



MEMORANDUM

Council Agenda
Item No. XI. S
3/28/2023

The City of OKLAHOMA CITY

TO: Mayor and City Council

FROM: Craig Freeman, City Manager

1. Public hearing regarding Resolution approving the Allocation Plan for the Federal HOME-ARP program.
2. Resolution approving the Allocation Plan for the Federal HOME-ARP program and authorizing submission to the U.S. Department of Housing and Urban Development.

Background:

In 2021, Congress appropriated \$5 Billion in funds from the American Rescue Plan to be allocated through the Federal HOME Investment Partnership Program administered by the U.S. Department of Housing and Urban Development (HUD) to primarily assist individuals and families who are homeless. On April 8, 2021, HUD announced that the City of Oklahoma City would be receiving \$8,443,107 of these funds.

In order for HOME-ARP funds to be allocated, participating jurisdictions must have developed an allocation plan detailing how funds will be used. To develop this plan, communities must have consulted with organizations providing specific services to populations that are eligible to be served according to HOME-ARP requirements. In November 2022, HUD notified participating communities that the deadline to submit allocation plans in order to receive funding would be March 31, 2023.

On February 3rd, 2023, Oklahoma City Homeless Services staff held a consultation meeting with local service and housing organizations to obtain input for the HOME-ARP allocation plan. Services allowable under the plan are development of rental housing, rental assistance, development of non-congregate shelters, and non-profit operating and capacity building. In addition to this meeting, a comment portal was opened on the City's website for providers to enter feedback. The majority of providers agreed that the most significant needs were development of rental housing and increased intensive support services with a focus on people who are unsheltered.

On February 28th, 2023, the City issued public notice of the HOME-ARP allocation and the intended use of the funds that would be included in the Plan, and the online comment portal was reopened to allow citizens to comment on the proposed use of the funds. The notice issued also included the day the plan was to be brought before City Council for approval where public comment could be heard.

The plan being presented for approval today outlines the needs of people experiencing homelessness or at risk of homelessness in Oklahoma City and the proposed uses for the \$8,443,107 in HOME-ARP funding that were determined most appropriate to address their needs. These uses include development of rental housing, rental assistance, and supportive services such as housing location assistance, and intensive case management, among others.

Review:

Planning Department

Recommendation: Resolution be adopted.

RESOLUTION

RESOLUTION APPROVING THE ALLOCATION PLAN FOR THE FEDERAL HOME-ARP PROGRAM AND AUTHORIZING SUBMISSION TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT.

WHEREAS, In 2021, Congress appropriated \$5 Billion in funds from the American Rescue Plan to be allocated through the Federal HOME Investment Partnership Program administered by the U.S. Department of Housing and Urban Development (HUD) to primarily assist individuals and families who are homeless; and

WHEREAS, On April 8, 2021, HUD announced that the City of Oklahoma City would be receiving \$8,443,107 of these funds; and

WHEREAS, In order for HOME-ARP funds to be allocated, participating jurisdictions must develop an allocation plan detailing how funds will be used; and

WHEREAS, To develop this plan, communities must consult with organizations providing specific services to populations that are eligible to be served according to HOME-ARP requirements; and

WHEREAS, The deadline to submit allocation plans to HUD in order to receive funding is March 31, 2023; and

WHEREAS, Services allowable under the plan are development of rental housing, rental assistance, development of non-congregate shelters, and non-profit operating and capacity building; and

WHEREAS, On February 3rd, 2023, Oklahoma City Homeless Services staff held a consultation meeting with local service and housing organizations to obtain input for the HOME-ARP allocation plan.

WHEREAS, In addition to this meeting, a comment portal was opened on the City's website for service providers to enter feedback; and

WHEREAS, The majority of providers agreed that the most significant needs were development of rental housing and increased intensive support services with a focus on people who are unsheltered; and

WHEREAS, On February 28th, 2023 the City issued public notice of the HOME-ARP allocation and the intended use of the funds that would be included in the Plan and the online comment portal was reopened to allow citizens to comment on the proposed use of funds; and

WHEREAS, The notice issued also included the day the Plan was to be brought before City Council for approval where public comment could be heard; and

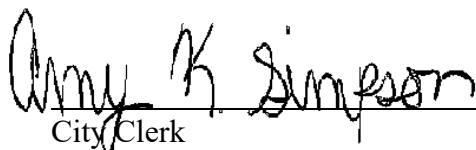
WHEREAS, The Plan being presented for approval today outlines the needs of people experiencing homelessness or at risk of homelessness in Oklahoma City and the proposed uses for the \$8,443,107 in HOME-ARP funding that were determined most appropriate to address their needs; and

WHEREAS, These services include development of rental housing, rental assistance, housing location assistance, and intensive case management, among others.


NOW, THEREFORE, BE IT RESOLVED by the Mayor and City Council of The City of Oklahoma City that the Allocation Plan for the Federal HOME-ARP Program be approved and submitted to the Department of Housing and Urban Development so that the funds may be received.

ADOPTED by the Council and **APPROVED** by the Mayor of the City of Oklahoma City this 28TH day of MARCH, 2023.

ATTEST:


City Clerk




Mayor

APPROVED for form and legality.


Assistant Municipal Counselor

HOME-ARP Allocation Plan

Participating Jurisdiction: City of Oklahoma City, Oklahoma **Date:** 3-28-23

Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- CoC(s) serving the jurisdiction's geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans' groups,
- public housing agencies (PHAs),
- public agencies that address the needs of the qualifying populations, and
- public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

State PJs are not required to consult with every PHA or CoC within the state's boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

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

The City of Oklahoma City (the City) partnered with CLUTCH Consulting Group (CLUTCH) to facilitate consultation with providers regarding services provided and HOME ARP guidelines. CLUTCH consulted one-on-one with multiple homeless service providers, behavioral health providers, and PHAs from May 2022 to November 2022. Many providers (listed in the table below) attended the Homeless System Refinement Update and Planning for 2023 meeting held by the City on February 3rd, 2023. At this meeting, the City reviewed the eligible activities and qualifying populations under HOME-ARP and requested feedback from providers regarding how the granted funds should be utilized. Providers were afforded the opportunity to provide written feedback following the meeting through an online portal established on the City's website; this portal was open from February 3rd, 2023 to February 17th, 2023. In order to ensure all necessary parties were given the opportunity to provide feedback, the City sent emails to any agency that data was missing from. All feedback is included in the table below or in the summary following.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
HOPE Community Services	Behavioral Health and Homeless Service Provider	<p>In person meeting (9.21.22)</p> <p>Homeless System Refinement Update and Planning for 2023 session (2.3.23)</p> <p>Online portal submission</p>	<p>Currently runs 6 Permanent Supportive Housing (PSH) programs for 3 CoCs- 4 of the PSH programs are in OKC totaling about \$1 million. All are scattered sites, and clients must have mental health needs. Takes referrals from Coordinated Entry System (CES). Needs help with move-in kits, performance improvement assistance and feedback more than once a year.</p> <p>See Summary below on the Homeless System Refinement Update and Planning for 2023 session.</p> <p>Funds should be used for non congregate shelter (NCS) and a housing navigation center.</p>
CityCare	Homeless Service Provider	<p>Virtual meeting (10.24.22)</p> <p>Homeless System Refinement Update and Planning for 2023 session (2.3.23)</p> <p>Online portal submission</p>	<p>Current PSH provider with mostly site-based inventory. Site based inventory is recovery oriented and persons living there must pass a drug screening before entering. Reported a lack of stabilization services and the need for long term basic case management and tenancy supports for individuals. Reported landlords do not want to take vouchers. Need to help chronic individuals but often these people need navigation help to get documents and find a housing unit.</p> <p>See Summary below on the Homeless System Refinement Update and Planning for 2023 session.</p> <p>Funds should be focused on developing more low-income</p>

			housing units, PSH units, fostering landlord relationships, building NCS offering medical respite care, aftercare case management, and Non-Profit Capacity Building.
NorthCare	Behavioral Health Service Provider	<p>In person meeting (10.11.22)</p> <p>Homeless System Refinement Update and Planning for 2023 session (2.3.23)</p> <p>Online portal submission</p>	<p>Currently have homeless outreach (PATH) and SOAR programs. Also have an integrated care partnership (clinic on-site) with Variety Care. Reports seeing an increase in K2 and meth addiction and treatment needs. Open to scaling services to meet future needs for PSH expansion through MAPs4 either through intensive case management or ACT team model.</p> <p>See Summary below on the Homeless System Refinement Update and Planning for 2023 session.</p> <p>Funds should be used for targeted strategies around behavioral health interventions especially substance use disorders and for people with serious mental illness.</p>
OCHA	PHA	<p>In person meeting (10.10.22 and 11.15.22)</p> <p>Homeless System Refinement Update and Planning for 2023 session (2.3.23)</p> <p>Online portal submission</p>	<p>Currently have a homeless preference in place that dedicates 100 vouchers and unlimited public housing slots. CoC PSH programs need more robust behavioral health case management for individuals. Seeing more chronic homeless with more acute behavioral health needs.</p> <p>See Summary below on the Homeless System Refinement Update and Planning for 2023 session.</p>

			Funds should be used to create a voucher-based rapid re-housing system with local PHAs.
OHFA	PHA	<p>In person meeting (5.5.22)</p> <p>Homeless System Refinement Update and Planning for 2023 session (2.3.23)</p> <p>Online portal submission</p>	<p>Currently have a homeless preference and sets aside vouchers through MOUs with partner agencies monthly. Currently do not issue project- base vouchers but would consider it. There is a tough rental market- already at 120% of payment standards and allowing 180-day extensions to lease up.</p> <p>See Summary below on the Homeless System Refinement Update and Planning for 2023 session.</p> <p>Funds should be used for development of more affordable rental housing units and supportive services funding.</p>
Homeless Alliance	Homeless Service Provider	<p>In person meeting (11.15.22)</p> <p>Homeless System Refinement Update and Planning for 2023 session (2.3.23)</p> <p>Online portal submission</p>	<p>Current PSH provider and CES lead. All but one program uses CES to receive referrals. Need automated process for referrals. Very small turnover rate each month- maybe 10 slots monthly. Need standardize service delivery and timeframes among PSH providers. Difficult to secure units- need more landlord support and engagement. No waitlist for veterans. Persons who are unsheltered chronic are the most difficult to move through CES because of lack of stabilization services. Vouchers are open but the case management is not available.</p> <p>See Summary below on the Homeless System Refinement Update and Planning for 2023 session.</p>

			Funds should be used for rental housing, McKinney-Vento Services, homeless prevention services, NCS, landlord incentives, tenant based rental assistance (TBRA), coordinated entry system, HMIS, supplement rent, utility, and case management at CoC-approved providers, and for non-profit capacity building.
City Rescue Mission	Homeless Service Provider	<p>In person meeting (9.8.22)</p> <p>Homeless System Refinement Update and Planning for 2023 session (2.3.23)</p> <p>Online portal submission</p>	<p>Currently operates emergency shelter (ES) and rapid rehousing (RRH). RRH functions more like rapid resolution and does not provide for a full year of case management or rental assistance. Seeing a huge increase in the number of families seeking assistance.</p> <p>See Summary below on the Homeless System Refinement Update and Planning for 2023 session.</p> <p>Funds should be used for homelessness prevention, RRH/TBRA short-term/medium-term assistance, and rental housing.</p>
Positive Tomorrows	Homeless Service Provider	Homeless System Refinement Update and Planning for 2023 session (2.3.23)	See Summary below on the Homeless System Refinement Update and Planning for 2023 session.
Community Cares Partners/Shelterwell	Public agency that addresses the needs of the qualifying populations	Homeless System Refinement Update and Planning for 2023 session (2.3.23)	See Summary below on the Homeless System Refinement Update and Planning for 2023 session.

