

City of Tulsa

HOME-American Rescue Plan (ARP)

Allocation Plan



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City of Tulsa HOME-ARP Allocation Plan

PREPARED BY THE GRANTS ADMINISTRATION-CITY OF TULSA FINANCE DEPARTMENT

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Introduction

On March 11, 2021, the United States Congress appropriated \$5 billion in American Rescue Plan (ARP) funds to be administered through HOME to perform four activities that must primarily benefit qualifying individuals or households who are experiencing homelessness, at risk of homelessness, and other vulnerable populations. There are six eligible activities: (1) development and support of affordable housing, (2) tenant-based rental assistance (TBRA), (3) provision of supportive services, (4) acquisition and development of non-congregate shelter (NCS) units, (5) administration and planning; and (6) nonprofit operating & capacity building assistance.

In September 2021, HUD awarded the City of Tulsa \$6,477,826 in HOME-ARP funds. To receive this funding, the City of Tulsa must develop and submit a HOME-ARP Allocation Plan to HUD, which describes the distribution of HOME-ARP funds and identifies any preferences for eligible activities. The City of Tulsa must also include in the development of the HOME-ARP allocation Plan stakeholder consultation and community engagement. The following is the City's HOME-ARP allocation plan.

Consultation

For the consultation process, the City of Tulsa invited agencies whose clientele serves HOME-ARP qualifying populations to attend virtual consultation sessions. A Needs Assessment Survey was open to service providers and the public to gain greater insight to the priority of needs for the qualifying populations. Four virtual consultation sessions were held with all the required and other various agencies. These virtual consultation sessions were broken up into the following groups: CoC, homeless, and at-risk homeless service providers; domestic violence service providers; public health, civil rights, housing, and disability service providers; and veteran service providers. Through the consultation process, 20 service providers attended the sessions and were invited to provide responses through the Needs Assessment Survey. The Needs Assessment Survey (April 2022) captured 27 responses from the public and service providers.

Consultation Sessions

The City of Tulsa held four Consultation sessions in December 2021. The virtual sessions included a presentation about the HOME-ARP program, similarities, and differences of this program with the HOME and ESG program, eligible activities, and the qualifying populations that must benefit from the eligible activities. Participants' comments can be summarized as:

Homeless and At-risk of Homelessness Session (12/7/21)

- Needs expressed:
 - Rehab of existing rental units
 - New construction and acquisition of multi-family rental units
 - Increase legal supportive services in response to high numbers of evictions
 - Lack of affordable housing units due to increase in rent costs

Domestic Violence Consultation Session (12/7/21)

- Needs expressed:
 - Attendees were present, but no comments were made at this time.

Public Health, Civil Rights, and Housing Session (12/9/21)

- Needs expressed:
 - Supportive Services for legal housing needs
 - New construction and acquisition for rental units

Veterans Session (12/9/21)

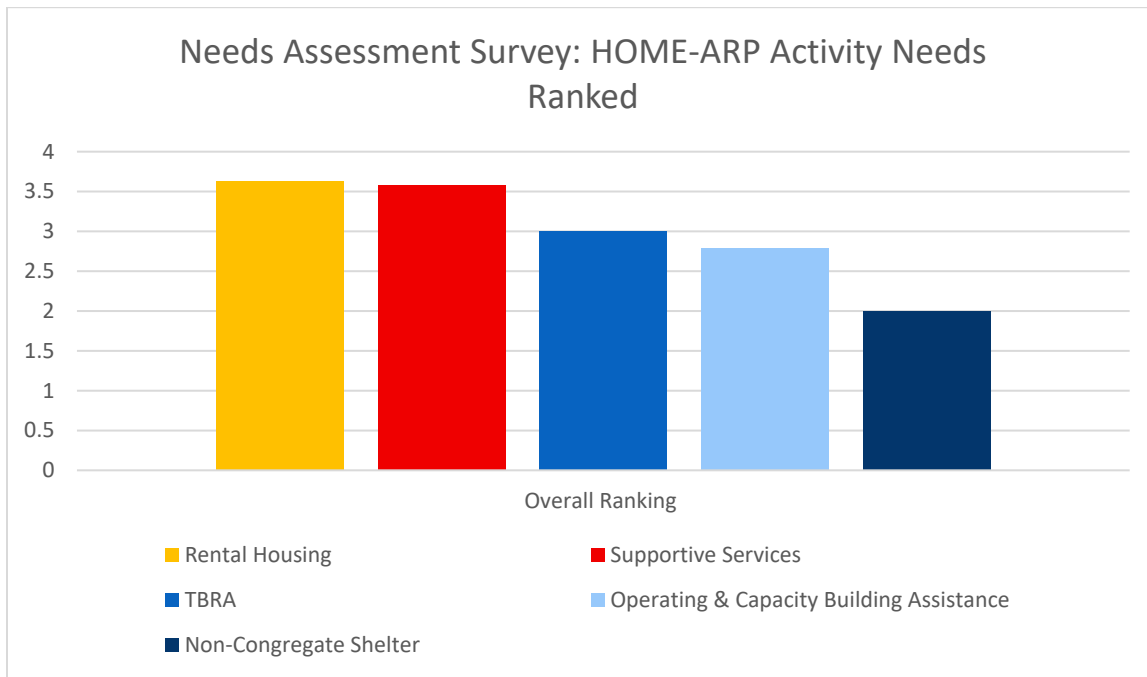
- Needs expressed:
 - Capacity building operations
 - Rehab of existing rental units

HOME-ARP Needs Assessment Survey (April 2022)

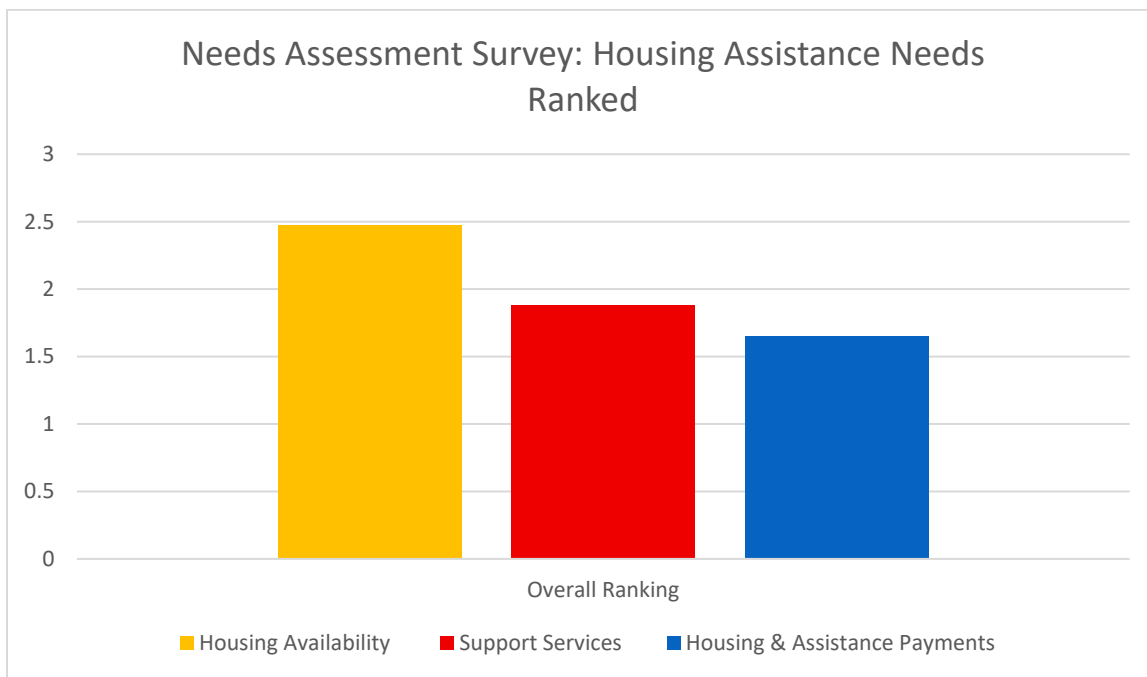
The Needs Assessment survey asked agencies to rank the HOME-ARP eligible activities by priority. The eligible HOME-ARP eligible activities are:

- Development of affordable rental housing
- Tenant-based rental assistance (TBRA)
- Supportive Services
- Acquisition and development of Non-Congregate Shelter (NCS)
- Operating & Capacity Building assistance

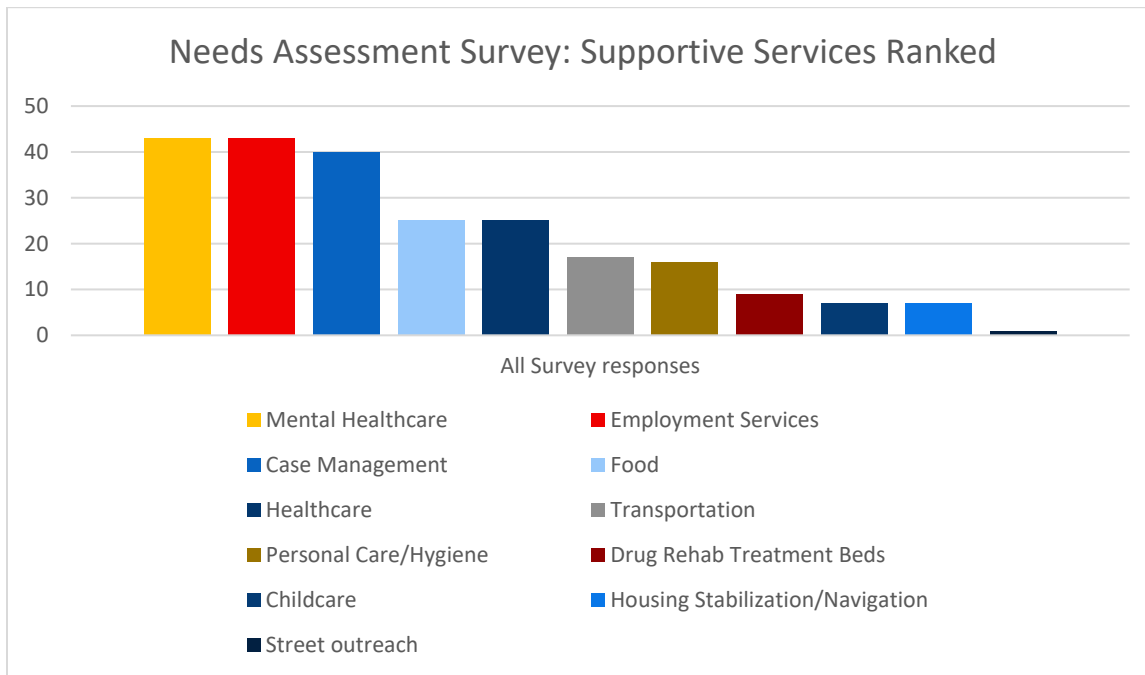
Survey responses identified development of Affordable Rental Housing as the top priority, followed by Supportive Services, TBRA, Operating & Capacity Building Assistance, and Non-Congregate Shelter.



The Needs Assessment survey was utilized for public input in ranking needs for Housing Availability, Supportive Services, and Housing Assistance Payments for all QPs. Housing Availability was ranked a top priority, followed by supportive services.



Survey results for agencies and the public indicated a ranking of the top 5 supportive service needs for those experiencing homelessness: Mental Healthcare, Case Management, Employment Services, Food, and Healthcare.



Participant’s comments from the Needs Assessment Survey can be summarized as follows:

Public

- General Comments:
 - Lack of affordable housing units
 - Lack of Education and Job Training services
 - Lack of housing besides emergency shelters
 - Lack of wrap around services
 - Lack of services and housing to at-risk population and low-income households
 - Lack of low-income housing programs: condominium units mixed with larger units
 - Lack of one- and two-person bedroom units
 - Lack of incentives to landlords to accept vouchers or offer affordable housing
 - Lack of new housing in replace of the dilapidated units that were torn down
 - Lack of Mental health services combined with rental assistance
 - Lack of housing loss prevention services

Public/Private Organizations

- General Comments:
 - Lack of mental health services and case management
 - Lack of affordable housing units
 - Lack of support for non-English speaking residents and those going through the immigration process
 - Lack of Supportive services

Homelessness and At-risk of Homelessness Providers

- General Comments:
 - Lack of affordable housing units
 - Lack of stabilization for mental health issues for clients needing housed
 - Lack of Justice-related supportive services
 - Lack of shelter or housing for families where they are not separated
 - Lack of housing developments
 - Lack of new rental housing units

Fair Housing Organizations

- General Comments:
 - Lack of legal supportive services, eviction rates are too high
 - Lack of transitional housing units and permanent housing
 - Lack of single occupant housing units
 - An abundance of vacant housing units left unoccupied for a lengthy amount of time

Domestic Violence Organizations

- General Comments:
 - Lack of affordable housing units in safe neighborhoods
 - Lack of wraparound service model to house people with mental and physical disabilities

All agencies were invited to attend one or more of the consultation sessions; however, not all who were invited attended. If “Consultation Session” is marked as a method of consultation in the table below this means they attended one of the various consultation sessions. To encourage further participation in providing comments regarding HOME-ARP program and Allocation Plan, survey invitations were sent out to community agencies and to the public.

Agency/Org Consulted	Type of Agency/Org	HOME-ARP QP(s)	Method of Consultation
Vintage House	Public Agency that addresses the needs of the Qualifying Populations (QPs)	All	Consultation Session & Survey Invitation
Indian Nations Council of Governments	Public/Private entity that addresses needs of QPs	All	Consultation Session & Survey Invitation

Volunteers of America	Public agency that addresses the needs of the QPs	All + Veterans	Consultation Session & Survey Invitation
Counseling & Recovery Service of Oklahoma	Private organization that addresses the needs of the QPs	All	Consultation Session & Survey Invitation
Mental Health Association of Oklahoma	Public agency that addresses the needs of the QPs	All	Consultation Session & Survey Invitation
Domestic Violence Intervention Services	Domestic Violence service provider	Domestic Violence	Consultation Session & Survey Invitation
Family and Children's Services	Public agency that addresses the needs of the QPs	All	Consultation Session & Survey Invitation
Family Promise of Tulsa County	Homeless service provider	Homeless	Consultation Session & Survey Invitation
Family Safety Center	Domestic Violence service provider	Domestic Violence	Consultation Session & Survey Invitation
Housing Partners of Tulsa	Private organization addressing fair housing (Approved HUD-Certified Housing Counseling Agency)	All	Consultation Session & Survey Invitation
Iron Gate	Homeless service provider	Homeless	Consultation Session & Survey Invitation
Legal Aid Services of Oklahoma	Civil rights organization	All	Consultation Session & Survey Invitation
Restore Hope Ministries	Private organization that addresses the needs of the QPs	All	Consultation Session & Survey Invitation
Tulsa Day Center	Homeless service provider	Homeless	Consultation Session & Survey Invitation
City Lights Foundation	Homeless service provider	Homeless	Consultation Session & Survey Invitation
Salvation Army	Public Agency that addresses the needs of the QPs	All	Consultation Session & Survey Invitation
Community Service Council	Public agency that addresses the needs of the QPs	All	Consultation Session & Survey Invitation
Crossover Community Impact	Public agency addresses the needs of the QPs	All	Survey Invitation
Housing Authority of the City of Tulsa (THA)	Public Housing Agency (PHA)	All	Survey Invitation

Tulsa Health Department	Public Government entity that addresses the needs of the QPs	All	Survey Invitation
Boomtown/Habitat for Humanity	Public agency that addresses the needs of the QPs	All	Survey Invitation
Community Action Project Tulsa	Public agency that addresses the needs of the QPs	All	Survey Invitation
Tulsa Police Department Crisis Intervention Unit	Public Government entity that addresses the needs of the QPs	All	Survey Invitation
EMSA	Public trust that addresses the needs of the QPs	All	Survey Invitation
South Tulsa Community House	Public agency that addresses the needs of the QPs	All	Survey Invitation
Community Food Bank of Eastern OK	Public agency that addresses the needs of the QPs	All	Survey Invitation
Tulsa Dream Center	Public agency that addresses the needs of the QPs	All	Survey Invitation
Resonance	Public agency that addresses the needs of the QPs	All	Survey Invitation
YWCA	Public agency that addresses the needs of the QPs	All	Survey Invitation
Center for Employment Opportunities	Public agency that addresses the needs of the QPs	All	Survey Invitation
Muscogee (Creek) Nation	Public/Private entity that addresses the needs of the QPs	All	Survey Invitation
Osage Nation	Public/Private entity that addresses the needs of the QPs	All	Survey Invitation
Cherokee Nation	Public/Private entity that addresses the needs of the QPs	All	Survey Invitation
John 3:16	Public/Private entity that addresses the needs of the QPs	All	Survey Invitation
Catholic Charities	Public/Private entity that addresses the needs of the QPs	All	Survey Invitation

First Baptist Church North Tulsa	Public/Private entity that addresses the needs of the QPs	All	Survey Invitation
North Peoria Church of Christ	Public/Private entity that addresses the needs of the QPs	All	Survey Invitation
Morning Star Baptist Church	Public/Private entity that addresses the needs of the QPs	All	Survey Invitation
First Baptist Church	Public/Private entity that addresses the needs of the QPs	All	Survey Invitation
Asbury Church	Public/Private entity that addresses the needs of the QPs	All	Survey Invitation
Jewish Federation of Tulsa	Public/Private entity that addresses the needs of the QPs	All	Survey Invitation
1st Presbyterian Outreach	Public/Private entity that addresses the needs of the QPs	All	Survey Invitation
1st United Methodist Church	Public/Private entity that addresses the needs of the QPs	All	Survey Invitation
Housing Solutions Tulsa	CoC lead agency & homeless service provider	Homeless	Survey Invitation
National Resource Center for Youth Services	Public entity (OU) that addresses the needs of the QPs	All	Survey Invitation
Morton Comprehensive Health Services	Public/Private entity that addresses the needs of the QPs	All	Survey Invitation
Surayya Ann Foundation	Homeless service provider	Homeless	Survey Invitation
Counseling & Recovery Service of Oklahoma	Homeless service provider	Homeless	Survey Invitation
Youth Villages	Public Government entity addresses the needs of the QPs & Veterans service provider	All + Veterans	Survey Invitation
Department of Veterans Affairs	Veterans service provider	All + Veterans	Survey Invitation
Tulsa CARES	Homeless service provider	Homeless	Survey Invitation

12 & 12	Public agency that addresses the needs of the QPs	All	Survey Invitation
BeHeard Movement	Homeless service provider	Homeless	Survey Invitation
Barracks for Vets	Veterans service provider	All + Veterans	Survey Invitation
Lindsey House	Domestic violence service provider	Domestic Violence	Survey Invitation
Tulsa Speech and Hearing Association	Private organization that addresses the needs of persons with disabilities	All	Survey Invitation
Life Senior Services	Public agency that addresses the needs of persons with disabilities and QPs	All	Survey Invitation
Ability Resources	Public agency that addresses the needs of persons with disabilities and QPs	All	Survey Invitation
The Center for Individuals with Physical Challenges	Public agency that addresses the needs of persons with disabilities and QPs	All	Survey Invitation
Area Agency on Aging	Public agency that addresses the needs of persons with disabilities and QPs	All	Survey Invitation
Tulsa Apartment Association	Private organization that addresses fair housing	All	Survey Invitation
Human Rights Commission	Public entity that addresses Fair housing for QPs	All	Survey Invitation

Public Participation

- ***Date(s) of public notice: 10/25/2022***
- ***Public comment period: start date –11/07/2022 end date – 11/21/2022***
- ***Date(s) of public hearing:11/10/2022***

The City of Tulsa provided for and encouraged citizen participation in the development of the HOME-ARP Allocation Plan. Council members and staff from the Grants Administration held workshops, HUD Community Development Committee meetings, and public hearings. In conducting public hearings to solicit input and comments from citizens, public hearings are posted and advertised with adequate advance notice (at least 14 days) to citizens and contain enough information, so the public will understand the event being announced. Hearings are held

at City Hall located at 175 East 2nd Street. Public hearings are conducted after normal business hours to solicit input from citizens on the proposed HOME-ARP allocation plan.

