gaps in the PJ's shelter and housing inventory and service delivery systems based on the data presented in the plan:***

The level of need was determined by analysis of the stakeholder surveys and focus groups, PIT counts, and mapping available resources.

## **HOME-ARP Activities**

***Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contacts and whether the PJ will administer eligible activities directly:***

OHFA will offer funding through a competitive notice of funding availability. OHFA will start by identifying an organization to administer and oversee the distribution of HOME-ARP funding.

***Describe whether the PJ will administer eligible activities directly:***

The PJ will administer eligible activities indirectly.

***If any portion of the PJ's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:***

Not applicable.

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

### ***Use of HOME-ARP Funding***

	Funding Amount	Percent of Grant	Statutory Limit
	<i>Allocated</i>		
Supportive Services	4,813,992.75		
Acquisition/Development of Non-Congregate Shelters	3,209,328.50		
Tenant Based Rental Assistance (TBRA)	4,813,992.75		
Development of Affordable Rental Housing	12,837,314.00		
Non-Profit Operating	1,604,664.25	5%	5%
Non-Profit Capacity Building	1,604,664.25	5%	5%
Administration and Planning	3,209,328.50	10%	15%
Total HOME-ARP Allocation	32,093,285.00		

### ***Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:***

Funds will be available statewide, over the course of three rounds or until funds are completely allocated. Round one will solicit applications for 50% of the allocation focused on rural parts of the state that are not eligible for a separate distribution from another HOME-ARP allocation plan. Round two will make available remaining funds to organizations statewide. A third round of applications will be accepted based on funding availability after round 1 and round 2.

Proposals should be submitted using application processes established for the existing 2023 HOME program found at: <https://www.ohfa.org/home-investment-partnership-program/>

Proposals for funding should address:

- Analysis of regional and local availability of services for the unhoused and housing insecure and ways activities will alleviate existing unhoused individuals and families
- Explanation of how funding will build upon existing assets to leverage capacity and financial resources
- Assessment of regional and local housing market for proposed activity
- Collaboration with developers, government agencies, and other service providers to connect existing and proposed affordable housing units with access to services
- The formation of new collaborations with organizations and agencies that do not traditionally participate in Continuum of Care meetings and activities
- Plans to maintain affordability of units created through funds (e.g. rent set at 30% of tenant income for at least 10 years).

A timeline, due dates, and process for proposal submission will be established by the Oklahoma Housing Finance Agency upon approval of this plan from the US Department of Housing and Urban Development.

***Describe how the characteristics of the shelter and housing inventory, service delivery systems, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:***

Stakeholder feedback on surveys and focus groups overwhelmingly identified a need for more housing and supportive, wrap around services as important priorities to address housing instability and homelessness. Additionally, tenant based rental assistance was identified as important through the provider survey and administrative data suggest a disproportionate rent burden among Oklahomans in the lowest income ranges in the state. Focus group participants cited concerns regarding landlord participation in TBRA inspections and the need for higher caps on TBRA assistance amounts. While the acquisition and development of congregate shelters were less favored by some service providers, others suggested that more were needed as part of a comprehensive strategy to address housing insecurity in the state. The proposed allocation is intended to support these goals by encouraging collaboration between housing developers and those who provide services to develop housing that supports the well-being of low-income individuals and families struggling with housing insecurity.

## **HOME-ARP Production Housing Goals**

***Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:***

Estimates provided by the Oklahoma Housing Finance Agency suggest that an allocation of \$9,627,985.50 will result in the construction of approximately 36 single family homes or approximately 60 apartment units. If acquisition and rehabilitation of existing housing, this amount could be applied to approximately 50 single family homes.

***Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJ's priority needs:***

The activities included in this allocation plan align with and support the priority needs identified in the 2019-2023 Oklahoma Consolidated Plan Strategic Plan (ODC, 2020) which identifies the need for affordable housing as a priority for addressing housing insecurity. Specifically, the plan establishes 10 goals for improving the lives of unhoused and precariously housed individuals and families:

- 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
- 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

## **Preferences**

***Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying population for any eligible activity or project:***

The PJ does not plan to give preference to one or more of the qualifying population or subpopulations within one or more qualifying populations.

***If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the PJ's needs assessment and gap analysis:***

Not applicable.

## **Referral Methods**

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers to an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,

3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE.

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

***Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):***

Not applicable.

***If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):***

Not applicable.

***If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):***

Not applicable.

***If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):***

Not applicable.

### **Limitations in a HOME-ARP rental housing or NCS project**

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.

- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

***Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:***

The participating jurisdiction does not plan to limit eligibility to a qualifying population.

***If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:***

Not applicable.

***If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):***

Not applicable.

## **HOME-ARP Refinancing Guidelines**

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with 24 CFR 92.206(b). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:



***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity:***

Not applicable.

***Require a review of management practices to demonstrate the disinvestment in the property has not occurred, that the long-term needs of the project can be met; and that the feasibility of serving qualified population for the minimum compliance period can be demonstrated:***

Not applicable.

***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both:***

Not applicable.

***Specify the required compliance period, whether it is the minimum 15 years or longer:***

Not applicable.

***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG:***

Not applicable.

***Other requirements in the PJ's guidelines, if applicable:***

Not applicable.

## Appendix A References and Data Sources

Annual Report of the Oklahoma Domestic Violence Review Board. 2021. Office of the Oklahoma Attorney General. Available at: [https://www.oag.ok.gov/sites/g/files/gmc766/f/2021\\_annual\\_report\\_infographics\\_0.pdf](https://www.oag.ok.gov/sites/g/files/gmc766/f/2021_annual_report_infographics_0.pdf)

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## Appendix B Recruitment Materials

## **Emails/ calls/ voicemails sent per regional meeting**

### **Southwest (SW) Lawton for July 12<sup>th</sup>, 2022**

- emails: 28X3.
  - Emails to this region were sent on: 06/24/2022, 06/27/2022, 06/29/2022. These emails enclosed meeting links, website links, and link the survey. They were sent out for this region behind the others due to receiving the list of members late.
- calls: 31
  - Calls were placed on 07/06/2022 and 07/07/2022
- Voicemails: 18
  - Calls were placed on 07/06/2022 and 07/07/2022

### **Southwest Meeting Attendance: 23**

- **Organizations Present:**
  - City of Lawton
  - City Council of Lawton
  - C. Carter Crane Shelter
  - Marie Detty Youth and Family Services
  - Catholic Charities
  - Cameron University
  - Southwest Oklahoma Community Action Agency
  - Might Community Development and Resource Center
  - Family Promise of Lawton
  - Unite Oklahoma
  - Oklahoma Employment Security Commission
  - Oklahoma Department of Human Services
  - Debruler Inc
  - Oklahoma Housing Finance Authority
  - University of Oklahoma
  - Lawton Veterans Association

### **Northeast (NE) Claremore for July 14<sup>th</sup>, 2022**

- Emails: 20X3.
  - Emails to this region were sent on 06/24/2022 and 07/10/2022 to invite and remind them of the meetings.
- Calls: 20
  - Calls were placed on 07/06/2022 and 07/07/2022
- Voicemails: 12
  - Calls were placed on 07/06/2022 and 07/07/2022.

### **Northeast Meeting Attendance: 4**

- **Organizations Present:**
  - Veterans Association
  - INCOG

### **Northwest (NW) Alva**

- Emails: 40

- Emails were sent on 6/24 & 7/14
- no voicemails/ phone calls were made due to lack of interest after several rounds of emails/ several email correspondence where people were unable to attend due to distance, also had several requests for virtual meeting so people were directed to the virtual meeting on 8/2

#### Northcentral (NC) Enid

- Emails: 20
  - Emails were sent on 6/24 & 7/15
- phone calls: 22
  - Calls were placed on 7/15
- Voicemails: 10
  - Left on 7/15

#### *NW & NC combined*

- 22 calls, 60 emails
- ***\*\*Enid (NW) and Alva (NC) Meetings were combined\*\****

#### Northeast (SE) McAlester

- Meeting is 7/28/22

#### Virtual Meeting for all regions

- Meeting is 8/2/22

#### In person Meeting for all regions at OU

- Meeting is 8/3/22

***\*\*NOTE: majority of email correspondence included information about other in-person/ virtual meetings if unable to attend specified regional meeting***

***\*\*NOTE: contacted agencies on given list but continued to add agencies as list was not extensive***

### **Surveys per Region/ Town**

**Total responses (as of 7/18): 52**

#### Surveys per region

- NW: 0
- NC: 2
- NE: 3
- SE: 11
- SW: 5
- Tulsa: 3
- Norman (Cleveland County): 4
- Oklahoma City: 2

#### Surveys Per town/ city

- Ada: 5
- Ardmore: 2
- Bartlesville: 2
- Enid: 2
- Lawton: 5
- Muskogee: 2
- Norman: 4
- Oklahoma City: 2
- Okmulgee: 1
- Stigler: 1
- Tahlequah: 1
- Tulsa: 3

Hello,

My name is \_\_\_\_, and I am part of a research team from OU aimed at addressing housing insecurity and homelessness in the state of Oklahoma. On behalf of my team, we would like to extend an invitation to participate in a research project entitled Understanding Housing Security and Homelessness in Oklahoma: identifying gaps and assets for the Oklahoma Housing Finance Agency application to the US Department of Housing and Urban Development HOME American Rescue Plan. We are hosting our regional meeting on (date of regional meeting) and would love to see you there! The meeting is at the (time/ location).

