



MEMORANDUM

TO: Tulsa County Board of Commissioners

FROM: Claudia Brierre

DATE: March 15, 2023

RE: APPROVAL OF HUD ALLOCATION PLAN FOR HOME AMERICAN RESCUE PLAN FUNDS

BACKGROUND: The American Rescue Plan Act of 2021 appropriated \$5 billion to provide housing, service, and shelter to individuals experiencing homelessness and other vulnerable populations, to be allocated by formula to jurisdictions that qualified for HOME Investment Partnerships Program. The Department of Housing and Urban Development awarded Tulsa County HOME Consortium HOME-ARP funding in the amount of \$4,094,107.00 to address housing needs for qualified populations within the HOME Consortium's service area of 6 counties and 18 jurisdictions. This does not include the City of Tulsa, which receives its own separate allocation.

As part of the federal requirements for the HOME- ARP funds, Tulsa County as the lead entity for the HOME Consortium must develop and adopt an Allocation Plan which describes the uses of the funds. HOME-ARP funds can be used for four eligible activities: production or preservation of affordable housing; purchase and development of non-congregate shelter; tenant-based rental assistance and; supportive services. The lead entity must consult with the providers who assist the qualifying populations to be served including Continuums of Care serving the jurisdiction's geographic area, homeless service providers, domestic violence service providers, veterans' groups, public housing agencies, 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.

Attached is the draft Allocation Plan developed by INCOG. Based on consultation with subject matter expert providers and data from a needs assessment and gap analysis highlighting a lack of facilities and services throughout the Consortium service area, INCOG staff recommends allocation of funding to the following activities:

• Development of Affordable Rental Housing	\$ 2,794,402
• Acquisition and Development of Non-Congregate Shelters	\$1,000,000
• Supportive Services	\$ 95,000
• Administration (5%)	<u>\$ 204,705</u>
	\$4,094,107

REQUEST FOR ACTION: Request that the Board of County Commissioners:

1. Approve the Tulsa County HOME Consortium HOME-ARP Allocation and required Certifications, and authorize submittal to HUD by March 31, 2023.

FOR MONDAY MARCH 20, 2023 COMMISSION AGENDA



Tulsa County HOME Consortium

HOME- American Rescue Plan (ARP)

Allocation Plan

Prepared by

INCOG | Williams Tower 2 | 2 West 2nd Street | Suite 800

Tulsa, OK 74103

<http://www.incog.org>

March 2023

CMF# 20230369

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

4. Applicant Identifier:

M21-DP400205

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:**

Tulsa County HOME Consortium

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

736006419

*** c. UEI:**

064553571000

d. Address:

*** Street1:**

218 West 6th Street

Street2:

*** City:**

Tulsa

County/Parish:

*** State:**

OK: Oklahoma

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

74119-1004

e. Organizational Unit:

Department Name:

Division Name:

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

Prefix:

Ms.

*** First Name:**

Claudia

Middle Name:

*** Last Name:**

Brierre

Suffix:

Title: Community and Economic Development Manager

Organizational Affiliation:

*** Telephone Number:**

918-579-9431

Fax Number:

*** Email:**

cbrierre@incog.org

Application for Federal Assistance SF-424

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

B: County 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:

HOME Investment Partnership Program

* 12. Funding Opportunity Number:

* Title:

13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

HOME American Rescue Plan program to provide housing, service, and shelter to individuals experiencing homeless and other vulnerable populations.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

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

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

Add Attachment

Delete Attachment

View Attachment

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

* a. Federal	<input type="text" value="4,094,107.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="4,094,107.00"/>

*** 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

Add Attachment

Delete Attachment

View Attachment

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


Pro Tem* Date Signed:

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

3/20/2023
Date

Chairman Pro Tem
Title

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

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 project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL  Chairman Pro Tem	TITLE Chairman Pro Tem, Board of County Commissioners
APPLICANT ORGANIZATION Tulsa County HOME Consortium	DATE SUBMITTED 3/20/2023

ASSURANCES - NON-CONSTRUCTION PROGRAMS

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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).
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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.
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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).
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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  Chairman Pro Tem	TITLE Chairman Pro Tem, Board of County Commissioners
APPLICANT ORGANIZATION Tulsa County HOME Consortium	DATE SUBMITTED 3/20/2023

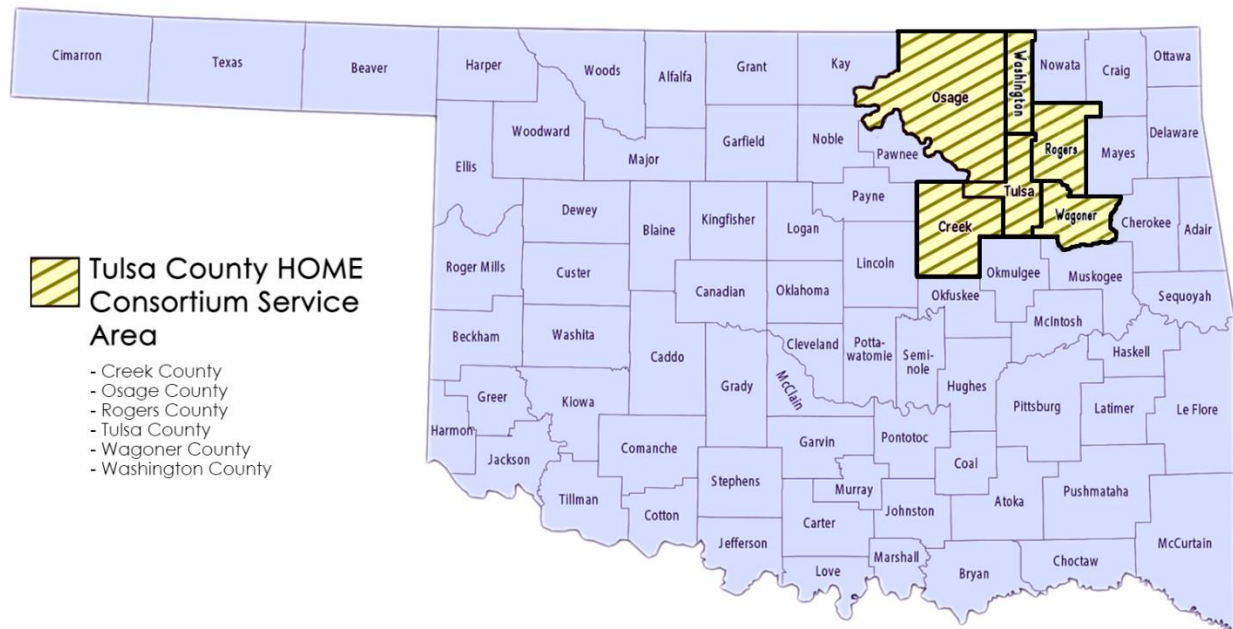
Tulsa County HOME Consortium HOME-ARP Allocation Plan