The City posted a notice of the 15-day review and comment period in the newspaper, The Tulsa World, as well as through various media channels, email newsletters, and on the city website. A digital draft of the plan was available for review and comment on the City of Tulsa website, which included accessible formats and translations in other languages. Physical copies were available upon request. Additionally, the HUD Community Development Committee for the City of Tulsa held a Public Hearing to comment on the City of Tulsa's Draft HOME-ARP Allocation Plan on November 10, 2022.

In developing the HOME-ARP allocation plan, the City of Tulsa took the following efforts to broaden public participation:

1. In December 2021, four consultation sessions were held with community service providers.
2. A Needs Assessment Survey was open to service providers and the public to gain greater insight to the HOME-ARP priority of needs for the qualifying populations in April 2022.
3. The Draft HOME-ARP Allocation Plan was posted on the city website, which includes the ability to accessible formats and translation in other languages during the 15-day comment period November 7, 2022, through November 21, 2022.
4. The HUD Community Development Committee for the City of Tulsa held a Public Hearing to comment on the Draft HOME-ARP Allocation Plan on November 10, 2022. This Public Hearing was held after business hours (5 p.m.) to encourage participation.

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

On the November 10, 2022, HOME-ARP public hearing no comments or recommendations were received about the Draft Allocation Plan.

During the 15-day public comment period of the Draft HOME-ARP Allocation Plan (November 7-21, 2022) there was one comment/question submitted through email to grantsadmin@cityoftulsa.org.

- **Comment:** "In my reading it says that HUD plans to spend \$4,506,826 on 20 units. In this case, what constitutes a unit and how many people/families will it house?"
- **Response:** "The estimated calculation of 20 affordable housing units to be produced with the allocation of \$4,506,826 is calculated using the [HOME-ARP Housing Production Goal Calculation Worksheet](#). This calculation is a high-level estimation using the example HUD has provided for a family of three and a two-bedroom unit. The HOME-ARP Rental Housing activity

may include single-family or multifamily housing, transitional or permanent housing, group homes, single-room occupancy (SRO) units, and manufactured housing. The City of Tulsa will be able to better answer this question in depth after the HOME-ARP Request for Proposals (RFP) process. The size of the exact unit(s) to be created and how many persons/families they may house will be narrowed down and more closely defined during this process.”

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

No comments or recommendations were not accepted.

Needs Assessment and Gaps Analysis

The Needs Assessment and Gaps Analysis section is broken into several sub-sections to help fully understand the needs of each HOME-ARP qualifying population (QP), the gaps of housing and services for QPs, and to determine the best use of HOME-ARP funding for the community of Tulsa. First, each QP will be assessed from various data sources to capture the size and demographic composition of each QP. Second, the current resources available to assist each QP will be assessed. Third, the unmet and housing needs for QPs are analyzed. Fourth, the gaps within the current shelter, housing inventory, and service delivery system will be analyzed. Fifth, the priority needs for QPs are established. Finally, the determination of the level of need for gaps in the shelter, housing inventory, and the service delivery system for all QPs is concluded.

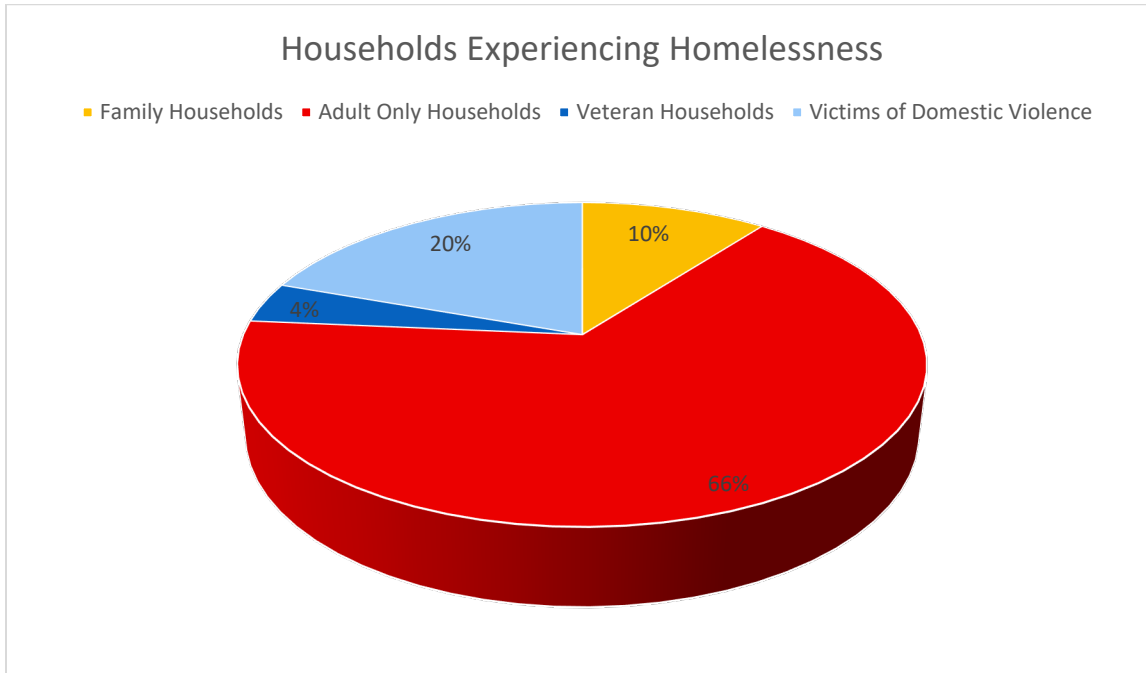
Size and Demographic Composition of Qualifying Populations

Homeless as defined in 24 CFR 91.5

To assess the size and data of the Homeless qualifying population, the Continuum of Care (CoC) By-Name List (BNL) data was used instead of the 2021 Point in Time (PIT) count data. At the time of constructing the HOME-ARP Allocation Plan the 2022 PIT count was not available and more recent BNL data was available. The BNL data showed a more true and current picture of persons experiencing homelessness in the month of July 2022 versus the PIT count in 2021, thus the BNL data is presented below.

According to CoC By-Name List data, within the City of Tulsa, there are total of 3,375 households experiencing homelessness as of July 2022. Of the total 3,375 households experiencing homelessness, 2,589 households were sheltered, and 786 households were unsheltered. Approximately 351 households, or 10% are family households (and are not veterans or victims of domestic violence). An estimated 2,228 households, or

66% are adult only households (and are not veterans or victims of domestic violence). Approximately 136 of households, or 4% are veteran households (and are not victims of domestic violence). Approximately 660 households, or 20% are victims of domestic violence (and are not veterans). The average number of days a person experiencing homelessness during 2021 was 79 days.

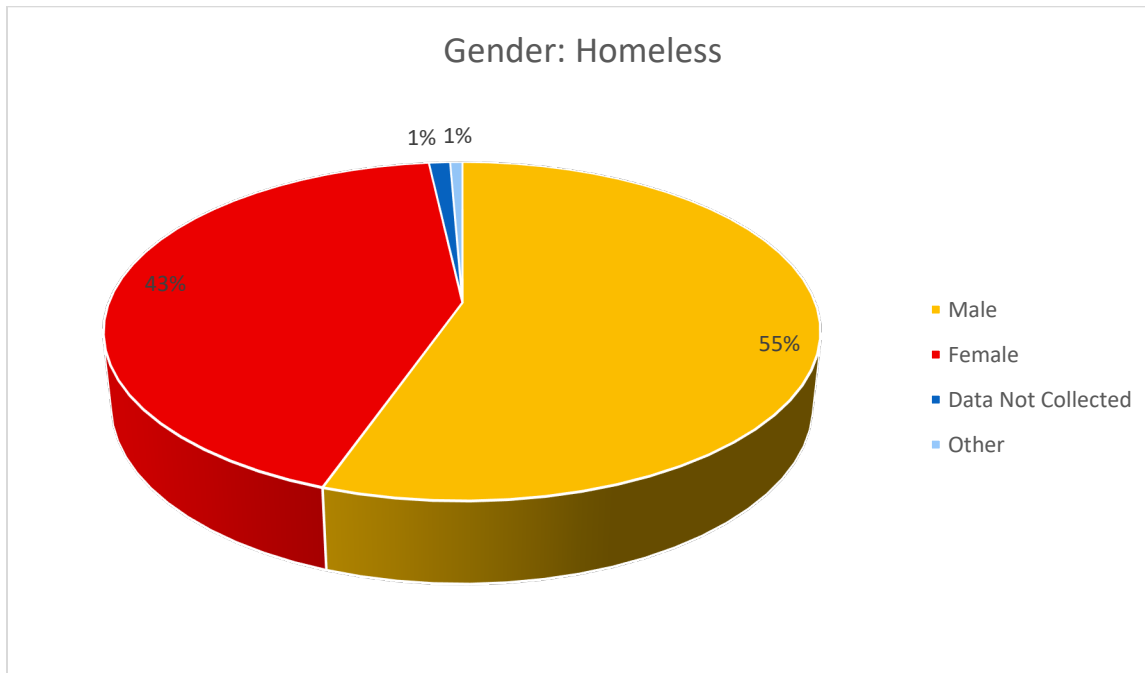


Data Source: CoC HMIS, By-Name List (July 2022)

Demographics:

Gender

- Male: 55%
- Female: 43%
- Data Not Collected: 1%
- Other-¹ 1%

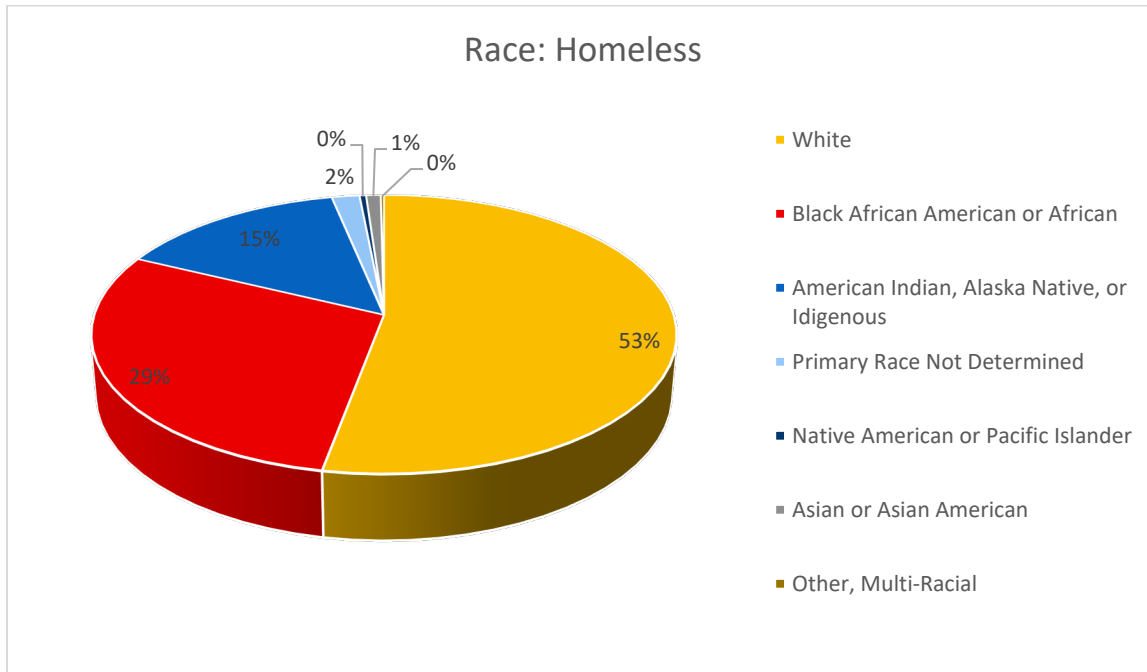


Data Source: CoC HMIS, By-Name List (July 2022)

¹ A Gender Other Than Singularly Female or Male (Nonbinary, Genderfluid, Agender, Culturally Specific Gender); Transgender; and Questioning.

Race

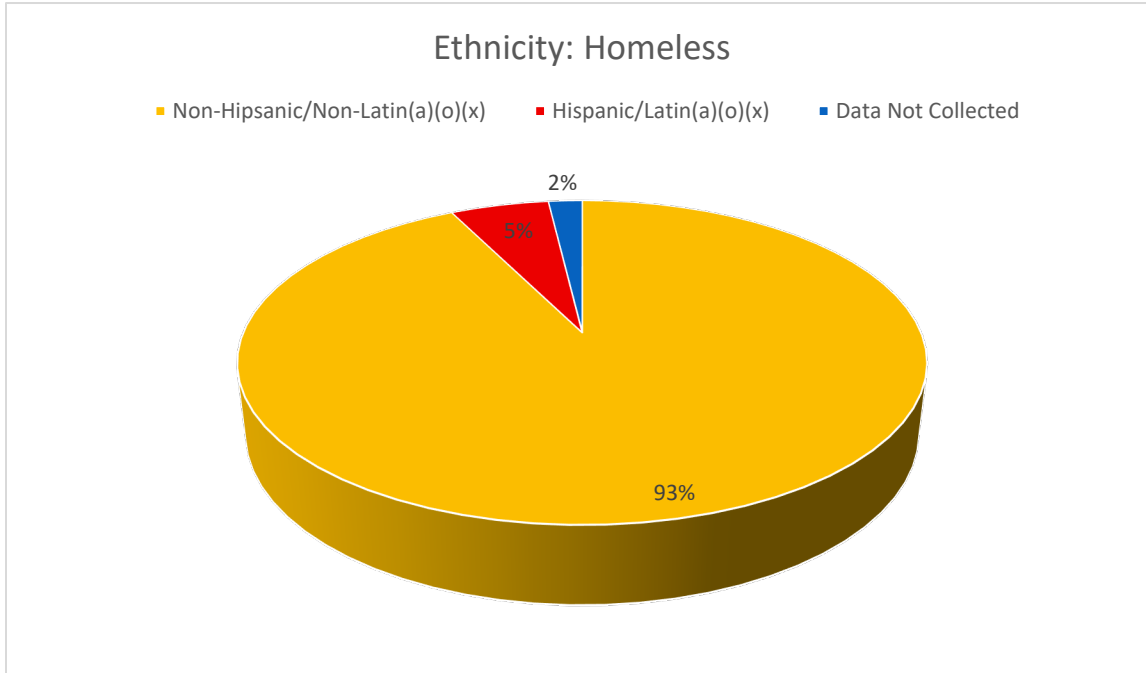
- White: 53%
- Black, African American, or African: 29%
- American Indian, Alaska Native, or Indigenous: 15%
- Primary Race Not Determined: 2%
- Native Hawaiian or Pacific Islander: 0%
- Asian or Asian American: 1%
- Other, Multi-Racial: 0%



Data Source: CoC HMIS, By-Name List (July 2022)

Ethnicity

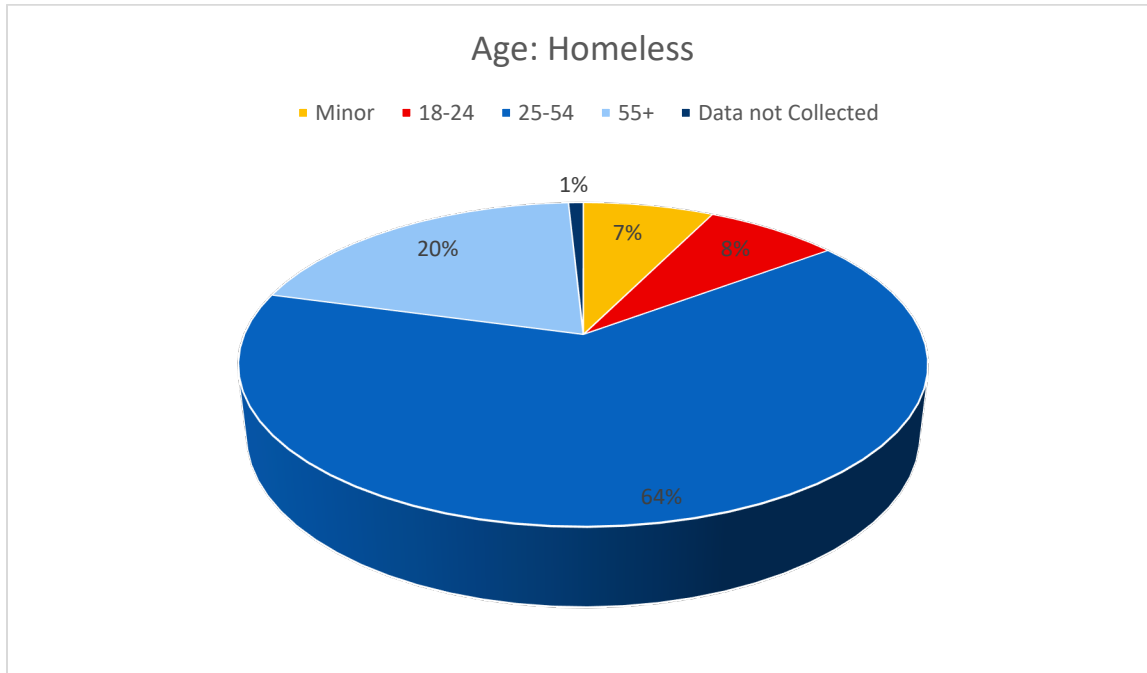
- Non-Hispanic/Non-Latin(a)(o)(x): 93%
- Hispanic/Latin(a)(o)(x): 5%
- Data Not Collected: 2%



Data Source: CoC HMIS, By-Name List (July 2022)

Age

- Minor: 7%
- 18-24: 8%
- 25-54: 64%
- 55+: 20%
- Data not Collected: 1%



Data Source: CoC HMIS, By-Name List (July 2022)

At Risk of Homelessness as defined in 24 CFR 91.5

(1) An individual or family who:

- (i) Has an annual income below 30% of median family income for the area, as determined by HUD;
- (ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “Homeless” definition in this section; and
- (iii) Meets one of the following conditions:
 - A. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - B. Is living in the home of another because of economic hardship;
 - C. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 - D. Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
 - E. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
 - F. Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
 - G. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

(2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act, section 637(11) of the Head Start Act, section 41403(6) of the Violence Against Women Act of 1994, section 330(h)(5)(A) of the Public Health Service Act, section 3(l) of the Food and Nutrition Act of 2008, or section 17(b)(15) of the Child Nutrition Act of 1966, or

(3) A child or youth who does not qualify as “homeless” under this section but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) of that child or youth if living with her or him.