This research is being conducted at the University of Oklahoma and at sites in each Continuums of Care in Oklahoma. You were selected as a possible participant because you provide services directly or indirectly to homeless individuals and families, those at risk for becoming homeless, or populations that experience enhanced risk for homelessness due to domestic violence, sexual assault, or human trafficking.

We are reaching out to you and other organizations across the state to let you know about opportunities to contribute to this work to enhance our understanding of gaps and existing resources available to help those experiencing homelessness and housing insecurity in our state.

For more information, visit <https://iqc.ou.edu/housing> where you can take our survey about your work and experience with the homeless community in Oklahoma. On this website, you can also sign up for one of our in-person or virtual consultations to provide more information about the things the Oklahoma Housing Finance Agency and US Department of Housing and Urban Development should consider as they allocate funds to address homelessness in our state.

The direct link to RSVP for the \_\_\_\_ meeting is: (link to rsvp)



# Oklahoma HOME-ARP Allocation Plan

A plan to support people who are experiencing homelessness and housing instability by allocating funds from the American Rescue Plan through service providers and agencies across Oklahoma.

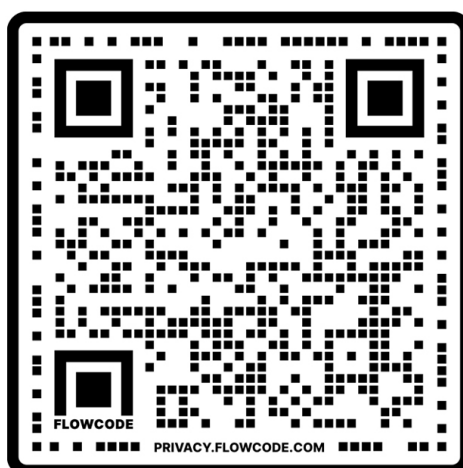


We invite you to participate in a research project entitled Understanding Housing Security and Homelessness in Oklahoma: identifying gaps and assets for the Oklahoma Housing Finance Agency application to the US Department of Housing and Urban Development HOME American Rescue Plan.

This research is being conducted at the University of Oklahoma and at sites in each of the Continuums of Care in Oklahoma. You were selected as a possible participant because you provide services directly or indirectly to homeless individuals and families, those at risk for becoming homeless, or populations that experience enhanced risk for homelessness due to domestic violence, sexual assault, or human trafficking.

We are reaching out to you and other organizations across the state to let you know about opportunities to contribute to this work to enhance our understanding of gaps and existing resources available to help those experiencing homelessness and housing insecurity in our state.

For more information, scan the QR code below where you can take our survey about your work and experience with the homeless community in Oklahoma. On this website you can also sign up for one of our in-person or virtual consultations to provide more information about the things the Oklahoma Housing Finance Agency and US Department of Housing and Urban Development should consider as they allocate funds to address homelessness in our state.



<https://iqc.ou.edu/housing/>

You are welcome to contact one of the faculty coordinating this project if you have questions:

Dr. Bryce Lowery  
Associate Professor of Regional and  
City Planning, University of Oklahoma  
Telephone: 213-399-7035  
Email: [bryce.c.lowery@ou.edu](mailto:bryce.c.lowery@ou.edu)

Dr. David McLeod  
Associate Professor of Social Work,  
University of Oklahoma  
Telephone: 405-757-7344  
Email: [damcleod@ou.edu](mailto:damcleod@ou.edu)

Dr. Christina Miller  
Associate Professor of Social Work,  
University of Oklahoma  
Telephone: 404-325-8031  
Email: [crmiller@ou.edu](mailto:crmiller@ou.edu)

Dear COC Members,

Thank you for your participation in the regional focus groups and stakeholder surveys. If you have not had a chance to take the stakeholder survey, please follow this link now: [https://ousurvey.qualtrics.com/jfe/form/SV\\_8lc7WRwtyktO51k](https://ousurvey.qualtrics.com/jfe/form/SV_8lc7WRwtyktO51k)

We have now opened a link to a new survey for people with Lived Experience of homelessness or housing instability. Please share this survey link with anyone in your network that has lived experience. [https://ousurvey.qualtrics.com/jfe/form/SV\\_8bP7PmxDiJIGCIIm](https://ousurvey.qualtrics.com/jfe/form/SV_8bP7PmxDiJIGCIIm)

Attached you will find a flyer that you can post in your agencies and/or shelters to recruit participants to take the Lived Experience survey.

If you would like to learn more about the project, please visit <https://iqc.ou.edu/housing>

# Oklahoma HOME-ARP Allocation Plan

A plan to support people who are experiencing homelessness and housing instability by allocating funds from the American Rescue Plan through service providers and agencies across Oklahoma.



**Have you ever experienced homelessness or housing instability?**

**Are you currently unhoused?**

If you answered yes, we invite you to participate in a research project entitled Understanding Housing Security and Homelessness in Oklahoma: identifying gaps and assets for the Oklahoma Housing Finance Agency application to the US Department of Housing and Urban Development HOME American Rescue Plan.

This research is being conducted by the University of Oklahoma at sites around the state. We are reaching out to you so we can better understand the Lived Experience of homelessness or housing instability in Oklahoma.

Scan the QR code below where you can take our survey about your experience with homelessness or housing instability.

**For taking survey scan a QR code**



You are welcome to contact one of the faculty coordinating this project if you have questions:

Dr. Bryce Lowery  
Associate Professor of Regional and  
City Planning, University of Oklahoma  
Telephone: 213-399-7035  
Email: bryce.c.lowery@ou.edu

Dr. David McLeod  
Associate Professor of Social Work,  
University of Oklahoma  
Telephone: 405-757-7344  
Email: damcleod@ou.edu

Dr. Christina Miller  
Associate Professor of Social Work,  
University of Oklahoma  
Telephone: 404-325-8031  
Email: crmiller@ou.edu

## Appendix C: Recruitment Materials Public Meeting

State of Oklahoma

Department of Housing and Urban Development

HOME-American Rescue Plan (ARP) Allocation Plan Public Comment

On February 1, 2023, the Oklahoma Housing Finance Agency plans to release the draft allocation plan for Oklahoma Non-Entitlement (Key 409999). The draft allocation plan will be available at:

[www.ohfa.org](http://www.ohfa.org)

Additionally, starting February 1, 2023, a portal will be made available at [iqc.ou.edu/housing](http://iqc.ou.edu/housing) where you can:

- Sign up to receive notifications about the release of the draft allocation plan;
- view the plan (starting February 1, 2023),
- submit comments regarding the contents of the plan (starting February 1, 2023), and
- register for the public meeting (being held February 8, 2023) to make comment.

The public meeting will be held February 8, 2023 via video conference from 10:00 a.m. – 12:00 p.m. Central Time.

Public comment via the online portal will remain open until February 15, 2023.

You can also use this QR code to be directed to [iqc.ou.edu/housing](http://iqc.ou.edu/housing):

Please contact Bryce C. Lowery, Associate Professor of Regional and City Planning at the University of Oklahoma, if you have questions or require accommodations to be able to participate in public participation regarding the allocation plan. He can be reached at [bryce.c.lowery@ou.edu](mailto:bryce.c.lowery@ou.edu).



# Oklahoma HOME-ARP Allocation Plan

A plan to support people who are experiencing homelessness and housing instability by allocating funds from the American Rescue Plan through service providers and agencies across Oklahoma.



## State of Oklahoma Department of Housing and Urban Development HOME-American Rescue Plan (ARP) Allocation Plan Public Comment

On February 1, 2023, the Oklahoma Housing Finance Agency plans to release the draft allocation plan for Oklahoma Non-Entitlement (Key 409999). The draft allocation plan will be available at:

[www.ohfa.org](http://www.ohfa.org)

Additionally, starting January 13, 2023, a portal will be made available at [iqc.ou.edu/housing](http://iqc.ou.edu/housing) where you can:

- Sign up to receive notifications about the release of the draft allocation plan;
- view the plan (starting February 1, 2023),
- submit comments regarding the contents of the plan (starting February 1, 2023), and
- register for the public meeting (being held February 8, 2023).

