

City of Tulsa

HOME-American Rescue Plan (ARP)

Draft Allocation Plan



GRANTS ADMINISTRATION- City of Tulsa Finance Department
175 East 2nd Street, Tulsa, OK 74103

T: 918-596-9084 | F: 918-699-3523
E: grantsadmin@cityoftulsa.org
www.cityoftulsa.org

City of Tulsa **DRAFT** HOME-ARP Allocation Plan

PREPARED BY THE FINANCE DEPARTMENT-GRANTS ADMINISTRATION

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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 four eligible activities: (1) development and support of affordable housing, (2) tenant-based rental assistance (TBRA), (3) provision of supportive services; and (4) acquisition and development of non-congregate shelter (NCS) units.

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 inform the development of the HOME-ARP allocation Plan through stakeholder consultation and community engagement. The following is the Draft 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 various agencies and 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 4 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 eligible activities must benefit. 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:
 - No comments were made at this time. A survey invitation was sent out to these service providers to capture needs seen for HOME-ARP activities.

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.

[Chart demonstrating data above not available in draft.]

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.

[Chart demonstrating data above not available in draft.]

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.

[Chart demonstrating data above not available in draft.]

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
 - Housing besides emergency shelters is needed
 - Lack of Wrap around services
 - Provide more services and housing to at-risk population and low-income households
 - Low-income housing programs: condominium units mixed with larger units
 - Lack of one- and two-person bedroom units
 - Incentivize landlords to accept vouchers or offer affordable housing
 - Replace dilapidated housing that was torn down with affordable housing throughout Tulsa
 - 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
 - Provide 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:
 - Eviction rates are too high, lack of legal supportive services
 - Lack of transitional housing units and permanent housing
 - Lack of single occupant housing units
 - There are too many vacant housing units in Tulsa 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

Agency/Org Consulted	Type of Agency/Org	Method of Consultation
Vintage House	Affordable housing service provider	Consultation session & survey Invitation
Indian Nations Council of Governments	Public/Private Entity; Municipal Planning and Community Development services	Consultation session & survey Invitation
Volunteers of America	Affordable housing service provider; Homeless service provider; Disability service provider; Veteran service provider	Consultation session & survey Invitation
Counseling & Recovery Service of Oklahoma	Mental health service provider	Consultation session & survey Invitation
Mental Health Association of Oklahoma	Affordable housing service provider; Homeless service provider	Consultation session & survey Invitation
Domestic Violence Intervention Services	Domestic violence service provider	Consultation session & survey Invitation

Family and Children's Services	Community behavior health service provider	Consultation session & survey Invitation
Family Promise of Tulsa County	Homeless service provider	Consultation session & survey Invitation
Family Safety Center	Domestic violence service provider	Consultation session & survey Invitation
Housing Partners of Tulsa	Housing counseling service provider (Approved HUD-Certified Housing Counseling Agency)	Consultation session & survey Invitation
Iron Gate	Homeless service provider	Consultation session & survey Invitation
Legal Aid Services of Oklahoma	Civil rights organization; Other: legal service provider	Consultation session & survey Invitation
Restore Hope Ministries	Affordable housing service provider; homeless service provider	Consultation session & survey Invitation
Tulsa Day Center	Homeless service provider	Consultation session & survey Invitation
City Lights Foundation	Homeless service provider	Consultation session & survey Invitation
Salvation Army	Affordable housing service provider; homeless service provider	Consultation session & survey Invitation
Community Service Council	Homeless service provider and community social, health, civic, and educational service provider	Consultation session & survey Invitation
Crossover Community Impact	Health, education, and community service provider	survey invitation
Housing Authority of the City of Tulsa (THA)	Public Housing Agency; Affordable housing service provider	survey invitation
Tulsa Health Department	Public Government entity; Health service provider	survey invitation
Boomtown/Habitat for Humanity	Affordable housing service provider	survey invitation