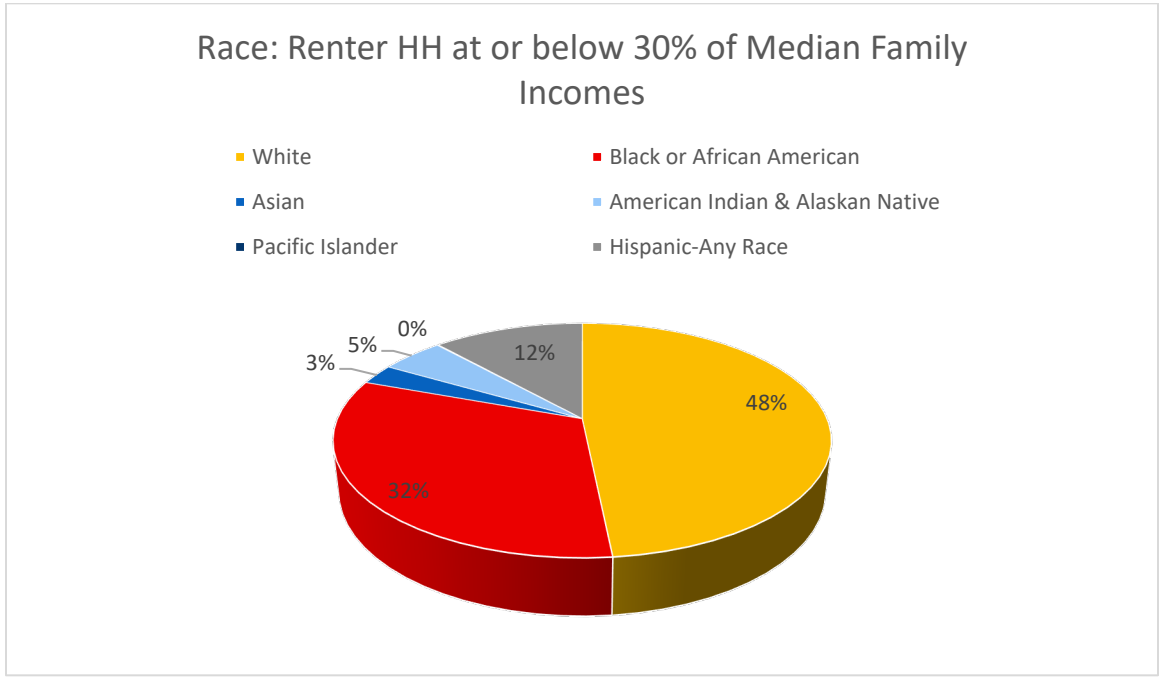
To assess the size and demographics of the at-risk HOME-ARP QP (1), as defined above, the Comprehensive Housing Affordability Strategy data is the most comprehensive data source in demonstrating the extent of housing problems and housing needs, particularly for low-income households. To assess the at-risk HOME-ARP QP (2) & (3), as defined above, various data was taken from national and local data sources to help better understand the population's size and demographics: National Runaway Hotline, 211 Community Service Council, CoC, McKinney-Vento Homeless Liaisons, and the Oklahoma Department of Education. The CoC gathers data from McKinney-Vento homeless liaisons in the Tulsa Public School system who are funded through the McKinney-Vento Homeless Assistance Act.

According to 2014-2018 CHAS data reports, the City of Tulsa is estimated to have 24,735 total households who are at or below 30% AMI. When extracting demographic data from 2014-2018 CHAS data reports, it can be estimated that there are 5,665 owner households and 19,070 renter households at or below 30% AMI. The estimated size and demographics of this population are broken down in the following pages.

Renter Households:

Race

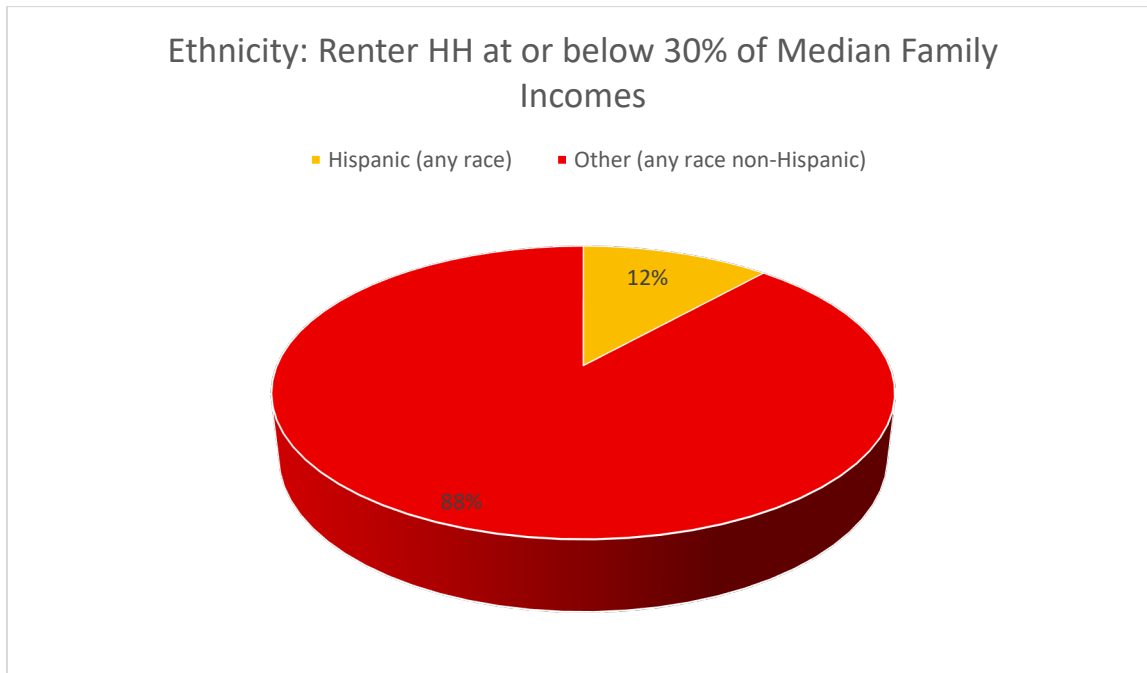
- White: 48 %
- Black or African American: 32%
- Asian: 3%
- American Indian and Alaskan Native: 5%
- Pacific Islander: 0%
- Hispanic, Any Race: 11.7%



Data Source: Comprehensive Housing Affordability Strategy (CHAS) 2014-2018

Ethnicity

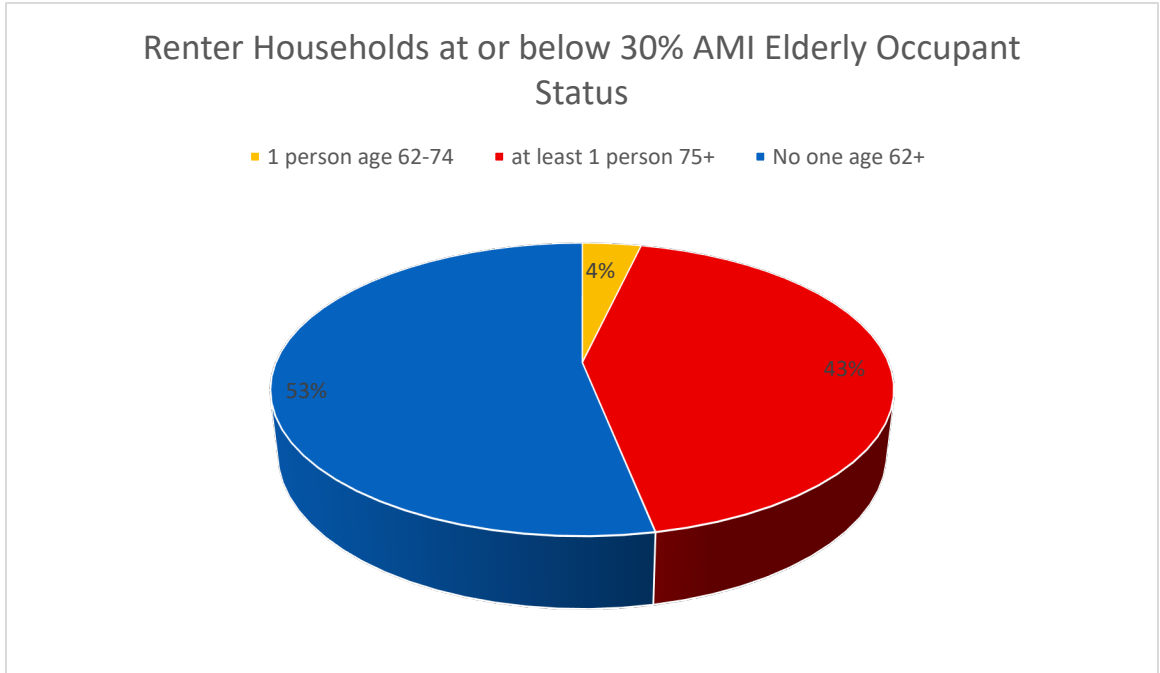
- Hispanic Any Race: 12%
- other (any race non-Hispanic): 88%



Data Source: Comprehensive Housing Affordability Strategy (CHAS) 2014-2018

Elderly Occupants in Renter Household Status

- HH contains 1-person age 62-74: 4%
- HH contains at least 1 person 75+: 43%
- HH contains no one age 62+: 53%

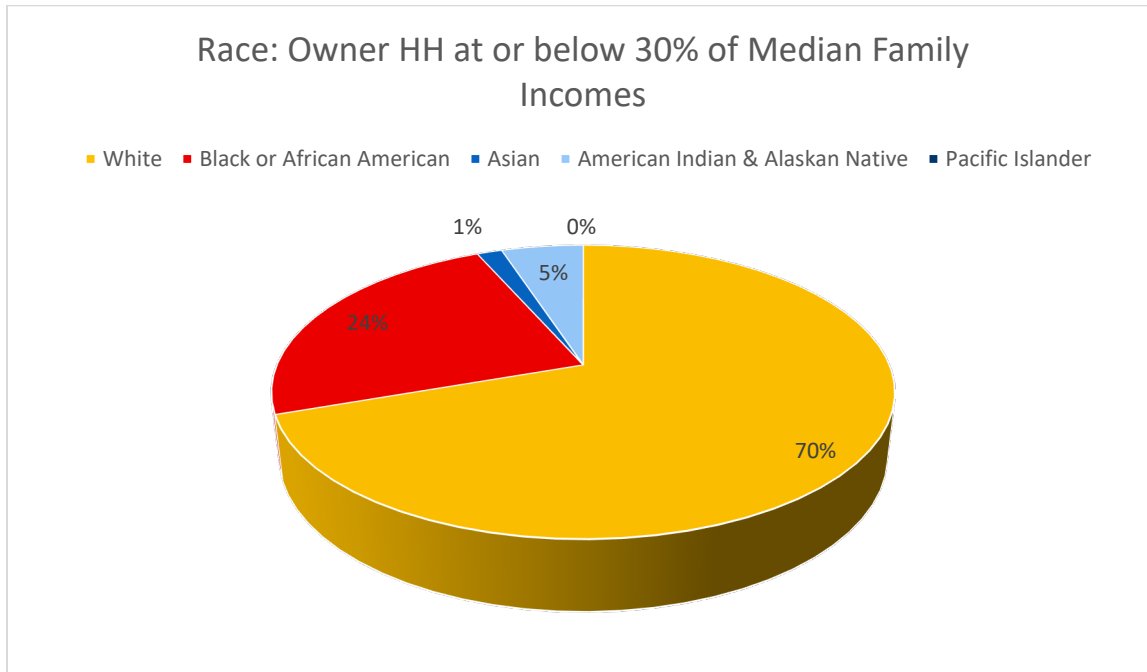


Data source: Comprehensive Housing Affordability Strategy (CHAS) 2014-2018

Owner Households:

Race

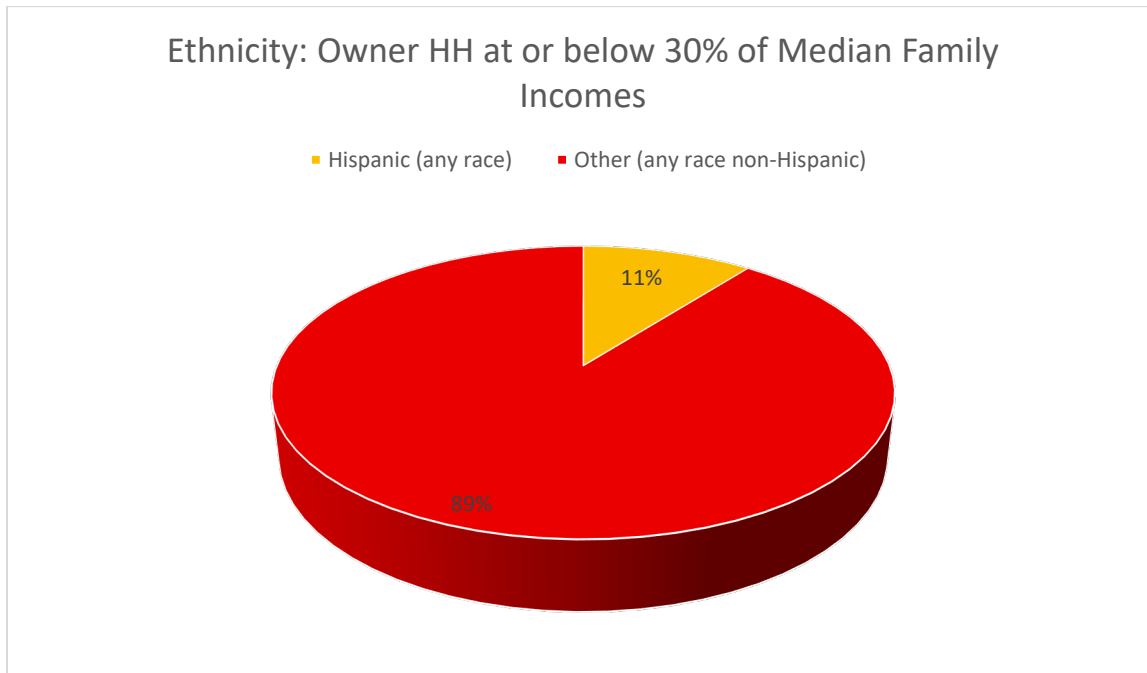
- White: 62%
- Black or African American: 21%
- Asian: 1%
- American Indian and Alaskan Native: 5%
- Pacific Islander: 0%
- Hispanic, Any Race: 11%



Data source: Comprehensive Housing Affordability Strategy (CHAS) 2014-2018

Ethnicity

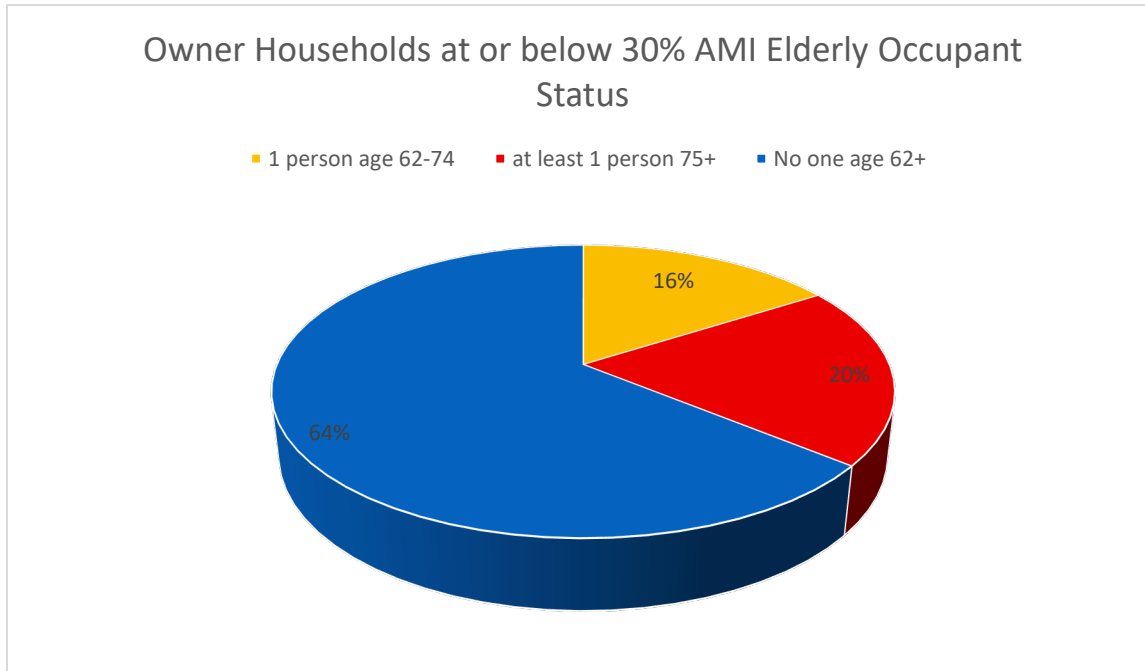
- Hispanic Any Race: 11%
- other (any race non-Hispanic): 89%



Data source: Comprehensive Housing Affordability Strategy (CHAS) 2014-2018

Elderly Occupants in Household Status

- HH contains 1-person age 62-74: 16%
- HH contains at least 1 person 75+: 20%
- HH contains no one age 62+: 64%



Data source: Comprehensive Housing Affordability Strategy (CHAS) 2014-2018

National Runaway Safeline reports that in 2021, 341 children in Oklahoma contacted the hotline. The Oklahoma Department of Education reports nearly 1,800 homeless students (age 12-18) in Tulsa County Schools from 2020-2021. Tulsa's 2022 Point in Time survey (a one-time snapshot of homelessness) documented 1,063 homeless people with 138 (13%) being transitional age youth. Of these youth, 62% were Black, Indigenous, and people of color. Additionally, the Community Service Council (2021) reports that Native American youth are twice as likely to experience homelessness as White youth. Based on available data, an estimated 1,800 runaway and homeless youth age 12 to 18 in Tulsa County need prevention and intervention services.

In 2022, per the Tulsa City and County Continuum of Care (CoC), Tulsa Public Schools estimated there were 429 students experiencing homelessness as defined under the McKinney-Vento Homeless Assistance Act. Union schools were estimated to have 945 students experiencing homelessness as defined under the McKinney-Vento Homeless Assistance Act. The school systems are staffed with Homeless Liaisons who assess the student's situation and work to remove any barriers for this population, connect the families with resources in the community, and make any accommodations necessary for the children to attend school.