Mental Health Association of Oklahoma	Behavioral Health and Homeless Service Provider	Homeless System Refinement Update and Planning for 2023 session (2.3.23) Online portal submission	See Summary below on the Homeless System Refinement Update and Planning for 2023 session. Funds should be used for 1. Development of Affordable Rental Housing (primary function) a. Acquisition and Rehabilitation of existing multifamily rental housing b. New construction (potentially, depending on cost or other leveraged dollars) 2. Non-congregate shelter development 3. Establish limited or very targeted "flexible subsidy pool" (funds to assist people into housing) a. This could leverage private dollars into the fund.
Sisu Youth Services	Homeless Service Provider	Homeless System Refinement Update and Planning for 2023 session (2.3.23)	See Summary below on the Homeless System Refinement Update and Planning for 2023 session.
Neighborhood Services Org., Inc.	Homeless Service Provider	Homeless System Refinement Update and Planning for 2023 session (2.3.23)	See Summary below on the Homeless System Refinement Update and Planning for 2023 session.
Oklahoma Department of Health	Public agency that addresses the needs of the qualifying populations	Homeless System Refinement Update and Planning for 2023 session (2.3.23)	See Summary below on the Homeless System Refinement Update and Planning for 2023 session. Focus on the need of supportive services through a respite/

		Email correspondence	recuperative care model at shelters for those experiencing homelessness, potentially one that provides medical services.
Pivot	Homeless Service Provider	Homeless System Refinement Update and Planning for 2023 session (2.3.23)	See Summary below on the Homeless System Refinement Update and Planning for 2023 session.
Oklahoma Department of Human Services	Public agency that addresses the needs of the qualifying populations	Homeless System Refinement Update and Planning for 2023 session (2.3.23)	See Summary below on the Homeless System Refinement Update and Planning for 2023 session.
Mid-Del Public Schools	Public agency that addresses the needs of the qualifying populations	Homeless System Refinement Update and Planning for 2023 session (2.3.23)	See Summary below on the Homeless System Refinement Update and Planning for 2023 session.
Oklahoma Policy Institute	Public organization that address fair housing, civil rights, and the needs of persons with disabilities	Homeless System Refinement Update and Planning for 2023 session (2.3.23)	See Summary below on the Homeless System Refinement Update and Planning for 2023 session.
Upward Transitions	Homeless Service Provider	Homeless System Refinement Update and Planning for 2023 session (2.3.23)	See Summary below on the Homeless System Refinement Update and Planning for 2023 session. There is a need for greater availability of affordable low barrier housing and assistance with housing deposits.

		Online portal submission	
Joe's Addiction	Homeless Service Provider	Homeless System Refinement Update and Planning for 2023 session (2.3.23) Online portal submission	See Summary below on the Homeless System Refinement Update and Planning for 2023 session. Funding should go toward creating more housing options for registered sex offenders and PSH for those with developmental disabilities/mental health concerns.
Red Rock Behavioral Health Services	Behavioral Health and Homeless Service Provider	Homeless System Refinement Update and Planning for 2023 session (2.3.23)	See Summary below on the Homeless System Refinement Update and Planning for 2023 session.
VA/VA Medical Center	Veterans' group	Homeless System Refinement Update and Planning for 2023 session (2.3.23)	See Summary below on the Homeless System Refinement Update and Planning for 2023 session.
Legal Aid	Public organization that address fair housing, civil rights, and the needs of persons with disabilities	Homeless System Refinement Update and Planning for 2023 session (2.3.23)	See Summary below on the Homeless System Refinement Update and Planning for 2023 session.
Community Health Centers, Inc.	Homeless Service Provider	Homeless System Refinement Update and Planning for 2023 session (2.3.23)	See Summary below on the Homeless System Refinement Update and Planning for 2023 session. Need to expand and continue offering homeless health care

		Online portal submission	services for medical, dental, behavioral and substance abuse; and case management.
OKC Youth Action Board	Youth with Lived Experience Planning Group	Homeless System Refinement Update and Planning for 2023 session (2.3.23)	See Summary below on the Homeless System Refinement Update and Planning for 2023 session.
City of Oklahoma City	CoC serving the jurisdiction's geographic area	Homeless System Refinement Update and Planning for 2023 session (2.3.23)	See Summary below on the Homeless System Refinement Update and Planning for 2023 session.
Oklahoma Department of Mental Health and Substance Abuse Services	Behavioral Health Service Provider	Homeless System Refinement Update and Planning for 2023 session (2.3.23) Online portal submission	See Summary below on the Homeless System Refinement Update and Planning for 2023 session. Funds should be used for diversion suites/SRO shelter options for people with developmental disabilities and mental health concerns.
YWCA	Domestic Violence Service Provider	Email/phone correspondence	Funds should be utilized for survivors of domestic violence, sexual assault, stalking, and human trafficking as these are huge factors for families/women/children who end up homeless. There is an overall lack of affordable housing and funds should be used for this. Luxury housing has increased, but

			not affordable housing. Likewise, funds should be utilized for operating costs and we would be open to expanding our housing services for funding in this area. Finally, funds should be used for rental assistance program, including for rent and deposits.
VA/VASH	Veteran's Group/Provider.	Homeless System Refinement Update and Planning for 2023 session (2.3.23)	Frequently, when we are assisting veterans with vouchers, they give up hope due to the amount of time that elapses between turning in paperwork for a voucher and the date of inspection. If lack of capacity is a factor for public housing authorities (PHAs) to not be able to timely pre-inspect units, perhaps some funding could be used to address that.

Summarize feedback received and results of upfront consultation with these entities:

The City of Oklahoma City held the Homeless System Refinement Update and Planning for 2023 session with multiple homeless service providers referenced in the table above on February 3rd, 2023. At this meeting, providers were informed of the four qualifying populations and eligible activities under the HOME-ARP Implementation Notice. Throughout discussion, there was consensus on utilizing the Continuum of Care's Coordinated Entry System (CES) to organize preference among the four qualifying populations. Several providers noted the use of funds should be focused on the development of affordable housing. Multiple outreach providers noted the use of funds for Non-Congregate Shelters (NCS) would only be beneficial if the NCS provided intensive supportive services and were utilized as a temporary housing bridge between street homelessness and permanent supportive housing for length of stays between 30 and 60 days. Overall, all parties agreed funding should be used to support intensive support services and affordable housing.

Public Participation

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for "reasonable notice and an opportunity to comment" for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one**

public hearing during the development of the HOME-ARP allocation plan and prior to submission.

PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive, and
- The range of activities the PJ may undertake.

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

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(s) of public notice: 2/28/2023***
- ***Public comment period: start date – 2/28/2023 end date – 3/28/2023***
- ***Date(s) of public hearing: 3/28/2023***

Describe the public participation process:

A public meeting was held with stakeholders on February 3rd, during the plan development period. Subsequent to this A formal Notice of Opportunity to Comment on the City of Oklahoma City's HOME-ARP Allocation Plan was published on the City's website on Tuesday, February 28th. This notified the public that the City would be receiving \$8.4M in HOME-ARP funds from HUD, with an estimated \$2.4M proposed to be allocated toward services to eligible populations, and the remainder \$6M towards the development of housing units. The latter amount was later revised to a little over \$5M in order to increase funds for administrative needs. The notice also informed the public of all activities that are eligible under the HOME-ARP program. The notice advised of a Public Hearing and opportunity to comment on the plan to be held at the City Council meeting in City Hall on Tuesday March 28th, at 8:30 am. Persons were also invited to provide comments on the proposal or use of the funds by not later than March 28th, 2023 through a comment portal on the City's website.

It is the policy of the City to ensure that communications with participants and members of the public with disabilities are as effective as communications with others. Anyone with a disability who requires an accommodation, a modification of policies or procedures, or an auxiliary aid or service in order to participate in public meetings is encouraged to contact the ADA department coordinator at 297-2396 or TDD 297 2020 as soon as possible but not later than 48 hours (not including weekends or holidays) before the scheduled meeting. The City will give primary consideration to the choice of auxiliary aid or service requested by the individual with disability. If alternate format of the agenda or any information provided at said meeting is needed, residents

can contact the ADA department coordinator listed above 48 hours prior to the scheduled meeting.

Describe efforts to broaden public participation:

In late February, The City posted the information on its Facebook page to encourage broader public interaction. The Planning Department's Homeless services also shared the information on its social media site. *(Proof of posting can be found in Attachments A – D at the end of this document)*

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

(Full comments can be found in Attachment E at the end of this document)

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

The City accepts all comments but does not consider those pertaining to ineligible activities.

Needs Assessment and Gaps Analysis

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	308	52	677	677	0								
Transitional Housing	86	31	113	113	8								
Rapid ReHousing	137	50	187	187	17								
Permanent Supportive Housing	371	121	643	643	385								
Other Permanent Housing	0	0	0	0	0								
Sheltered Homeless						64	652	82	80				
Unsheltered Homeless						6	396	61	49				
Current Gap										178	13	(333)	(279)

Suggested Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation Data Sources: 2022 Point in Time Count (PIT) (OK-502); 2022 Housing Inventory Count (HIC) (OK-502)

- Gap Analysis (Family Beds) = Family Beds (394), less Homeless Persons in Households with at least 1 child (216 – see Table 3) = 178 beds
- Gap Analysis (Family Units) = Family Units (83), less Homeless Family Households (70) = 13 units
- Gap Analysis (Adult Beds) = Adult Beds (790), less Homeless Adult Persons (1123 – see Table 3) = (333) beds
- Gap Analysis (Adult Units) = Adults Units (790), less Homeless Adult Households (1069) = (279) units

OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	237,899		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	12,278		
Rental Units Affordable to HH at 50% AMI (Other Populations)	46,964		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		22,546	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		20,264	
Current Gaps			10,268

Suggested Data Sources: 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

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

Homeless as defined in 24 CFR 91.5

Oklahoma City conducted their most recent Point in Time (PIT) count on March 3, 2022. There were 1,339 homeless individuals in OKC, which was down from 1,573 in 2020. This number may be low because the count was rescheduled to a warmer day. Shelter stays were lower than usual, and it's more difficult to locate people outdoors. Regardless, 1,339 is higher than the 2018 and 2019 counts and shouldn't be ignored. Local service providers believe the number is the same as 2020, if not higher. There was a total of 673 sheltered individuals, 471 unsheltered individuals, and 195 individuals in transitional housing.

According to the PIT count, 80% of individuals were 25 years old or older, 9% were 18-24 years of age, and 11% were under the age of 18. The count displayed 51% of people identified as White, 27% identified as Black, 10% identified as American Indian, and 10% identified as multiple races. Likewise, the count displayed 63% identified as male, 36% identified as female, and 1% identified as transgender.