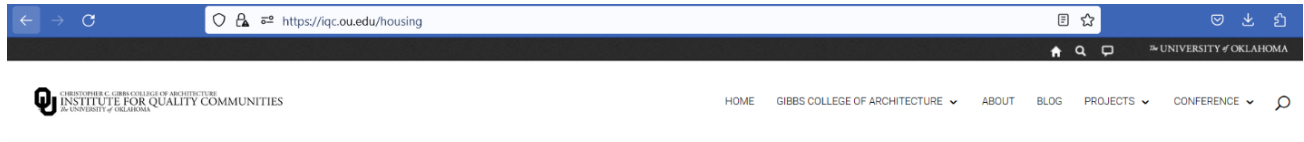
The public meeting will be held February 8, 2023 via video conference from 10:00 a.m. – 12:00 p.m. Central Time.

**You can also use this QR code to be directed to [iqc.ou.edu/housing](http://iqc.ou.edu/housing):**



Please contact **Bryce C. Lowery**, Associate Professor of Regional and City Planning at the University of Oklahoma, if you have questions or require accommodations to be able to participate in public participation regarding the allocation plan. He can be reached at **[bryce.c.lowery@ou.edu](mailto:bryce.c.lowery@ou.edu)**.

## Website



### Review & Comment: Oklahoma HOME-ARP Allocation Plan Draft

Fellow Oklahomans,

On behalf of our friends, neighbors, and family members who are unhoused or experiencing housing insecurity, thank you for making time to review the State of Oklahoma HOME-American Rescue Plan (ARP) allocation plan draft. You can download the draft in PDF format from this page.

Comments will be accepted until February 15, 2023, either through the form below or at the virtual public meeting on February 8, at 10 a.m. At the meeting, we will review the document and take comments about the proposed allocation plan. [Please register for the event here.](#)

Warm regards,

Bryce C. Lowery, PhD, Associate Professor of Regional and City Planning  
Christina Miller, PhD, Associate Professor of Social Work  
David McLeod, PhD, Associate Professor of Social Work



#### Download Draft Plan

PDF Format

[PDF File](#)

#### Download Public Meeting Presentation

PDF Format

[PDF File](#)

**Submit online comments by March 2, 2023.**

Name	Email Address
Message	

10 + 6 =

[Submit](#)

## Appendix D: Consultation Meeting Summaries



# Continuum of Care Stakeholder Meetings

## **Claremore**

### ***Meeting Information***

A community stakeholder meeting was conducted on July 14, 2022, for the Northeast Continuum of Care in Oklahoma. The meeting was held in Claremore, Oklahoma at the Claremore Technology Center, from 1:30p.m.-3:30p.m.

### ***Common Themes***

In the Northeast Continuum of Care, a variety of pertinent themes were discussed among community stakeholders. Among these, homelessness, specifically pertaining to veterans who are homeless, was highlighted. Here, one community member stated, *“We deal with this population because of mental health and maybe because of disabilities, they have a hard time as far as keeping housing.”* Barriers, such as mental health, a criminal background, disability, past eviction, and behavioral disorders were indicated as factors making it hard to house veterans.

Alongside this, vouchers were discussed heavily, pertaining to both veterans and community members. One community member stated, *“After COVID, a lot of, a lot of property owners stop taking vouchers and it's just been going downhill from there.”* Stakeholders indicated that landlords are increasingly less inclined to accept vouchers because of the stipulations, inspections, and lack of economic gain associated with them. Pertaining to housing stock, community perception is that there is not enough housing stock. Highlighting this, one stakeholder stated, *“There's about a shortage of 4,000 to 5,000 housing units in this part of the state to address affordable housing right now and vulnerable populations, there's never enough.”*

### ***Unique to NE CoC***

A variety of insight was shared into the factors specifically impacting the Northeast Continuum of Care. Tribal governments were spoken of in high regard, pertaining to their efforts in housing homeless individuals and caring for their community. Stakeholders indicated that, *“they (Cherokee, Choctaw, Chickasaw, Choctaw Tribes) have done probably the most that I've seen in the way of housing and everything they've built a lot of housing.”*

Another prominent theme, unique to this CoC, is the notion of housing development. Community stakeholders were active in processing ways to further develop housing and renovate existing spaces. In terms of development, one stakeholder highlighted the essential factors that are a necessity to the process, *“Neighborhood support of what's happening and then understanding. And then financing because it's, you know, nobody is going to make money on permanent supportive housing where affordable housing units, it's just not, it doesn't attract a developer.”*

### ***Compelling Quotes***

*“So, if you were to highlight the priority need of someone who is at risk of homelessness, what would be kind of the top two priority needs of that group in this community?”*

*“I would say safe and secure housing, if you're at risk of homelessness. To make sure that you have access to safe and secure housing, which includes, you know having not only a unit that is, you know, up to code and secure, but also having some kind of way to continue to pay the rent or the mortgage so that.”*

Theme	# of times discussed	% of meeting spent discussing	Notes
Homeless	19	7.01%	
At-Risk	10	3.69%	
DV/ fleeing. Trafficking/ sexual assault/ stalking	5	1.84%	
Veterans	27	9.96%	
Other Populations	40	14.76%	Mental Health (3), Native American (16), Rural Residents (2), Disability (3), Youth (1), Family (5), Elderly (10)
Administration & Planning	1	0.37%	
Home Arp Rental Housing	15	5.53%	
Tenant-Based Rental Assistance	15	5.53%	Vouchers (6)
Supportive Services	24	8.85%	Transportation (5), Medical (6), Food Resource (1), Childcare (1), Funding (1), Case Management (4), Mental Health (7), Shelter (1), Housing (2)
Non-Congregate Shelter	13	4.79%	
Non-Profit Operating & Capacity Building	0	0	
Housing Stock	47	17.34%	
Economic/ Market Influence	14	5.17%	
Community Perception	24	8.85%	
Shelter for Minority Population	1	0.37%	
Justice System Involvement	1	0.37%	
Covid	5	1.85%	
Landlords	10	3.69%	

## **Enid**

### ***Meeting Information***

A community stakeholder meeting was conducted on July 19, 2022, for the Northcentral Continuum of Care in Oklahoma. The meeting was held in Enid, Oklahoma at the Autry Technology Center, from 1:30p.m.-3:30p.m.

### ***Common Themes***

The need for more affordable housing was identified as a primary theme for the Northcentral CoC. The community perception is that there is not enough housing stock in the area and of the housing that is available, it is not affordable. In highlighting this lack of affordability, one community member stated, *“I would say probably the average here, just for a couple of bedrooms is \$600 a month. Most of the people on the street, if they have income, it’s \$750 a month (SSI). So, after they pay their rent and the utilities, they have nothing.”*

Many community stakeholders expressed their frustrations with the landlords in their community, stating that they are charging egregious amounts of application fees, late rent fees, increasing rent, and not maintaining properties or making necessary repairs. One stakeholder stated, *“And then the landlords won’t do anything when something gets broke. ‘Why should we? We know you’re not going to move out, you can’t afford to.’”* Alongside this, community members spoke extensively about the importance, accessibility, and necessity of individuals having necessary personal documentation (driver’s license, birth certificates, etc.). One community member shared an example highlighting this reality, *“Rhonda met a client, homeless, living in car, female and just got out of sober living. We put her up in a hotel for a couple of days, within a week, CDSA has her in a home. I mean, that’s the quick turnaround we have if they have their paperwork.”* It was concluded that when individuals possess necessary paperwork, their path to being housed is exponentially quicker than those who lack necessary documentation.

### ***Unique to NC CoC***

Within this Continuum of Care, a unique theme that was discussed on multiple occasions was the ability to find accessible housing for individuals with a criminal record, specifically sex offenders. One stakeholder stated that, *“Out of our 50 places I have nowhere I can put someone on the registry. Next to a house, a church, a school.”* Community members indicated that finding access to housing, supportive landlords, and even locating shelters that will accept someone with a criminal charge can be incredibly challenging. Another theme present in the stakeholder conversation was the discrepancy between acute and chronic homelessness. During the conversation, it was indicated that *“there’s a real difference between chronic homelessness and that experience and transitioning into housing stability compared to someone who had fire and is temporarily displaced, fleeing from a violent situation, who may just get all the paperwork they need to go to their new place.”* Concluding that, *“it is the chronic homeless, those who have been out there awhile or may have that deep-seeded issue that is really hard to get them in some place.”* Ultimately, stakeholders stated that the longer an individual is homeless, the harder it becomes to house them.