Introduction

The American Rescue Plan Act of 2021 appropriated \$5 billion to provide housing, service, and shelter to individuals experiencing homeless and other vulnerable populations, to be allocated by formula to jurisdictions that qualified for HOME Investment Partnerships Program.

The Department of Housing and Urban Development has allocated Tulsa County HOME Consortium HOME-ARP funding in the amount of \$4,094,107.00 to address housing needs for qualified populations within the HOME Consortium's service area of 6 counties and 18 jurisdictions.

The Tulsa County HOME Consortium, formed in 1994, serves 24 members governments in Northeastern Oklahoma in a geographic area that covers 5,291 square miles. The Consortium includes 18 cities and 6 counties with a total 2020 Census population of 564,162, excluding the City of Tulsa. The Consortium includes rapidly growing suburban areas adjacent to the corporate city limits of Tulsa and small communities under 5,000 population, as well as the unincorporated rural areas of six counties. **The City of Tulsa is not a member of the HOME Consortium, and therefore, HOME-ARP funds cannot be spent within the city limits without a joint project MOA.**



HOME-ARP Overview

Eligible Populations

HOME-ARP funds must be used to primarily benefit individuals or families from the following qualifying populations:

- Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11302\(a\)](#));
- At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11360\(1\)](#));
- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary;
- In other populations where providing supportive services or assistance under section 212(a) of the Act ([42 U.S.C. 12742\(a\)](#)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability;
- Veterans and families that include a veteran family member that meet one of the preceding criteria.

Eligible Activities

HOME-ARP funds can be used for four eligible activities:

- Production or Preservation of Affordable Housing
- Tenant-Based Rental Assistance (TBRA)
- Supportive Services, including services defined at [24 CFR 578.53\(e\)](#), Homeless Prevention Services, and Housing Counseling
- Purchase and Development of Non-Congregate Shelter. These structures can remain in use as non-congregate shelter or can be converted to: 1) emergency shelter under the [Emergency Solutions Grants \(ESG\) Program](#); 2) permanent housing under the [Continuum of Care \(CoC\) Program](#); or 3) affordable housing under the [HOME Program](#).

Administrative and Operating Funding

HOME-ARP provides up to 15 percent of the allocation for administrative and planning costs of the PJ and subrecipients administering all or a portion of the grant. In addition, HOME-ARP can provide up to 5 percent of its allocation for operating costs of Community Housing Development Organizations (CHDOs), other non-profit organizations, and homeless providers. Additional HOME-ARP funding is available to these organizations for capacity building activities.

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.

The geographic area of the HOME Consortium is covered by portions of three Continuum of Cares:

- Tulsa City-County CoC (all of Tulsa County);
- North Central CoC (all of Creek and Osage Counties and excluding remaining 6 counties);
- and North East CoC (all of Rogers, Wagoner and Washington Counties and excluding remaining 8 counties).

The geographic area of the HOME Consortium is covered by four Public Housing Agencies:

- Bristow Housing Authority, Creek County (159 units);
- Drumright Housing Authority, Creek County (148);
- Housing Authority of Osage County, Pawhuska, Osage County (280 units)
- Tulsa Housing Authority (can operate in Tulsa County in 1-mile area outside of city limits of Tulsa)

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

Consultation was conducted with the required organizations listed above using a variety of methods, including direct one-on-one conversations, virtual meetings, email correspondence and emailed surveys. The table lists the organizations, type of organization , dates of consultation and feedback gathered about the needs and data required for the plan.

List of organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Housing Solutions Tulsa	Lead organization Tulsa City & County CoC	1:1 Virtual Meeting 2/6/23	Needs in Tulsa County for : Affordable housing Permanent Supportive Housing Supportive Services Respite Care housing
Community Development Support Assn (CDSA)	Lead organization North Central OK CoC	Email consultation with CoC staff	PIT Count data for February 2023 showed one substance recovery facility counted in Creek County. No unsheltered count conducted.
Northeast OK Community Action Agency (NECAA)	Lead organization Northeast OK CoC	1:1 Virtual Meeting 2/27/23	Needs in Rogers, Wagoner, Washington Counties: Affordable rental housing Mortgage assistance Permanent Supportive housing for general homeless population
Community Action Resource & Development (CARD)	Community Action Agency serving Rogers, Wagoner, Washington Counties Serves all QPs	1:1 Virtual Meeting 2/27/23	Needs in Rogers, Wagoner, Washington Counties: Affordable rental housing Supportive Services Rapid Re-Housing
Oklahoma Housing Finance Agency	Public Agency PJ serving balance of state	Participated in In Person Stakeholder Meeting for Northeast Consultation Claremore 7/14/2022	Needs identified for Northeast COC area during stakeholder meeting included: Limited housing stock for QP's; Inability to obtain affordable housing using vouchers; Need for construction of new affordable housing.
City of Tulsa	HUD PJ	Participated in City's virtual consultation meeting 12/7/2021	Restore Hope cited lack of affordable housing and requested providing more affordable housing; Mental Health Association OK cited need more rental housing Discussed a Joint Activity with City; at this time City not interested in joint activity because