According to the PIT count, the chronically homeless count continues to rise in OKC, making up 61% of the unsheltered. Veterans make up 10% of the homeless population. Of that 10%, 42% are unsheltered and 48% are chronically homeless. Families make up 16% of the homeless population and six families were unsheltered on the night of the count. In 2022, there were 216 people in 70 households experiencing family homelessness and three in five members of homeless families are minors. There were 10 households with parenting youth and none of them were unsheltered on the night of the count. Oklahoma City Public Schools counted 2,184 homeless students at the end of the 2021-22 school year. Of those, 1,952 were couch homeless. Data from PIT indicated 121 unaccompanied youth making up 9% of the homeless population and 11.5% being unsheltered. PIT data indicates 378 people identified as having a severe mental illness (of those 42% were unsheltered), 335 people identified as having substance abuse issues, and 24 people identified as having HIV/AIDS.

Table 3- Persons and Households Experiencing Homelessness

Overall Persons	Sheltered/TH Persons	Unsheltered Persons	Total	Percent
Individuals	671	452	1123	84%
Families	197	19	216	16%
Total	868	471	1339	100%
Percent	65%	35%	100%	-

Overall Households	Sheltered Households	Unsheltered Households	Total	Percent
Individuals	671	398	1069	94%
Families	64	6	70	6%
Total	735	404	1139	100%
Percent	65%	35%	100%	-

Data Source: 2022 Point in Time Count (PIT)

At Risk of Homelessness as defined in 24 CFR 91.5

Due to the nature and characteristics of this category, for the purposes of this Plan, at-risk populations and other populations needing prevention assistance or with the greatest risk of housing instability (or unstably housed) are considered under the same heading in each section of the Plan.

According to the City of Oklahoma City's 2020-2024 Consolidated Plan (OKC Consolidated Plan), a significant percentage of households (both renters and homeowners) that earn less than 30% of the Area Median Income (AMI) suffer from housing problems. The Small Family category (2-4 family members) has the highest percentage of all households. Among renters, households earning between 0-30% AMI carry the highest percentage of households with a cost burden exceeding 30%. In Oklahoma City, approximately 33,475 households fall into the 0-30% AMI category. Among these households, 11,140 are small family households (2-4 family members) and 2,754 are large family households (5+ family members). Among these households, 7,222 households contained at least one-person age 62 or older and 7,683 households contained one or more children 6 years old or younger. Nearly half of these households are spending 50% or more of their income on housing costs.

According to the OKC Consolidated Plan, individuals and families that are currently housed but are at risk of losing that housing most often need the type of assistance that the Emergency Solutions Grant (ESG) program provides. Being behind on rent or utility payments is often the cause of evictions. These individuals may initially need to be connected with ESG assistance in order to stabilize. Many of the families who need prevention resources to remain housed are at or below 30% AMI. Often, their needs are exacerbated by an acute circumstance that leads to an imminent risk of homelessness, such as job loss, change in relationships, domestic violence, and/or sudden illness. Families in need of rapid re-housing assistance, and also those with assistance that is terminating, need a source of revenue and often times assistance to address other contributory issues. Other identified needs may include transportation needs, mental health and/or substance abuse treatment, parenting skills, supplemental income while in treatment or temporarily disabled, or employment. All households receiving ESG assistance work with a case manager to address the issues jeopardizing their housing. (Note: While, the OKC Consolidated Plan specifically references the use of ESG funds for these activities, many of these activities are eligible under HOME-ARP and may be performed with those funds.)

According to the OKC Consolidated Plan, the following housing characteristics have been linked with instability and an increased risk of homelessness. The rental market in Oklahoma is at very low capacity overall, and particularly for individuals with low incomes. Individuals and families living in some of the most cost-efficient units often find they are no longer able to afford them as housing demand increases leading to rising rents. The inability to make

rental security deposits and utility deposits is often a barrier to those households who are being evicted or are attempting to locate a cheaper housing option. Short term assistance is often the difference between maintaining shelter and avoiding homelessness.

According to the OKC Consolidated Plan, an analysis of the 2011-2015 Comprehensive Housing Affordability Strategy (CHAS) tables for the Oklahoma City area as reflected below show disproportionately greater need for persons experiencing housing problems among five (5) different minorities and ethnicities, and within various income demographics. The four housing problems included in the data analysis include lack of complete kitchen facilities, lack of complete plumbing facilities, more than one person per room, and housing cost burden greater than 30%. A "disproportionately greater need" exists when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10% or more) than the income level as a whole.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	25,975	4,245	3,260
White	11,145	2,105	1,525
Black / African American	7,309	1,160	1,100
Asian	493	119	209
American Indian, Alaska Native	968	165	55
Pacific Islander	40	0	0
Hispanic	4,659	405	204

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

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

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	21,560	8,685	0
White	10,420	4,754	0
Black / African American	4,219	1,453	0
Asian	478	299	0
American Indian, Alaska Native	474	244	0
Pacific Islander	15	0	0
Hispanic	5,013	1,588	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

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

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	17,160	26,235	0
White	10,305	14,805	0
Black / African American	2,880	4,079	0
Asian	610	680	0
American Indian, Alaska Native	447	668	0
Pacific Islander	0	14	0
Hispanic	2,250	4,624	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

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

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,805	18,060	0
White	3,235	11,099	0
Black / African American	645	2,514	0
Asian	220	754	0
American Indian, Alaska Native	60	580	0
Pacific Islander	0	0	0
Hispanic	529	2,360	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

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

According to these aforementioned tables, in the 0-30% AMI bracket, no disproportionate needs related to housing problems have been identified among different ethnicities. The percentage of households city-wide that report one (1) or more of the four (4) housing problems is 95%. For those households earning between 30-50% AMI, disproportionate needs also exist for Black/African American households. Black families have 19.6% greater housing problems than the general populace as a whole. No disproportionate needs have been identified in the 80-100% AMI category and each ethnic minority group experiences housing problems in a similar manner as the general population. In the 0-30% AMI bracket, a disparate need is represented by the Black/African American population of which 28.1% report one or more of the four housing problems noted in the introduction section above. For those households earning between 30-50% AMI, the Black/African American population reflects a disproportionately high rate of 18.1% reporting at least one (1) of the four (4) housing problems. No disproportionate needs have been identified in the 50-80% and 80-100% AMI categories and each ethnic minority group experiences housing problems in a similar manner as the general population. The CHAS data suggests that Black/African American households experience a cost burden in excess of 50% at a somewhat disproportionately greater rate (14.8%) than the general populace. Hispanics also experience a disproportionately greater cost burden at 11.8% above that of the general population. As noted previously, the following ethnicities in the 30-50% AMI category have reported one or more housing problems indicating a disproportionately greater need than the general population: Black/African American (14.8%), and Hispanic (11.8%).

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

Due to the nature of this population and safety risks/concerns, there is limited data for this qualifying population. According to the City of Oklahoma City's 2020-2024 Consolidated Plan (OKC Consolidated Plan), the total number of cases of those seeking housing assistance due to domestic violence had been increasing in Oklahoma City annually until 2015. Since that time though, the number of cases has fluctuated between approximately 115 and 200 per year. These numbers reflect active cases only.

The YWCA indicated they served 384 individuals in FY 21-22. The Homeless Alliance reported of 2,562 VI-SPDATs administered in 2022, 1,624 respondents said 'yes' to "Is your current homelessness in any way caused by a relationship that broke down, an unhealthy or abusive relationship, or because family or friends caused you to become evicted?". Likewise, the Homeless Alliance reported of 710 Family VI-SPDATs administered in 2022, 442 respondents answered 'yes' to the previous question. Similarly, the Homeless Alliance reported of 2,562 VI-SPDATs administered in 2022, 1,805 respondents answered 'yes' to the question: "Has your current period of homelessness been caused by an experience of emotional, physical, psychological, sexual, or other type of abuse, or by any other trauma you have experienced?". Likewise, the Homeless Alliance reported of 710 Family VI-SPDATs administered in 2022, 510 respondents answered 'yes' to the previous question. In 2022, the Homeless Alliance served 201 people from 84 households through their Palomar navigation program and 101 people from 46 households through their YWCA navigation program. Both of these programs are specifically for people experiencing and fleeing domestic violence.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

As noted above, due to the nature and characteristics of this category, for the purposes of this Plan, at-risk populations and other populations needing prevention assistance or with the greatest risk of housing instability (or unstably housed) are considered under the same heading in each section of the Plan. The size and demographic composition of other populations needing prevention assistance or with the greatest risk of housing instability (or unstably housed) are discussed above under At-Risk Populations, because data for the two populations heavily overlaps.

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

EMERGENCY SHELTERS

City Rescue Mission of Oklahoma City (CRM) is the largest shelter in Oklahoma City and the State of Oklahoma. The campus houses a men's center, a women's center and rooms for families.

Between all facilities they have a total number of 472 year-round beds according to the annual Housing Inventory Count (HIC). These beds have fluctuated over the last several years during the pandemic to accommodate social distancing but they have continued to provide winter overflow every year except 2020 when a standalone location was secured for that purpose. During that time, they utilized their men's center as a COVID respite facility which was the only one in the City for people who were literally homeless. CRM reopened to full capacity over a year ago. While the facility provides a small number of nightly shelter beds and strives to turn no one away during the winter, most of the beds are programmatic and have a recovery focus.

City Care Night Shelter opened as a result of a need for more low barrier shelter beds. The facility contains 145 year-round beds divided between men and women along with family rooms. City Care is the lowest barrier shelter facility in Oklahoma City and staff frequently have to turn people away even after exceeding capacity most nights, especially during winter overflow. The Night Shelter opened during the pandemic in early 2021 and has largely stayed at full capacity since that time. The City Care shelter was also the first overnight facility to provide a kennel for the pets of stayers. City Care is also one of the participating facilities in the City's winter shelter plan and regularly exceeds their capacity as much as possible during the season.

Salvation Army of Central Oklahoma, like City Rescue Mission and City Care, provides beds for men, women and families. In total, these number 109 year-round beds. Salvation Army does have some requirements for guests so is not low barrier. However, like the other large shelters in Oklahoma City, they do provide low barrier overflow beds during the winter months and have regularly exceeded capacity in the past, including during the COVID pandemic.

SISU Youth operates the lowest barrier youth shelter in Oklahoma City. They began providing 16 beds at the Church of the Open Arms in Oklahoma City almost 8 years ago and are currently renovating a property that will serve as their own, new facility. This will allow them to expand beds and services for youth as they will also house a drop-in center and plan to construct transitional housing units. SISU was recently awarded 3 of the 5 projects under Oklahoma City's YHDP Program to assist with the drop in center, transitional housing and services for youth residing in host homes.

The Point at Pivot is also a youth shelter that houses 12 beds. Like SISU, the Point also houses a drop-in center for youth as well as a medical clinic. Pivot additionally offers other programs such as transitional housing in a tiny home community on the property, the SKIL Program that provides assistance for youth living on their own and counseling among other services.