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

To capture the size and the demographics of the population fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking that receives assistance or has reported the abuse, statewide and local data was gathered. According to the Violence Policy Center (2019), Oklahoma is ranked 8th in the nation for female domestic violence victims’ deaths.

The City of Tulsa receives funding through the Violence Against Women Act, which has helped implement the Improving Criminal Justice Responses to Sexual Assault, Domestic Violence, Dating Violence, and Stalking Grant Program (ICJR) and the data stemming from this program is the most accurate source to assess the entirety of this HOME-ARP QP. The data demonstrated in this section comes from semi-annual reports that are submitted and approved by the Department of Justice (DOJ). The ICJR program works to reduce violent crime against women and to promote victim safety through investing in law enforcement and increasing prosecution in Tulsa County. The ICJR program is a collaborative effort of the City, Tulsa Police Department, Domestic Violence Intervention Services, The Family Safety Center, and the Tulsa County District Attorney’s Office.

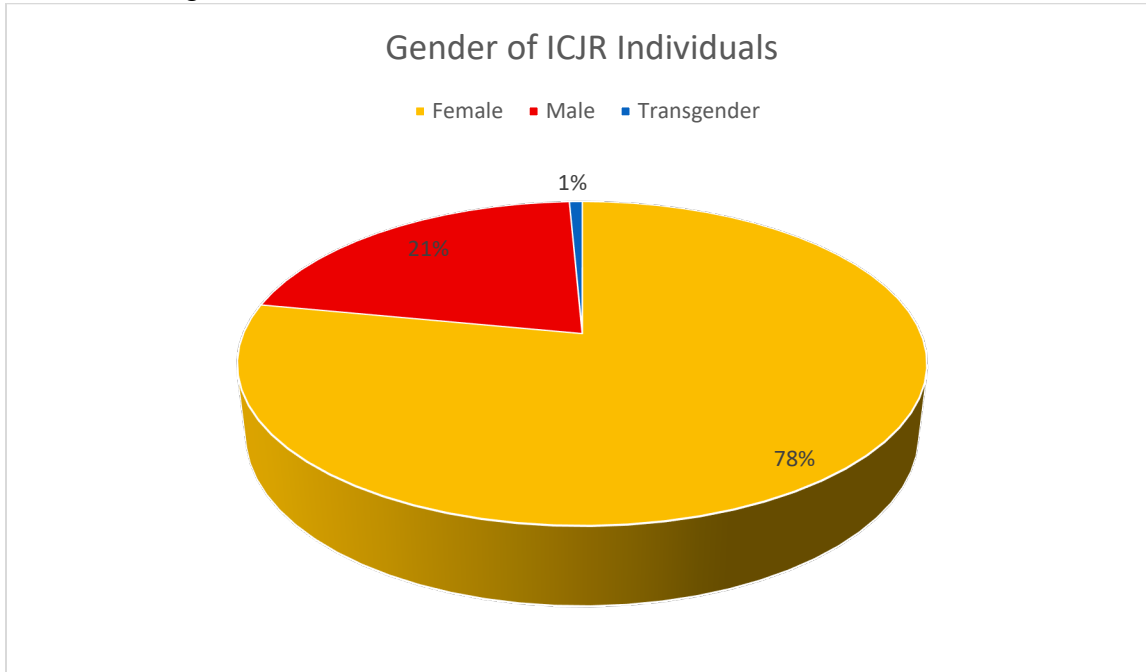
From June 2021 through July 2022 the ICJR program trained 29 persons in law enforcement and 25 prosecutors on topics such as best-practices with the Rapid Intervention Team, coordinated community response, Response teams (DART, DVRT, SART), criminal court procedures, law enforcement response, and evidence-based prosecution response. There were 18,342 emergency calls for assistance from June 2021 through July 2022: 751 sexual assault calls, 17,373 domestic and dating violence calls, and 218 stalking calls. During this same timeframe there were 654 strangulation reports, 946 forensic exams, 250 domestic strangulation arrests, and 2,802 temporary protection orders (88%) granted out of the 3,201 requested. Further, the Community Service Council (2021) reports that domestic violence calls to 911 are 1.5 times more likely to come from North Tulsa than South Tulsa.

Size and demographics reported from the July 2021-June 2022 ICJR report(s) are as follows:

Size of Assisted Survivors through ICJR (July 2021-June 2022)				
Sexual Assault Survivors	Domestic & Dating Violence Survivors	Stalking Survivors	Trafficking Survivors	Total Survivors
211	2,519	1,004	4	3,734

Gender

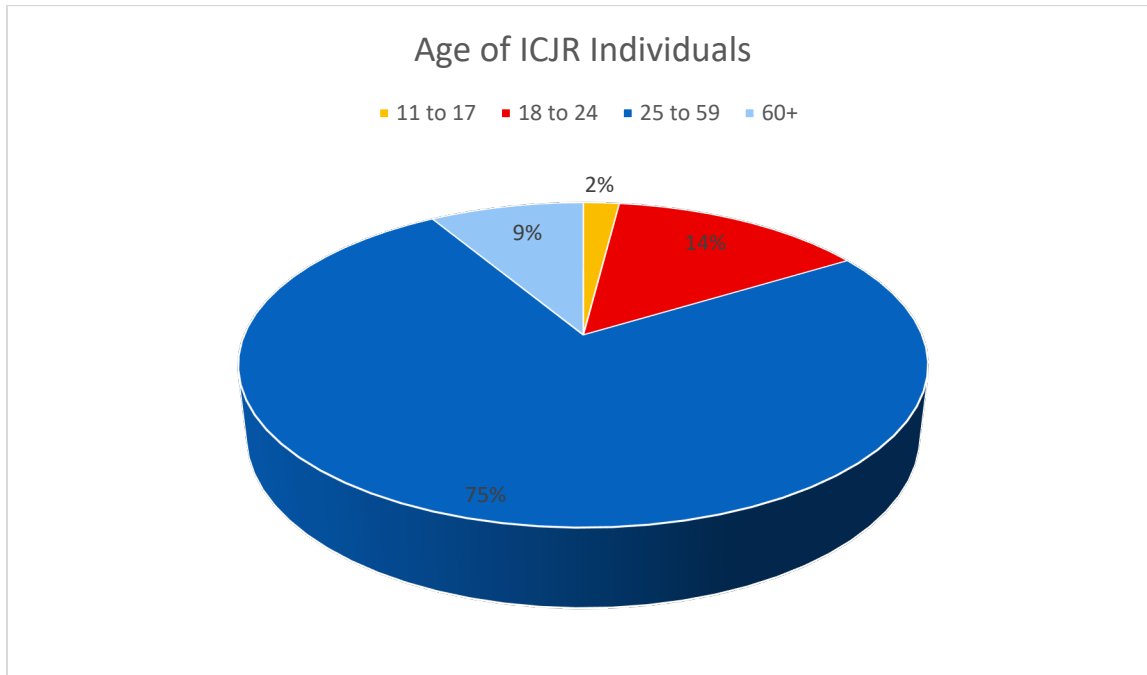
- Female: 78%
- Male: 21%
- Transgender: 1%



Data source: July 2021-June 2022 Improving Criminal Justice Responses Report(s)

Age

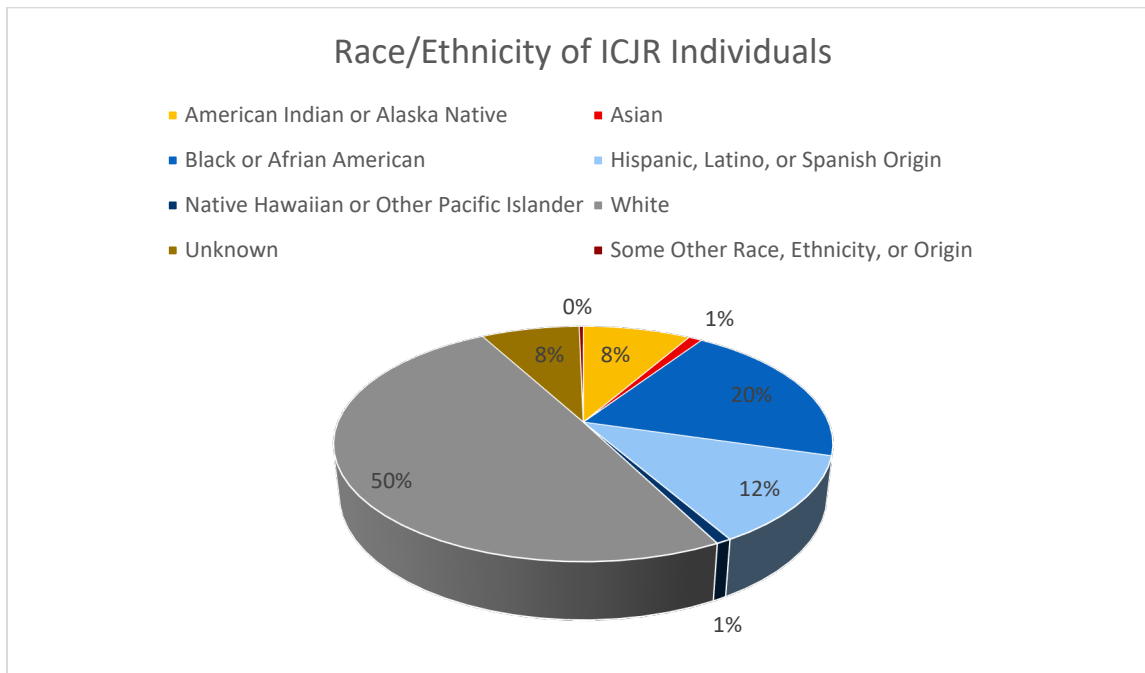
- 11-17: 2%
- 18-24: 14%
- 25-59: 75%
- 60+: 9%



Data source: July 2021-June 2022 Improving Criminal Justice Responses Report(s)

Race/Ethnicity

- American Indian or Alaska Native: 8%
- Asian: 1%
- Black or African American: 20%
- Hispanic, Latino, or Spanish Origin: 12%
- Native Hawaiian or Other Pacific Islander: 1%
- White: 50%
- Unknown: 0%
- Some Other Race, Ethnicity, or Origin: 8%



Data source: July 2021-June 2022 Improving Criminal Justice Responses Report(s)

Other Demographics

- Lesbian, Gay, Bisexual, Transgender, or Queer (LGBTQ) individuals: 0.4%
- People with Disabilities: 13.8%
- People with limited English Proficiency: 6.3%
- People who are Deaf or Hard of Hearing: 0.1%
- People who are Immigrants/Refugees/Asylum Seekers: 1.0%

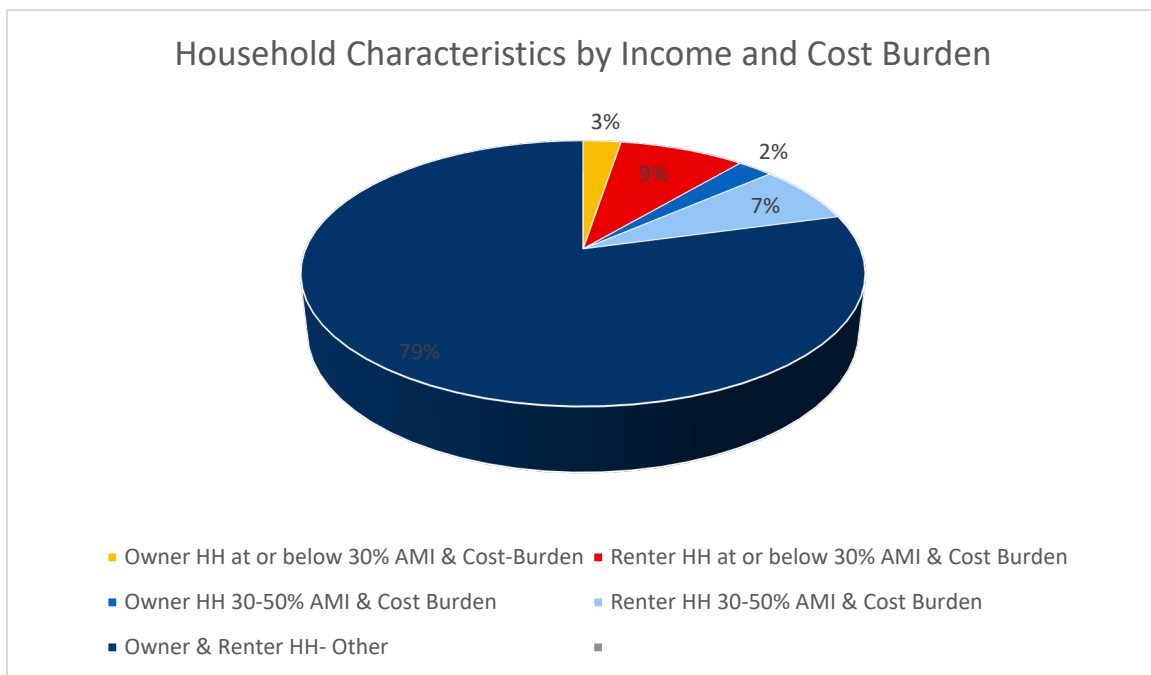
The United States Department of Justice reports that one in four women experiencing homelessness is due to violence committed against her. During the 2022 Point in Time count, 20% of respondents reported that domestic violence was a factor in their homelessness and 50% reported a history of experiencing domestic violence. In 2022, the Domestic Violence Intervention Services reported that they have seen an ongoing increase in the average client stay at the emergency shelter due to clients having more complex needs or experiencing high levels of violence, increasing their danger of becoming homicide victims. Those in this Qualifying population are at high risk of experiencing homelessness or further harm without assistance.

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

Other populations:

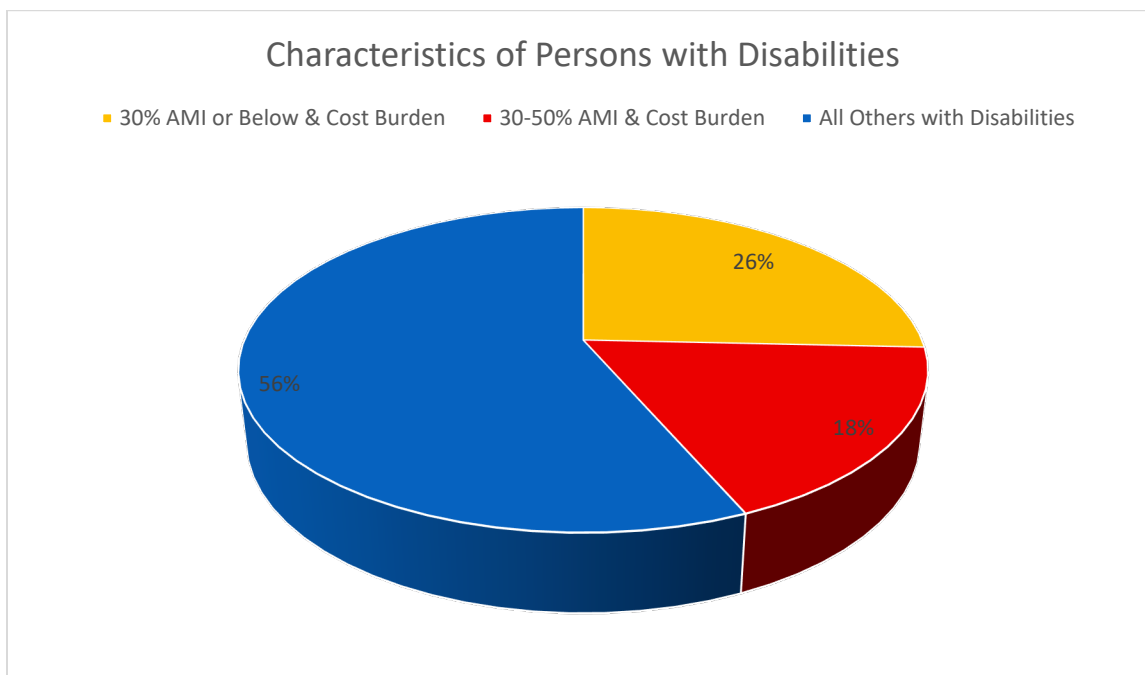
- Households who have previously been qualified as homeless
- Currently housed due to temporary or emergency assistance (financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed)
- Need additional housing assistance or supportive services to avoid a return to homelessness
- Annual income less than or equal to 30% AMI and severe cost burden (paying more than 50% of monthly household income toward housing costs).
- Annual income less than or equal to 50% AMI and meets one of the conditions of at risk of homelessness

CHAS 2014-2018 data considers those at greatest risk of housing instability by reporting on Tulsa’s households by income, housing problems, and their cost burden. Per CHAS 2014-2018 data there were 4,265 homeowners and 14,105 renters whose income was less than or equal to 30% AMI with a cost burden greater than 50%. Additionally, there were 4,010 homeowners and 11,715 renters whose income was greater than 30% AMI and less than or equal to 50% AMI with a cost burden greater than 50%. These 34,095 households at greatest risk of housing instability account for 21% of the 164,225 households reported in the CHAS 2014-2018 data.



Data source: Comprehensive Housing Affordability Strategy (CHAS) 2014-2018

Through consultation efforts, it was stated that there is a need for additional support services and units of accessible housing options for those who have disabilities or mental health issues. Individuals with disabilities usually have a fixed income and have limited housing options. In the City of Tulsa’s 2020-2024 Consolidated Plan, it was stated that there is an additional need for accessible affordable housing units. According to CHAS data 44% of persons with a disability in Tulsa are persons who are at greatest risk of housing instability by having a household income at or below 30% or 30-50% AMI, are severely cost burdened, and have a disabling condition. According to ACS data (2018), the overall population of persons with disabilities in Tulsa was 57,219. Per 2014-2018 CHAS data, there are 24,890 persons within Tulsa whose household income is less than or equal to 30% AMI or 30-50% AMI, severely cost-burdened, and have a disabling condition.



Data source: 1. Comprehensive Housing Affordability Strategy (CHAS) 2014-2018 2. American Community Survey (ACS) 2018

Per HMIS data, approximately 21% of persons previously housed through permanent housing, transitional housing, emergency shelter, or street outreach in 2021 returned to homelessness. This data suggests that there is a need for additional shelter, affordable housing units with wrap around services, and supportive services to avoid people returning to homelessness.

Current Resources Available to Assist Qualifying Populations

Current Housing Inventory for the Homeless

The City of Tulsa's current inventory of emergency shelters, safe havens, transitional housing, rapid re-housing (RRH), and permanent supportive housing (PSH) for those experiencing homelessness can be displayed in the table below.