Community Action Project Tulsa	Early Childhood Education service provider; Social service, education, and job training provider for families of ECDC children	survey invitation
Tulsa Police Department Crisis Intervention Unit	Public Government entity; Crisis intervention service provider	survey invitation
EMSA	Health service provider	survey invitation
South Tulsa Community House	Social service provider	survey invitation
Community Food Bank of Eastern OK	Community food service provider	survey invitation
Tulsa Dream Center	Community food, medical, and educational service provider	survey invitation
Resonance	Women's criminal justice and support service provider	survey invitation
YWCA	Social service provider; programs for immigrants and refugees	survey invitation
Center for Employment Opportunities	Social service provider to persons returning from prison	survey invitation
Muscogee (Creek) nation	Public/private entity	survey invitation
Osage Nation	Public/private entity	survey invitation
Cherokee Nation	Public/private entity	survey invitation
Restore Hope Ministry	Public/private entity	survey invitation
John 3:16	Public/private entity	survey invitation
Catholic Charities	Public/private entity	survey invitation
First Baptist Church North Tulsa	Public/private entity	survey invitation
North Peoria Church of Christ	Public/private entity	survey invitation
Morning Star Baptist Church	Public/private entity	survey invitation
First Baptist Church	Public/private entity	survey invitation
Asbury Church	Public/private entity	survey invitation

Jewish Federation of Tulsa	Public/private entity	survey invitation
1st Presbyterian Outreach	Public/private entity	survey invitation
1st United Methodist Church	Public/private entity	survey invitation
Housing Solutions Tulsa	CoC lead agency & Homeless service provider agency	survey invitation
National Resource Center for Youth Services	Public Entity (OU); Resource provider for youth social service providers	survey invitation
Morton Comprehensive Health Services	Public/private entity: Federally Qualified Health Center	survey invitation
Surayya Ann Foundation	Homeless service provider; Affordable housing service provider	survey invitation
Counseling & Recovery Service of Oklahoma	Homeless service provider	survey invitation
Youth Villages	Public Government entity; Veterans service provider	survey invitation
Department of Veterans Affairs	Veterans service provider	survey invitation
Tulsa CARES	Homeless service provider; Affordable housing service provider	survey invitation
12 & 12	Addiction recovery service provider	survey invitation
BeHeard Movement	Homeless service provider	survey invitation
Barracks for Vets	Veterans service provider	survey invitation
Lindsey House	Domestic violence service provider	survey invitation
Tulsa Speech and Hearing Association	Service provider for persons with disabilities	survey invitation
Life Senior Services	Service provider for persons with disabilities; Health service provider; Social Service provider	survey invitation

Ability Resources	Service provider for persons with disabilities	survey invitation
The Center for Individuals with Physical Challenges	Service provider for persons with disabilities	survey invitation
Area Agency on Aging	Public Entity; Social service provider for persons with disabilities	survey invitation
Tulsa Apartment Association	Housing service provider; Fair Housing advocacy	survey invitation
Human Rights Commission	Public Entity; Fair housing advocacy	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 provides for and encourages citizen participation in the development of the HOME-ARP Allocation Plan. Council members and staff from the Grants Administration sponsor 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 at OTC 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 includes the ability to accessible formats and translate 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. Consulted with community providers through 4 virtual consultation sessions in December 2021.

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.

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

Not Available

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

Not Available

Needs Assessment and Gaps Analysis

Size and Demographic Composition of Qualifying Populations

Homeless as defined in 24 CFR 91.5

Within the City of Tulsa, there is a 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 of homelessness experienced during 2021 was 79 days.

Demographics:

Gender

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

- Other-¹ 1%

[Chart demonstrating data above not available in draft. Data Source: CoC HMIS, By Name List (July 2022)]

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%

[Chart demonstrating data above not available in draft. 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%

[Chart demonstrating data above not available in draft. Data Source: CoC HMIS, By Name List (July 2022)]

Age

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

[Chart demonstrating data above not available in draft. 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.

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.

According to 2014-2018 CHAS data report(s), 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 report(s), 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 below.