YWCA Thelma Gaylord Emergency Shelter is the only certified shelter for women and children fleeing domestic violence, dating violence, sexual assault, and stalking in Oklahoma County. The shelter provides 51 year round beds. Previously, the YWCA operated both permanent supportive housing and transitional housing programs but has ceased to do so opting to connect clients through housing offered by other programs accessed via the Palomar Family Resource Center (See Supportive Services and Outreach).

Cardinal House is a respite shelter for people who are unsheltered who have recently exited the medical care. The facility was previously a halfway house but was converted into a respite center over the course of the first years of the COVID pandemic. Cardinal House is primarily a non-medical facility with services largely provided by Catholic Charities of Oklahoma City. However, partnerships with local healthcare organizations are being sought. The respite facility gives case managers time to try and locate permanent housing for some of Oklahoma City's most vulnerable residents. Currently, 17 respite beds are provided through Cardinal House.

Grace Rescue Mission is a men's shelter located in Oklahoma City's Stockyards District. While Grace is a men's facility, they serve up to 400-600 meals daily to anyone in need. Grace operates a one year, in residence recovery program but also has provided several low barrier beds for winter shelter nights in recent years and opened a temporary facility for people recovering from COVID in 2020 until a facility was opened at City Rescue Mission. Grace provides 30 year round shelter beds for men who are homeless.

Jesus House is a shelter that provides free recovery programs to people who are homeless or of low income. While Jesus House started as a low barrier facility in 1973 and later converted to have a focus on recovery, they have participated in the community winter shelter strategy in the past by providing low barrier beds on nights when temperatures drop below freezing. They currently provide 35 year-round beds, all recovery focused.

Westtown Day Shelter is a low barrier day facility that provides meals, access to internet, showers, and other amenities as well as conducts housing assessments and has served as an overnight shelter during inclement winter weather in recent years. The Day Shelter is operated by the Homeless Alliance and typically serves nearly 300 or more people a day.

Sanctuary Women's Development Center is a day facility for women operated by the Catholic Charities Oklahoma City Archdiocese. As the name suggests, the facility serves only women. Sanctuary offers shelter and connection to case management and other services for women who are homeless or at risk of homelessness.

Joe's Addiction is one of the few service organizations located in south Oklahoma City. The facility serves as both a coffee shop that serves anyone as well as a day shelter. Joe's provides 2 meals a day, access to laundry services and a clothing closet, connection to case management and housing, and other services.

Other Facilities that provide shelter services in Oklahoma City target services towards a specific population and with a limited number of beds. Pivot provides 4 year round beds for youth in foster care, the Department of Veterans Affairs provides 8 year round beds for veterans and Red Rock Behavioral Health provides 3 beds specifically for people with severe mental illnesses.

TRANSITIONAL HOUSING

The Winds House in Oklahoma City is operated by the AIDS Support Program, Inc. This facility provides transitional and supportive housing for individuals and families living with HIV/AIDS. They currently have 12 year-round beds.

Catholic Charities Transitional Housing is available to clients participating in the HOPE program. Individuals living in one of the transitional housing units have monthly rent payments based on their income and do not pay any utility bills. A case manager meets with each of the tenants on a weekly basis to assist them in developing an individualized plan towards permanent housing and self-sufficiency. Tenants receive assistance in accessing educational and/or vocational training within the community as well as accessing community resources. They currently have 18 year-round beds.

HopeHouse OKC's Transitional Housing Program provides families experiencing homelessness a fully furnished apartment for one year and an opportunity to rebuild their lives. They create individualized action plans with each resident family designed to meet their goals and dreams for the future. Families work on things such as: restoring their driver's license and securing transportation, legal relief, GED completion, continued education, resume development, job training, job placement, money management, and healthy living, just to name a few. Upon completion of their action plan, HopeHouse OKC works with the family to find permanent affordable housing for the long-term future. They currently have 32 year-round beds.

MHAO Housing to Hope Youth Program offers transitional living to youth ages 18-24 who are experiencing or are at risk of homelessness. The program provides housing at apartment complexes throughout Oklahoma City in a roommate setting, as well as extensive case management and life skills training that enables youth to successfully graduate into independent living. They currently have 8 year-round beds.

NSO – Carolyn Williams Center is a transitional living program for homeless young men, ages 18-23 years old. This housing facility offers 17 year-round beds and residents can participate in the program for up to 24 months.

NSO – Gatewood offers four units for homeless mothers who are pregnant or have one child under the age of five years old. These families are provided with a fully furnished apartment and can participate in the program for up to 24 months. They currently offer 8 year-round beds.

NSO – Martha's House offers seven units for homeless mothers with up to four children. These families are provided a fully-furnished three-bedroom apartment and can participate in the program for up to 24 months. They currently offer 28 year-round beds.

Phoenix House is a group home for homeless veterans. They currently offer 19 year-round beds.

Tiny Homes is operated by Pivot. These transitional homes are provided for transitional age youth who find themselves living on their own without parental supervision. They are located on Pivot's campus and offer access to onsite staff 24/7. Each Tiny Home is complete with a bed, small kitchen, eating area and a bathroom, equating to a manageable living space. Pivot provides opportunities for the youth to learn the necessary life skills needed to manage a living space, things most of us take for granted but they often lack. Things such as how to cook, do laundry, problem solving, budgeting, effective communication skills, driver's ed, etc. They currently have 9 year-round beds.

Park View Place is a Red Rock Housing program designed to help individuals who are homeless and diagnosed with serious mental illness and to help individuals integrate back into the community. With support, individuals with mental health, substance use, or co-occurring disorders can become stable in the community, maximize their abilities, and achieve a higher level of functioning and quality of life. Services include transportation and teaching life skills, coping skills, job skills, and utilizing community resources. They currently have 26 year-round beds.

Atlas Transitional Living is operated by Sisu Youth Services. Atlas is a new, semi-independent living program providing young people at high risk for homelessness with the support they need to pursue the life they want. This program emphasizes gaining job and life skills with a focus on achieving stable employment and housing. Atlas is apartment based with dedicated case management and 24/7 staff support and supervision. Participants will be provided with housing at no cost and a full schedule of classes and groups. This program is a transitional housing model with most clients staying approximately 6 months. Eligible clients are youth ages 18-24, youth with mental health or substance use concerns, and youth with no history of sexual offenses. Youth with previous child welfare and/or justice system involvement will be prioritized for placement. They currently have 6 year-round beds.

Friendship House is a transitional housing program operated by the VA and they currently have 16 year-round beds.

PERMANENT SUPPORTIVE HOUSING

HOPE Community Services has four permanent supportive housing projects, totaling 121 units. First, the HOPE Housing Plus Program is a scattered site, permanent supportive housing program that provides rental assistance in conjunction with supportive services. The program provides placement in one-bedroom units within the Oklahoma City limits, targeting the chronic homeless population who have been diagnosed with a severe mental illness. Additionally, the program provides rehabilitation and case management services. Second, the HOPE Partners in Housing Program is a scattered site, permanent supportive housing program that provides rental assistance in conjunction with supportive services. This program provides placement in one-bedroom units within the Oklahoma City limits, targeting the chronic homeless population who have been diagnosed with a severe mental illness. Additionally, the program provides

rehabilitation and case management services. Third, the HOPE Shelter Plus Care 39 is a scattered site, permanent supportive housing program that provides rental assistance in conjunction with supportive services. This program provides placement in one-bedroom units within the Oklahoma City limits, targeting the chronic homeless population who have been diagnosed with a severe mental illness. Additionally, the program provides rehabilitation and case management services. Fourth, the HOPE CH32 is a scattered site, permanent supportive housing program that provides rental assistance in conjunction with supportive services. This program provides placement in one-bedroom units within the Oklahoma City limits, targeting the chronic homeless population who have been diagnosed with a severe mental illness. Additionally, the program provides rehabilitation and case management services.

The Homeless Alliance has two permanent supportive housing programs. First, the Homeless Alliance Building Foundations supportive housing program provides 20 units of master leased permanent supportive housing to homeless families with dependent children, targeting homeless families in which the head of household has a disability. In addition to housing assistance, the program provides case management, employment services, and life skills assistance. Second, the Homeless Alliance Journey Home Now supportive housing program provides 15 units of master leased permanent supportive housing to chronically homeless individuals or veterans. In addition to housing assistance, the program provides case management, employment services, and life skills assistance.

The Mental Health Association of Oklahoma has two permanent supportive housing programs. First, the Mental Health Association LTS Consolidated project provides permanent supportive housing units for chronically homeless families and individuals. In addition to housing, residents receive supportive services through this program. Second, The Mental Health Association Supportive Housing project provides permanent supportive housing units for chronically homeless families and individuals. In addition to housing, residents receive supportive services through this program.

Red Rock Behavioral Health Services has two permanent supportive housing program. First, the Red Rock Behavioral Health Services Permanent Supportive Housing Program At the Lodges consists of three separate residences, Western Lodge, Sunset Lodge, and Candlewood Lodge. Western Lodge is a four-bedroom house for eight homeless male veterans who participate in the VA Grant and Per Diem Program at the Oklahoma City VA Medical Center. Sunset Lodge is a four-bedroom house for four homeless women. Candlewood Lodge is a four-bedroom house for a family of four. In addition to housing, residents receive supportive services through this program. Second, the Red Rock Behavioral Health Services Permanent Supportive Housing Program At Parkside is a permanent supportive housing program that consists of eleven private one-bedroom one-bathroom apartments, and one two-bedroom two-bathroom apartment, all of which serve homeless individuals with severe mental illness. The goal of the project is to help these individuals integrate back into the community.

Community Enhancement Corporation (CEC) Permanent Supportive Housing serves chronically homeless persons with a disability, many of whom have a dual diagnosis of problems that need medical attention monitoring, ongoing psychological treatment and intensive case

management to properly cope and adapt to a community-based living environment. The assistance includes access to mainstream services, transportation, work related services, education, counseling and assistance with personal hygiene, grooming, housekeeping and shopping. CEC is a non-profit arm of the Oklahoma City Housing Authority which also provides access to vouchers or public housing for clients.

RAPID REHOUSING

Over the course of the pandemic, the Oklahoma City Continuum of Care was able to ramp up rapid rehousing activities significantly using ESG-CV assistance. On the night of the Point In Time count, 324 people were being served with rapid rehousing services by 9 programs operated by the Homeless Alliance, City Rescue Mission, Pivot youth services, Positive Tomorrows and Goodwill which operates the SSVF program. However, resources for rapid rehousing are typically few in OKC and provided only through the annual ESG allocation. With ESG-CV funding expiring in September 2023, rapid rehousing services will be significantly reduced to 5 programs. Last year, those programs were serving 145 people on the night of the Point In Time count. The OKC CoC does not have dedicated units for rapid rehousing so the number of units is annually dictated by the amount of ESG funds allocated to the City.

HOMELESSNESS PREVENTION

Similar to rapid rehousing services, the OKC CoC used ESG-CV funding to significantly increase homelessness prevention services, anticipating skyrocketing evictions. Almost 2 million dollars were allocated to 8 programs and millions more in CARES funding were allocated to open a tenant eviction prevention program. However, also like rehousing funding, this service is usually provided with annual ESG funds and will be significantly reduced with the expiration of both ESG-CV and CARES funds. Upon that expiration, services will return to being provided by 5 programs with between 120 to 150 thousand dollars.