### ***Compelling Quotes***

*“It’s such generational trauma also you know, they’re doing things the way that they experienced growing up and they don’t have strategies and things in place to replace that with and even the situational trauma, like for us with victims of domestic violence, maybe they weren’t allowed to work, so really, they have no idea how to sustain a job or what that looks like. And so there are those, like you said, the big picture things we have to address to make everything else work.”*

*“They’re reason you don’t send people to shelters because they have small children, they have babies, they have old people who are handicapped, they have, you know, mental illnesses when it’s very difficult for them to be, they have kids that are autistic. That’s one of the reasons with the Red Cross, we, we have specifically that, that medically, we can give them medically necessary, lodging and a hotel for a short term.”*

<b>Theme</b>	<b># of times discussed</b>	<b>% of meeting spent discussing</b>	<b>Notes</b>
Homeless	36	9.39%	
At-Risk	17	4.44%	
DV/ fleeing. Trafficking/ sexual assault/ stalking	11	2.87%	
Veterans	21	5.48%	
Other Populations	50	13.05%	Disability (8), Youth (7), Family (11), Immigrants (1), Elderly (8), Sex Offender (8), LGBTQ+ (2), Chronic Homeless (5)
Administration & Planning	1	0.26%	
Home Arp Rental Housing	2	0.56%	
Tenant-Based Rental Assistance	4	1.04%	
Supportive Services	62	16.19%	Medication (1), Case Management (9), Food Stamps (2), Transportation (27), Documentation (20), Supportive Housing (10), Mental Health (14), Physical Health (4), Shelter (15), Agency Connection (4), Substance Abuse Treatment (5), Public Facilities (1), Online Accessibility (7), Walkability/Sidewalks/Infrastructure (5)
Non-Congregate Shelter	0	0	
Non-Profit Operating & Capacity Building	1	0.26%	
Housing Stock	41	10.70%	
Economic/ Market Influence	7	1.83%	

Community Perception	45	11.75%	
Shelter for Minority Population	28	7.31%	
Justice System Involvement	26	6.79%	Sex Offender
Covid	6	1.57%	
Landlords	25	6.53%	

## **Lawton**

### ***Meeting Information***

A community stakeholder meeting was conducted on July 12, 2022, for the Southwest Continuum of Care in Oklahoma. The meeting was held in Lawton, Oklahoma at the Great Plains Improvement Foundation, from 1:30p.m.-3:30p.m.

### ***Common Themes***

Throughout the meeting, a variety of themes and deepened insight was gained for the unique challenges impacting the SW CoC. Among these, housing, specifically affordable housing, was discussed in detail. One community member stated, *“It (rent) used to be about \$500-600, it’s come up to \$900-\$1600,”* further citing that this increase has taken place within the past 6 months. Community members stated that as a direct result of increasing rent, the community is now experiencing a drastic increase in both homeless and at-risk populations.

Alongside this, landlords and their current practices were discussed heavily, and perceptions are highlighted by this stakeholder’s comment, *“I think before COVID, the landlords were already real quick to evict and it’s gotten even worse since COVID. Cause people are not working, nor have the finances, so they’re doing it much quicker.”* The overall community perception of landlords was unfavorable, with many believing landlords are solely financially driven and unconcerned with the rights of tenants. Similarly, community members stated that housing vouchers, though once beneficial, no longer are deemed valuable by landlords. One stakeholder spoke about landlord incentives, stating, *“if you’re thinking about landlord incentives, they are not very effective right now because of our ES Covid funds allowed for that and we are seeing that drop right now across the state.”* The topic of supportive services was heavily discussed, citing the need for transportation, mental health resources, childcare, access to medical care, and increased legal services. Alongside this, veterans, the Hispanic community, individuals with intellectual and developmental disabilities, and the elderly were indicated as lacking needed supports.

### ***Unique to SW CoC***

Within this Continuum of Care, multiple participants cited that there has been an increase in both youth and family homelessness, stating that there is an immense lack of housing resources for these specific populations. When asked about the homeless population specific to the southwest, a community member stated, *“We are seeing families, especially the multi-generational families, when they get evicted, you are talking about grandma, auntie, children who are disabled—you’re talking about the whole gambit of the most needy of our population who are being affected by this.”* Furthermore, the implications of a family experiencing homelessness were highlighted, *“we really need some housing for these families. Because by the end of the year, what we’ve*

*seen from January to June, by December, it's going to be bad. It's going to be really bad. And it's going to be sad. It's gonna be very sad."*

Domestic violence, in correlation to the military, was another theme unique within this continuum of care. A community stakeholder spoke to this theme, stating, *"we work closely with Fort Sill because we get the domestic victims, when they're military and stuff we can house them in our shelter. And we also provide counseling and all of our services, they don't have to come into our shelter to get it. So, if they're needing counseling, an idea for military is that we don't bill insurance. So, if they're not ready to leave that relationship yet, but want to get supported, they come to us and we can still provide that service, and their partner will not know about it because we don't bill insurance for it, and it's free, and so, and we house them."*

### **Compelling Quotes**

*"So, when you have multigenerational families, you have multigenerational problems. You have multigenerational stresses—you have all of these issues and these coping skills that are destructive that are multigenerational. So, you have little ones seeing grandma, auntie, and uncle and everyone else with their coping skills and we can't expect them to, all of a sudden, because you sent them to school or something expect them to all of a sudden be able to say, "oh, let me do it this way."*

*"I've had some families go ahead and go in with the promise that the landlord that they will fix it, and, and they don't. I've had clients' holes in the roof, couldn't use the bathroom because the plumbing was backing up into the tub, water running in, and the landlord isn't doing anything because, because he doesn't have to and there is no advocate for them (the tenants)."*

<b>Theme</b>	<b># of times discussed</b>	<b>% of meeting spent discussing</b>	<b>Notes</b>
Homeless	21	7.92%	
At-Risk	31	11.70%	
DV/ fleeing. Trafficking/ sexual assault/ stalking	12	4.53%	
Veterans	7	2.64%	
Other Populations	37	13.92%	Disability (6), Youth (13), Hispanic (7), Family (8), Elderly (3)
Administration & Planning	0	0	
Home Arp Rental Housing	7	2.64%	
Tenant-Based Rental Assistance	4	1.51%	
Supportive Services	49	18.49%	Childcare (5), Shelter (1), Programming (1), Education Services (1), Transportation (6), Mental Health (8),

			Physical Health (6), Database (7), Legal Services (4)
Non-Congregate Shelter	2	0.75%	
Non-Profit Operating & Capacity Building	3	1.13%	
Housing Stock	38	14.34%	
Economic/ Market Influence	5	1.89%	
Community Perception	20	7.55%	
Shelter for Minority Population	1	0.37%	
Justice System Involvement	1	0.37%	
Covid	10	3.77%	
Landlords	17	6.42%	

## **Norman**

### ***Meeting Information***

A community stakeholder meeting was conducted on August 4, 2022, and was open to agencies throughout the state. In attendance were stakeholders from Shawnee, Norman, and Oklahoma City. The meeting was held at The School of Social Work at The University of Oklahoma from 1:30p.m.-3:30p.m.

### ***Common Themes***

There were several very persistent themes throughout the meeting. A major theme was the housing shortage, specifically the need for assisted living and supportive housing as well as larger units for families. To demonstrate this housing shortage, one stakeholder stated *“As far as housing we’ve got 1300 too few housing units, assuming that landlords would rent to them, or take third party funding or take felonies and all that stuff. There would still be a lack of 1300 housing units.”* Community perception including lack of understanding, awareness, and acceptance of efforts to reduce homelessness was also very prevalent both in community members and community leaders. One stakeholder stated *“My community is overall very very negative. If you’re homeless it’s because you deserve it you chose it.”*

Homelessness in general was discussed significantly as well as those at-risk. Specific groups of homeless or at-risk of homelessness included those with an intellectual and/or developmental disability, youths, families, elderly, sexual offenders, and LGBTQIA+ individuals. Tenant Based Rental Assistance specifically vouchers, and their lack of use was discussed as well as issues with landlords, vouchers being a major theme. One stakeholder spoke to challenges with vouchers stating, *“In the vouchers...they calculate in utilities and so you can’t just get a 960 dollar or 875-dollar apartment, your utilities can’t go over that number either which precludes even more people.”* The need for supportive services included access to medication, transportation, mental health help, substance abuse treatment, and legal services. Non-congregate shelters and Home ARP Rental Housing was persistent throughout. Unique to this meeting,

domestic violence and in particular sex trafficking was heavily discussed. Justice System involvement, Economic Market Influence, Covid, non-congregate shelters, and Veterans were also discussed.