			of focus on creating permanent units.
Tulsa County Social Services	Tulsa County Government Agency serving all QPs	1:1 Meeting 1/30/23	County-operated Non-congregate Homeless Family Emergency Shelter (located within City of Tulsa Limits): Only family shelter in the area which keeps families together in shelter situation. Needs renovation and expansion. Shelter usually at capacity.
Tulsa City County Health Department	Public Agency	1:1 Virtual Meeting 2/16/23	Needs in Uninc. Tulsa County: Many households at risk of homelessness through inadequate/unsafe housing units. No housing code in County, so renters living in unsanitary/unsafe conditions. Fair housing violations with no remedy.
Tulsa Housing Authority	PHA serving City of Tulsa	Virtual Meeting 1/23/23	By law, can provide housing 1-mile outside of city limits. Has sold all scattered site single family units and is focused on multi-family units within the City. Need for education and connections to services so tenants so do not face eviction. More affordable housing
Bristow Housing Authority	PHA serving Creek County	Email Survey	Invited to consult about needs in Bristow, Creek Co
Drumright Housing Authority	PHA serving Creek County	Email Survey	Invited to consult about needs in Drumright, Creek Co
Osage County Housing Authority	PHA serving Osage County	Email Survey	Invited to consult about needs at scattered site housing in Osage Co
Caring Community Friends Sapulpa	Non-Profit Organization- Food Pantry/ Emergency Assistance	Zoom Virtual Meeting 2/2/23	Need for family shelters
Youth Services Creek County	Non-Profit Organization- Counseling Services/	Zoom Virtual Meeting 2/2/23	Housing needed in area for children who age out of system and don't want to leave area because their support systems are

	Youth Services, Behavioral Health		there. (Pivot housing model needed)
OK Department Human Services	Government Agency-Creek County TANF	Zoom Virtual Meeting 2/2/23	Rental Assistance Family housing Housing for Domestic Violence victims Lack of any shelters in Creek County
United Community Action Program	Community Action Program – Creek County & Osage County	Zoom Virtual Meeting 2/2/23	Participant in meeting
CREOKS	Substance Abuse / Behavioral Health	Zoom Virtual Meeting 2/2/23	No shelters in Creek County Lack of support services for qualified populations Lack of affordable housing
Creek County Board of Commissioners	Government Entity	Zoom Virtual Meeting 2/2/23	Participant in meeting
OK State University Prevention Programs-Creek County	Higher Education Public Institution- Oklahoma State University	Zoom Virtual Meeting 2/2/23	Participant in meeting
Sapulpa Public Schools	Public Entity	Zoom Virtual Meeting 2/2/23	Many students couch surfing; need shelter
Sooner Success	Higher Education Public Institution - University of Oklahoma	Zoom Virtual Meeting 2/2/23	Participant in meeting
Homeless Veterans Reintegration Program Creek County	Tribal Muscogee Nation – Job Training/ behavioral counseling	Zoom Virtual Meeting 2/2/23	Participant in meeting
High Point Youth Ranch	Faith Based Service	Zoom Virtual Meeting 2/2/23	Participant in meeting
Life Gate Freedom Recovery	Private organization Addiction recovery / sober living	Zoom Virtual Meeting 2/2/23	PIT Count February 2023 counted 50 beds for addiction recovery population.
City of Bartlesville Community Development Director	Government Entity- Washington County	Conference call 2/27/23	City seeing increased homeless population. Has a Homeless Task Force to explore resources. City has several faith-based shelters, including The Lighthouse

			<p>(65 private beds) and Family Promise</p> <p>Uncertain if Bartlesville included in formal CoC PIT count in February, CD director believes 50 homeless in the city then; 40 unsheltered and 10 couch surfing.</p>
Legal Aid of Oklahoma	Non Profit Addressing Fair Housing and Civil Rights	Zoom Virtual Meeting 2/23/23	<p>Reduce barriers to seeking shelter such as permitting service pets; Education, programs, resources to reduce evictions of vulnerable populations;</p> <p>Increase domestic violence protections for renters at risk of homelessness. Educate landlords about DV protections.</p> <p>Agency sees more housing discrimination outside of city limits.</p>
A New Leaf	Non Profit Organization serving Persons with Disabilities	Zoom Virtual Meeting 2/23/23	<p>Need housing and supportive services- 200 persons on waiting list for housing, 80% of clients have dual disabilities</p> <p>Need for Supportive Services</p>
Vintage Housing	Non Profit Organization providing housing for Low Income Elderly	Zoom Virtual Meeting 2/23/23	<p>Provides congregate elderly housing outside of city of Tulsa.</p> <p>Early intervention services needed for At-Risk of Homelessness populations so they aren't forced out of homes.</p> <p>Waiting lists for subsidized properties longest outside of city in the County.</p> <p>Shelters are not set up for needs of seniors.</p> <p>Access to more affordable housing needed.</p>
Mental Health Association of Oklahoma	Non Profit Organization serving Persons with Disabilities	Zoom Virtual Meeting 2/23/23	<p>TBRA is deleted quickly.</p> <p>Supportive Services also gone in one-time funding; not sustained.</p> <p>Need to fund Acquisition and Rehab with one-time HOME ARP program as most effective use of funds.</p>

Domestic Violence Intervention Services	Non Profit serving Tulsa and Creek Counties. Domestic violence, human trafficking victims	Conference call 3/20/23	Serves clients in City of Tulsa, as well as clients outside of Tulsa in Tulsa County and in Creek County. Challenge to find affordable and safe housing for DV victims after they leave DV shelter. Case management is biggest need.
Volunteers of America	Non Profit services statewide. Serves veterans, elderly, homeless and disabled with housing opportunities.	Conference call 3/20/23	Provides 51 units of scattered site housing for individuals experiencing chronic homelessness; funds to prevent eviction and homelessness; housing for veterans. Lack of affordable housing units for clients living in poverty and supportive housing for behavioral health and medical challenges.

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

Within the context of the consultation with agencies and organizations providing services to the qualified populations, the themes most often expressed by subject experts were:

- Lack of access to affordable housing;
- Lack of shelters for affected populations experiencing homelessness and cost burdened housing;
- Lack of supportive services to reduce on-going homelessness.