Homeless												
	Current Inventory (June 2022)								Homeless Population (July 2022)			
	HH w/Children			HH w/o Children			Year-Round Beds	Total Beds in System	Family HH (at least 1 child)	Adult HH (w/o Children)	Veterans	History of DV
	Veteran beds	Youth Beds	Chronic Beds	Veteran Beds	Youth Beds	Chronic Beds	Undesignated Beds					
Emergency Shelter	0	0	0	18	0	0	458	476				
Transitional housing	0	0	0	28	53	0	103	184				
Permanent Supportive Housing	36	0	0	189	8	301	35	569				
Other Permanent Housing	26	0	0	126	12	0	260	424				
Total Beds in System	62	0	0	361	73	301	856	1,653				
Sheltered Homeless									308	1744	113	424
Unsheltered Homeless									43	484	23	236
Current Gap									See Narrative below			

Data Source: Tulsa City and County Continuum of Care 2022 HMIS data

As of July 2022, there are not enough shelters and housing options to house all persons experiencing homelessness. The CoC's By-Name List as of July 2022 consists of 3,375 persons experiencing homelessness. Breaking this down, there are 786 persons unsheltered and 2,589 sheltered. The CoC reported that in June 2022, there were 859 persons needing emergency shelter and 438 shelter beds available, this leaves the community with a gap of 421 emergency shelter beds or appropriate housing options for those experiencing homelessness. The demand for beds can fluctuate on a daily basis and could rapidly increase depending on weather-related conditions or a crisis such as COVID-19 where capacity is then limited due to social distancing measures.

Current Housing Inventory Non-Homeless
Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	88,491		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	9,540		4,565
Rental Units Affordable to HH at 50% AMI (Other Populations)	18,100		(-6,385)
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		14,105	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		11,715	
Current Gaps			(-1,820) See Narrative

Data Source: Comprehensive Housing Affordability Strategy (CHAS) 2014-2018

The table above demonstrates a surplus of 1,820 affordable rental units overall. Focusing on rental units affordable to households at 50% AMI there is a surplus of 6,385 units. However, when looking at rental units affordable to households at 30% AMI, there is a gap and a need of 4,565 additional affordable housing units. It is important to mention this data is pre-pandemic (2014-2018). Affordable housing needs are projected to have increased, and the number of affordable rental units available decreased. According to Partner Tulsa, 46% of renter households in the city are cost-burdened, meaning they spend more than 30% of their income on housing costs. Residents have faced challenges during the pandemic that have affected their ability to afford rising housing costs.

City of Tulsa Apartment Market Breakdown (ALN Apartment Data, August 2022)				
Property Type	% of Market	Units	Occupancy Rate	Average Rent (Mkt)
Conventional	76%	61,454	95.2%	\$928
Affordable	17%	13,662	86.9%	\$721
Senior Living	7%	5,689	90%	\$1,020

The ALN Apartment Data shown above, breaks down the market for apartments in the City of Tulsa as of August 2022. According to the ALN, 17% of the apartments in Tulsa are considered affordable with an 86.9% occupancy rate and the senior living average market rent costs more than the average conventional market rent. The properties that fall under Affordable are a mix of affordable and low-income affordable units. The ALN's definition of Affordable properties means properties that offer lower rents because they rent to people under a certain threshold of the median income in an area.

Housing Authority of the City of Tulsa (THA) Inventory		
Public Housing, RAD, and PBRA Units	Project-Based Vouchers	Housing Choice Vouchers Leased
1,809	258	4,733

The Housing Authority of the City of Tulsa's (THA) public housing waitlist as of August 2022, has 5,048 applicants and the housing choice voucher waitlist has 6,750 applicants which include, families, the elderly, and the disabled. The average wait time for public housing is 3 months to 5 years or longer. The average wait time for housing choice vouchers is 2 months to 3 years or longer.

Current Shelter & Housing dedicated to Domestic Violence Survivors

DV Service Provider	Housing Type	Number of Beds
Domestic Violence Intervention Services	Emergency Shelter	90
Domestic Violence Intervention Services	Transitional housing	40

Tenant Based Rental Assistance (TBRA)

The City of Tulsa offers TBRA through the Housing Opportunities for Persons with AIDS (HOPWA) program. Supportive service programs are available in the City of Tulsa and similarly achieve keeping persons stably housed through providing rental assistance, security deposit assistance, utility deposits, and utility payments. The City of Tulsa has allocated rental assistance through ESG, ESG-CV, CDBG-CV, and the Emergency Rental Assistance Program (ERAP). Additionally, rental assistance is provided through the Tulsa City and County Continuum of Care's (CoC) funded programs.

Non-Congregate Shelters

ESG-CV money was previously used for a temporary Non-Congregate Shelter. However, there are no Non-Congregate Shelters currently in operation within the City of Tulsa.

Congregate Shelters

Per the CoC and as of July 2022, there are 30 congregate and low barrier shelters within the City of Tulsa. These provide a total of 494 shelter beds for the community, 18 of which are designated for veterans' use. Additionally, Mayor Bynum announced the launching of the Tulsa Housing Challenge in December 2022, which includes establishing a low barrier shelter and certifying faith-based organizations to provide emergency sheltering facilities.

Supportive Services

The City of Tulsa has a vast network of community partners working to provide supportive services. Tulsa's 211 helpline received 39,679 requests for housing expense assistance in 2019 and 51,279 requests in 2021, with the majority of callers experiencing a housing crisis that put them at risk of homelessness. The top five housing assistance requests from 211 in 2021 were 1) rent payment assistance, 2) homeless shelter, 3) low-income subsidized rental housing, 4) at-risk/homeless housing-related assistance programs, and 5) transitional housing/shelter.

The City of Tulsa uses CDBG and ESG to fund 22 programs to stabilize individuals and families by providing supportive services. These CDBG & ESG programs provide various assistance to the community and the current funded supportive services align closely with the HOME-ARP eligible support service categories. Additionally, there is funding for the Improving Criminal Justice Response (ICJR) program (Improving Criminal Justice Responses) through VAWA to support efforts to improve criminal justice responses to sexual assault, domestic violence, dating, and stalking. There is not a gap in the type of supportive services provided to qualifying populations within the City of Tulsa; however, there is a funding gap, making it hard to fully address the quantity of needs.

Affordable Housing Trust Fund: From Homeless to Homeowner Program

In February 2021, the City of Tulsa and Partner Tulsa launched the Affordable Housing Trust Fund, a city-wide fund for production or preservation of affordable housing through affordable rental housing development, homebuyer assistance, landlord incentives, and rental assistance.

The Affordable Housing Trust Fund creates opportunities for households to move from homelessness to homeownership:

- **Preventing Homelessness through Landlord Incentives and Rental Assistance:** Provides grants to agencies to provide direct rental assistance and financial incentives to encourage landlords to work with low-income tenants experiencing barriers to affordable housing, such as a history of eviction or justice involvement.
- **Increasing Quality, Affordable Rental Housing Opportunities:** Provides zero-interest loans to qualified developers for the production and preservation of affordable rental housing.
- **Strengthening Wealth-Building through Homebuyer Assistance:** Provides grants to agencies to provide homebuyer education and financial assistance, such as down payment and closing costs assistance.

Unmet Housing and Service Needs of Qualifying Populations

Homeless as defined in 24 CFR 91.5

As of July 2022, there are not enough shelter beds and housing options to house all persons experiencing homelessness. The CoC's By-Name List consists of 3,375 persons experiencing homelessness, 786 are currently unsheltered and the other 2,589 are sheltered. Further, there are 526 emergency shelter beds available to the community and there is a demand for an additional 421 emergency shelter beds as of June 2022.

There are no Non-Congregate Shelters currently in operation within the City of Tulsa. However, Mayor Bynum announced the launching of the Tulsa Housing Challenge in December 2022, which includes establishing a low barrier shelter and certifying faith-based organizations to provide emergency sheltering facilities.

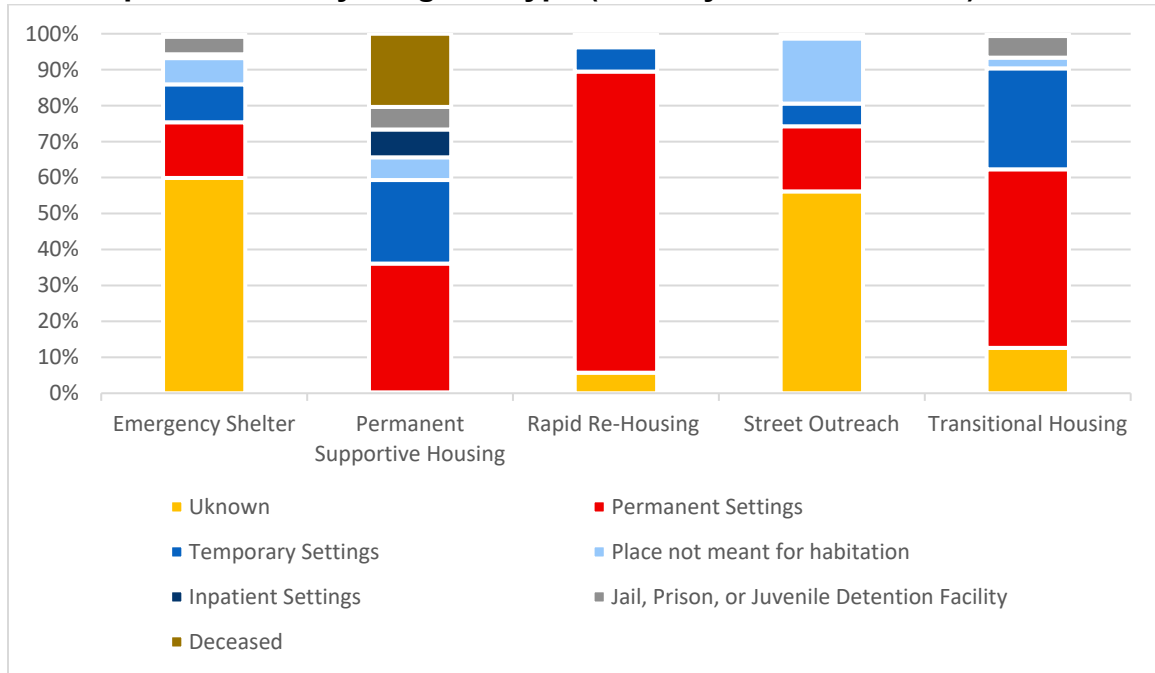
To understand the housing needs presented among those experiencing homelessness and that would best suit their individual needs, the CoC utilizes a tool called the Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT). The 2,225 completed VI-SPDAT assessments from 2021 indicate a range of housing needs:

- Range under 5:
 - 22 %
 - Lowest vulnerability range
 - Rapid re-housing need
- Range 5-10:
 - 53%
 - Rapid re-housing need
 - May seek transitional housing
- Range 11-15
 - 18%
 - Permanent supportive housing need
 - May seek transitional housing
- Range over 15
 - 7%
 - Highest vulnerability categorization
 - Permanent supportive housing need
 - Could potentially benefit from long term care institutional care, nursing homes, or assisted living facilities

There is a greater percentage, 75% of those experiencing homelessness, who completed a VI-SPDAT that could benefit from accessing rapid re-housing and these individuals are at a low vulnerability range. The remaining 25% at a high vulnerability range may potentially benefit from permanent supportive housing. Since a higher percentage of those experiencing homelessness fall into a lower vulnerability category, affordable rental housing with appropriate wrap-around services could be beneficial. Those ready to transition to permanent supportive housing or other affordable rental housing options would create space in the emergency shelters for others who are currently unsheltered, thus helping reduce the degree of need for more shelter beds.

Further, those who qualified as homeless, accessed a housing program, and have exited to permanent, temporary, or unknown destinations indicate that additional services and/or permanent housing solutions are needed. On the next page is a table showing data from the Tulsa City & County CoC 2021 HMIS dashboard.

CoC Reported Exits by Program Type (January-December 2021)



Data source: CoC HMIS Dashboard January-December 2021

In 2021, 5,181 exits occurred from those who accessed the following programs: emergency shelter, permanent supportive housing, rapid re-housing, street outreach, and transitional housing. The graph above demonstrates that those who were supported through rapid re-housing, transitional housing, or permanent supportive housing were more likely to exit to permanent housing situations than those who were assisted through emergency shelter. Overall, 71.7% of persons who accessed one of these programs exited into unknown settings, temporary settings, or a place not meant for habitation and 22.5% exited into a permanent setting. This means that 3,176 households were experiencing a need of additional services and/or permanent housing options to avoid exiting the homelessness system into unknown settings or places not meant for habitation. This indicates that there is a gap and need for more affordable housing solutions and wrap around supportive services to better stabilize and house those experiencing homelessness in the community.

Per HMIS data the CoC reported that in 2021, those accessing emergency shelters, safe havens, transitional housing, and permanent housing experienced homelessness for the first time within two years rose by 9% from 2020. This demonstrates that increased hardships were experienced during the pandemic and that the need for support services, shelter, and affordable housing options were more prevalent.

The April 2022 surveys sent out by the City of Tulsa to agencies assisting QPs and the community ranked the top five supportive services needed for those experiencing homelessness as the following:

1. Mental Healthcare
2. Employment Services
3. Case Management
4. Food
5. Healthcare

Considering all data and community input regarding the homeless qualifying population, the following unmet needs in housing and supportive services can be summarized below.

- There is a need for additional shelter beds.
- There is a need for an increase in affordable housing units: permanent supportive housing and rapid re-housing.
- There is currently a TBRA program in the City of Tulsa for HOPWA recipients, but not for all HOME-ARP QPs. A TBRA program would benefit this population; however, the City of Tulsa is funding similar supportive services through ESG, ESG-CV, CDBG-CV, and ERAP. Additionally, rental assistance is provided through the Tulsa City and County Continuum of Care's (CoC) funded programs.
- There is a continued need to provide wrap-around supportive services to keep those in this population stably sheltered, transitioned to affordable housing units, and prevent further experiences of homelessness.

At Risk of Homelessness as defined in 24 CFR 91.5

There was an estimated total of 1,374 children and families reported as at-risk of homelessness per the McKinney-Vento Act at the end of the school year, June 2022. Homeless Liaisons within the school system help connect families with resources to overcome the barriers these individuals and families may face. School districts can apply for McKinney-Vento funding through the Oklahoma Department of Education. However, there is a need of generating affordable housing units for this population and wrap around services to prevent homelessness. In the consultation process it was voiced that more multi-family affordable units and affordable units overall are needed for the at-risk population.

According to 2014-2018 CHAS data, the City of Tulsa is estimated to have 24,735 renter and owner households who are at or below 30% AMI. Combined with the housing crisis Tulsa is experiencing, many whose household income is at or below 30% AMI may be one financial setback away from homelessness. Additionally, the 19,070 renters who are at or below 30% AMI are at greater risk of falling into the statistic where 1 in 13 renter households have experienced an eviction filing during the pandemic.

When looking at rental units affordable to households at 30% AMI, there is a gap and need of 4,565 affordable housing units for the at-risk of homelessness population. With the increase in costs of housing stemming during the pandemic, this population is more likely to be at-risk of being evicted due to non-payment. The Oklahoma Court Tracker tool created by Open Justice Oklahoma displays that in Tulsa County, between March 2020 through April 2022, 65,600 evictions were filed with 40% of those being granted.

The at-risk population received Homelessness Prevention (HP) assistance funded through ESG, ESG-CV, CDBG-CV, and the Emergency Rental Assistance Program (ERAP) throughout the pandemic. The summary of assistance received is shown in the chart below:

Funding Source	Expenditures	Type of Assistance	Assisted
ESG (PY20)	\$2,205(RRH)	<ul style="list-style-type: none"> • RRH • HP 	33 Households
	\$4,475 (HP)		
ESG (PY21)	\$35,000 (RRH)	<ul style="list-style-type: none"> • RRH • HP 	192 Households
	\$80,886.87(HP)		
ESG-CV (PY20)	\$614,793.02 (RRH)	<ul style="list-style-type: none"> • RRH • HP 	225 Households
	\$145,308.89 (HP)		
ESG-CV (PY21)	\$1,972,944.21 (RRH)	<ul style="list-style-type: none"> • RRH • HP 	756 Households
	\$470,400 (HP)		
CDBG-CV (PY22)	\$520,524.88	<ul style="list-style-type: none"> • Foreclosure Prevention • Shelter & Feeding • Legal Assistance 	2,392 individuals
	\$9,530.45		
	\$2,893.51		
Emergency Rental Assistance Program I (ERAP I)	\$11,034,642	<ul style="list-style-type: none"> • Rental and Utility Assistance 	2,389 Households
ERAP II	\$207,628	<ul style="list-style-type: none"> • Rental and Utility Assistance 	72 Households

It is also important to consider that the at-risk population may be affected by the long waitlists for public housing or housing choice vouchers and need additional assistance while on the waitlist. The THA's waitlist currently has 5,048 applicants and the housing choice voucher waitlist currently has 6,750 applicants: families, the elderly, and disabled. The average wait time for public Housing is 3 months to 5 year(s) or longer. The average wait time for housing choice voucher is 2 months to 3 year(s) or longer.

Considering all data and community input regarding the at-risk of homelessness qualifying population, the following unmet needs in housing and supportive services can be summarized below.

- There is a need for an increase of affordable housing supply.
- There is a need for additionally funding supportive service based on the high eviction rates.
- There is currently a TBRA program in the City of Tulsa for HOPWA recipients, but not for all HOME-ARP QPs. A TBRA program would benefit this population; however, the City of Tulsa is funding similar supportive services through ESG, ESG-CV, CDBG-CV, and ERAP. Additionally, the Tulsa City and County Continuum of Care (CoC) provides rental assistance through CoC-funded programs.
- There is a continued need to provide supportive services to keep those who are at risk of homelessness stably housed and to prevent homelessness.
- There is a gap in shelter beds for those experiencing homelessness.
- Non-Congregate shelters do not currently exist within City limits.

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

The City of Tulsa receives funding through the Violence Against Women Act, which has helped implement the Improving Criminal Justice Responses to Sexual Assault, Domestic Violence, Dating Violence, and Stalking Grant Program (ICJR). This program works to reduce violent crime against women and to promote victim safety through investing in law enforcement and increasing prosecution in Tulsa County. The ICJR program has trained law enforcement and prosecutors on topics like best practices with the Rapid Intervention Team, coordinated community response, Response teams (DART, DVRT, SART), criminal court procedures, law enforcement response, and evidence-based prosecution response. This program assists this population tremendously, but once assisted through this program, additional supportive services and affordable housing needs exist. The HOME-ARP program could provide affordable housing, shelter, and supportive services to help stably support those trying to flee from these situations.

Currently, the two main providers assisting with direct housing, shelter related assistance, and support services for those fleeing from domestic violence, sexual assault, etc. in the City of Tulsa is the Domestic Violence Intervention Services (DVIS) and the Family Safety Center.

In 2021, DVIS provided the following housing related assistance:

- Housing through the emergency shelter for 424 survivors and children for a combined total of 19,209 nights of shelter.
 - The DVIS emergency shelter provides 90 shelter beds for the community.
 - The DVIS shelter capacity in 2021 was 71 beds. There were 33,215 nights available of shelter beds, while 23,446 nights of shelter beds were utilized in 2021.
- Housing through DVIS transitional housing facility in 2021 assisted 119 survivors and children.
 - The 20 transitional housing apartments include: 6 one bedroom, 8 two-bedroom, and 6 three-bedroom units, for a total of 40 bedrooms in the transitional housing program.