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%

[Chart demonstrating data above not available in draft. Data Source: Comprehensive Housing Affordability Strategy (CHAS) 2014-2018]

Ethnicity

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

[Chart demonstrating data above not available in draft. 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%

[Chart demonstrating data above not available in draft. 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%

[Chart demonstrating data above not available in draft. Data Source: Comprehensive Housing Affordability Strategy (CHAS) 2014-2018]

Ethnicity

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

[Chart demonstrating data above not available in draft. 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%

[Chart demonstrating data above not available in draft. 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 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 under the McKinney-Vento Homeless Assistance Act. Union schools were estimated to have 945 students experiencing homelessness 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). 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. From June 2021 through July 2022 the 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%

[Chart demonstrating data above not available in draft. Data source: July 2021-June 2022 Improving Criminal Justice Responses Report(s)]

Age

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

[Chart demonstrating data above not available in draft. 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%

[Chart demonstrating data above not available in draft. not available in draft. 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%

During the 2022 Point in Time count, 216 out of 1,063 respondents or 20% reported that domestic violence was a factor in their homelessness. Out of the 1,063 respondents 50% reported a history of experiencing domestic violence.

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

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.

[Chart demonstrating data above not available in draft. 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 burden, 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.

[Chart demonstrating data above not available in draft. 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, and Permanent Supportive Housing, along with shelter and housing for those fleeing domestic violence are shown in a 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	508	526				
Transitional Housing	0	0	0	28	53	0	159	240				
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	962	1759				
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, the Tulsa City and County Continuum of Care (CoC) provides rental assistance through CoC-funded programs.

Non-Congregate Shelters

Through the ESG-CV program, Housing Solutions, the lead agency for the CoC, will operate a seasonal NCS. This shelter is projected to have 100 rooms with the option to increase to 300 if there is a weather crisis.

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 veteran's use.

Supportive Services

The City of Tulsa has a vast network of community partners working to provide supportive services. Tulsa's 2-1-1 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 2-1-1 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 lack of overall funding needed 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.

Through the ESG-CV program, a seasonal NCS will be funded for operation during winter months. This temporary NCS is planned to have 100 rooms with the option to increase to 300 if there is a weather crisis. Currently, there is an unmet need for shelter beds in the community's shelter system and a long-term NCS could be beneficial.

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.

[Table demonstrating data above not available in draft. 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, the Tulsa City and County Continuum of Care (CoC) provides rental assistance through 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 in 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 30% AMI or below. 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.

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.
- Eviction rates are too high, and additional funding for supportive services is needed.
- 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.
- If supportive services and additional affordable housing units are not made available, then additional shelter beds may be needed as this population is at risk of experiencing homelessness. In this scenario, additional NCS space would be beneficial.

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 with 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 Service Providers (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%. There were 33,215 nights available of shelter beds, while 23,446 nights of shelter beds were utilized in 2021.
- 119 survivors and children lived at the DVIS transitional housing facility in 2021
 - 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 (8) adult clients with nine (9) 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 3 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 (16) adult clients with twenty-three (23) children of domestic violence with rental application, rental deposit, rent, and/or utilities.
 - Most clients needed assistance in 3 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 3 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.”
- Top three services needed to assist those fleeing domestic violence to secure housing: “Affordable housing, emergency supplies/food/clothing, and medical resources.”
- Top three most needed services for keeping domestic violence victims housed: “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.
- 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.

- 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

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% according to CHAS 2014-2018 data. Additionally, According to HMIS data, in 2021, 133 persons 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:

- Increase in legal support services due to high eviction rates
- Education and job training services needed
 - could assist in bringing households out of cost-burdened category
- Low-income housing programs
- Housing loss prevention services
- Construction of new rental units
- Lack of mental health services and case management for clients needing housing
- Lack of affordable housing due to increase in rent costs
- New construction and acquisition for rental units

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 these 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.

- 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.
- The acquisition or construction of more affordable rental housing units could assist this population, especially since there is a need identified for 4,565 housing units affordable to those at or below 30% AMI.
- Various HOME-ARP-eligible support services would benefit this population. There was an overwhelming response from consultation with agencies about additional legal services to prevent eviction or housing loss prevention services to keep those in this population stably housed. Additionally, education and job training services were mentioned in the needs assessment survey.

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

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 as of June 2022. There are many factors that create the additional need for shelter beds and this quantity of need can fluctuate from day to day.