Providers recognized that facilities and services are concentrated in the urban areas of the three Continuum of Cares serving the HOME Consortium and generally not available outside of the communities of Tulsa, Stillwater, Ponca City, Tahlequah, Miami.

Feedback obtained during the consultation process with subject experts will determine the HOME Consortium's approach to allocating the HOME-ARP funds among the eligible activities due to the general unavailability of data for the rural areas served by the Consortium. Homeless needs inventory data, including Point in Time Counts, for the three CoC's was aggregated for each of the CoC's and not broken out by county or location. Feedback received did not lead to any preferences, methods of prioritization, or limitations on eligibility of the qualified populations for any of the HOME-ARP activities.

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.

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 for Needs Public Hearing: 1/24/2023***
- ***Date(s) of Needs public hearing: 2/13/2023***
- ***Public comment period: start date - 3/1/2023 end date - 3/15/2023***

Describe the public participation process:

Per Tulsa County’s adopted Citizen Participation Plan, through the Needs Public Hearing on February 13, 2023, citizens were provided information on the amount of HOME-ARP funds awarded to the HOME Consortium and the range of activities eligible for funding. Notice of the Needs public hearing was published in the regional newspaper, Tulsa World, on January 24th. Notice of a 15-day comment period on the draft Allocation Plan was published in the Tulsa World on March 1st. The Notice stated that citizens could view the draft Plan on the Tulsa County website and the INCOG website for the 15-day comment period and where to direct comments on the Plan.

Describe efforts to broaden public participation:

Public participation was broadened through Tulsa World news article coverage of Needs Public Hearing at the Tulsa County Board of County Commissioners meeting, describing eligible uses of HOME-ARP funding; local public radio (KWGS) interview; Sapulpa Herald news article following consultation meeting on February 2, 2023 with Sapulpa social service providers.

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

No written or oral public hearing comments were received.

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

No comments were received.

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INCOG--WILLIAMS TOWER

Attn: Claudia Brierre

2 W 2ND ST, # 800

TULSA, OK 74103-4236

Date

January 24, 2023

Date	Category	Description	Ad Size	Total Cost
01/24/2023	Legal Notices	NEEDS FY2020 HOME INVESTMENT	2 x 42.00 CL	73.76

Affidavit of Publication

I, Brenda Brumbaugh, of lawful age, am a legal representative of the Tulsa World of Tulsa, Oklahoma, a daily newspaper of general circulation in Tulsa County, Oklahoma, a legal newspaper qualified to publish legal notices, as defined in 25 O.S. § 106 as amended, and thereafter, and complies with all other requirements of the laws of Oklahoma with reference to legal publication. That said notice, a true copy of which is attached hereto, was published in the regular edition of said newspaper during the period and time of publication and not in a supplement, on the DATE(S) LISTED BELOW

01/24/2023

Newspaper reference: 0000792440

792440
Published in the Tulsa World, Tulsa County, Oklahoma, January 24, 2023

NOTICE OF NEEDS PUBLIC HEARING TULSA COUNTY FY2020 HOME INVESTMENT PARTNERSHIPS PROGRAM AMERICAN RESCUE PLAN PROGRAM

A Public Hearing will be held at 9:30 a.m., February 13, 2023 in the Tulsa County Headquarters Building, Room 132 at 218 W. 6th Street, Tulsa, to receive recommendations on housing needs for the cities and counties within the Metropolitan Tulsa HOME Consortium. The Department of Housing and Urban Development has awarded Tulsa County HOME Consortium FY2020 HOME-American Rescue Plan funding in the amount of \$4,049,107.00 to address housing needs for the qualified populations of homeless or at risk of homelessness, fleeing or attempting to flee domestic violence, sexual violence, stalking, or human trafficking, veterans and families that include a veteran who meet one of preceding criteria within the HOME Consortium's service area of 4 counties and 18 jurisdictions. Citizens are requested to participate in the Hearing and express their views on the allocation of these funds. Citizens are requested to express their views on qualifying populations housing needs in Bartlesville, Broken Arrow, Bixby, Bristow, Catoosa, Claremore, Collinsville, Coweta, Drumright, Glenpool, Hominy, Jenks, Owasso, Pawhuska, Sand Springs, Sapulpa, Skiatook, Sperry and the unincorporated areas of Creek, Osage, Rogers, Tulsa, Wagoner and Washington Counties.

Recommendations received will be considered by INCOG and the Tulsa County Board of Commissioners in developing an Allocation Plan for the HOME ARP funds to be submitted to HUD. Comments where feasible, will be incorporated into the Allocation Plan to be submitted to HUD by March 31, 2023.

Anyone requiring special accommodations pursuant to the Americans with Disabilities Act should notify Claudia Brierre at 918/584-7526.

Brenda Brumbaugh
Legal Representative

Sworn to and subscribed before me this date:

1/24/23

gshew
Notary Public

AMBER SHELL
NOTARY PUBLIC - STATE OF OKLAHOMA
MY COMMISSION EXPIRES SEP 11, 2023
COMMISSION # 10009197

My Commission expires _____

TULSA WORLD

P.O. Box 1770 Tulsa, Oklahoma 74102-1770 | tulsa-world.com

Account Number

1009017

INCOG--WILLIAMS TOWER

Attn Claudia Brierre

2 W 2ND ST, # 800

TULSA, OK 74103-4236

Date

March 01, 2023

Date	Category	Description	Ad Size	Total Cost
03/01/2023	Legal Notices	HOME AMERICAN RESCUE PLAN	2 x 29.00 CL	57.12

Affidavit of Publication

I, Brenda Brumbaugh, of lawful age, am a legal representative of the Tulsa World of Tulsa, Oklahoma, a daily newspaper of general circulation in Tulsa County, Oklahoma, a legal newspaper qualified to publish legal notices, as defined in 25 O.S. § 106 as amended, and thereafter, and complies with all other requirements of the laws of Oklahoma with reference to legal publication. That said notice, a true copy of which is attached hereto, was published in the regular edition of said newspaper during the period and time of publication and not in a supplement, on the DATE(S) LISTED BELOW