In 2021, the Family Safety Center provided the following housing related assistance and support services:

- Immediate access to housing and services to prevent homelessness through the ESG-CV funded HOPE project:
 - Eight adult clients with nine children of domestic violence with rental deposit, rent, and/or utilities and follow-up services to provide additional resources that kept victims safer.
 - Most clients needed assistance in three areas concerning rental applications: rental deposit, rent, and/or utility assistance to become stable.
- Immediate access to housing and services to prevent homelessness through the ESG-funded HOPE project:
 - Sixteen adult clients with twenty-three children of domestic violence with rental application, rental deposit, rent, and/or utilities.
 - Most clients needed assistance in three areas concerning rental applications: rental deposit, rent, and/or utility assistance.

Additionally, The Oklahoma Summary section of the 16th Annual Domestic Violence Counts Report from the National Network to End Domestic Violence (2022) captured that 55% of the unmet requests for services from 14 domestic violence programs on one day in 2021 were housing and emergency shelter.

Survey results (April 2020) and responses from Domestic Violence agencies assisting QPs and the community ranked the top three program needs from the HOME-ARP program:

1. Support Services
2. Rental Housing
3. TBRA

Survey results also revealed the following:

- Gaps in assistance: “Housing availability, housing assistance payments, and supportive services to assist the QP to remain housed.”
- Gaps in Housing: “Lack of available units at reasonable prices in safe neighborhoods.”
- Gaps in securing housing: “Affordable housing, emergency supplies/food/clothing, and medical resources.”
- Gaps in keeping “Steady employment or income stream, feeling of safety, and continued case management and short-term resources.”

Considering all data and community input regarding this qualifying population, the following unmet needs in housing and supportive services can be summarized as:

- Emergency shelters have not been utilized at full capacity due to social distancing measures and there is a need for more shelter beds.
- Rental assistance through a TBRA program would be beneficial; however, the City of Tulsa is funding similar supportive services through ESG, ESG-CV, CDBG-CV, and ERAP. Additionally, rental assistance is provided through the Tulsa City and County Continuum of Care’s (CoC) funded programs.
- Creation of affordable rental housing units would be beneficial, especially in safer areas, as mentioned in survey results.
- Various HOME-ARP-eligible support services could benefit this population. Additional funding could assist a greater number of those in this population and a greater portion of the needs to keep them stably housed.

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

According to CHAS 2014-2018 data, the City of Tulsa has a population of 34,095 or 21% of the total population who are either at or below 30% AMI or 30%-50% AMI and are cost burdened greater than 50%. Additionally, according to HMIS data, in 2021, 133, or 21%, of persons returned to homelessness who had previously been permanently housed or sheltered by agencies. It is important to consider that those at greatest risk of housing instability could be a part of the population facing high rates of eviction due to non-payment, especially since housing costs have risen with inflation. These populations are at greatest risk of housing instability and need additional housing assistance or support services to avoid homelessness or a return to homelessness.

This “other” population could benefit from various HOME-ARP-eligible support services and programs that increase affordable housing or keep this population stably housed. Consultation and survey efforts mentioned the following needs:

- Legal support services due to high eviction rates
- Education and job training services
 - could assist in bringing households out of cost-burdened category
- Low-income housing programs
- Housing loss prevention services
- Construction of new rental units
- Mental health services and case management for clients needing housing

Considering all data and community input regarding this qualifying population, the following unmet needs in housing and supportive services can be summarized as:

- Non-congregate shelter needs could increase if households cannot be assisted with wrap-around support services or additional affordable housing units. Without assistance this population faces a high risk of transitioning from at-risk of homelessness to experiencing homelessness. Thus, an increase in shelter beds would be needed.
- Rental assistance through a TBRA program would be beneficial; however, the City of Tulsa is funding similar supportive services through ESG, ESG-CV, CDBG-CV, and ERAP. Additionally, the Tulsa City and County Continuum of Care (CoC) provides rental assistance through CoC-funded programs.
- With identifying 4,565 housing units affordable to those at or below 30%, the acquisition or construction of more affordable rental housing units would be beneficial.
- With an overwhelming response from consultation about the need for additional legal services to prevent eviction or housing loss, various HOME-ARP eligible supportive services would benefit this population. Additionally,

education and job training services were mentioned in the needs assessment survey.

Gaps Within the Current Shelter, Housing Inventory, and Service Delivery System

Non-Congregate Emergency Shelter:

According to the CoC's data, there is a gap in providing emergency shelter for all households experiencing homelessness. As of July 2022, there are 30 congregate and low-barrier shelters in the CoC's inventory count for the City of Tulsa with 526 beds available. This leaves a gap in the emergency shelter system of an estimated 421 beds. There are many factors that create the additional need for shelter beds and this quantity of need can fluctuate from day to day.

Regarding the need for additional non-congregate shelters (NCS) for qualifying populations, non-congregate shelters currently do not exist within the City of Tulsa. The community could benefit from a permanent NCS, adding additional shelter beds to the city's inventory. However, Mayor Bynum announced the launching of the Tulsa Housing Challenge in December 2022, which includes establishing a low barrier shelter and certifying faith-based organizations to provide emergency sheltering facilities.

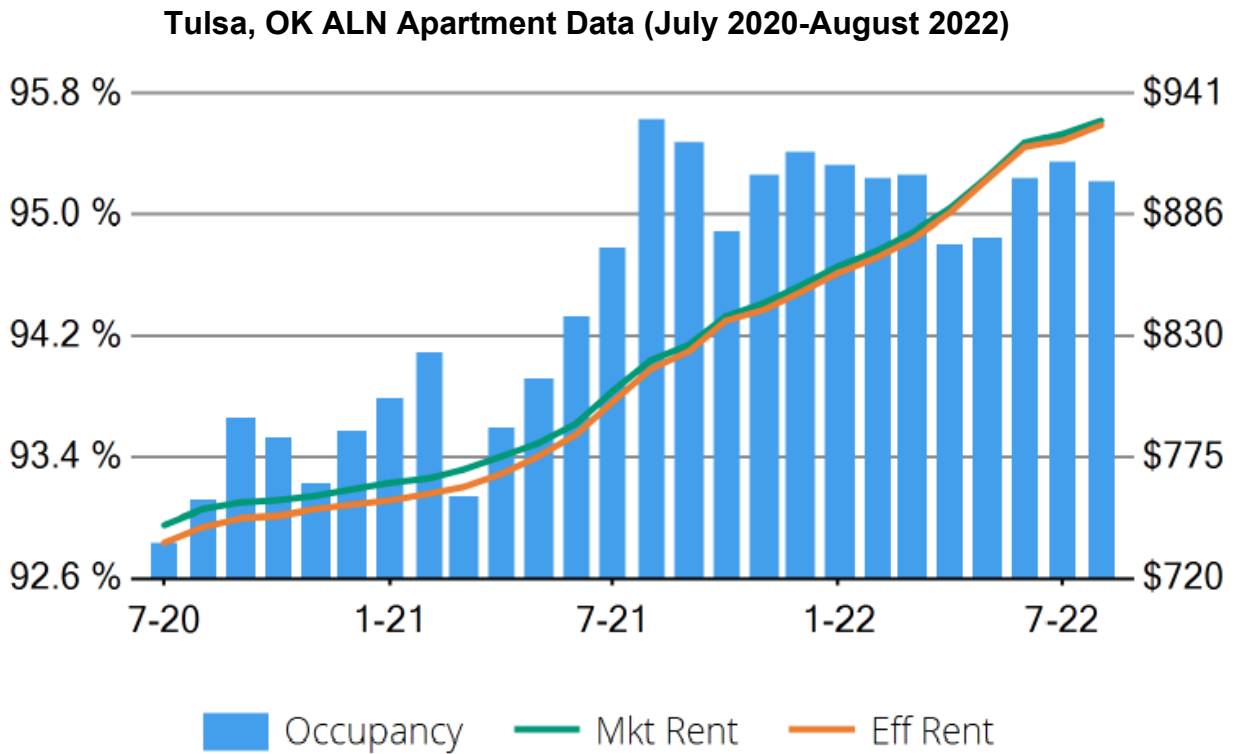
Affordable Housing:

One of the biggest factors mentioned in the consultation process for the HOME-ARP program was the need for more affordable permanent housing solutions. Per Housing Solutions (2021), "Tulsa's multifamily unit occupancy rate is 94%...it currently takes an average of 10 months from the time someone becomes homeless to the time they obtain permanent housing."

The Housing Needs Inventory and Gap Analysis Table on page 36 demonstrate a surplus of 1,820 affordable rental units overall. Focusing on rental units affordable to households at 50% AMI there is a surplus of 6,385 units. However, when looking at rental units affordable to households at 30% AMI, there is a gap and need of 4,565 affordable housing units. It is important to mention this data is pre-pandemic (2014-2018). Housing needs are projected to have increased, and the number of affordable rental units available has gone down as rental rates continue to increase. According to Partner Tulsa, 46% of renter households in the city are cost-burdened, meaning they spend more than 30% of their income on housing costs. Residents have faced challenges during the pandemic that have affected their ability to afford rising housing costs.

According to the Washington Post, average rental rates have increased by 14.9% in Tulsa since 2019. Tulsa's average rental rate is higher than the national rental rate

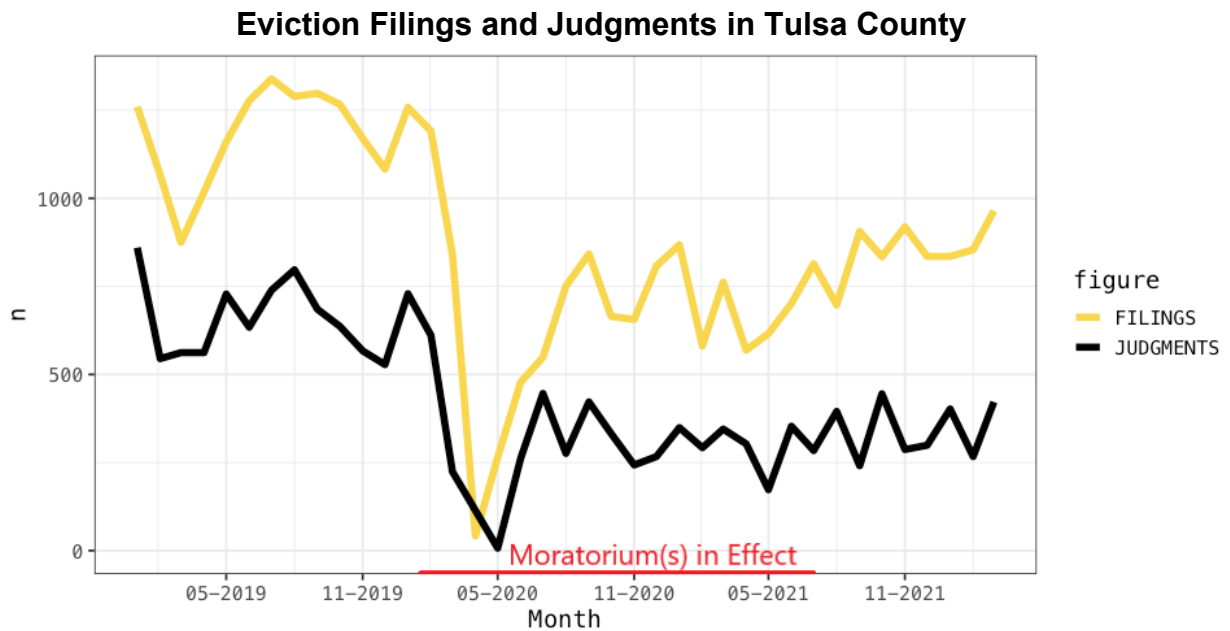
increase of 11.3%. Additionally, The Tulsa Apartment Association says since 2021, rental rates in Tulsa, on average jumped more than 13%.



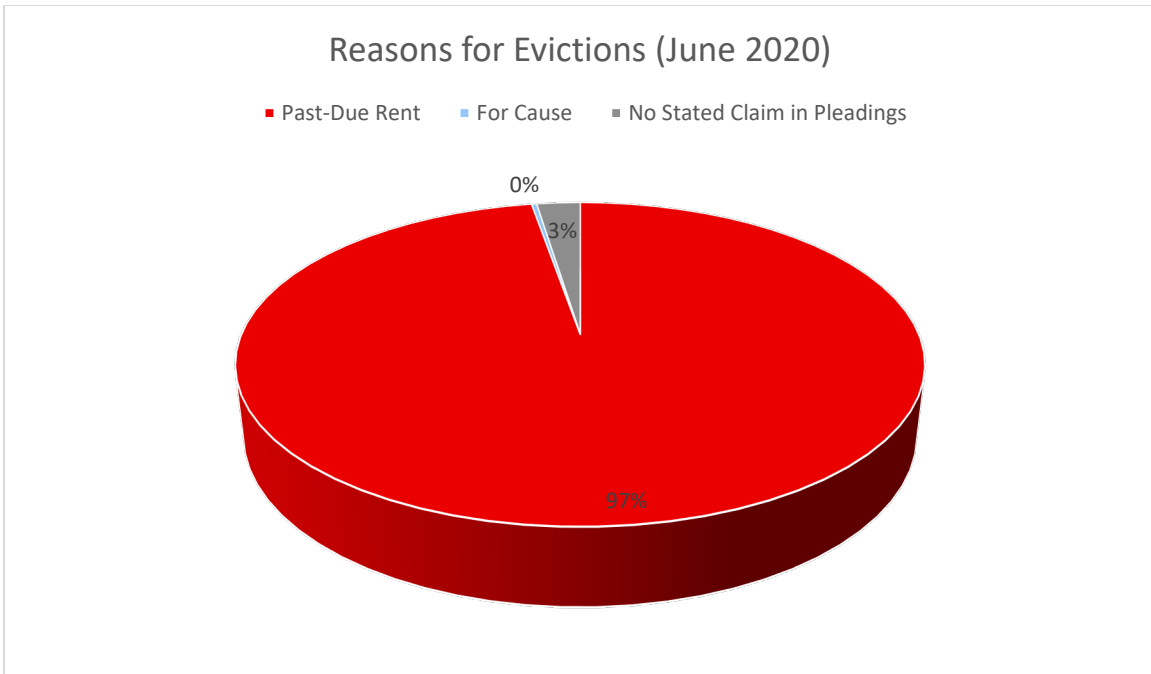
Data Source: ALN Apartment Data End of August 2022

When looking at the ALN Apartment Data at the end of August 2022, there is a rising occupancy rate for apartments in Tulsa and an almost \$200 increase in average rental rates from July 2020- August 2022. This demonstrates that the affordability of apartments has decreased while the availability of apartments has gone down. Further, affordable units make up 17% of the apartments in Tulsa and 7% are dedicated to senior living. This data supports the claim that additional affordable housing units are needed. This data also demonstrates that those who were already facing potential housing instability due to being at risk of homelessness or at greatest risk of housing stability have most likely seen increases in their rent over the past two years of almost \$100 a year. Lastly, according to ALN Apartment Data (2022), Senior Living apartments have an average rental rate that is more costly than a conventional apartment, although seniors often have a fixed income and need assistance to maintain autonomy.

Tulsa has had the 11th highest eviction rate among large American cities since 2011 and the COVID-19 pandemic has exacerbated the number of persons who face eviction due to past-due rent and are considered at risk of homelessness. According to Partner Tulsa, 1 in 13 renter households in Tulsa has experienced an eviction filing. The CARES Act moratorium took effect on March 27, 2020, imposing a partial residential eviction moratorium and expired on July 24, 2020. On September 4, 2020, the CDC eviction moratorium took effect, was extended several times, and expired on July 31, 2021. The moratoriums reduced the rate of eviction proceedings; however, eviction filings were still occurring in Tulsa, as demonstrated by the graph below.



Data Source: Legal Aid Services of Oklahoma; modification made by the City of Tulsa: Moratorium(s) in Effect inserted



Data Source: The University of Tulsa: Advancing Housing Justice in Tulsa (June 8, 2020)

According to data presented in the Oklahoma Court Tracker tool the average eviction filings and granted evictions per month can be seen below.

Average Eviction Filings per Month:

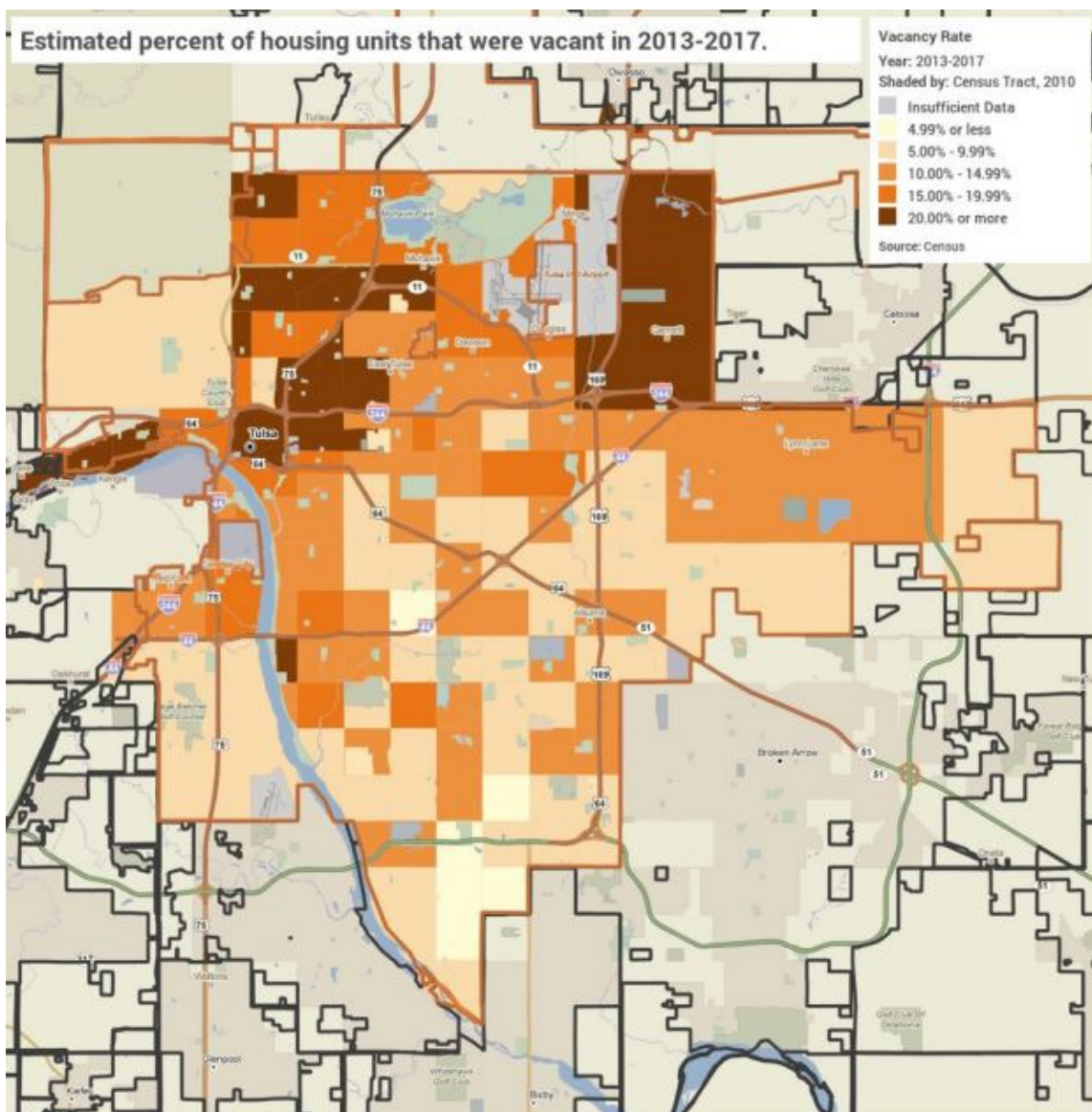
- Pre-pandemic: 1,181
- During the moratorium (November 2020-July 2021): 2,282
- Post-moratorium (August 2021-April 2022): 2,945

Average Granted Evictions per Month:

- Pre-pandemic: 691
- During the moratorium (November 2020-July 2021): 899
- Post-moratorium (August 2021-April 2022): 1,108

This data upholds the feedback received from consultation sessions and surveys: eviction rates are high and additional funding for legal services is a continued need within the community, especially for those who are at-risk of homelessness.