### ***Themes Unique to the Meeting***

Community perception and sexual trafficking were predominant themes to this meeting. Community perception included not only negative perception by community members such as business owners and local community leaders, but also the sense of community amongst homeless and housing insecure populations. Several stakeholders agreed to this sentiment stating *“I think people really strive when they feel like they're in a community...in my mind that would be like 20 people or less in a community where they could actually have relationships with each other and work through their conflicts and some guidance.”* as well as *“If we could create smaller communities and create that sense of community for people I think the ultimate result would be stronger connections and more housing stability.”*

The correlations between homelessness and sex trafficking were also highlighted stating *“We wouldn't call it trafficking necessarily but the women, most of the time it's women, have to use sex as currency to get a safe place to sleep at tonight and when that relationship goes wrong somebody else makes an offer and it ends up being trafficking.”* with another participant agreeing stating *“That's what we end up calling trafficking but that's, that's how it starts. It's just mere survival.”* Violence and safety surrounding homeless was communicated in this meeting as demonstrated by the following quote *“All they're doing is try to survive...one guy said “I wake up every morning I think about what I'm gonna eat and the next thing is where I'm gonna sleep that's safe. So his entire focus is on that is pure survival, I mean most wild animals know where they're gonna sleep tonight, um so there's no way they can deal with anything else.”*

### ***Compelling Quotes***

*“All they're doing is try to survive...one guy said “I wake up every morning I think about what I'm gonna eat and the next thing is where I'm gonna sleep that's safe. So his entire focus is on that is pure survival, I mean most wild animals know where they're gonna sleep tonight, um so there's no way they can deal with anything else.”*

<b>Theme</b>	<b>Approximate # of times discussed</b>	<b>Approximate % of meeting spent discussing</b>	<b>Notes</b>
Homeless	23	11.8%	
At-Risk	9	4.6%	
DV/ fleeing. Trafficking/ sexual assault/ stalking	8	4.1%	Sex trafficking
Veterans	6	3.1%	
Other Populations	19		Intellectual and developmental disability, youth, family, elderly, sex offender, LGBTQIA+
Administration & Planning	0	0%	



Home Arp Rental Housing	7	3.6%	
Tenant-Based Rental Assistance	12	6.2%	Vouchers
Supportive Services	13	6.7%	
Non-Congregate Shelter	11	5.6%	
Non-Profit Operating & Capacity Building	0	0%	
Housing Stock	21	10.8%	Assisted/ supportive/ elderly, all bills paid, larger units for families
Economic/ Market Influence	6	4.6%	
Community Perception	32	16.4%	
Shelter for Minority Population	3	1.5%	LGBTQIA+, youth w/ disabilities
Justice System Involvement	4	2.1%	
Covid	7	3.6%	
Landlords	14	7.2%	

## **McAlester**

### ***Meeting Info***

A community stakeholder meeting was conducted on July 28, 2022, for the Southeast Continuum of Care in Oklahoma. The meeting was held in McAlester, Oklahoma at the Kiamichi Tech Center from 1:30p.m.-3:30p.m. The meeting consisted of 16 participants and ran for 2 hours and 3 minutes.

### ***Common Themes***

Landlords were heavily discussed with most of the discussion being negative regarding working with landlords as an agency and consumer experiences. Tenant based rental assistance and issues with administering and utilizing vouchers was discussed in addition to the housing shortage and up to code housing. One stakeholder stated, *"There's nothing for them to rent that wants to charge fair market or willing to rather because they can charge more and they don't want to do the inspection process... it will not pass inspection and they don't want to do what's necessary to get it to pass inspection."* The discussion around supportive services included addiction and substance abuse services, education, childcare, mental health services and counseling, transportation, case management, life skills training, and rental assistance. Other groups mentioned in addition to homeless, at-risk, domestic violence/ fleeing/ sex trafficking, veterans were sex offenders, intellectual or developmental disabilities, and youth. Other discussion points included administration and planning, Home ARP rental housing, non-congregate shelters, Non-profit operating and capacity building, economic market influence, community perception, justice system involvement, and Covid.

### ***Themes unique to this meeting***

Rural relationships and the diminishment of those was a unique theme to this area, one stakeholder explained this in the following quote: *"You call those old contacts those landlords and they've sold out... so those rural relationships... they don't exist anymore those landlords aren't in place anymore."* Another unique theme to this area was tribal relations and the positive influence of tribal organizations. Members of the Chickasaw Nation were present at this meeting and other stakeholders positively remarked on their services stating *"And a lot of times when we have someone come in to fill out a housing application, they come in, if they're a Chickasaw Citizen, they come in with a navigator... The most successful cases, are the ones that have advocates, have someone holding them accountable, or have someone holding their hand like a Navigator."*

The need for increased trainings and increased funds for social workers and case managers was also highlighted in this meeting. One participant stated *"I think one thing that would help the uh quality and the longevity of um social service workers is access to more funds for um professional development. The continuing education...even without the licenses... just for your average caseworker who is not licensed. Um getting the training in uh mental health first aid, all the things that we do is expensive. And these smaller nonprofits which are the vast majority in Oklahoma that don't have \$10,000 a year for professional development to train their staff. So overworked, burnout."*

### ***Compelling Quotes***

*"I think one thing that would help the uh quality and the longevity of um social service workers is access to more funds for um professional development. The continuing education...even without the licenses... just for your average caseworker who is not licensed... getting the training in mental health first aid, all the things that we do is expensive. And these smaller nonprofits which are the vast majority in Oklahoma that don't have \$10,000 a year for professional development to train their staff. So overworked, burnout."*

<b>Theme</b>	<b>Approximate # of times discussed</b>	<b>Approximate % of meeting spent discussing</b>	<b>Notes</b>
Homeless	15	6.6%	
At-Risk	15	6.6%	Financial issues, couch surfing, lack of friends/ family
DV/ fleeing. Trafficking/ sexual assault/ stalking	11	4.8%	Fleeing, sex trafficking
Veterans	9	3.9%	
Other Populations	13		Sex offenders, intellectual and developmental disability, youth

Administration & Planning	11	5.7%	
Home Arp Rental Housing	4	1.7%	
Tenant-Based Rental Assistance	9	3.9%	Vouchers
Supportive Services	20	8.7%	Addiction/substance abuse, education, childcare, mental health, counseling, rental assistance, transportation, case management, life skills
Non-Congregate Shelter	4	1.7%	
Non-Profit Operating & Capacity Building	14	6.1%	
Housing Stock	28	12.2%	
Economic/ Market Influence	15	6.6%	
Community Perception	2	0.9%	
Shelter for Minority Population	7	3.1%	Women
Justice System Involvement	6	2.6%	
Covid	17	7.4%	
Landlords	29	12.7%	

## **Zoom**

### ***Meeting Info:***

A community stakeholder meeting was conducted on August 2, 2022, and was open to agencies throughout the state. In attendance were four stakeholders who each represented a different CoC in Oklahoma. The meeting was held virtually from 2:00p.m.-3:30p.m.

### ***Common Themes***

Major discussion points included the need for different kinds of housing including transitional, supportive/ hospice, and ADA accessible. When asked if there was enough supportive housing for families and individuals, one participant stated “...*Not at all. Not even close.*” Homelessness, persons at-risk, domestic violence, and other populations including tribes, mental health, sex offenders, and intellectual and developmental disabilities were discussed with an emphasis on “other” groups. Administration and Planning, tenant based rental assistance including vouchers, nonprofit operation and capacity building, economic market influence, community perception, justice system involvement, covid, and minority population shelter in particular women were other themes.

Discussion on supportive services included the need for mental health services, case managers, outreach services, life skills and credit repair training, healthcare, and substance rehabilitation.

Regarding supportive services, one participant stated “...supportive services goes a long way. So, if we can get rent paid, that's just one part of the puzzle...that doesn't mean that individual is being successful in a program or even working towards their community engagement and being an individual in a house at some point. So supportive services goes along way and that should include transportation, the mental health and substance use care, the general case management, the utility assistance, because they're all wrapped up into a bigger piece.” In how to best support clients, one participant stated “But working on that with those supportive services throughout, you're going to have a better outcomes”.

### ***Themes Unique to this Meeting***

The need for increased coordination efforts between agencies statewide as well as increased advertising for agency services was a unique theme to this meeting. One stake holder explained this stating the need for “A robust investment in coordination between all of the various agencies and resources out there.... In the four years I've been doing housing, the number one thing I've consistently heard across the board is I had no idea how many resources were out there until I had to have them.”.

