



Tulsa County HOME Consortium

HOME- American Rescue Plan (ARP)

DRAFT

Allocation Plan

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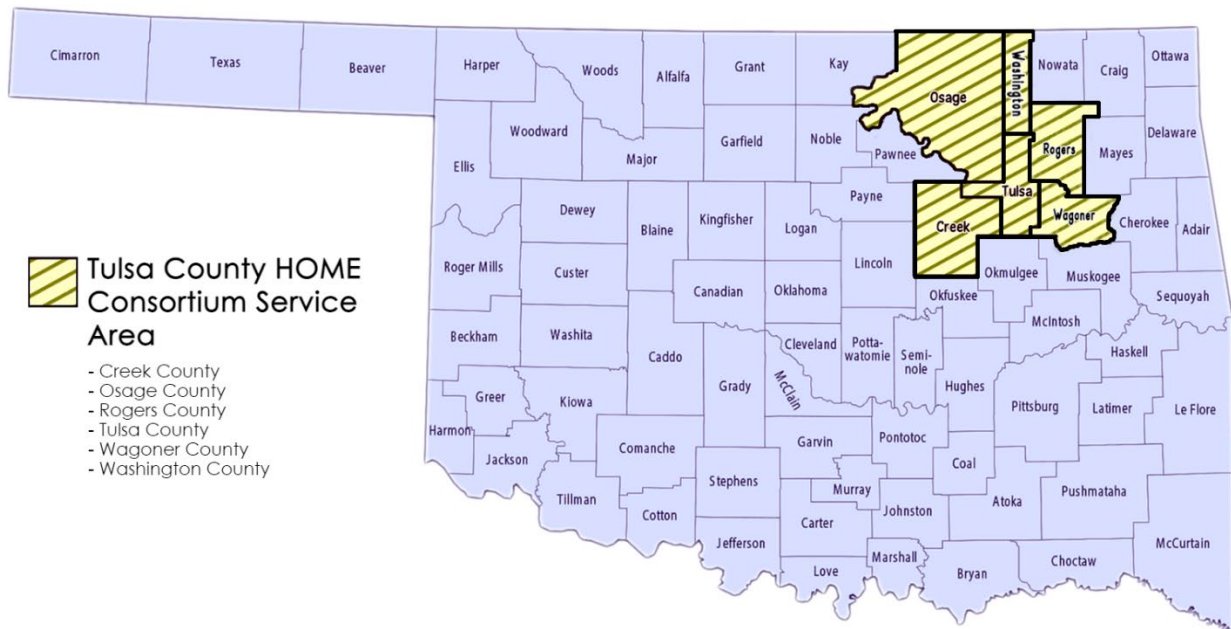
Tulsa County HOME Consortium HOME-ARP Allocation Plan

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 \$4,049,107.00 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

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

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:

Enter narrative response here.

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

Enter narrative response here.

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	\$ 50,000.00		
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	\$ 4,049,107.00		

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.