According to ACS 2014-2018 data, a healthy or normal vacancy rate is 5-7%; however, the City of Tulsa’s rental housing market vacancy rate is estimated at 9.2% vacancy and is considered unhealthy. While the data from 2018 indicates there are plenty of housing units available in the city, the type and price of the units do not match what residents need or can afford. Additionally, it is projected that the vacancy rate has declined in Tulsa since the pandemic and housing costs have risen due to inflation. There is not a lack of housing supply, but rather a lack of affordable housing. This makes it harder for low to moderate-income households and qualifying populations to find affordable housing, even if they have housing assistance. To combat this issue, the production of affordable units should be highly considered in the development of the City of Tulsa’s HOME-ARP program.



Data Source: 2020-2024 City of Tulsa Consolidated Plan

The THA's public housing waitlist currently has 5,048 applicants and the housing choice voucher waitlist has 6,750 applicants. Those on the waitlist include families, the elderly, and the disabled. The long public housing waitlist shows a need for continued funding of supportive services and an increase in affordable housing units to keep QPs stably housed and prevent homelessness.

Supportive Services:

The City of Tulsa has a vast network of community partners providing supportive services in all HOME-ARP supportive service categories. However, there is a funding gap for supportive services to address the quantity of needs for residents to become stably housed and self-supportive. Combining additional affordable housing units with ongoing supportive services for residents in HOME-ARP units would proactively assist the community in ensuring that those at risk of homelessness do not re-experience homelessness and that those experiencing homelessness is a brief and nonrecurring experience.

To summarize, the following gaps exist within the City of Tulsa's current shelter, housing inventory, and service delivery system:

- There is a gap in the emergency shelter system of 421 beds.
- There is a gap of 4,565 affordable housing units.
- There is not a gap in HOME-ARP-eligible supportive services offered in the City of Tulsa's service delivery system. There is a gap in funding to meet the quantity of needs seen for QPs in the service delivery system.

The creation or acquisition of affordable housing units would meet the needs of all qualifying populations, while also bridging the gap of affordable housing units available to those at or below 30% AMI. Supportive services dedicated to those residing in the HOME-ARP units would be very impactful. Providing these supports with affordable housing would help ensure that the experience of homelessness would be more brief and non-recurring. Additionally, the support would help ensure that those who are at risk of homelessness do not re-experience homelessness.

Priority Needs for Qualifying Populations

The priority needs identified for all four qualifying populations are producing affordable housing with dedicated ongoing supportive services to the qualifying population households residing in HOME-ARP units. Providing ongoing supportive services to those living in the HOME-ARP units will help make experiencing homelessness non-recurring while proactively helping other qualifying populations from experiencing homelessness.

Determination of the Level of Need and Gaps in Shelter, Housing Inventory, and Service Delivery Systems

The City of Tulsa consulted agencies that assist qualifying populations to help assess the needs of Tulsa's qualifying populations. Various data was gathered to analyze the gaps in the current shelter, housing inventory, and service delivery systems. The City of Tulsa utilized data from national and local sources, including the Tulsa City and County CoC PIT report, CoC HMIS data, U.S. Census Data, input derived from consultations, and from various community partners. Additionally, responses from the April 2022 HOME-ARP Needs Assessment Survey gathered input from the public and community, helping identify the top priority needs for HOME-ARP funding and qualifying populations.

HOME-ARP Activities

Solicitation Methods

The City of Tulsa will not administer the HOME-ARP activities directly. Subrecipient(s) will be selected through request for proposals. This process will involve the development of a scope of services consistent with the HOME-ARP Notice and approved funding sources, solicitation to local non-profit agencies who serve qualifying populations, review, scoring, interviews, and award. An invitation to attend an RFP workshop will be released through a mass email list, posted on the City's website, and advertised on various social media platforms.

The City of Tulsa will not allocate funds to a sub-recipient or contractor to administer the entire HOME-ARP grant.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$550,682	8.5%	
Acquisition and Development of Non-Congregate Shelters	\$ 0	0%	
Tenant Based Rental Assistance (TBRA)	\$ 0	0%	
Development of Affordable Rental Housing	\$ 4,956,144	76.5%	
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 971,000	15 %	15%
Total HOME ARP Allocation	\$ 6,477,826		

Distribution of HOME-ARP funds Guided by Needs Assessment & Gaps Analysis

Priority needs for HOME-ARP qualifying populations were first assessed through consultation with agencies in the community that assist these populations with housing, shelter, and supportive services. Throughout the consultation process, a common need appeared: more affordable housing units and ongoing supportive services for those housed.

A survey in April 2022 collected community input on how HOME-ARP activities would be ranked in assisting qualifying populations and additional needs seen in the community for each qualifying population. The top priority needs identified from the Needs Assessment Survey were the development of affordable rental housing followed by supportive services.

City staff gathered various data applicable to assess the qualifying populations' needs and data to analyze the gaps in the shelter, housing inventory, and service delivery system. Demonstrated through the Needs Assessment and Gap Analysis section there is a lack of affordable housing units in Tulsa, especially for those who are at or below 30% AMI. All four qualifying populations within the City of Tulsa show a need for affordable housing units. Due to the many funding sources focusing on providing various supportive services in the community, the City of Tulsa plans to use HOME-ARP supportive services to provide ongoing assistance to those housed in the HOME-ARP assisted units.

Taking all of this into consideration, 76.5% of the HOME-ARP funding is planned to be used to create affordable housing units and 8.5% to provide ongoing supportive services to the qualifying populations being housed in HOME-ARP assisted units. With a compliance period of at least 15 years for the HOME-ARP units, it is projected that

15% for administration and planning will be needed to successfully carry out the HOME-ARP program.

HOME-ARP Production Housing Goals

Per the HOME-ARP Housing Production Goal Calculation Worksheet, the City of Tulsa is estimated to produce 20 affordable rental housing units with the current HOME-ARP Rental Housing activity allocation alone. The flexibility exists with HOME-ARP dollars to allow a maximum of 30% of units assisted to be persons of Low-Income without being a QP. This flexibility will be considered during the RFP process. To potentially produce more affordable housing units, the city is looking to combine other funding sources with HOME-ARP. Ongoing operating costs will not be provided from HOME-ARP dollars. HOME-ARP dollars will be dedicated to creating, acquiring, or rehabbing HOME-ARP units and ongoing supportive services to those residing in those assisted units.

Preferences

The City of Tulsa does not intend to give preference to any qualifying populations or subpopulations at the activity level. Applications and waitlists for HOME-ARP projects/programs will be managed chronologically by the subrecipients. The City of Tulsa understands it cannot exclude any qualifying populations from the overarching HOME-ARP program and if a preference is included in a HOME-ARP activity or project, it must be stated and justified in the Allocation Plan.

Limitations in a HOME-ARP rental housing or NCS project

The City of Tulsa does not intend to limit eligibility for HOME-ARP rental housing to a particular qualifying population or specific subpopulation.

HOME-ARP Refinancing Guidelines

The City of Tulsa does not intend to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.

APPROVED

OCT 26 2022

Tulsa City Council

Grant Applications, Amendments and Awards

Version 1.9 released on 11/9/21

For use with Grant Applications, Amendments and Awards based on the guidelines provided in Executive Order 2003-07



CITY COUNCIL USE ONLY

Tracking #: 22-892-1
Committee: PW
Hearing Date: _____
Agenda Date: _____

Date Received: _____
Committee Date: 9-28-22 10-26
1st Agenda Date: 10-19-22 10-26 2nd

CITY CLERK USE ONLY
 Scanned Date: 11.02.2022
 Posted Item #: 2209-02089

All department items requiring Council approval must be submitted through the Mayor's Office.

Primary Details

Department Finance	Contact Name Carol Jones	Email caroljones@cityoftulsa.org	Phone 9185967537
Grant/Application # 22506	Grant Description SUPPLEMENTAL DOCUMENTATION		Grantor Type Federal
Grantor US Dept of Housing & Urban Dev	Grant Name M21-MP400202 HOME ARP Grant		
Start Date 9/20/21	Expiration Date 9/30/30	Fiscal Year 2023	Federal CFDA 14.239
Grant Amount \$6,477,826.00	Match Required? <input type="radio"/> Yes <input checked="" type="radio"/> NO	Match Source	: \$6,477,826.00 TOTAL: \$6,477,826.00

Approvals

Department: [Signature]
Finance Budget: [Signature]
Finance Accounting: [Signature]
Legal: [Signature]
Mayor: [Signature]

Date: Sep 16, 2022
Date: Sep 19, 2022
Date: Sep 19, 2022
Date: 9-19-22
Date: SEP 21 2022

Summary

Provide a summary description of the grant.
Under the HOME-ARP program the City of Tulsa was awarded \$6,477,826.00. Grants Administration recommends the funds be directed to the following eligible activities: Supportive Services-\$500,000 (8%), Acquisition & Development of Non-Congregate Shelters-\$500,000 (8%), Development of Affordable Rental Housing \$4,506,826 (69%), Administration & Planning \$971,000 (15%).

Processing Information for City Clerk's Office

- Post Execution Processing
- Mail vendor copy (add'l signature copies attached)
 - Must be filed with other governmental entity
 - Add'l governmental entity approval(s) required

Additional Routing and Processing Details
Please forward to City Council for additional approval.



MEMORANDUM
GRANTS ADMINISTRATION

DATE: October 26, 2022

TO: Hon. G.T. Bynum, Mayor of Tulsa
 Vanessa Hall-Harper, Chair of City Council (District 1)
 Lori Decter Wright, Vice-Chair of City Council (District 7)
 Jeannie Cue, Councilor District 2
 Crista Patrick, Councilor District 3
 Kara Joy McKee, Councilor District 4
 Mykey Artherell-Knezek, Councilor District 5
 Connie Dodson, Councilor District 6
 Phil Lakin, Jr., Councilor District 8
 Jayme Fowler, Councilor District 9

FROM: Finance Department Grants Administration

SUBJECT: HOME-ARP Activities & Funding Recommendations

CC: Cassia Carr, Deputy Mayor
 Blake Ewing Chief of Staff
 James Wagner, Director, Finance Department
 Travis Hulse, Housing Policy Director
 Carol Jones, Grants Manager
 Rhys Williams, Grants/Contracts Manager
 Judy Gillaspie, Fiscal Agent Administrator
 Katlin Wahl, Sr. Grants Compliance Monitor

After consultation with City Councilors, the Finance Department Grants Administration recommends that the following revisions be made to the HOME-ARP funding allocations, as outlined in the previous memo dated September 15, 2022:

	Revised Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services*	\$550,682	8.5%	N/A
Acquisition and Development of Non-Congregate Shelters	\$0	0%	N/A
Development of Affordable Rental Housing	\$4,956,144	76.5%	N/A
Administration and Planning	\$ 971,000	15 %	15%
Total HOME-ARP Allocation	\$ 6,477,826		

In addition to the revisions listed above, funding for supportive services will be limited to providing on-going assistance to the qualifying populations residing in the HOME-ARP units created through the development of affordable rental housing.

Should you require any additional information or other supporting documentation, please contact Carol Jones at 596-7537. Thank you.



MEMORANDUM
GRANTS ADMINISTRATION

DATE: September 15, 2022

TO: Hon. G.T. Bynum, Mayor of Tulsa
Vanessa Hall-Harper, Chair of City Council (District 1)
Lori Decter Wright, Vice-Chair of City Council (District 7)
Jeannie Cue, Councilor District 2
Crista Patrick, Councilor District 3
Kara Joy McKee, Councilor District 4
Mykey Artherell-Knezek, Councilor District 5
Connie Dodson, Councilor District 6
Phil Lakin, Jr., Councilor District 8
Jayme Fowler, Councilor District 9

FROM: Finance Department Grants Administration

SUBJECT: HOME-ARP Activities & Funding Recommendations

CC: Cassia Carr, Deputy Mayor
Blake Ewing Chief of Staff
James Wagner, Director, Finance Department
Travis Hulse, Housing Policy Director
Carol Jones, Grants Manager
Rhys Williams, Grants/Contracts Manager
Judy Gillaspie, Fiscal Agent Administrator
Katlin Wahl, Sr. Grants Compliance Monitor

The Finance Department Grants Administration recommends that the \$6,477,826.00 received under the HOME-ARP program be directed to the following eligible activities:

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 500,000	8%	N/A
Acquisition and Development of Non-Congregate Shelters	\$ 500,000	8%	N/A
Development of Affordable Rental Housing	\$ 4,506,826.00	69%	N/A
Administration and Planning	\$ 971,000.00	15 %	15%
Total HOME ARP Allocation	\$ 6,477,826.00		

The HOME-ARP program will address the need for homelessness assistance and supportive services for qualifying populations through the eligible activities identified above.

Should you require any additional information or other supporting documentation, please contact Carol Jones at 596-7537. Thank you.










HOME ARP Memorandum 2

Final Audit Report

2022-09-19

Created:	2022-09-19
By:	Kim Howe (khowe@cityoftulsa.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAABU06LTehjoXIkfE8WYj4e89hXtU8vv4V

"HOME ARP Memorandum 2" History

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Ukraine says it felled more drones

ANDREW MELDRUM
Associated Press

KYIV, Ukraine — Ukrainian authorities tried to dampen public fears over Russia's use of Iranian drones by claiming increasing success Monday in shooting them down, while the Kremlin's talk of a possible "dirty bomb" attack added another worrying dimension as the war enters its ninth month.

Ukrainians are bracing for less electric power this winter following a sustained Russian barrage on their infrastructure in recent weeks. Citizens in the southern Ukrainian city of Mykolaiv lined up for water and essential supplies Monday as Ukrainian forces advanced on the nearby Russian-occupied city of Kherson.

Ukraine's forces shot down more than two-thirds of the approximately 330 Shahed drones that Russia fired through Saturday, the head of Ukraine's intelligence service, Kyrylo Budanov, said Monday. Budanov said Russia's military ordered about 1,700 drones of different types and is rolling out a second batch of about 300 Shaheds.

"Error with the use of 'Shaheds' can actually last for a long time," he was quoted as saying in the Ukrainian Pravda newspaper, adding: "Air defense is basically coping, 70% are shot down."

Both Russia and Iran deny that Iranian-built drones were used but the triangle-shaped Shahed-136s have rained down on civilians in Kyiv and elsewhere.

"First of all, we have to be able to counter the drones," U.S. House of Representa-



EMILIO MORENATI, ASSOCIATED PRESS
People line up to refill drinking water containers Monday from a tank in the center of Mykolaiv, Ukraine.

tives Speaker Nancy Pelosi said Monday at a press conference in Zagreb with Croatia's leader. "It is a dangerous technology and it must be stopped."

Britain's Ministry of Defense said Russia was likely to use a large number of drones to try to penetrate the "increasingly effective Ukrainian air defenses" — to substitute for Russian-made long-range precision weapons "which are becoming increasingly scarce."

That assessment came on top of a stark warning by Russian Defense Minister Sergei Shoigu to his British, French, Turkish and U.S. counterparts over the weekend that Ukrainian forces were preparing a "provocation" involving a radioactive device — a so-called dirty bomb. Britain, France, and the United States rejected that claim as "transparently false."

A dirty bomb uses explosives to scatter radioactive waste in an effort to sow terror. Such weapons don't have the devastating destruction of a nuclear explosion, but could expose broad areas to radioactive contamination.

Russian authorities on Monday doubled down on Shoigu's warning. Lt. Gen. Igor Kirillov, head of the Russian military's radiation, chemical and biological protection forces, said Russian military assets were on high readiness for possible radioactive contamination. He told reporters a dirty bomb blast could contaminate thousands of square kilometers.

Russian Foreign Minister Sergey Lavrov said Monday: "It's not an unfounded suspicion, we have serious reasons to believe that such things could be planned."

Ukraine has rejected Moscow's claims as an attempt to distract attention from its own plans to detonate a dirty bomb. German Defense Minister Christine Lambrecht on Monday dismissed as "outrageous" the Russian claim that Ukraine could use a dirty bomb.

The White House on Monday again underscored that the Russian allegations were false.

Trump Organization trial starts

LARRY NEUMEISTER AND
MICHAEL R. SISAK
Associated Press

NEW YORK — Donald Trump's company went on trial Monday in a criminal tax case and the first task facing the court was a big one: picking a jury of New Yorkers who didn't have a strong opinion about the former president.

About half of an initial pool of 132 prospective jurors begged off the jury before formal questioning began, with some telling reporters outside the courtroom that they know they couldn't be fair in a trial related to Trump.

Questioning of the first group of prospective jurors to sit in the jury box was to continue Tuesday morning, with lawyers from each side permitted to ask questions for 30 minutes. After a sufficient number of prospective jurors are screened, lawyers will be allowed to exclude more individuals from the panel to reach the final dozen jurors.

Manhattan prosecutors say the Trump Organization helped top executives avoid income taxes on job perks such as rent-free apartments and luxury cars.

Trump himself isn't on trial and isn't expected to testify. The judge and lawyers in the case looked to keep people off the jury if they have unshakably strong feelings about the Republican.

In the 2020 presidential election, 87% of Manhattan voters supported Democrat Joe Biden for president. Trump got 12% of the vote.

"Day 1 in the books," William Brennan, one of the



CHRIS SEWARD, ASSOCIATED PRESS
Former President Donald Trump speaks at a Sept. 23 rally in Wilmington, N.C.

Trump Organization's lawyers, said as he exited the courtroom late Monday afternoon. "When you boil it all down, it is a garden-variety tax case. And that's how they should look at it."