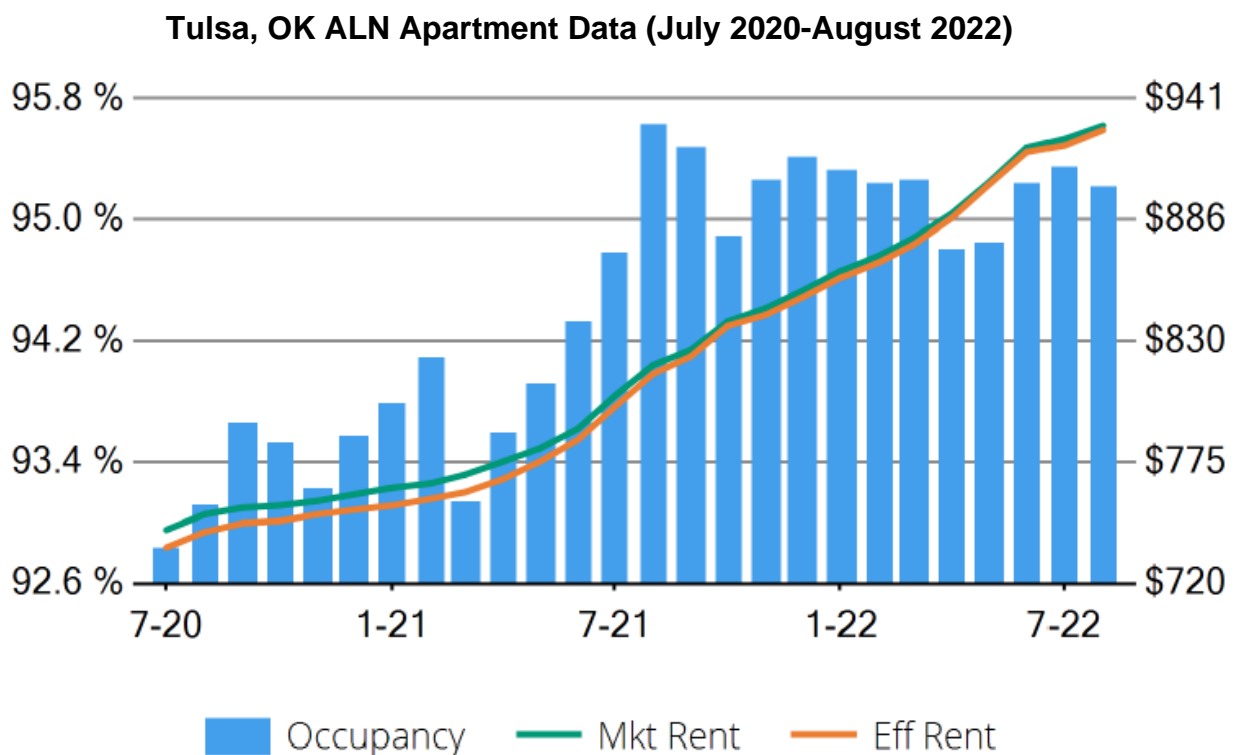
Regarding the need for additional non-congregate shelters (NCS) for qualifying populations, the City of Tulsa has one seasonal NCS. Through the ESG-CV program, the City of Tulsa has funded Housing Solutions, the lead agency for the Tulsa City and County Continuum of Care, to operate a seasonal NCS. This shelter is projected to have 100 rooms with the option to increase to 300 if there is a weather crisis. The community could benefit from a permanent NCS, adding additional shelter beds to the city's inventory.

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), the lead agency of the Tulsa City & County CoC, "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 32 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.