SUPPORTIVE SERVICES & OUTREACH

Outreach

Outreach is the first step in the process of housing someone. Oklahoma City only has 6-7 outreach workers across the City that serve all homeless populations. Two of those outreach workers are police officers that are a part of the Homeless Outreach Team (HOT). This allows Oklahoma City Police Department to remain sensitive to the unique needs of the homeless population while responding to the concerns of the greater community. HOT works with homeless individuals linking them with valuable social services to improve their living conditions and thereby improving public safety. HOT serves the community by coordinating efforts between law enforcement, local, state and private agencies that provide services to at risk homeless in the City who are living on the streets and considered Chronically Homeless. The other outreach workers in the City work for Mental Health Association of Oklahoma (MHAO) and the Homeless Alliance. MHAO has the Intensive Outreach and Navigation (ION) team. ION provides outreach and services to individuals with serious mental illness. ION serves individuals who are frequently and repeatedly admitted to local area mental health crisis centers. This

program includes access to housing at apartment complexes throughout Oklahoma City, along with intensive wrap-around case management services to aid individuals as they move toward obtaining self-sustainability. The Homeless Alliance street outreach program provides a team of trained case managers who go out into the community to connect with people who are on the street.

Palomar Family Justice Center is a resource hub for victims of domestic violence, child abuse, sexual assault, stalking, elder abuse, and human trafficking. Palomar provides services themselves but also through partner organizations like the YWCA and Homeless Alliance. Currently they partner with 42 organizations with many having offices on site.

OKC Diversion Hub provides a path to divert people who are involved with the justice system from incarceration. Like Palomar, many partners office on site at the Diversion Hub to provide case management, housing navigation services, justice navigation an employment assistance among other services.

Community Health Centers (CHCI) is the only healthcare provider that provides assistance to people who are literally homeless. In addition to working in the field, CHCI provides a clinic at the Westtown Day Shelter once a week as well as assistance at other shelters.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

(QUALIFYING POPULATION 1 – QP1)

During the 2022 Point In Time count 1,339 people were found residing in shelters, transitional housing and outdoors and the total shelter bed inventory count was 989. This alone already indicates a shortage of at least 350 shelter beds. However, it is known that, no matter how thorough the count, there are many people who are missed. In addition to that, Oklahoma City had to postpone our count twice due to Covid and poor weather, moving it from what would have been a very cold night to an unusually warm one. This appears to have led to lower shelter stays and locating people in the field is considerably more difficult. That being the case, the PIT Planning Committee and service providers believe the final count was significantly lower than it should have been and the real number was likely higher than the previous year when 1,573 people were counted. As mentioned previously, the Housing Affordability Study indicated Oklahoma City has a shortage of over 17,000 units in the 30% AMI range and most residents living in the units that are available are significantly cost burdened. This indicates a sizeable population of people at risk of homelessness and a shortage of units to access to house people who are currently homeless.

While the OKC CoC is working to secure more resources to address rental subsidies, utility deposits and arrears, the sources currently available are only CoC and ESG and the amounts allocated are not enough to address the growing need. Another challenge is that when units do come available, they are difficult to timely access. Housing navigation services currently don't

exist as a standalone position and are largely addressed by case managers or staff also performing other duties. A housing navigation team paired with landlord incentives could significantly increase the number of units that could be secured and the speed at which people could be moved in. This would allow case management and other service delivery staff to dedicate their full time to other necessary duties as the CoC's case management and support service capacity is currently not adequate enough to meet the demand either.

At Risk of Homelessness as defined in 24 CFR 91.5

(QUALIFYING POPULATION 2 – QP2)

Similar to QP1, there is not sufficient affordable housing to address the needs of QP2. The 2021 Housing Affordability Study found that 77% of renters in Oklahoma City that fall in the 30% AMI range are cost burdened and 66% in the 31-50% AMI range are as well. Resources available to assist with rental subsidies, deposits, utilities and arrears are not sufficient to meet the demand and landlords are, more often than not, hesitant or unwilling to rent to tenants with an eviction on their record. This problem has grown more severe over the course of the pandemic. The OKC CoC has benefited from landlord-tenant mediation services and targeted legal assistance at a smaller scale during that time but those services will need to be expanded. Housing navigation services and landlord incentives would also benefit individuals and families who are not able to avoid an eviction.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

(QUALIFYING POPULATION 3 – QP3)

Over the last 5 years, Oklahoma City has greatly expanded the services available to QP3 through the Palomar Family Justice Center. However, there is a significant need for Permanent Supportive Housing targeted specifically to this population. The OKC CoC recently received two new projects to assist with this service. However, it is likely that the number of units that those will be able to provide will not be adequate to meet the need. In any case, access to affordable units will be necessary for both people in Permanent Supportive Housing programs and those who do not require the level of intensive case management and other support services that are provided with supportive housing. Many of QP3's remaining needs are similar to those of other qualifying populations in that there is a need for adequate rental and other housing cost subsidies, housing navigation services, legal assistance, landlord-tenant mediation services and landlord incentives, when necessary.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

(QUALIFYING POPULATION 4 – QP4)

As QP4 shares similar characteristics to QP2, they essentially face the same problems. There is a shortage of affordable housing and housing subsidies and this population would benefit from expanded landlord-tenant mediation, targeted legal services, and housing navigation services.

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

Shelter Inventory

Oklahoma City has a total of 989 year-round shelter spaces. However, according to the Point in Time count conducted on March 3, 2022, there were a total of 1,144 sheltered and unsheltered individuals, not including people staying in transitional housing. These numbers depict a clear need for more shelter beds, since there are not enough beds to accommodate everyone experiencing homelessness. However, local providers have been not had significant difficulty securing funding for shelters from local foundations and other private sources. One local provider is planning to open a new shelter facility in the next several months.

Outreach

As previously mentioned, Oklahoma City has only 6-7 outreach workers (4-5 professional outreach workers and 2 police outreach) to cover the entire 621 square mile area. However, the City of Oklahoma City recently approved a new outreach program with the Mental Health Association of Oklahoma (MHAO). MHAO will dedicate two street outreach and crisis responses teams to the program. These teams will be made up of a licensed clinician and two case managers. Likewise, NorthCare will be starting a new outreach program for Oklahoma City.

Affordable Housing

One of the major gaps identified throughout the consultation process was a lack of affordable housing for all populations. This idea is amplified by the data presented in the final report of the Housing Affordability Study prepared for Oklahoma City by Economic & Planning Systems, Inc., RRC Associates (2021; the Housing Study). The Housing Study held focus groups to determine renter, owner, and systems-level issues throughout Oklahoma City. One systems-level issue identified was the issue with long-term affordability for housing. According to Figure 12 (see below) from the Housing Study, Oklahoma City's overall population has increased by 42 percent since 1995. However, Table 3 and Table 1(see below) from the Housing Study displays the mismatch in the amount of available and vacant units in Oklahoma City. These numbers depict a serious divide between the available and vacant units and the number of people in Oklahoma City.

Figure 12 Population Trends, 1995-2019

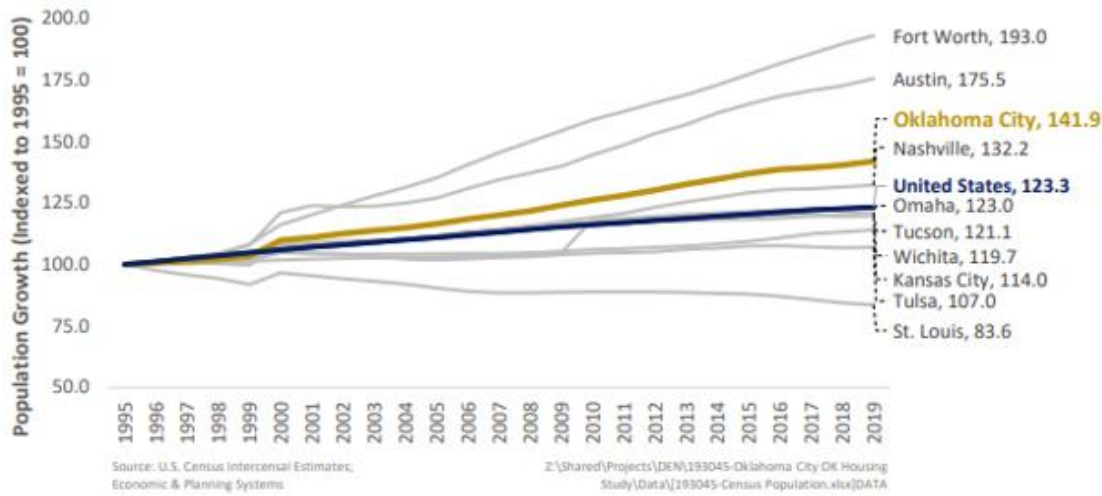


Table 3 Housing Inventory, 2010-2019

			Housing Units (in '000s)								
	Oklahoma	United	Tulsa	Austin	Kansas	Fort	Omaha	Tucson	Wichita	Nashville	St. Louis
	City	States			City	Worth					
	(millions)										
2010	254.2	130.0	185.6	345.3	224.3	282.5	178.0	233.0	166.5	269.3	176.3
2011	255.6	131.0	186.2	351.4	224.6	288.1	178.3	231.9	167.1	271.6	176.1
2012	257.5	131.6	186.3	354.9	224.8	291.7	179.3	231.0	167.2	274.6	175.9
2013	257.5	132.1	186.3	366.5	225.1	294.2	182.2	231.2	167.1	275.5	175.6
2014	259.9	132.7	186.7	373.5	225.5	297.1	186.8	232.2	167.9	277.5	175.7
2015	261.5	133.4	187.2	380.3	227.0	301.7	188.4	233.7	168.1	280.2	175.6
2016	265.2	134.1	187.6	388.3	227.8	306.3	189.1	234.3	168.8	284.3	175.5
2017	267.4	135.4	187.2	393.6	229.5	312.1	196.7	236.8	169.7	288.9	176.2
2018	270.2	136.4	187.7	404.3	230.3	319.7	197.9	238.2	171.2	295.3	176.4
2019	273.2	137.4	187.7	415.0	232.5	327.4	201.6	239.3	172.0	301.8	176.7
Change (2010-2019)											
Total Change	18.9	7.4	2.1	69.7	8.2	44.9	23.5	6.3	5.6	32.6	0.4
Overall % Change	7.5%	5.7%	1.1%	20.2%	3.7%	15.9%	13.2%	2.7%	3.3%	12.1%	0.2%

Source: U.S. Census, ACS 5-Year Estimates, B25001; Economic & Planning Systems

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Table 1 Households by Tenure as a Percent of Total Households, 2010-2019

	Oklahoma City	United States	Tulsa	Austin	Kansas City	Fort Worth	Omaha	Tucson	Wichita	Nashville	St. Louis
Distribution (2010)											
Owner Households	60.8%	66.6%	53.7%	45.5%	57.6%	59.9%	59.4%	52.4%	62.3%	56.6%	46.5%
Renter Households	38.3%	33.4%	45.1%	53.8%	41.3%	39.3%	39.4%	46.6%	36.4%	42.6%	52.1%
Distribution (2019)											
Owner Households	58.4%	64.0%	50.1%	44.9%	52.7%	57.0%	58.0%	50.1%	58.0%	53.5%	43.0%
Renter Households	40.8%	36.0%	48.7%	54.6%	46.3%	42.3%	40.9%	48.9%	40.7%	45.7%	55.6%

Source: U.S. Census, ACS 5-Year Estimates, B25003; Economic & Planning Systems
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As shown in figure 37 below, the Housing Study also found that increase in housing cost is significantly outpacing household income growth in Oklahoma City, the latter only increasing by eight percent from 2010-2019. Along with the median household income only increasing marginally, roughly 75 percent of jobs in Oklahoma City pay less than 100 percent of the AMI and approximately 40 percent of jobs pay less than 60 percent of the AMI.