### ***Compelling Quotes***

“...supportive services goes a long way. So, if we can get rent paid, that's just one part of the puzzle...that doesn't mean that individual is being successful in a program or even working towards their community engagement and being an individual in a house at some point. So supportive services goes along way and that should include transportation, the mental health and substance use care, the general case management, the utility assistance, because they're all wrapped up into a bigger piece.”

<b>Theme</b>	<b>Approximate # of times discussed</b>	<b>Approximate % of meeting spent discussing</b>	<b>Notes</b>
Homeless	7	9.1%	
At-Risk	5	6.5%	
DV/ fleeing. Trafficking/ sexual assault/ stalking	6	7.8%	
Veterans	0	0%	
Other Populations	10	13.0%	Tribes, Intellectual and Developmental Disability, Sexual Offender,
Administration & Planning	2	2.6%	
Home Arp Rental Housing	0	0%	
Tenant-Based Rental Assistance	4	5.2%	Vouchers
Supportive Services	8	10.4%	Mental health, case management, outreach, life skills training, credit repair, healthcare, substance rehab

Non-Congregate Shelter	0	0%	
Non-Profit Operating & Capacity Building	1	1.3%	
Housing Stock	11	14.3%	Transitional, hospice/ supportive, ADA
Economic/ Market Influence	5	6.5%	
Community Perception	1	1.3%	
Shelter for Minority Population	2	2.6%	Women
Justice System Involvement	4	5.2%	
Covid	1	1.3%	
Landlords	10	13.0%	

## **Lived Experience Meetings**

### **Muskogee**

#### ***Meeting Information***

A meeting was conducted on September 28, 2022, for individuals who have previously, are currently, or work directly with those experiencing homelessness. The meeting was held in Muskogee, Oklahoma at the Gospel Rescue Mission, from 5:30p.m.-7:30p.m. At this meeting, 3 agencies were represented (one Gospel Rescue Mission, two independents within continuum), consisting of 6 community members.

#### ***Common Themes***

Research concluded from this lived experience meeting focused heavily on supportive services, challenges with landlords, and the community's perception of those experiencing homelessness. Firstly, one participant spoke about how difficult and circuitous it can be to speak to agencies who are providing services. The participant stated, *"you can't get a hold of anybody. DHS here won't answer the phone. So, what are you supposed to do? They send you a letter you got to do this and that, if you have questions well, call this number, call this number. And especially for seniors."* Furthermore, the participants highlighted their frustrations with landlords, stating that they are often aloof, unhelpful, and do not complete necessary maintenance, with one individual stating, *"they're slumlords, not landlords."*

This meeting prominently highlighted resources in the community, both available and unavailable. Multiple participants spoke about their positive experiences with community agencies, citing dental care, recovery programs, and food banks as beneficial. A major gap in services, as mentioned by participants, was an overall lack of educational services. Participants stated that life skills, financial management, and housing maintenance courses would be beneficial to those experiencing homelessness. Alongside this, participants spoke about the difficulties in locating the documentation necessary for housing and employment, such as a social security card, birth certificate, or an identification card. Finally, participants spoke about the necessity of case management and how imperative it is to have an advocate. Individuals stated that the documentation is frequently overwhelming and confusing. As a result, participants indicated that the most beneficial resource would be having an individual who can help fill out forms, walk an individual through the process of receiving services, and ultimately, serve as a case manager for the client.

#### ***Themes Unique to This Meeting***

This was the first lived experience meeting of the study and consisted of both people experiencing homelessness, staff with lived experience, and the formerly homeless. This population had one person who qualified as elderly. This population focused heavily on the accessibility of educational resources and the language used to create materials for persons obtaining resources.

#### ***Compelling Quotes***

*"They're living in the tyranny of the moment—they're trying to make it day by day. Single moms are trying to figure out, you get picture forms done. They're just trying to figure out how to use the \$10 they have to put food on the table that night. They're (landlords) are just making decisions for us, they take their clothes to the cleaners. They have NO idea what is, is to be us."*

*“But you’d be surprised what some of the people come in and we help them with, I know I’ve said it too, and they’ll even say, “I love you.” And it’s worth every minute of what I do. And just for that reason. . . And to me, this is supposed to be the United States of America, and we’ve got so many homeless and things go on that shouldn’t. It supposed to be a rich country, we’re supposed to help one another. Where did that go? Out the window a long time ago? People don’t want to help anybody. Certain people will.”*

*“And that one person, one person gave me hope. I was like suicidal this man, trusted me that I would do the right thing and he handed me a \$100 bill and I did the right thing. \*tearfully\* and we lose so many people because they’re “just a strung out, drug addict, felon, piece of shit” excuse my language but. That’s how we look at people and my suffering was SO great and out of all the people in this community, I didn’t even ask for help, this one man who didn’t make hardly any money handed me that and I went. I went to church and I asked for help because like, he gave me this hope that day and I think that, right there, is the most important thing, you know. Just, when we see people—care.”*

“Being homeless is traumatic. And the threat of being homeless again creates PTSD.”

<b>Theme</b>	<b>Approximate # of times discussed</b>	<b>Approximate % of meeting spent discussing</b>	<b>Notes</b>
Homeless	16	9.8%	
At-Risk	1	0.6%	
DV/ fleeing. Trafficking/ sexual assault/ stalking	1	0.6%	
Veterans	1	0.6%	
Other Populations	3	1.8%	Families (2), Mental Illness (1)
Administration & Planning	0	0%	
Home Arp Rental Housing	0	0%	
Tenant-Based Rental Assistance	10	6.1%	Vouchers (8)
Supportive Services	44	27%	Physical Health (8), Mental Health (3), Healthcare (5), Resources (8), Transportation (3), Legal (5), Documentation (3), Insurance (4), Navigator (6), Education (5), Food (2), Financial (3), Trouble Accessing Resources (5)

Non-Congregate Shelter	0	0%	
Non-Profit Operating & Capacity Building	0	0%	
Housing Stock	24	14.7%	ADA Accessible (5), Stock (2), Inspection/Codes (3), Elderly (3), Transitional (2)
Economic/ Market Influence	0	0%	
Community Perception	25	15.3%	
Shelter for Minority Population	0	0%	
Justice System Involvement	5	3.1%	
Covid	3	1.8%	
Landlords	30	18.4%	Evictions (3)

## **Tulsa**

### ***Meeting Information***

A meeting was conducted on November 18, 2022, for individuals who have previously, are currently, or work directly with those experiencing homelessness. The meeting was held in Tulsa, Oklahoma at the Denver House from 10:00a.m.-11:30a.m. At this meeting, 1 agency was represented, consisting of 8 community members.

### ***Common Themes***

The overarching themes of the Tulsa Lived Experience Meeting were community perception, law enforcement, and mental health needs. Firstly, individuals spoke prominently about how they feel perceived by individuals throughout the Tulsa community. One participant stated that they had an interaction with a community member that very morning, stating, *“It was, it was very slanderous, it was very uh, offensive, and uh, it was- quite frankly, it was like stigma. A stigma that she passed just because we’re word of mouth, somebody must have told her I was homeless but it’s just the fact, to hear a cuss word from a person, like, you know, bad enough she was my race- she was a Black woman. But I knew she was my race, but on top of that, she was judging me just because of my situation, and not because, it was bad, it was very bad.”*

Stigma, and the stigma felt by those experiencing homelessness, was agreed upon by many of the participants. One participant spoke about his experience being denied entry from a local church because church members thought he was, *“a scam artist”* and that he was there, *“to hurt the church.”* When, in reality, the individual was seeking merely community and spiritual connection. Other residents mentioned a similar perception from community agencies and their lack of competency in working with individuals who have experienced homelessness. This led into discussion about law enforcement. *“And this is where it gets dangerous. You have cops killing people they shouldn’t be doing. You have an authority person with a gun and a person*



*who shouldn't be what they're doing, and there coming over to homeless person who's been through hell and high water, and they do things to trigger homeless person and if they hit the right triggers that homeless person is going to yell, and scream, and cuss, and they tase them and they're in jail. And that's how a lot of those arrests happen because this authority, these 'bad apples' they call them, most of them are good, but you have bad apples come over."*

### ***Themes Unique to this Meeting***

One participant from this meeting spoke about the challenges pertaining to homeless shelters and how many individuals prefer sleeping on the street to seeking shelter. The participant stated that the shelters often had too many barriers, were dangerous, and often facilitated by unempathetic and ill-informed staff members, *"And that's the problem with a lot of the shelters, they're not run by the ight people. So, they'll kick anyone out- they'll kick out people that's deserving of it, and then they'll kick people out that don't deserve it and then you've got good and bad people on the streets."* Furthermore, participants spoke about their challenges in attaining necessary documentation, such as birth certificates, driver's licenses, and social security cards. One participant indicated that even entering the building to receive documentation can quickly become combative because employees do not want to work alongside individuals experiencing homelessness.