03/01/2023

Newspaper reference: 0000796894

796894
Published in the Tulsa World, Tulsa County, Oklahoma,
March 1, 2023

NOTICE OF AVAILABILITY OF TULSA COUNTY HOME CONSORTIUM HOME AMERICAN RESCUE PLAN ALLOCATION PLAN

The Department of Housing and Urban Development has awarded Tulsa County HOME Consortium FY2020 HOME--American Rescue Plan funding in the amount of \$4,049,107.00 to address housing needs for qualified populations within the HOME Consortium's service area of 6 counties and 18 jurisdictions which includes Bartlesville, Broken Arrow, Bixby, Bristow, Catoosa, Claremore, Collinsville, Coweta, Drumright, Glenpool, Hominy, Jenks, Owasso, Pawhuska, Sand Springs, Sapulpa, Skiatook, Sperry and the unincorporated areas of Creek, Osage, Rogers, Tulsa, Wagoner and Washington Counties. A draft Allocation Plan which recommends allocation of these funds will be available for a 15-day public review and comment period beginning March 1, 2023. The Allocation Plan will be available online at www.tulsa-county.org and www.incog.org. The public is invited to review the document online and make comments on the proposed allocation of funds. Comments where feasible, will be incorporated into the Allocation Plan to be submitted to HUD by March 31, 2023. Comments should be directed to INCOG, 2 West 2nd St., Suite 800, Tulsa, Oklahoma, 74103.

Brenda Brumbaugh
Legal Representative

Sworn to and subscribed before me this date:

3/1/23

Amber Shell


Notary Public

AMBER SHELL
NOTARY PUBLIC - STATE OF OKLAHOMA
MY COMMISSION EXPIRES SEP. 11, 2023
COMMISSION # 19009197


My Commission expires

American Rescue Plan Resources

https://www2.tulsacounty.org/american-rescue-plan-resources/

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How may we help you?



American Rescue Plan Resources

Home / American Rescue Plan Resources

The American Rescue Plan Act (ARPA) is meant to provide relief and recovery from the lasting impacts of the COVID-19 pandemic. Here you'll find resources and information from various entities offering ARPA-related funding opportunities for small businesses, housing, arts, economic development and more.

[Oklahoma American Rescue Plan Act](#)

The state of Oklahoma received \$1.3 billion for counties, cities and local communities. Visit the state's website to learn more about their review process and requirements to apply for funding.

[Oklahoma Housing Finance Agency](#)

The Oklahoma Homeowner Assistance Fund provides financial assistance for homeowners who have experience a significant reduction or loss of income or significant increase in expenses due to COVID-19 and have been unable to remain current on their mortgage, insurance, property tax or homeowner's association due payments. Oklahomans in need of assistance can complete an


Related Links

- [ARP Home Application Plan Draft](#)
- [2021 Tulsa County Recovery Plan](#)
- [2022 Tulsa County Recovery Plan](#)
- [Oklahoma Homeowner Assistance Fund](#)
- [FCC Affordable Connectivity Program](#)
- [Rental Assistance Program](#)
- [COVID-19 Funeral Assistance through FEMA](#)

News

- [Tulsa County, Muscogee Nation Health Department Announce Funding For COVID 19 Clinic](#)
- [Tulsa County Approves More Than Half Of ARP Funds In First Six Months](#)
- [Tulsa County Allocates \\$13.4 Million To ARP Projects, Including Airport Infrastructure](#)
- [Tulsa County Allocates \\$50 Million To Health](#)

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News and Updates

Tulsa County HOME Consortium HOME-ARP Draft Allocation Plan Comment Period Open

The Department of Housing and Urban Development has allocated Tulsa County HOME Consortium HOME-American Rescue Plan funding in the amount of \$4,049,107.00 to address housing needs for qualified populations within the HOME Consortium's service area of 6 counties and 18 jurisdictions. A draft Allocation Plan which recommends allocation of these funds will be available for a **15-day public review and comment period until March 15, 2023**. The public is invited to review the document online and make comments on the proposed allocation of funds. Comments where feasible, will be incorporated into the Allocation Plan to be submitted to HUD by March 31, 2023. Comments should be directed to INCOG, 2 West 2nd St., Suite 800, Tulsa, Oklahoma, 74103.

[Click here for the Tulsa County HOME Consortium HOME-ARP Draft Allocation Plan](#)

Section 5310 Transportation Funding Grant Application Period Open

As the Designated Recipient of the Enhanced Mobility for Seniors and Individuals with Disabilities – Federal Transit Administration Section 5310 Program funds, INCOG is announcing a call for projects. The available funds are for projects that improve transportation for elderly individuals and people with disabilities. Projects have to be derived from the adopted Tulsa Transportation Management Area Coordinated Public Transportation - Human Services Transportation Plan.

The deadline for applications is 5:00 p.m., March 31, 2023. [Click here for more information.](#)

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Transportation Planner

Senior Transportation Planner

Community and Economic Development

Housing and Community Development

Principal Planner

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Needs Assessment and Gaps Analysis

A PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. Current data should be used, 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.

Information for the three (3) CoC's in the HOME Consortium service area are individually presented in the accompanying tables below.

OK-505 Northeast Oklahoma CoC (Rogers, Wagoner and Washington Counties only) Homeless Needs Inventory and Gap Analysis Table

Numbers reported in parentheses in table are totals for entire 11-county Northeast OK CoC service area; all beds and units are located outside of the three counties in Tulsa County HOME Consortium. Homeless count numbers are from February 2023 for Bartlesville only, obtained from City of Bartlesville community development director and do not represent the CoC-wide PIT count in February 2023 (data not yet available to public).