Figure 37 Indexed Median Housing Prices and Median Household Incomes, 2000-2019

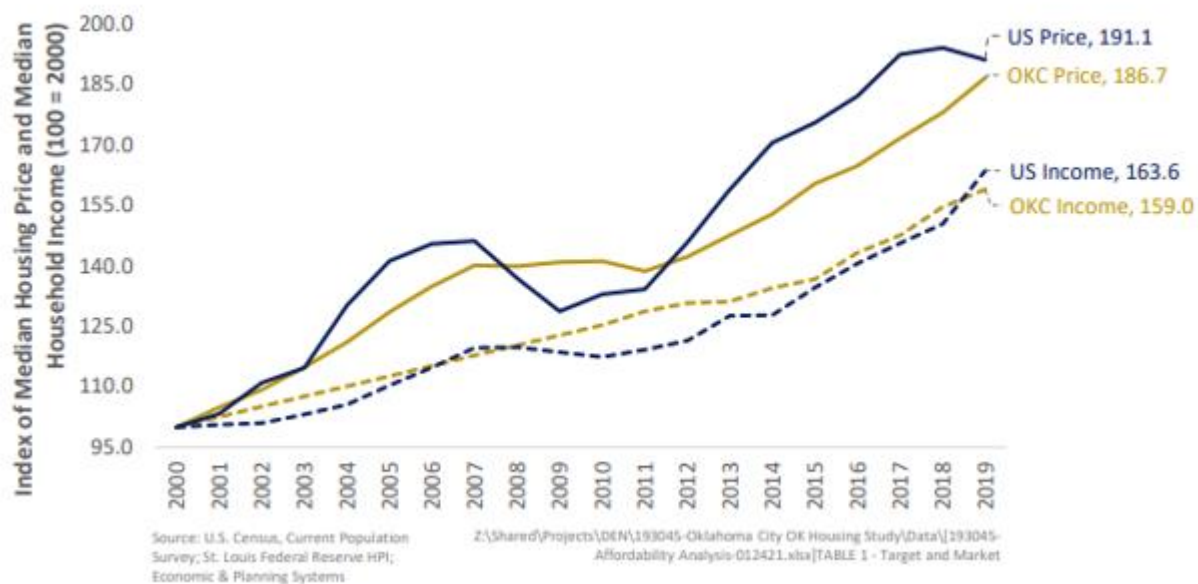
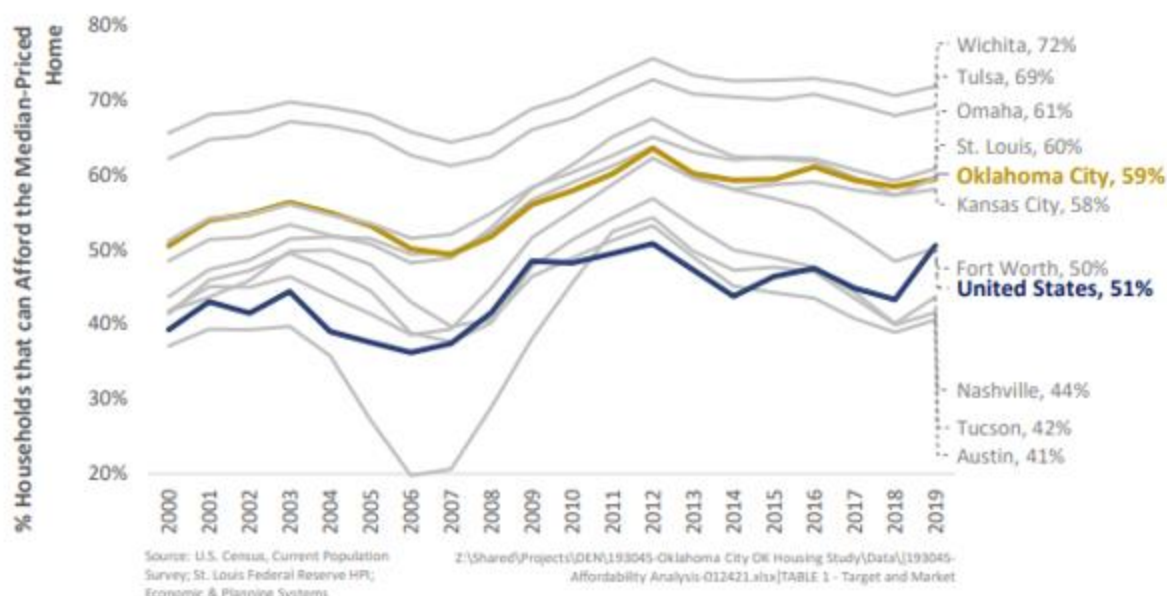


Figure 39 (see below) from the Housing Study displays the portion of inventory affordable to 100 percent AMI at a staggering 59 percent, while previously noted 75 percent of jobs pay less than 100 percent AMI.

Figure 39 Percent Households for whom Median Price is Affordable, 2000-2019



These factors together have led to a significant housing mismatch (shortage) and cost burden across different income ranges with the most significant burden felt by renters in the lower 50% and 30% of AMI income ranges as shown in tables 15 and 16 below. (Note: negative numbers indicate an insufficient amount of housing). It should also be noted the Housing Study indicated that particularly in the 30% of AMI range, there is a greater need for support services to help households stabilize.

Table 15 Renter Mismatch by AMI, 2010-2019

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2010-19	
											Total Δ	Ann. %
Less than 30% AMI	-14,380	-16,618	-18,150	-18,792	-18,943	-18,494	-17,476	-16,886	-17,778	-17,111	-2,731	-303
31% to 50% AMI	20,529	20,854	20,512	18,423	19,398	22,202	21,351	24,319	25,151	26,696	6,167	685
51% to 60% AMI	5,133	6,759	7,739	8,751	9,056	8,558	9,252	7,678	9,473	11,615	6,482	720
61% to 80% AMI	60	584	1,315	3,996	3,481	1,380	1,983	1,465	1,934	-2,400	-2,460	-273
81% to 100% AMI	-4,357	-3,967	-3,464	-3,223	-2,933	-3,015	-3,071	-3,626	-4,448	-6,263	-1,906	-212
101% to 120% AMI	-4,415	-4,681	-4,494	-3,890	-4,332	-4,723	-4,990	-5,162	-5,783	-5,010	-594	-66
Greater than 120% AMI	-7,123	-7,570	-7,994	-9,722	-10,308	-10,765	-11,897	-12,584	-13,622	-11,896	-4,773	-530

Source: U.S. Census, ACS 5-Year Estimates, B25063 and B25118; Economic & Planning Systems

Z:\Shared\Projects\DEN\193045-Oklahoma City OK Housing Study\Data\193045-Housing Gaps.xlsx\Table 6 - Renter Gaps by AMI

Table 16 Cost-Burdened Renter Households by AMI, 2010-2019

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2010-19	
											Total Δ	Ann. %
Less than 30% AMI	22,626	23,582	24,074	23,028	23,031	23,903	22,463	21,946	22,104	22,546	-80	0.0%
31% to 50% AMI	9,802	10,467	11,204	11,604	12,187	12,946	12,859	13,095	14,110	13,276	3,475	3.4%
51% to 60% AMI	3,929	3,902	3,959	4,735	4,517	3,658	3,736	2,875	2,149	2,411	-1,517	-5.3%
61% to 80% AMI	1,601	1,816	2,133	2,557	2,766	2,911	3,080	2,966	2,610	2,311	711	4.2%
81% to 100% AMI	531	545	496	747	614	505	520	619	723	723	191	3.5%
101% to 120% AMI	249	363	382	385	448	414	432	359	305	81	-168	-11.7%
<u>Greater than 120% AMI</u>	<u>119</u>	<u>154</u>	<u>157</u>	<u>199</u>	<u>184</u>	<u>143</u>	<u>194</u>	<u>118</u>	<u>198</u>	<u>220</u>	<u>101</u>	<u>7.1%</u>
Renter Households	38,857	40,828	42,405	43,256	43,749	44,479	43,285	41,978	42,199	41,569	3,342	0.8%
As % of Renter HHs												
Less than 30% AMI	81%	80%	81%	80%	79%	80%	79%	78%	79%	77%	-4%	-0.6%
31% to 50% AMI	51%	56%	59%	61%	63%	63%	64%	64%	68%	66%	14%	2.7%
51% to 60% AMI	47%	47%	48%	54%	53%	45%	45%	35%	28%	30%	-17%	-5.0%
61% to 80% AMI	15%	16%	18%	21%	22%	22%	23%	22%	20%	18%	3%	2.0%
81% to 100% AMI	8%	8%	8%	11%	9%	7%	7%	7%	8%	7%	-1%	-1.9%
101% to 120% AMI	5%	6%	6%	6%	7%	6%	6%	5%	5%	1%	-3%	-12.3%
<u>Greater than 120% AMI</u>	<u>2%</u>	<u>2%</u>	<u>2%</u>	<u>2%</u>	<u>2%</u>	<u>1%</u>	<u>2%</u>	<u>1%</u>	<u>1%</u>	<u>2%</u>	<u>0%</u>	<u>1.6%</u>
Renter Households	45%	46%	47%	47%	46%	46%	44%	43%	42%	42%	-3%	-0.9%

Source: U.S. Census, ACS 5-Year Estimates, B25106; Economic & Planning Systems

Z:\Shared\Projects\DEN\193045-Oklahoma City OK Housing Study\Data\193045-Housing Gaps.xlsx|Table 8 - Renter CB by AMI

In summary, the Housing Affordability Study determined that there has been a 1,300 unit decline in the supply of rental units affordable at 30% AMI since 2010 even though rental unit inventory overall has increase 2 times faster than ownership inventory during that same time. Like many urban areas across the United States, rents for those units have been climbing faster than incomes. In Oklahoma City, demand for those units has been increasing over time with the overall increase in the city's population. This has led to a growing shortage of units for households in the 30% AMI income range that reached 17,100 as of 2019. Overall, 42% of all rental households were found to be cost burdened with the highest burdens falling on households in the lowest income ranges, especially those in the 30% AMI income range of who almost 80% indicated they were cost burdened.

Overall Need

Overall, the City of Oklahoma City needs more resources and funding to go toward permanent housing solutions. While there is a need for higher shelter inventory and more street outreach programs, providers have adamantly insisted that these solutions are only short-term. Likewise, both shelter inventory and outreach services are being expanded through other funding sources. Ultimately, there is a clear need to utilize HOME-ARP funds to increase the availability of affordable housing in Oklahoma City. Through providing more affordable housing options, shelter and outreach workers will be able to divert clients to a more permanent supportive housing solution.