### ***Compelling Quotes***

*"If stigmas would disappear, and the only way stigmas disappear is if people stop believing everything they see on television. Plain and simple."*

*"The homeless shelters, everyone knows this, they're rough. They're strict, and sometimes too strict, and they kick people out sometimes, in the middle of winter over like... if they don't like the color of your t-shirt."*

*"Because I don't want to be around no thugs, no gang members, not that I can't relate but just that I am past that. You know? And I don't think, I don't really, I don't really agree with a bad influences being a part of my uh, uh, being a part of me or where I am going."*

<b>Theme</b>	<b>Approximate # of times discussed</b>	<b>Approximate % of meeting spent discussing</b>	<b>Notes</b>
Homeless	34	29.57%	Chronic (6)
At-Risk	1	0.87%	
DV/ fleeing. Trafficking/ sexual assault/ stalking	0	0%	
Veterans	5	4.35%	
Other Populations	7	6.09%	Disability (6), Tribal (1)
Administration & Planning	0	0%	
Home Arp Rental Housing	0	0%	

Tenant-Based Rental Assistance	0	0%	
Supportive Services	23	20.0%	Education (2), Public Library (1), Transportation (3), Trainings (3), Documentation (2), Cops (4)
Non-Congregate Shelter	2	1.74%	
Non-Profit Operating & Capacity Building	3	2.61%	Staff Competency Trainings (3)
Housing Stock	4	3.48%	
Economic/ Market Influence	0	0%	
Community Perception	21	18.26%	
Shelter for Minority Population	0	0%	
Justice System Involvement	9	7.83%	Preventative Measure (2)
Covid	0	0%	
Landlords	6	5.22%	

## **Oklahoma City**

### ***Meeting Information***

A meeting was conducted on November 4, 2022, for individuals who have previously, are currently, or work directly with those experiencing homelessness. The meeting was held in Oklahoma City, Oklahoma at the Lottie House Day Shelter from 11:30a.m.-1:30p.m. At this meeting, 1 agency was represented, Lottie House. The group survey consisted of 2 individual community members.

### ***Common Themes***

One of the most compelling themes of the Oklahoma City Lived Experience meeting was how crucial housing is to all other facets of life. Both participants spoke about how, without housing, all other tasks feel irrelevant, unnecessary, and inconsequential. It became clear that if an individual lacks stable housing, all other areas of life become insurmountable. Another important topic presented was the perceived perception of the community. One individual spoke about the disdain and disgust that has been shown to him because he is homeless. He spoke about how individuals frequently avoid him and disregard his humanness. The individual went on to speak about the lack of governmental support, stating, “they want to see the homeless people die.” Finally, both participants highlighted the difficulties in locating reliable transportation. One participant stated that they frequently resort to walking to their appointments because transportation may not be on time, the weather is not cooperating, or it is too expensive.

### ***Themes Unique to this Meeting***

A theme unique to this meeting was the community that many individuals who are houseless have found together. One participant spoke about the community she had developed and how many of her friends are “comfortable” in their homelessness. The participant indicated that the most beneficial resources she has been able to locate are word of mouth from those that are also experiencing homelessness. The participant spoke positively about the interconnectivity between supporting agencies, stating “they’re connected, so like, if you come here, they know about the other ones you can go to.”

### ***Compelling Quotes***

*“Who cares if there’s housing, if it’s unaffordable.”*

*“I just say the housing piece, the work and everything, I feel like, just falls into place. Just really, just really, it’s the housing piece, the housing part. That’s my biggest hurdle right now, housing. I’m missing something, I can’t get it. It’s right here, but I can’t touch it.”*

<b>Theme</b>	<b>Approximate # of times discussed</b>	<b>Approximate % of meeting spent discussing</b>	<b>Notes</b>
Homeless	26	43.34%	Acute (1), Chronic (2), Transient (1)
At-Risk	0	0%	
DV/ fleeing. Trafficking/ sexual assault/ stalking	0	0%	
Veterans	1	1.67%	
Other Populations	0	0%	
Administration & Planning	0	0%	
Home Arp Rental Housing	0	0%	
Tenant-Based Rental Assistance	1	1.67%	
Supportive Services	27	45%	Case Management (1), Transportation (6), Documentation (1), Employment Support (1), Food Assistance (1), Technology Assess (2)
Non-Congregate Shelter	3	5%	
Non-Profit Operating & Capacity Building	1	1.67%	
Housing Stock	13	21.67%	Affordable Housing (2)

Economic/ Market Influence	0	0%	
Community Perception	3	5%	
Shelter for Minority Population	0	0%	
Justice System Involvement	0	0%	
Covid	0	0%	
Landlords	0	0%	

## Appendix E: Public Comments

## **Via Public Meeting**

Number of Attendees: 123 participants, representing at least 65 organizations, including:

1. A New Leaf
2. Ada Homeless Services
3. Ada Public Library
4. Arnall Family Foundation
5. Arzon Development Company
6. Avenue Property Management
7. Black Wall Street Chamber of Commerce
8. Boomtown Development
9. Carter County Health Department
10. Catoosa Public Library
11. CDSA, inc
12. City Care Night Shelter
13. City Lights Foundation of Oklahoma
14. City of Norman
15. City of Shawnee, OK
16. City of Tulsa
17. Community Action Agency of OKC
18. Community Cares Partners
19. Community Development Support Association
20. CREOKS
21. DeBruler, Inc.
22. Downtown Public Library, OKC
23. DVIS, Tulsa
24. Enid Street Outreach Service
25. Founder of Flourish Homes (Tulsa).
26. Gatesway Foundation
27. Grand Mental Health
28. Green Country Behavioral Health
29. Green Country Habitat for Humanity
30. Healing Houses & Heart 4 The Homeless (H4TH)
31. Homeless Program Coordinator City of Shawnee
32. House District 44.
33. Housing Partners of Tulsa
34. Housing Solutions Tulsa
35. INCA Community Services
36. INCOG
37. KI BOIS Community Action/Southeastern Oklahoma CoC
38. KI BOIS Domestic Violence Program
39. LifeGate Freedom Recovery Ministries
40. LIFT Community Action Agency, Inc.

41. LW Development
42. Lynco Properties
43. Mental Health Association Oklahoma
44. Morton Comprehensive Health Services, Tulsa
45. Northeast OK Community Action Agency/COC 505
46. OK Dept of Commerce
47. OKC Housing Authority
48. OKC Public Schools
49. Oklahoma Association of REALTORS
50. Oklahoma Department of Commerce
51. Oklahoma Housing Finance Agency (OHFA)
52. Oklahoma Policy Institute
53. Oklahoma Senate
54. Oklahoma State Department of Health, District 9
55. QUEST of Oklahoma
56. REAL brokerage
57. Restore Hope (Tulsa)
58. SOAR Partners
59. Tulsa Day Center
60. Tulsa Health Department, Environmental Health
61. Tulsa Housing Authority
62. University of Oklahoma
63. Urban League of Greater OKC
64. Village Public Library
65. Volunteers of America of Oklahoma

Text of Comments:

**General Questions Asked in Chat:**

1. Will there be a process or specific criteria for verifying capacity/capability of applicants to deliver on the proposed projects? Affordable housing development is quite challenging so I'm wondering what criteria will be used to gauge applicants' ability to deliver on the proposed projects.
2. Are the nonprofit and operating funds intended to be given to the same organization funded for programs and housing development?
3. How long does OHFA have to fully award and expend the HOME-ARP dollars per HUD requirements?
4. Can two rural agencies submit an application together?
5. What is the funding category for capacity-building among providers?
6. What are the capital costs for non-profit & operating expenses and are those included in this funding?
7. Will agencies be required to match funds?