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	0 (15)	0 (2)	0 (26)	0	0								
Transitional Housing	0	0	0	0	0								
Permanent Supportive Housing	0	0	0 (6)	0	0								
Other Permanent Housing	0 (12)	0 (2)	0 (14)	0	0 (5)								
Sheltered Homeless						0 (46)	10 (53)	0 (1)	0 (75)				
Unsheltered Homeless						0	40 (76)	0 (3)	0 (4)				
Current Gap										DK	DK	14	14

Data Sources: 1. Point in Time Count (PIT) 2/22/2022; 2. Continuum of Care Housing Inventory Count (HIC) 2/8/2022; 3. Consultation

OK-500 North Central OK CoC (Creek and Osage Counties only)

Homeless Needs Inventory and Gap Analysis Table

Numbers reported in parentheses in table are totals for entire 8-county North Central OK CoC service area; all beds and units and homeless counts are located outside of the two counties in Tulsa County HOME Consortium. Current Gap shown on table obtained by using percentage of the population in the two counties (35%) to determine number of beds and units needed.

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	0 (73)	0 (31)	0 (43)	0	0								
Transitional Housing	0 (19)	0 (7)	0 (28)	0	0								
Permanent Supportive Housing	0 (8)	0 (6)	0 (16)	0	0 (13)								
Other Permanent Housing	0 (55)	0 (48)	0 (18)	0	0								
Sheltered Homeless						0 (14)	0 (93)	0	0 (12)				
Unsheltered Homeless						0	0 (88)	0 (11)	0				
Current Gap										DK	DK	63	63

Data Sources: 1. Point in Time Count (PIT) 1/27/2022; 2. Continuum of Care Housing Inventory Count (HIC) 2/8/2022; 3. Consultation

OK-501Tulsa City & County OK CoC
Homeless Needs Inventory and Gap Analysis Table

Numbers reported in parentheses in table are totals for entire Tulsa City & County OK CoC service area; all beds and units are located within the City of Tulsa limits and outside of the jurisdiction of the Tulsa County HOME Consortium. Homeless population was obtained from Housing Solutions (CoC lead agency) for PIT count outside of Tulsa city limits in January 2023.

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	0 (203)	0 (72)	0 (575)	#	0 (18)								
Transitional Housing	0 (77)	0 (26)	0 (190)	0	0 (31)								
Permanent Supportive Housing	0 (55)	0 (15)	0 (525)	#	0 (244)								
Other Permanent Housing	0 (114)	0 (34)	0 (131)	#	0 (16)								
Sheltered Homeless						0 (67)	6 (417)	0 (37)	0 (138)				
Unsheltered Homeless						6	17 (340)	2 (38)	3 (78)				
Current Gap										0	0	23	23

Data Sources: 1. Point in Time Count (PIT) 1/27/2022; 2. Continuum of Care Housing Inventory Count (HIC) 2/8/2022; 3. Consultation

Housing Needs Inventory and Gap Analysis Table
Totals for Six Counties in HOME Consortium Service Area (Excludes City of Tulsa)

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	53,995		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	3,380		
Rental Units Affordable to HH at 50% AMI (Other Populations)	2,970		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		5,815	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		2,135	
Current Gaps			1,600

Data Sources: 1. American Community Survey (ACS) 2017-2021 5-year narrative profile; 2. Comprehensive Housing Affordability Strategy (CHAS) 2015-2019

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

Homeless as defined in 24 CFR 91.5

Within the service area of the HOME Consortium, the great majority of both homeless individuals and families and the support services to assist them are located within the City of Tulsa as the second largest urban area in the state. Tulsa County operates an emergency non-congregate family shelter within the city limits. Homeless populations exist outside of the City of Tulsa in concentrated pockets, generally along major expressway corridors (south and east) and along the Arkansas River levy (west). Unsheltered populations located closer to the city limits may reside outside of the city during the night and seek services inside the city during the day. The larger communities in the Consortium area are Broken Arrow, Owasso and Sand Springs in Tulsa County; Bartlesville in Washington County; Claremore in Rogers County; and Sapulpa in Creek County. Each of these communities are experiencing a growing number of homeless populations but lack the resources or partnerships with expert service providers to establish services to assist. Several faith-based organizations operate emergency shelters in these communities; however, they are not a part of the CoC system and do not participate in coordinated entry or assessment protocols to determine readiness for housing.

During the January 2023 Point in Time Count conducted by the Tulsa City-County Continuum of Care, outreach teams were sent to established encampments out of the city. A special tabulation of the demographics of the count in unincorporated Tulsa County was provided by Housing Solutions, the TCC CoC lead. The count found a total of 23 homeless individuals/families in various locations around the County; 17 were counted as Unsheltered and 6 were in emergency shelters such as hotels. Eighty-seven percent (87%) were single persons and 13% were with a spouse or partner. No households with children were counted. Two unsheltered veterans meeting the definition of chronic homeless were counted. By race, White accounted for 52% of the count and the majority were unsheltered. American Indian and Black both accounted for five of the persons counted. Three of the persons counted were homeless due to domestic violence.

Tulsa County Uninc Point-in-Time Count	HH	Spouse/ Partner	Grand Total
Emergency Shelter (Hotel voucher)	6		6
Unsheltered	14	3	17
Grand Total	20	3	23

By Age Group / PIT Location Category	HH	Spouse/ Partner	Grand Total
18-24 years old	1		1
Unsheltered	1		1
25-34 years old	4	2	6
Unsheltered	4	2	6
35-44 years old	4	1	5
Unsheltered	4	1	5
45-54 years old	3		3
Emergency Shelter (Hotel voucher)	3		3
55-61 years old	5		5
Emergency Shelter (Hotel voucher)	2		2
Unsheltered	3		3
62+ years old	1		1
Emergency Shelter (Hotel voucher)	1		1
(blank)	2		2
Unsheltered	2		2
Grand Total	20	3	23

Veteran Sub-population/Chronic Homelessness	Count
Unsheltered	2
Grand Total	2
By Race / PIT Location Category	Count
American Indian, Alaska Native, or Indigenous	5
Emergency Shelter (Hotel voucher)	1
Unsheltered	4
Asian or Asian American	1
Emergency Shelter (Hotel voucher)	1
Black, African American, or African	5
Emergency Shelter (Hotel voucher)	3
Unsheltered	2
White	12
Emergency Shelter (Hotel voucher)	1
Unsheltered	11
Grand Total	23
By Tribal Citizenship / PIT Location Category	Count
Emergency Shelter (Hotel voucher)	1
Creek	1
Unsheltered	7
Cherokee	1
Choctaw	1
Creek	1
Osage	2
Seminole	1
Sioux	1
Grand Total	8