Identify priority needs for qualifying populations:

As previously mentioned, there is a need for affordable housing. This is certainly a priority need for QPs I and III. Likewise, there is a need for intensive supportive services and housing navigation to ensure individuals in QPs I and III are securely housed and stabilized within their housing prior to the removal of services. Supportive services would also be applied to QPs II and IV, since they are needing assistance with remaining stably housed. These services may include

but are not limited to trauma-informed supportive services, landlord-tenant liaison services, intensive case management, and financial assistance (rental deposits, application fees, utility deposits).

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 gaps in services/programs displays a need for shelter inventory, outreach, affordable housing, and supportive services/housing navigation. The data was collected by the most recent Comprehensive Housing Affordability Strategy (CHAS), Continuum of Care Housing Inventory Count (HIC), 2020 Point in Time count, the Housing Affordability Study conducted on behalf of the City of Oklahoma City, consultation with providers and the public, and Health Management Information Systems (HMIS). The priority needs for the qualifying populations are affordable housing (QP I and III) and supportive services/housing navigation (all four QPs). These needs were determined based off the analysis of the data and were prioritized by the suggestions expressed during the consultation period.

HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

The City of Oklahoma City has standard procurement procedures that will be followed to select recipients of HOME-ARP funds. A Notice of Funding Availability (NOFA) will be released noting the amount of funds available, the populations to be served and the expected deliverables. As with notices for other affordable housing and service projects, the NOFA will be distributed to known developers and service organizations that have proven experience working similar programs with the City along with PHAs. The NOFA will also be published on the City's website and notice given through the City's social media as well as through the Journal Record and other publications.

The NOFA will include all eligibility criteria for applicants and timelines for the application and selection process including a time period for proposers to ask questions and the deadline for submitting applications. Applications will be released along with the NOFA as part of the same package. After the submittal period concludes, applications will be reviewed and project funding recommendations determined by a special selection committee approved by the CoC Board. All projects chosen by the selection committee will also go before the CoC Board for consideration before contracts are completed and finally, proposed agreements will be sent to City Council for approval.

Describe whether the PJ will administer eligible activities directly:

The City of Oklahoma City will be responsible for administration and planning for the HOME-ARP program. Additionally, the City may directly administer some program activities, but currently which activities those may be have not been determined.

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:

The City will be administering the HOME-ARP grant program so no funds will be distributed for any activity until the allocation plan is accepted by HUD.

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 the Grant	Statutory Limit
Supportive Services	\$450,000		
Acquisition and Development of Non-Congregate Shelters			
Tenant Based Rental Assistance (TBRA)	\$1,170,952		
Development of Affordable Rental Housing	\$5,155,689		
Non-Profit Operating	\$400,000	5 %	5%
Non-Profit Capacity Building		# %	5%
Administration and Planning	\$1,266,466	15 %	15%
Total HOME ARP Allocation	\$8,443,107		

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

The NOFA that will be issued by the City will be tailored to solicit projects that address the priorities identified in our needs assessment and gap analysis. The NOFA will specify the requirements that any proposal will have to meet in order to be considered for HOME-ARP funding, and will describe why those requirements were selected, consistent with the findings of our needs assessment and gap analysis. This will set the threshold that determines whether applications will be evaluated or considered ineligible. Projects that are selected will be scored by a special selection committee with the highest score ideally going to the project that best meets the City's needs.

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

As previously indicated, the 2021 *Housing Affordability Study* conducted on behalf of the City found that there was a shortage of over 17,000 units for individuals and families making 30% of AMI in Oklahoma City and that the households currently living in those units were severely cost burdened and at risk of becoming homeless. Additionally, when Continuum of Care funded housing providers have access to more affordable units they are able to stretch their funding further to support a greater number of people. While Point In Time and Housing Inventory counts do indicate a shortage of shelter beds, local service organizations have recently been able to secure other resources for two new shelter facilities. Consultations also indicated that service providers prefer to focus the use of the HOME-ARP funds on long term solutions such as housing rather than shelters, regardless of whether or not those shelters are non-congregate. The City intends to use the Coordinated Entry System currently employed by the Oklahoma City CoC so those with the most significant service needs will be prioritized for assistance with supportive services funded through HOME-ARP. A portion of HOME-ARP funds will be allocated towards intensive services as the needs individuals and families moving directly from homelessness to housing will be high and currently cannot be addressed with the existing capacity of service organizations if the City desires assist people rapidly.

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:

In order to produce the greatest number of units, HOME-ARP funds will likely be targeted towards acquisition and rehab more than new construction. It is estimated that between 30 – 70 affordable units could be produced using HOME-ARP funds alone.

However, through combining HOME-ARP with other resources that can support affordable housing such as CDBG, HOME and, MAPS 4 (the City's capital improvement program funded by sales tax), etc. the funds could assist with the development of hundreds of units. The exact number would be dependent on the amount of the other contributing resources supporting a housing project and the amount of HOME-ARP dedicated to assist.

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

According to the 2021 Housing Affordability Study, Oklahoma City needs to focus on putting 2,632 new affordable rental units on the market over the next 15 years. While HOME-ARP clearly cannot cover the cost of that entire new inventory on its own it can address far more units when combined with some of the other resources mentioned previously. As examples,

- The City's voter- approved sales tax program called MAPS 4 includes a project to reduce homelessness through provision of affordable housing units. MAPS 4 has budgeted over \$55 million towards the development of a range of affordable housing options, including

500 permanent supportive housing units, 3,000 preserved public housing units and 500 new affordable units.

- A local service and housing development organization also recently used \$4.8 million in CDBG-CV and CDBG to acquire and rehab over 50 units of affordable housing.
- The City dedicated \$8.2M in ARPA funds this year to the support of affordable housing. Proposals from developers were received and reviewed, and contracts are being prepared for City Council approval. These ARPA funds, along with other funding mechanisms, including Low Income Housing Tax Credits, are expected to support the development of over 500 new housing units.

Combining HOME-ARP with the MAP 4 initiative, or other resources would allow for development of a greater number of affordable units and bring us closer to our production goals.

Preferences

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A *preference* permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A *method of prioritization* is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

If a PJ is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan.** For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan. Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

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

The City of Oklahoma City intends to give preference through the utilization of Oklahoma City CoC's Coordinated Entry System (CES). There are multiple entry points to the CES throughout Oklahoma City. These entry points include homeless service providers and any other agency partnering with Oklahoma City CoC, including the 211 hotline. CES uses vulnerability to rank applicants with the most vulnerable households being ranked at the top of the list. CES takes into account multiple factors, including VI-SPDAT scores, length of time homeless, number of episodes of homelessness, etc., to organize individuals who need access to services. Ultimately, CES prioritizes those who are most vulnerable. The CES is open to everyone experiencing homelessness, including all four qualifying populations under ARP, and those who are seeking services. The CES may not reject any referrals.

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 subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

The City intends to prioritize services towards those of highest need determined by the Coordinated Entry System which we anticipate will be predominantly people of highest needs who are unsheltered or primarily residing in shelters. These populations need immediate access to housing and intensive support services as the longer they remain in an unstable housing situation, the higher the likelihood that their needs such as mental and physical health will decline due to not being adequately met. Supporting this is the finding during the 2022 Point In Time count that a little over 60% of Oklahoma City's unsheltered population is chronically homeless.

There will not be any preferences for HOME-ARP funds allocated towards the development of affordable housing as research indicated all qualifying populations are in need

If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:

There will be no preference for a particular qualifying population for housing developed through the HOME-ARP program. Additionally though, the City is planning to put other ARP resources towards affordable housing development and recently passed MAPS 4, a local capital improvement program that has allocated \$55 million towards affordable housing and rehabilitation so HOME-ARP funds will also not be the only resources available to address the needs of all qualifying population with regards to affordable housing.

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 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):

The City of Oklahoma City intends to utilize Oklahoma City's CoC's Coordinated Entry System to refer people to HOME-ARP projects.

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):

Oklahoma City's CoC Coordinated Entry System allows all individuals experiencing or at risk of homelessness to access the housing and services system. This includes individuals in all four qualifying populations.

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):

CES uses vulnerability to rank applicants with the most vulnerable households being ranked at the top of the list. CES takes into account multiple factors, including VI-SPDAT scores, length of time homeless, number of episodes of homelessness, etc., to organize individuals who need access to services. Ultimately, CES prioritizes those who are most vulnerable.

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):

N/A

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 City of Oklahoma City does not intend to use any limitations.

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:

N/A

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):

N/A

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*

N/A

- *Require a review of management practices to demonstrate that 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 populations for the minimum compliance period can be demonstrated.*

N/A

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

N/A

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

N/A

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

N/A

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

N/A

ATTACHMENT A – 30 DAY NOTICE

NOTICE OF OPPORTUNITY TO COMMENT ON THE CITY OF OKLAHOMA CITY'S HOME-ARP ALLOCATION PLAN

The City of Oklahoma City (City) is a participating jurisdiction (PJ) that receives HOME funds from the U.S. Department of Housing and Urban Development (HUD). To address the need for homelessness assistance and supportive services, in 2021 Congress appropriated \$5 billion in ARP funds to be administered through HOME to perform activities that primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations. Eligible activities include: (1) development and support of affordable housing, (2) tenant-based rental assistance (TBRA), (3) provision of supportive services; and (4) acquisition and development of non-congregate shelter units. The program is the HOME-American Rescue Plan or "HOME-ARP."

HUD has set aside \$8.4M in HOME-ARP funding for the City to address homelessness and affordable housing. In order to receive these funds, the City must develop an Allocation Plan for HUD's approval that outlines needs, gaps in services, and how funds will be allocated. Thus far, the following actions have been taken to determine gaps and needs.

- Consulting with service recipients and over 40 providers of homeless services including those that provide services to veterans, people fleeing domestic violence, and youth, as well as public housing agencies and mental health organizations.
- Analyzing data from the City's Affordable Housing Study as well as data from annual Point In Time homeless census counts, and the American Community Survey.
- Working with consultants from Clutch Consulting to evaluate service intake and other data from the community's homeless services database to determine gaps and areas of improvement.

After evaluating gathered information, current consensus is that Oklahoma City's most significant needs with regards to serving the homeless is to expand and strengthen more intensive services such as case management, as well as expand the community's inventory of affordable housing for those falling in extremely low income ranges (30% of area median income or \$17,200 annually for a single person household). In order to address these issues, the City currently plans to allocate \$2.4 million towards intensive services to be provided through a housing navigation/case management program and \$6,049,107 towards the development of additional affordable housing units.

The City's Allocation Plan must be submitted to HUD by no later than March 31, 2023. A Public Hearing on the City's Allocation Plan will be held at the City Council Meeting on March 28th at 8:30 am where public comments can be heard. Council Chambers are located on the 4th floor of City Hall, 200 N Walker, Oklahoma City, OK. 73102.

The public may also comment on the proposed or possible uses for the funds, at the following website.