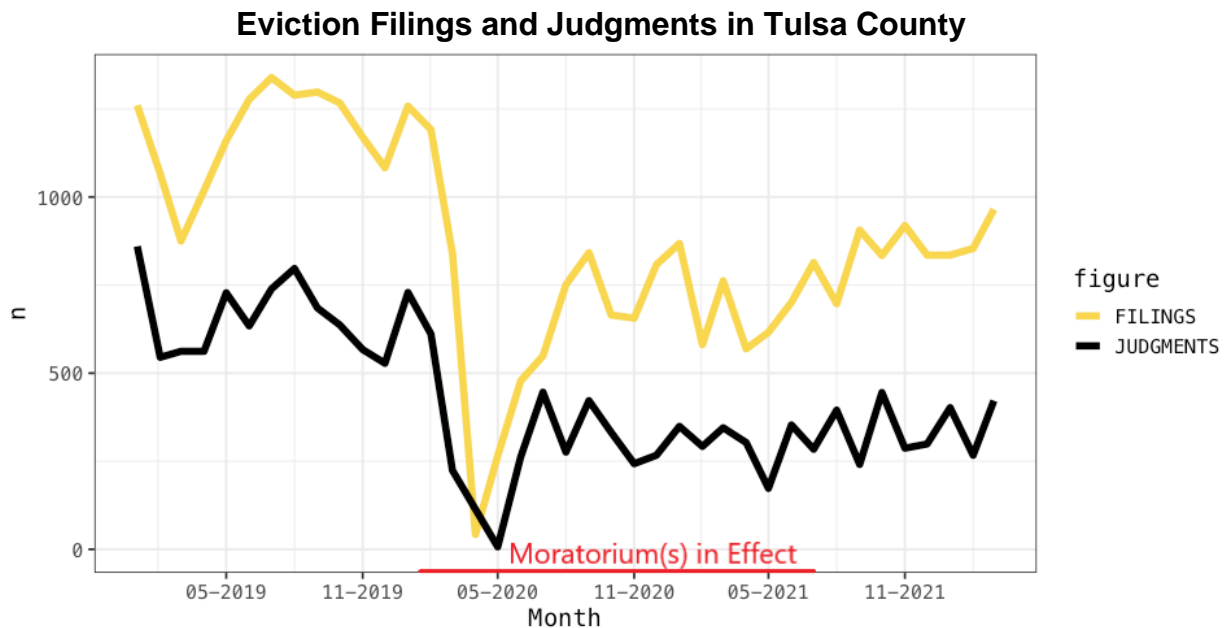
According to the Washington Post, average rental rates have increased by 14.9% in Tulsa since 2019. Tulsa’s average rental rate is higher than the national rental rate increase of 11.3%. Additionally, The Tulsa Apartment Association says since 2021, rental rates in Tulsa, on average jumped more than 13%.



[Chart demonstrating Tulsa, OK ALN Apartment Data: Occupancy rate is blue, market rent is green, and efficiency rent is orange. Data Source: ALN Apartment Data End of August 2022]

Additionally, 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 apartments dedicated to senior living are 7%. This data supports the claim that additional affordable housing units are needed in Tulsa. 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.



[Chart Description: eviction filings are in yellow, eviction judgements are in black, and moratorium is in red. Data Source: Legal Aid Services of Oklahoma; modification made by the City of Tulsa: Moratorium(s) in Effect inserted.]

[Chart demonstrating data not available in draft. Data is titled “Reasons for evictions (June 2020)”: Past-Due Rent-97%, For Cause-0%, No Stated Claim in Pleadings-3%. **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 are a continued need within the community, especially for those who are at-risk of homelessness.

According to ACS 2014-2018 data, the City of Tulsa's rental housing market would be deemed an unhealthy rental housing market with an estimated 9.2% vacancy rate, versus a healthy or normal vacancy rate of 5%-7%. 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 up with 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.

[Chart "Estimated percent of housing units that were vacant 2013-2017" demonstrating data above not available in draft. 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 currently has 6,750 applicants: 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 a Housing Choice Voucher is 2 months to 3 years or longer. This long 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.

The City of Tulsa has a vast network of community partners providing supportive services. There is not a lack of supportive services provided within the City of Tulsa. There is a lack of funding 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 experience homelessness and 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. However, 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 to house qualifying populations 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 supportive services with affordable housing would help ensure that the experience of homelessness would be briefer and non-recurring while proactively assisting those who are at risk of homelessness so that they do not have to experience homelessness.

The City of Tulsa will not be considering additional characteristics associated with instability and the increased risk of homelessness will be added to the definition of “other populations.”

Priority Needs for Qualifying Populations

The priority needs identified for 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 were 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 data 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 procured through request for proposals. This process will involve the development of a scope of services consistent with the HOME-ARP Notice and any other funding sources that may be combined, solicitation to local non-profit agencies who serve qualifying populations, review, scoring, interviews, and award. There will be a posted public notice in the local newspaper as well as 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 assessing 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 Gaps 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 focus on HOME-ARP supportive services to provide ongoing assistance to those housed in the HOME-ARP units created.

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 units. Considering the compliance period of a minimum of 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 a minimum of 20 affordable rental housing units with the current HOME-ARP Rental Housing activity allocation alone. To potentially produce more affordable housing units, the City of Tulsa 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 the HOME-ARP 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. 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.