Attorney Michael van der Veen, another Trump Organization attorney, said Tuesday would involve "sludging through, really getting down to people's interests and whether they can be fair or not." He said they hoped to have a jury by Friday.

Judge Juan Manuel Merchan warned all prospective jurors to avoid researching the case on the internet or talking to anybody about it.

In the morning, he described the case to them and explained that he wants unbiased jurors who will decide the case solely on the evidence.

Merchan told the jury pool the trial would last about six weeks, and that they should expect during the presentation of evidence to hear Trump's name and the names of his three eldest children,

Ivanka, Eric and Donald Trump Jr.

After the introduction, Merchan and the lawyers retreated to a back room out of public view where they let prospective jurors who raised their hands explain why they thought they didn't belong on the jury.

Those who were excused from the jury pool emerged from the courtroom, telling reporters they were let go for various reasons, including for medical issues or job-related stresses.

Others who were excused from a fast exit, including a psychiatrist who said she told them that Trump exhibits social narcissistic behavior and the charges related to the company reflect his personality.

Delvin Gerdan, a Manhattan doorman, said he merely expressed that he was opinionated about Trump. He said he was asked if he would be "leaning more toward one side" and he responded "yes." That was enough to get him excused.

Stitt hires new counsel in gaming case

Attorneys say they will seek dismissal of tribes' federal suit

CURTIS KILLMAN
Tulsa World

Cherokee Nation Principal Chief Chuck Hoskin Jr. on Monday tweeted a response to a report that the state of Oklahoma is hiring new outside legal counsel in its fight with the tribes over gaming compacts.

"More time wasting, resource squandering, and will sap legal actions against tribes in Oklahoma," Hoskin tweeted around noon Monday on Twitter.

He added a second tweet with simply a hashtag and the words "Remember in November," an apparent reference to the Nov. 8 statewide elections.

Hoskin was responding to a story Monday from KOSU radio that detailed the hiring of new attorneys and the state's new legal strategy in a federal lawsuit.

The Cherokee Nation, Chickasaw Nation, Choctaw Nation and Citizen Potawatomi Nation sued the U.S. Department of Interior, state of Oklahoma and four Oklahoma tribes in August 2020 in Washington, D.C., federal court after the latter signed

gaming compacts with the state of Oklahoma.

The Cherokee Nation and the other plaintiff tribes are seeking to replicate two rulings issued in 2020 by the Oklahoma State Supreme Court, which tossed the four gaming compacts after finding they were illegally negotiated.

Gov. Kevin Stitt approved the gaming compacts with the Comanche Nation, Otoe-Missouria Tribe of Indians, United Keetoowah Band of Cherokee Indians of Oklahoma and the Kiagee Tribal Town.

At issue were provisions in the compacts that provided for categories of games that included sports and video game betting, and the plaintiff tribes claim are illegal in Oklahoma.

On Oct. 11, members of the Washington D.C.-based law firm Sullivan and Cromwell P.P. indicated they would be the new counsel for Stitt, who was sued in federal court in his official capacity as the governor of Oklahoma.

The same day, the new attorneys filed a motion indicating the state would be seeking to dismiss the

lawsuit outright, based at least in part on the U.S. Supreme Court's June 2022 Castro-Huerta decision, which granted the state of Oklahoma the right to prosecute non-American Indians when they commit a crime in Indian Country against a tribal member.

"In the wake of that groundbreaking decision, the Governor has conducted a review of pending litigation involving Oklahoma Tribes and the State," the motion states.

As a result of that review, Governor Stitt has retained the undersigned and now intends to assert the defense that Plaintiff's Second Amended Complaint fails to state a claim upon which relief can be granted," the motion states.

The state will file its motion by Nov. 11, according to the court filing.

"We are hopeful that the federal judge will allow us to file a motion to dismiss to put an end to this litigation," Stitt spokeswoman Carly Atchison said. "The governor did not initiate this litigation."

curtis.killman@tulsa-world.com

17-year-old killed in drive-by ID'd

FROM STAFF REPORTS

A 17-year-old boy killed in a Saturday drive-by shooting has been identified.

Demarion Brown was found dead in the street in the 1500 block of East 48th Street North after a 911 caller heard multiple gunshots about 2:15 a.m.

Saturday. Another victim, 15, was hospitalized with a gunshot wound in the leg, Tulsa police said in a social media post.

Based on witness reports, police said they believe the victims were walking down the street when they were "fired upon by occupants in a passing car."

No arrests have been made, police said.

Those with information about the incident are asked to call TPD's non-emergency number 918-596-9222. Call Tulsa Crime Stoppers at 918-596-COPS to remain anonymous.

PUBLIC NOTICE

The City of Tulsa's Draft HOME-ARP Allocation Plan will be available for a 15-day public review and comment period from November 7, 2022 through November 21, 2022. The HOME-ARP Allocation Plan serves as the application to the U.S. Department of Housing and Urban Development (HUD) for HOME American Rescue Plan (ARP) funds. The Draft HOME-ARP Allocation Plan will be available for review on the City of Tulsa website at <https://www.cityoftulsa.org/grants>. Availability on the City's website will include accessible formats and translation in other languages. Physical copies will be available only by request. All comments should be directed in writing to the attention of Grants Administration at 175 E 2nd Street, Suite 1560, Tulsa OK 74103, or by email to grantsadmin@cityoftulsa.org.

NOTICE OF PUBLIC HEARING

The HUD Community Development Committee for the City of Tulsa will hold a Public Hearing to comment on the City of Tulsa's Draft HOME-ARP Allocation Plan on Thursday, November 10, 2022, at 5:00 p.m. in the Council Chambers 2nd Floor 175 E 2nd St.

The meeting link will be available on the City's website at <https://www.cityoftulsa.org/government/meeting-agendas/>.

Interested persons are urged to attend and be heard. If you are unable to attend, all comments should be directed in writing to the attention of Grant Administration at 175 E 2nd Street, Suite 1560, Tulsa OK 74103, e-mail to grantsadmin@cityoftulsa.org.

Reasonable accommodations will be made in compliance with the Americans with Disabilities Act of 1990 for those with disabilities or those who require an interpreter for languages other than English. Please contact grantsadmin@cityoftulsa.org to request accommodations.



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Notice to the Public Availability of the Draft HOME-ARP Allocation Plan

► Draft HOME-ARP Allocation Plan - November 7, 2022

The City of Tulsa is in the process of preparing its HOME-American Rescue Plan (ARP) allocation plan, which is required by the Department of Housing and Urban Development in order to receive funding. The purpose of the Public Hearing is to solicit comments from Tulsans regarding the draft HOME-ARP Allocation Plan.

The City of Tulsa's HOME-ARP allocation totals \$6,477,826 for eligible activities through September 30, 2030. The proposed HOME-ARP eligible activities that may be conducted include


- Development and Support of Affordable Housing
- Provision of Supportive Services
- Acquisition and Development of Non-Congregate Shelter (NCS) Units
- Administration and Planning

The City of Tulsa's HOME American Rescue Plan (ARP) draft Allocation Plan will be available for a fifteen (15) day review and comment period by all interested parties from November 7, 2022, through November 21, 2022. Any actions or changes contemplated as a result of any public comments will be set forth in the HOME-ARP Allocation Plan.

The draft HOME-ARP Allocation plan will be available here starting November 7, 2022, through November 21, 2022. Physical copies will be available only by request.

All written comments should be directed to the attention of Grants Administration, 175 East 2nd Street, Suite 1560, Tulsa, OK 74103, or e-mailed to grantsadmin@cityoftulsa.org.

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Notice of Public Hearing

The HUD Community Development Committee for the City of Tulsa will hold a Public Hearing on

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Hogar ► Departamentos ► Finanzas ► Subsidios

Subsidios

La Ciudad de Tulsa recibe asignaciones federales a través de la Subvención en Bloque para el Desarrollo Comunitario (CDBG), la Subvención de la Asociación de Inversión en el Hogar (HOME), la Subvención de Soluciones de Emergencia (ESG) y las Oportunidades de Vivienda para Personas con SIDA (HOPWA).

La Administración de Subvenciones coordina y supervisa todos los aspectos de las presentaciones de subvenciones y proporciona supervisión para garantizar el cumplimiento ético. Además, la Administración de Subvenciones brinda apoyo a los departamentos de la Ciudad para garantizar que la implementación de políticas y prácticas cumplan con las leyes, reglamentos y estipulaciones contractuales federales, estatales y locales aplicables. Grants también brinda experiencia en elaboración de presupuestos, elaboración de informes y seguimiento de contratos y cumplimiento.

► Políticas y procedimientos de subvenciones

Aviso a la Disponibilidad Pública del Borrador del Plan de Asignación de HOME-ARP

► Borrador del Plan de Asignación HOME-ARP - 7 de noviembre de 2022

La ciudad de Tulsa está en proceso de preparar su plan de asignación HOME-American Rescue Plan (ARP), que es requerido por el Departamento de Vivienda y Desarrollo Urbano para recibir fondos. El propósito de la Audiencia Pública es solicitar comentarios de Tulsans con respecto al borrador del Plan de Asignación de HOME-ARP.

La asignación de HOME-ARP de la ciudad de Tulsa totaliza \$6,477,826 para actividades elegibles hasta el 30 de septiembre de 2030. Las actividades elegibles de HOME-ARP propuestas que pueden llevarse a cabo incluyen

- Desarrollo y apoyo de viviendas asequibles
- Prestación de servicios de apoyo
- Adquisición y Desarrollo de Unidades de Refugio No Congregado (NCS)
- Administración y Planificación

El borrador del Plan de Asignación HOME American Rescue Plan (ARP) de la Ciudad de Tulsa estará disponible para un período de revisión y comentarios de quince (15) días por parte de todas las partes interesadas desde el 7 de noviembre de 2022 hasta el 21 de noviembre de 2022. Cualquier acción o cambio contemplado como el resultado de cualquier comentario público se establecerá en el Plan de asignación de HOME-ARP.

El borrador del plan de asignación de HOME-ARP estará disponible aquí a partir del 7 de noviembre de 2022 hasta el 21 de noviembre de 2022. Las copias físicas estarán disponibles solo a pedido.

Todos los comentarios escritos deben dirigirse a Grants Administration, 175 East 2nd Street, Suite 1560, Tulsa, OK 74103, o enviarse por correo electrónico a grantsadmin@cityoftulsa.org.

Gobierno

Departamentos
Finanzas
► Subsidios

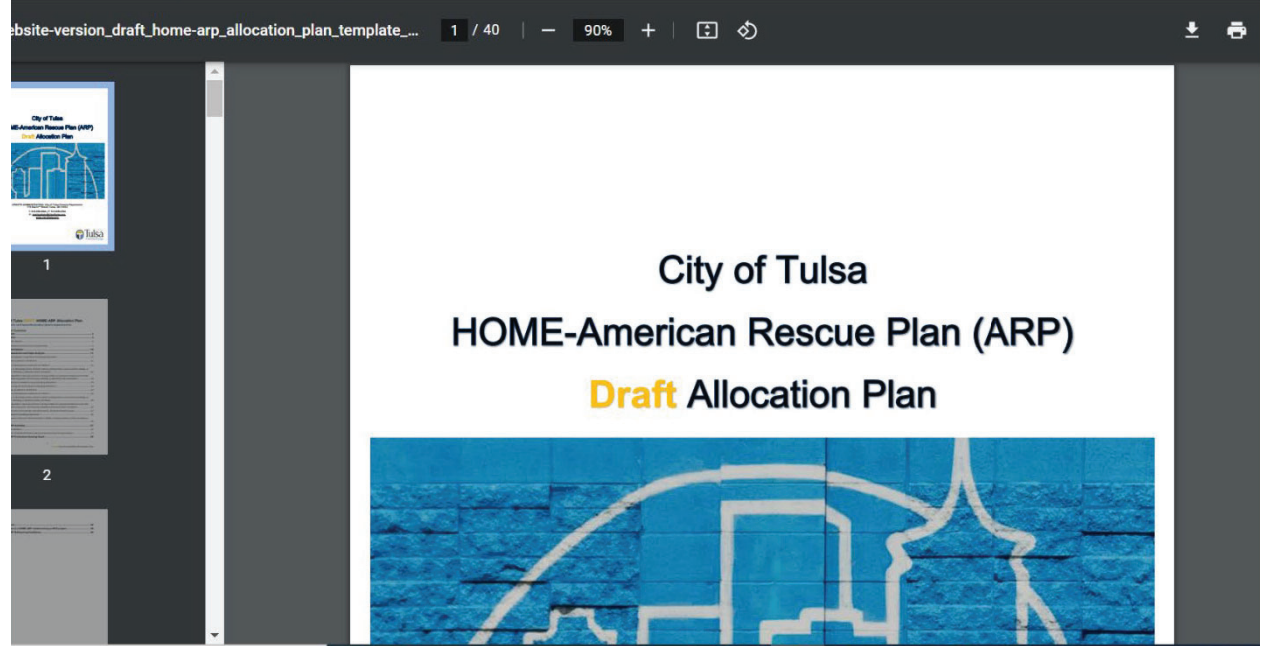
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Home > Departments > Finance > Grants > Plans and Reports
> HOME-ARP Draft Allocation Plan

HOME-ARP Draft Allocation Plan

▶ Download HOME-ARP PDF

- Introduction
- Consultation
- Consultation Sessions
- Public Participation
- Needs Assessment and Gaps Analysis
- Current Resources Available to Assist Qualifying Populations
- Unmet Housing and Service Needs of Qualifying Populations
- Gaps Within the Current Shelter, Housing Inventory, and Service Delivery System

Government

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Borrador del Plan de Asignación HOME-ARP

► [Descargar INICIO-ARP PDF](#)

Introducción

El 11 de marzo de 2021, el Congreso de los Estados Unidos asignó \$5 mil millones en fondos del Plan de Rescate Estadounidense (ARP, por sus siglas en inglés) que se administrarán a través de HOME para realizar cuatro actividades que deben beneficiar principalmente a las personas u hogares calificados que se encuentran sin hogar, en riesgo de quedarse sin hogar y otros poblaciones vulnerables. Hay cuatro actividades elegibles: (1) desarrollo y apoyo de viviendas asequibles, (2) asistencia de alquiler basada en inquilinos (TBRA), (3) provisión de servicios de apoyo; y (4) adquisición y desarrollo de unidades de refugios no colectivos (NCS). En septiembre de 2021, HUD otorgó a la Ciudad de Tulsa \$6,477,826 en fondos HOME-ARP. Para recibir estos fondos, la Ciudad de Tulsa debe desarrollar y presentar un Plan de asignación de HOME-ARP a HUD, que describe la distribución de los fondos de HOME-ARP e identifica cualquier preferencia para las actividades elegibles. La Ciudad de Tulsa también debe informar el desarrollo del Plan de asignación de HOME-ARP a través de la consulta de las partes interesadas y la participación de la comunidad. El siguiente es el borrador del plan de asignación de HOME-ARP.

Consulta

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**HOUSING AND URBAN DEVELOPMENT (HUD)
COMMUNITY DEVELOPMENT COMMITTEE (CDC)**

MEETING AGENDA

November 10, 2022, 5:00 p.m.
City Council Chambers, 2nd Floor
City Hall, 175 E. 2nd St., Tulsa, OK 74103

Note: The Committee may review, discuss and/or take action on the following agenda items.

1. Call to Order
2. Chair's Introduction and Remarks
3. Approval of Minutes from September 5, 2022 meeting
4. Review 2023 Meeting Calendar
5. HOME-ARP presentation by Grants Administration
6. Motion and Vote to Enter into HOME-ARP Public Hearing
7. Motion and Vote to Exit HOME-ARP Public Hearing
8. Public Comments
9. Adjournment

Reasonable accommodations will be made in compliance with the Americans with Disabilities Act of 1990 for those with disabilities or those who require an interpreter for languages other than English. Please contact our office to request accommodations.

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-MP400202

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:**6. Date Received by State:**

7. State Application Identifier:

8. APPLICANT INFORMATION:*** a. Legal Name:**

City of Tulsa

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

73-6005470

*** c. UEI:**

NG8FKKNYSEV5

d. Address:*** Street1:**

175 E. 2nd Street

Street2:

15th Floor

*** City:**

Tulsa

County/Parish:

*** State:**

OK: Oklahoma

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

74103-3201

e. Organizational Unit:**Department Name:**

Finance

Division Name:

Grants Administration

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

Ms.

*** First Name:**

Carol

Middle Name:

*** Last Name:**

Jones

Suffix:

Title:

Grants Manager

Organizational Affiliation:

*** Telephone Number:**

918-596-7537

Fax Number:

*** Email:**

caroljones@cityoftulsa.org

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

US Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnerships Program

*** 12. Funding Opportunity Number:**

N/A

* Title:

N/A

13. Competition Identification Number:

N/A

Title:

N/A

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

Add Attachment

Delete Attachment

View Attachment

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

HOME-ARP

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="6,477,826.00"/>
* 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="6,477,826.00"/>

*** 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:

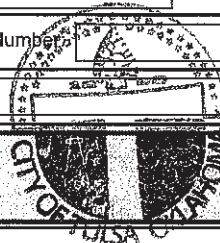
* Telephone Number: Fax Number:

* Email:

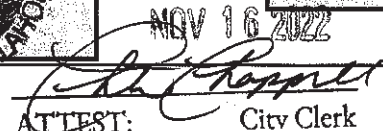
* Signature of Authorized Representative:



* Date Signed:



Approved: 
Asst. City Attorney

ATTEST: 
City Clerk

ASSURANCES - CONSTRUCTION PROGRAMS

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

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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:

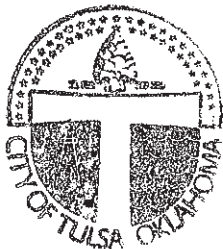
1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give 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 	TITLE G. T. Bynum Mayor - City of Tulsa
APPLICANT ORGANIZATION City of Tulsa	DATE SUBMITTED NOV 16 2022

SF-424D (Rev. 7-97) Back

ATTEST:  City Clerk



APPROVED AS TO FORM:

By: 
ASST. CITY ATTORNEY

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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8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
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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).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

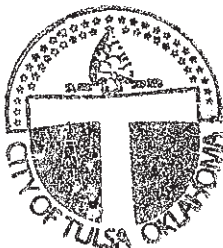
SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE G. T. Dymun Mayor - City of Tulsa
APPLICANT ORGANIZATION City of Tulsa	DATE SUBMITTED NOV 16 2022

Standard Form 424B (Rev. 7-97) Back

ATTEST: 
City Clerk

APPROVED AS TO FORM:

By: 
ASST. CITY ATTORNEY



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 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 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

NOV 16 2022

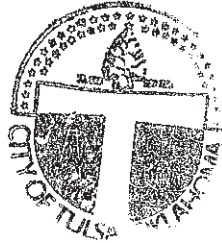
Date

G. T. Bynum
Mayor - City of Tulsa

Title



ATTEST: City Clerk



APPROVED AS TO FORM:

By: 
ASST. CITY ATTORNEY