By Ethnicity / PIT Location Category	Count
Hispanic/Latin(a)(o)(x)	2
Non-Hispanic/Non-Latin(a)(o)(x)	21
Grand Total	23

By Gender / PIT Location Category	Total
Female	6
Emergency Shelter (Hotel voucher)	1
Unsheltered	5

Male	17
Emergency Shelter (Hotel voucher)	5
Unsheltered	12
Grand Total	23

By Sexual Orientation	Total
Heterosexual	18
Emergency Shelter (Hotel voucher)	6
Unsheltered	12
(blank)	5
Unsheltered	5
Grand Total	23

Before experienced homelessness, lived in...	Count
Oklahoma - NOT Tulsa County	4
Outside of Oklahoma	3
Tulsa County	15
(blank)	1
Grand Total	23

Cause: Domestic Violence	Count
25-34 years old	2
35-44 years old	1
Grand Total	3

Numbers and demographics of any homeless populations formally counted in the PIT count conducted by the Northeast CoC and the North Central CoC are unknown at this time. Anecdotally, 50 persons were counted in Bartlesville and 20 were counted in Sapulpa with no demographics provided.

At Risk of Homelessness as defined in 24 CFR 91.5

At-Risk of Homelessness is defined as an individual or family who has an annual income below 30 percent of median family income for the area and who do not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter.

Within the six-county service area of the HOME Consortium, and excluding the PJ City of Tulsa data, there are a total of 53,995 rental units according to the Comprehensive Housing

Affordability Strategy (CHAS) 2015-2019. The CHAS tables show that there are 5,815 renter households with 1 or more severe housing problems with incomes between 0% to 30% of AMI. These households are defined as At-Risk of Homelessness. Rental units affordable to households at 30% of AMI total 3,380, leaving a gap of 2,435 affordable units in the region. This places this vulnerable population at risk of not being able to obtain units affordable to them. Further, evictions of households in this 0%-30% AMI category have dramatically increased due to job loss due to COVID, resulting in an increase in unsheltered homeless populations.

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

There is very limited data for these categories of qualifying populations within the HOME Consortium service area due to the lack of service providers assisting these populations in the areas outside of the City of Tulsa.

Three of the unsheltered 23 persons reporting homelessness in the 2023 PIT count locations outside of the City of Tulsa in the County reported domestic violence as the cause of homelessness. Two of the respondents were aged 25-34 years old, and one respondent was in the 35-44 year old category. No other demographics are available.

Human trafficking exists within the HOME Consortium service area, but exact statistics and demographics isolated to the geographic area are difficult to obtain. On a state-wide basis, the National Human Trafficking Hotline reported that in Oklahoma in 2021, of the 406 “signals” received by the Hotline, 206 signals were received from victims or survivors of human trafficking. Of the 99 cases identified in 2021, 180 victims were involved. The types of trafficking identified were predominantly sex trafficking, and these were motel based. Twelve (12) of 99 cases requested immediate shelter or crisis response. Eighty-two percent (82%) were adults; 96% were female. The City of Tulsa receives funding through the Violence Against Women Act to improve criminal justice responses to sexual assault and domestic violence. DVIS and Family Safety Center provide direct housing, shelter assistance and support services to those fleeing domestic violence. Services are provided within the city limits of Tulsa, once again.

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

Within the six-county service area of the HOME Consortium, and excluding the PJ City of Tulsa data, there are a total of 53,995 rental units according to the Comprehensive Housing Affordability Strategy (CHAS) 2015-2019. CHAS data shows that Renter households with incomes at 30%-50% of AMI with 1 or more severe housing problems total 2,135 for the region. Rental units affordable to households at 50% of AMI total 2,970, demonstrating a modest surplus of 835 rental units to households within this income level. Housing

instability is still a possibility due to the small number of surplus units, and efforts should be made to create more affordable housing for this population.

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.

The HUD Continuum of Care Homeless Assistance Programs Housing Inventory Count Report for each of the three COCs in the HOME Consortium service area was consulted to obtain the locations of the type of housing (shelter, transitional, permanent supportive and rapid re-housing) and the names of the providers operating the housing.

Within the North Central CoC, none of the locations or providers are located in either Creek or Osage Counties. Locations were in Enid, Stillwater, Payne County, or Ponca City;

Within the Northeast CoC in Rogers, Wagoner and Washington Counties;

The Lighthouse Outreach Center- 65 bed faith-based 24-hour homeless shelter in Bartlesville, only shelter within a 50-mile radius.

Within the Tulsa City County CoC and providing services and housing outside of the city limits:

The Spring- 65 bed faith based emergency shelter located in Sand Springs provides victims of domestic violence and human trafficking services and shelter.

A New Leaf- housing for 62 clients in permanent supportive housing campus, located in Owasso and serving individuals with developmental disabilities and autism.

Through Broken Arrow Neighbors, Owasso Community Resources and Caring Community Friends Sapulpa, CARES Act funding through CDBG-CV and ERAP provided rental and utility assistance to households impacted by COVID to prevent evictions and homelessness. These funds have been expended.

Within the city limits of Tulsa, there are a myriad of resources available to assist qualifying populations with congregate shelter, supportive services, tenant based rental assistance, and permanent supportive rental housing (see HUD Continuum of Care Homeless Assistance Programs Housing Inventory Count report for listing for Tulsa City County CoC. A Way Home For Tulsa membership demonstrates Tulsa's exceptional homeless support network.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

Per consultation with service providers and the HUD housing inventory count, there are currently not enough (or often any) emergency shelters, non-congregate shelters,

transitional housing units, or affordable rental units for families and individuals experiencing homelessness in the service area.