### **General Statements made in Chat:**

1. There is a shelter that will not allow you if you have active warrants, or a previous violent felony, there is another shelter that requires a printout from the police department to get in.
2. We recently did listening sessions and surveys on social determinants of health. One of the identified barriers of accessing available resources was stigma. Your feedback on stigma aligns with what we are finding as a whole.
3. Another issue I have seen for homeless is their animals and there is only one shelter in the state I know of to accept animals
4. We appreciate the focus on rural areas of the state!
5. How does OHFA intend to build capacity among service providers, especially when it comes to the development of new affordable housing? One of the issues we have seen is staff turnover and a lack of administrative capacity in areas where there is need, especially rural areas.
6. This is an opportunity to truly increase housing production.
7. I agree as well...housing first.
8. I agree housing is necessary. More housing.
9. I agree! The problem is being able to operate or provide supportive housing services long-term. We will need an ongoing source of operating subsidy that we don't have.
10. Housing needs to be first; we need to get people off the streets
11. The problem has always been that there are too many important needs across the state that need to be addressed and need more funding (TBRA, shelter bed capacity building across the state, etc.) as this study has shown. But even if all of this money was used to build affordable housing across the state, our state will still be a long way away from having the number of affordable housing needed. But the less attention/funding we use to construct affordable housing, the larger the deficit will become.
12. The motel idea is a great one. Cities in California as well as Austin or converting motels to shelters.

### **General Questions Discussed in Video:**

1. "My question is regarding disparities we see in race and unhoused populations here in this state, I was wondering if there have been any possible, or if we'd seen like any, like discrimination as far as access to shelters and rental opportunities?"
2. "So was the bulk of this research conducted through meetings with stakeholders and people with lived experience, or did you also use outside research from various groups in the state focusing on this area?"
3. "What is being done to improve the reputations of the homeless population?"
4. "Do we ever determine whether these homeless people are sex offenders? And are we ever going to start planning to house them or to work towards getting resources for them?"
5. "When will applications be open? When will funds be released?"



6. Is there sort of a criteria or process that would be really diligently looking at the capacity for applicants to be able to deliver on the projects that are proposed.

***Themed Comments/Questions: Development of Affordable Housing***

7. “I do have a comment on the number of units that are being proposed, that could possibly be built or added to the housing inventory. Even though the development of affordable housing is weighted number one with 30% of the funding at \$9.6 million, you’re only projecting to add 60 units of affordable housing -- if it was multifamily, maximum of 60 units. We know construction is very expensive, development is expensive. Believe me, we're in that world, we understand that. But it seems that given the gaps analysis and the shortage of the beds, when you look at the beds, the inventory count that you have, the data you have pulled from HUD, and when you look at the 71,000 units affordable housing gap, it seems that if you weighed it even a little bit more heavily towards production of affordable housing, you might be able to make a bigger dent in those gaps, which will be permanently on the ground as opposed to temporary services with onetime funding.”
8. “It seems like this is an opportunity to produce even more units than what you have projected here, if you weight even a little bit more heavily towards development of affordable housing.”
9. “But I'm just saying you might give consideration to putting more of the money into development of housing that what you're recommending in this split since this is a unique opportunity that is not renewable funding for services. The services money would only be temporary, but the affordable housing infrastructure would be on the ground for a really, really long time. And the gap is big. I know we can't meet it all, but I'm just putting that out there for consideration.”
10. “I do believe there is an absolute necessity of increasing the available units for housing. I don't certainly advocate 100 percent of anything being devoted to something like that. But I do want to highlight the fact as the lived experience individually, that there is an urgent need.”
11. “I think I more than anybody think we absolutely need PSH (permanent supportive housing). My only hesitation is when I look at the way in the short run that may alleviate pressure in the community and the statistics in homelessness in our city. But in the long run, I often wonder if it creates a condition, if it creates a phenomenon or where the problem is being managed by non-profits in a vacuum. And to where landlords and other broader community members don't have as much skin in the game. And so therefore, it's, it's, it's kind of out of sight, out of mind for the rest of the broader community when we have non-profits that are managing PSH programs.”

12. “If we have until ‘23 to fully expand the funds, it seems to me that it would be possible to go ahead and look at awarding a portion of those funds for operating assistance and supportive services. In other words, what we could do is we can go ahead and increase perhaps the production amount of units as (name) suggested. But then also award maybe the balance towards supportive services and operating cost, at least until 2030.”
13. Multiple people asked about the possibility of or showed interest in converting old hotels into homeless housing.

***Themed Comments/Questions: TRBA (Landlord Incentives)***

14. Some of the things that we are currently trying to work through, and this type of funding would be incredible towards achieving that, are ongoing incentives for landlords to participate in section eight, because right now with occupancy as high as it is, it's really hard for them to want to make that financial leap in continuing to accept that subsidy.

***Themed Comments/Questions: Special Populations***

15. “Is there any specific considerations for those with a disability or veterans?”

**Via Online Submission**

Text of Comments:

1. I have tried twice to successfully gain a permanent residence with no luck. I'm not related to anyone in these type of programs.
2. What towns and countries are focusing on.
3. My children and I have been homeless since June 2021. I have lived in a car (got repo'd), we stayed in a hotel for two months, and my kids have stayed with friends. I have contacted the State Board of Education and our local McKinney-Vento liaison TWICE and have not been offered any services for my 16 year old. I was just told that my child could enroll in her 'home' school without the normal required documentation. I have read the McKinney-Vento Act trying to see how I could get help for my baby. It seems that something is in place to help her but no one knows what to do so I just get radio silence.
4. Over the last 19 months we have struggled tremendously. I lost my home to Oklahoma County tax resale in June 2021, lost my job at Oklahoma Tax Commission in September 2021 due to my excessive tardiness. They could care less that I was living in my car and that I loved my job. My job was my sanity. I lost my husband (abandonment), my vehicle, my house, then my job and my already fragile mental health spiraled out of control.
5. Sorry, I got carried away... McKinney -Vento Act, can someone please help me help my baby. She didn't deserve this.

6. I have need for help with housing. I am grateful for the Oklahoma housing finance agency. I am grateful that I have received help from Oklahoma housing finance agency for years. I know that I personally have been going through some changes in my life and am working on doing better. I would like to further my education but honestly I am looking at turning 60 years old this year and having difficulty with many other aspects of my life. I recently chose to quit drinking alcohol.
7. With that in mind and my desire to do better and be a better person and be someone that not only my children that I gave birth to but that I can be someone that children adults and elderly people can look up to as well. And I don't mean look up to I mean I want to be respectable. I know because of my years of life that in order to receive respect, I must follow my heart so I can be respectable. That is why I have sent You this email so that I will be able to have an idea of the bigger picture. That takes knowledge and understanding. So I would like to be more informed because I am planning on being a part of the 2-hour session on Wednesday the 8th. Thank you for your time. Have a great day in the neighborhood! 🍀
8. I would like to see more funds dedicated to constructing affordable housing statewide. The need for housing across the state is significant and addressing housing first can help with other issues. The gap between the demand for housing and the number of available housing units is growing. This is an excellent and informative plan.

## HOME-ARP CERTIFICATIONS

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

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

**Uniform Relocation Act and 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, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

**Section 3** --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

**HOME-ARP Certification** --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.



Signature of Authorized Official

March 23, 2023

Date

Executive Director

Title



### Application for Federal Assistance SF-424

\* 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:

M21SP400100

#### 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):

73-0999618

\* c. Organizational DUNS:

MGJDLN8NAAF7

#### d. Address:

\* Street1:

100 NW 63rd Street, Suite, 200

Street2:

\* City:

Oklahoma City

County/Parish:

\* State:

OK: Oklahoma

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code:

73116-8208

#### e. Organizational Unit:

Department Name:

Oklahoma Housing Finance Agenc

Division Name:

Housing Development

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

Prefix:

Mr.

\* First Name:

Darrell

Middle Name:

\* Last Name:

Beavers

Suffix:

Title:

Housing Development Director

Organizational Affiliation:

\* Telephone Number:

405-419-8261

Fax Number:

405-419-9261

\* Email:

darrell.beavers@ohfa.org

## Application for Federal Assistance SF-424

### \* 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 ARP Program

### \* 12. Funding Opportunity Number:

\* Title:

### 13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

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

HOME ARP Program

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments



**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="32,093,285.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="32,093,285.00"/>

**\* 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 in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**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:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number:  Fax Number: \* Email: 

\* Signature of Authorized Representative:

\* Date Signed:



**ASSURANCES - NON-CONSTRUCTION PROGRAMS**

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

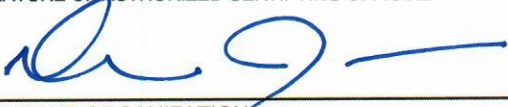
**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles 11 and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.



9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-1 33, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 		TITLE Executive Director	
APPLICANT ORGANIZATION Oklahoma Housing Finance Agency		DATE SUBMITTED March 23, 2023	



Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

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As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
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15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
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18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Executive Director
APPLICANT ORGANIZATION Oklahoma Housing Finance Agency	DATE SUBMITTED March 23, 2023