<http://www.okc.gov/departments/planning/programs/homelessness/home-arp>

All written comments received on or before March 28, 2023 will be considered before submission of the final plan.

ATTACHMENT B – 30 DAY NOTICE POSTING – CITY WEBSITE

The screenshot displays a web browser window with the URL <https://www.okc.gov/departments/city-clerk/legal-notices-and-publications/-fsiteid-1/-folder-2325#!/>. The page features a navigation bar with links for Residents, Business, Recreation, Government, Departments, Visitors, and a search bar labeled "Search okc.gov". A large "CITY CLERK" banner is prominently displayed. On the left, a sidebar menu lists various services, with "Legal Notices and Publications" highlighted in red. The main content area is titled "LEGAL NOTICES AND PUBLICATIONS" and includes links for "HOME-ARP Allocation Plan" and "DOWNTOWN MAPS ECONOMIC DEVELOPMENT PROJECT PLAN AMENDMENT". A message states: "Free viewers are required for some of the attached documents. They can be downloaded by clicking on the icons below." Below this message are icons for PDF, video, Word, Excel, and PowerPoint. The Windows taskbar at the bottom shows the search bar, task view, and several application icons, along with a system tray displaying the temperature (72°F) and date/time (2:34 PM, 2/28/2023).

Legal Notices and Publications | x +

https://www.okc.gov/departments/city-clerk/legal-notices-and-publications/-fsiteid-1/-folder-2325#!/

Residents Business Recreation Government Departments Visitors I Want to... Search okc.gov

CITY CLERK

DEPARTMENTS » CITY CLERK »

LEGAL NOTICES AND PUBLICATIONS

TEXT SIZE: [icon] [icon] [icon] SHARE & BOOKMARK FEEDBACK [icon] PRINT

[HOME-ARP Allocation Plan](#)

[DOWNTOWN MAPS ECONOMIC DEVELOPMENT PROJECT PLAN AMENDMENT](#)

Free viewers are required for some of the attached documents.
They can be downloaded by clicking on the icons below.

[PDF icon] [Video icon] [Word icon] [Excel icon] [PowerPoint icon]

Type here to search

72°F 2:34 PM 2/28/2023

ATTACHMENT C – 30 DAY NOTICE POSTING – COMMENT PORTAL

Legal Notices and Publications | HOME ARP | City of OKC

https://www.okc.gov/departments/planning/programs/homelessness/home-arp

Search okc.gov

abetterwayokc.org

Housing & Neighborhood Programs

Office of Arts and Cultural Affairs

Sustainability

Strong Neighborhoods Initiative

Planning Commission

Meetings and Events Calendar

NOTICE OF OPPORTUNITY TO COMMENT ON THE CITY OF OKLAHOMA CITY'S HOME-ARP ALLOCATION PLAN

The City of Oklahoma City (City) is a participating jurisdiction (PJ) that receives HOME funds from the U.S. Department of Housing and Urban Development (HUD). To address the need for homelessness assistance and supportive services, in 2021 Congress appropriated \$5 billion in ARP funds to be administered through HOME to perform activities that primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations. Eligible activities include: (1) development and support of affordable housing, (2) tenant-based rental assistance (TBRA), (3) provision of supportive services; and (4) acquisition and development of non-congregate shelter units. The program is the HOME-American Rescue Plan or "HOME-ARP."

HUD has set aside \$8.4M in HOME-ARP funding for the City to address homelessness and affordable housing. In order to receive these funds, the City must develop an Allocation Plan for HUD's approval that outlines needs, gaps in services, and how funds will be allocated. Thus far, the following actions have been taken to determine gaps and needs.

- Consulting with service recipients and over 40 providers of homeless services including those that provide services to veterans, people fleeing domestic violence, and youth, as well as public housing agencies and mental health organizations.
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- Working with consultants from Clutch Consulting to evaluate service intake and other data from the community's homeless services database to determine gaps and areas of improvement.

After evaluating gathered information, current consensus is that Oklahoma City's most significant needs with

navigation/case management program and \$6,042,107 towards the development of additional affordable housing units.

The City's Allocation Plan must be submitted to HUD by no later than March 31, 2023. A Public Hearing on the City's Allocation Plan will be held at the City Council Meeting on March 28th at 8:30 am where public comments can be heard. Council Chambers are located on the 4th floor of City Hall, 200 N Walker, Oklahoma City, OK. 73102. All written comments received on or before March 28, 2023 will be considered before submission of the final plan.

1. Name

2. Email

3. Organization

4. What homeless assistance and support services activities should we focus HOME ARP on?

ATTACHMENT D – 30 DAY NOTICE/COMMENT PORTAL – SOCIAL MEDIA POSTING

The image displays two screenshots of social media posts from the City of Oklahoma City (@cityofokc).

Left Screenshot: A tweet from the City of OKC (@cityofokc) dated 4:34 PM · 2/28/23. The text reads: "The City of OKC is receiving \$8.4 million from the @HUDgov to help address homelessness and we want to hear from you. The HOME-ARP program can provide funds for rental assistance, affordable housing development, support services and non-group shelters." The tweet has 11 Retweets and 21 Likes.

Right Screenshot: A thread of tweets from the City of OKC (@cityofokc) dated 4:34 PM · 2/28/23. The first tweet in the thread says: "After consultation with service providers and analysis of housing data, the City plans to allocate \$2.4M to expanding support services and \$6M towards housing development. There will be a public hearing on the allocation plan during the March 28th City Council meeting." The second tweet in the thread says: "You can also provide comments online on the potential or proposed uses of the funds at okc.gov/departments/pl...".

Bottom Screenshot: A screenshot of the City of Oklahoma City - Government Facebook page. The post, dated February 28 at 3:52 PM, contains the following text: "The City of Oklahoma City will be receiving \$8.4 million from the Department of Housing and Urban Development to help address homelessness and we want to hear from you. The HOME-ARP program can provide funds for rental assistance, affordable housing development, support services and non-group shelters. After consultation with service providers and analysis of housing data, The City plans to allocate \$2.4 million to expanding support services and \$6 million towards housing development. There will be a public hearing on the allocation plan in front of City Council on March 28th at 8:30am where public comment may be heard. If you would like to comment on the potential or proposed uses of the funds now, you may do so at: OKC.GOV HOME ARP | City of OKC".

ATTACHMENT E – SUBMITTED PUBLIC COMMENTS

Juan Ayala on 2/28/23: “Sheltering, Housing, job shifting”

Angela Banks on 2/28/23: “We need more affordable housing that's on bus routes. I am a single female, I work full time, college degree and it is impossible to find an apartment or house (1 bedroom) that I can afford that is not in a crime filled neighborhood. I'm 46, sober, single, and don't plan on getting involved in another relationship with anyone. It's impossible to live alone on one income. I also think more of these empty houses and hotels can be used for efficiency or studio apartments, even if they are rented out unfurnished. When I was out there on the streets, I was resourceful in getting what I need to get high or my drink of choice for the evening. I know now that I can use that for good and for my future.”

Steve Walden on 3/1/23: “We are striving to secure housing or Multifamily housing communities for women with children to provide a safe and secure environment for these families. In addition, our goals are to provide training and integration services to help these mothers gain the skills needed to provide for their children and become self-supporting. We believe strongly that first priority is to provide a secure home and that our community with collaborative efforts of the City and donors can achieve this goal. So many properties are available and not being utilized to fill potential. Our vision and belief are that once this burden is relieved temporarily that families can thrive in a secure environment. Women's natural instinct to provide shelter for their children is a priority and if we can help to provide access for this need then they are able to focus on education and benefit from some of the life skills training and resources to achieve financial independence. As a non-profit 501c3 we are seeking to partner with others whom can help us serve this often-overlooked group in our community.”

Abby on 3/1/23: “I think affordable housing is big. But another area that homeless need major help on is substance abuse, mental health disorders, and job assistance so they can hold a job.”

Jane McHose on 3/1/23: “Housing...housing...housing...get the tents off the streets and provide for those that sleep along the streets in a sleeping bag with no tent. Then address providing food or sending in a social worker once you have them in housing of some kind. Some cities provide little houses for them. Why can't we?”

Chelsea Campbell on 3/3/23: “I am a case manager at Northcare for adult outpatient community mental health treatment. There are so many barriers to treatment that are further complicated by homelessness. Currently, we have ONE resource for ID's which is a once in a lifetime referral; leaves us in a bind of helping people get ID's for housing, treatment, healthcare, employment, ETC. Something helpful would be a tag agency/facility to help people get state ID's (not real ID) through referrals from community agencies like Northcare/RR/etc. with a program to subsidize the cost. So many people are held back from obtaining an ID because they can't make it to DPS

by 6am to wait in line or they're too ill to navigate the process independently. Another common barrier is transportation. Creating a program to help subsidize Embark transportation or even just subsidize monthly bus passes would be a huge benefit to people who have mental illness (which is proven to generally be comorbid with physical health conditions). OKC is one of the biggest metros in the country and unfortunately resources are scattered everywhere. An office to help people file initial disability claims would also be helpful. It's one of the most requested CM services, and unfortunately CM's don't know what they're doing and most people with MH issues can't navigate the process independently.”

(No comments were made during public hearing)

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.

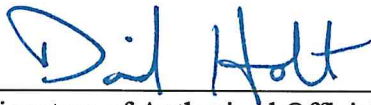
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

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



Date



Mayor 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:**

03/23/2023

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

City of Oklahoma City

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

73-600539

*** c. UEI:**

D3MUME8J5T25

d. Address:

*** Street1:**

420 W Main Street

Street2:

*** City:**

Oklahoma City

County/Parish:

Oklahom

*** State:**

OK: Oklahoma

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

73102-4437

e. Organizational Unit:

Department Name:

Planning

Division Name:

Community Development

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

Prefix:

Mr.

*** First Name:**

Jerod

Middle Name:

*** Last Name:**

Shadid

Suffix:

Title:

Program Planner

Organizational Affiliation:

*** Telephone Number:**

4052973608

Fax Number:

*** Email:**

jerod.shadid@okc.gov

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

US Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

14.239 Home Investment Partnership Program- American Rescue Plan (HOME-ARP)

* 12. Funding Opportunity Number:

14.239

* Title:

Home Investment Partnership Program- American Rescue Plan (HOME-ARP)

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:

2021 HOME-ARP Allocation Plan

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.

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

* a. Federal	<input type="text" value="8,443,107.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="8,443,107.00"/>

*** 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

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 18, 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 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 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-133, "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.
19. 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 Mayor
APPLICANT ORGANIZATION City of Oklahoma City	DATE SUBMITTED 

ASSURANCES - 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 (0348-0042), Washington, DC 20503.

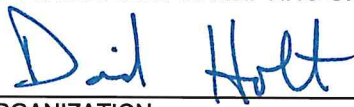
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

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 assistance 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 costs) 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 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 interest in the title of real property in accordance with 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 progress 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 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).
9. 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.
10. Will comply with all Federal statutes relating to non-discrimination. 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.

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.
12. Will comply with the 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.
13. 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.
14. Will comply 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.
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).
16. 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.
17. 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.).
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.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor	
APPLICANT ORGANIZATION City of Oklahoma City		DATE SUBMITTED May 24, 2023