At Risk of Homelessness as defined in 24 CFR 91.5

Throughout the Consortium service area, as described by consultations with providers, currently housed but at risk of homelessness populations lack access to tenant-landlord mediation that would assist in resolving potential evictions of cost and income burdened households. A lack of safe and secure affordable rental housing units slows the placement of homeless households out of emergency shelters and into supportive housing.

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

As is the case with the other qualifying populations of homeless or at risk of homelessness, for this qualifying population there is also a shortage of safe and secure affordable rental housing, shelters, and supportive services to assist the growing number of victims.

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

Populations requiring specialized services such as individuals with mental and developmental disabilities and the elderly with fixed incomes have the most access to housing and services within the region, resulting in a smaller unmet need than the other qualifying populations.

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

A lack of shelters and housing inventory within the services area is noticeable from an examination of the Housing Inventory Count.

Identify priority needs for qualifying populations:

Priority needs were identified through consultations with many service providers in the region.

All identified the priority needs of:

- Affordable rental housing for all four qualifying populations;

- Non-Congregate shelters particularly for families in order to remain together as a family unit whether due to experiencing unsheltered homelessness or domestic violence ;

- Supportive Services:

 - Legal aid to prevent evictions

 - Landlord education to expand the number of landlords accepting qualifying populations

 - Expanded case management with permanent supportive housing units.

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 HOME Consortium does not receive ESG or HOPWA funds and has limited experience with providing housing and services to the four qualifying populations in relation to addressing homelessness. Both Tulsa County and INCOG have representatives on the Tulsa City County Continuum of Care governing body Leadership Council, called A Way Home For Tulsa. Resources within the Tulsa City County CoC are generally focused on shelter and housing and service delivery within the City to assist the greatest concentration of the qualifying populations. The level of need and gaps in shelter and housing inventory, and service delivery systems for the Consortium's service areas outside of the City were determined principally from consultation with organizations operating within the counties in the Consortium.

HOME-ARP Activities

Tulsa County, through INCOG as its' HOME ARP program administrator, will use a Request for Proposal process similar to the process utilized in the regular HOME program. Applications for activity funding to select non-profit developers, service providers, or subrecipients will be developed, outlining a scope of services and point system for award. Applicants for funding will be required to complete a Development Capacity application to determine organization capacity prior to award of funding. RFPs will be advertised in local media outlets and direct solicitation of qualified developers.

Tulsa County will contract administration of HOME-ARP funds to INCOG (Council of Governments). Subrecipients will be utilized for eligible activities, with oversight by INCOG.

Since the formation of the Tulsa County HOME Consortium in 1994, Tulsa County has had an Administrative Services Agreement with INCOG for administration of the HOME program. Tulsa County will again contract with INCOG for administration of HOME-ARP funds. INCOG will provide oversight of subrecipients selected for eligible activities.

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	\$ 95,000.00		
Acquisition and Development of Non-Congregate Shelters	\$ 1,000,000.00		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 2,794,401.65		
Non-Profit Operating	\$ 0	# %	5%
Non-Profit Capacity Building	\$ 0	# %	5%
Administration and Planning	\$ 204, 705.35	# 5%	15%
Total HOME ARP Allocation	\$ 4,094,107.00		

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

Based on consultation with area subject expert providers and data from the needs assessment and gap analysis highlighting a lack of facilities and services throughout the Consortium service area, the HOME Consortium has allocated funding to:

- Development of Affordable Rental Housing;
- Acquisition and Development of Non-Congregate Shelters, and;
- Supportive Services.

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:

Through a robust consultation process across six counties with agencies and groups that provide a variety of housing, social services and shelter to the qualified populations, priority needs were identified, and the use of the PJ Tulsa County's allocation was developed. The shelter and housing inventory for the service area points to a lack of both outside of the City of Tulsa. The service delivery system is focused on areas of the three CoC other than the HOME Consortium service areas. Needs identified in the housing gap analysis demonstrate that more affordable rental units are needed for homeless and to prevent the at-risk of homeless populations from becoming homeless. There is a need for new and continued provision of wrap-around services to support long-term stability for those populations who transition to housing from shelters, and to prevent at-risk populations from losing housing through evictions and cost burden.

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:

Using the HOME-ARP Housing Production Goal Calculation Worksheet provided in the Allocation Plan template, the Tulsa County HOME Consortium proposes to produce 18 affordable rental housing units of permanent support housing for qualifying populations. The development partners producing the housing will be encouraged to seek additional funding sources such as Federal Home Loan Bank- Affordable Housing Program grant funds to expand the number of units created.

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:

Eighteen (18) affordable rental units of permanent support housing for qualifying populations will be produced with the amount of HOME-ARP funds reserved for the development of affordable rental housing in the proposed budget. The priority for affordable rental units is based on the lack of rental units available in the region for qualifying populations, and while the goal of the production of 18 units is far below the need identified, combined with support services, the region will see some benefit to vulnerable populations.

The production of non-congregate shelter units will assist households in transition to permanent housing.

Preferences

Feedback received through consultations did not lead to any preferences, methods of prioritization, or limitations on eligibility of the qualified populations for any of the HOME-ARP activities. Consistent with the HOME Consortium's needs assessment and gap analysis, the Tulsa County HOME Consortium does not intend to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project because unmet needs or gaps in benefits and services received by individuals and families in the qualifying populations or subpopulations of qualifying populations were not identified as needing preferences.

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).

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):

The Tulsa County HOME Consortium will not use the coordinated entry (CE) process established by a CoC because the Consortium service area includes three CoC's with varying CE processes. Projects locations to be funded with HOME-ARP will be determined and selected through a Request for Proposal process from qualified developers. After the locations are determined, dependent on the type of project funded, the CE process in place by the geographic CoC may be re-examined, and if necessary a Substantial Amendment #2 may be initiated.

Limitations in a HOME-ARP rental housing or NCS project

The Tulsa County HOME Consortium does not intend 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 .

HOME-ARP Refinancing Guidelines

The Tulsa County HOME Consortium HOME-ARP program will not extend the use of HOME-ARP funds to the refinancing of existing debt secured by multifamily rental housing rehabilitated with HOME-ARP funds, and therefore, no HOME-ARP refinancing guidelines have been established.