



**SUBSTANTIAL AMENDMENT #2  
to the**

**Tulsa County HOME Consortium  
&  
Tulsa County  
Community Development Block Grant  
Urban County**

**Fiscal Year 2019  
ANNUAL ACTION PLAN**

**May 2021**

Substantial Amendment #2 in May 2021 to PY2019 Action Plan to add projects and funding in response to CARES Act CDBG-CV additional allocation.

# Executive Summary

## AP-05 Executive Summary - 91.200(c), 91.220(b)

### 1. Introduction

The Tulsa County HOME Consortium, formed in 1994, serves 24 members governments in Northeastern Oklahoma in a geographic area that covers 5,291 square miles. The Consortium includes 18 cities and 6 counties with an estimated total 2017 population of 545,441. The Consortium includes rapidly growing suburban areas adjacent to the corporate city limits of Tulsa and small communities under 5,000 population, as well as the unincorporated rural areas of six counties. The Tulsa County Community Development Block Grant Urban County, formed in 2008, is comprised of unincorporated Tulsa County and ten Tulsa County incorporated places, including the City of Sapulpa (whose city limits include a portion of Tulsa County). The City of Tulsa is not a member of the CDBG Urban County. This Annual Action Plan 2019 outlines the activities which will be undertaken during the 2019 program year, beginning July 1, 2019 and ending June 30, 2020 using federal funds allocated to the Tulsa County HOME Consortium and the Tulsa County CDBG Urban County Entitlement program. Programs and activities described in this Annual Action Plan will principally benefit low and moderate income populations of the service areas of the HOME Consortium and the Urban County.

In March 2020, Congress created the CARES Act to provide supplemental funding to local governments to prevent, prepare for and respond to the Coronavirus COVID-19. Tulsa County was awarded CDBG-CV funding in the amount of \$861,792 for Urban County member governments. A CARES Act Substantial Amendment to the FY2019 Annual Action Plan was developed in May 2020 to create projects.

### 2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

Based on an assessment of needs across the Consortium region, priorities were selected to focus HOME and CDBG funding. Proposed goals and objectives for the Annual Action Plan period were developed to address those priorities.

#### HOME

**Priority Need:** Availability of Rental and Owner-Occupied Housing

**Goal:** New Construction of Multifamily Supportive Housing

**Objective:** Creation of affordable rental housing units for low income and disabled households

**Outcome:** Construction of 20 multi family rental units for extremely low income individuals with developmental disabilities.

**Priority Need:** Rental Housing for Elderly Households

**Goal:** Rental Housing for Elderly

**Objective:** Rehabilitation of existing affordable rental housing and supportive services within one complex to permit elderly to continue to lead independent life styles.

**Outcome:** Rental units rehabilitated: 40 Household Housing Units

### **CDBG**

**Priority Need:** Sustainability of Community

**Goal:** Construction of Public Facilities and Services

**Goal:** Construction of Public Infrastructure

**Objective:** Communities participating in the CDBG Urban County will seek to improve the quality and increase the quantity of public improvements and services for low income residents within their jurisdictions.

**Outcome:** Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit:

3,282 Persons Assisted

Public service activities other than Low/Moderate Income Housing Benefit:

46,517 Persons Assisted

### **CDBG-CV**

**Priority Need:** Sustainability of Community

**Goal:** Construction of Public Facilities and Services

**Objective:** Activities to prevent, prepare for and respond to the Coronavirus pandemic through services for low income residents and homeless populations within their jurisdictions.

**Outcome:** Public service activities other than Low/Moderate Income Housing Benefit:

910 Persons Assisted

### **3. Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

In recent years, significant contributions have been made by the HOME Consortium to supply new and rehabilitated affordable housing units to the member governments. This includes funding for the rehabilitation of affordable rental units for the elderly and families, construction of innovative single-family housing units to promote homeownership and affordable rental opportunities, and homebuyer assistance. To date, eleven MTHC Consortium cities have benefited from the construction of elderly congregate housing projects that were financed in part with the Consortium HOME funds. Two member communities, Sapulpa and Broken Arrow, have two HOME-funded elderly projects in their cities.

The City of Broken Arrow has utilized CDBG funds for numerous public works projects that have benefited low to moderate income residents of the residential neighborhoods in the Central City. Several social service agencies have also received CDBG funding for their programs that serve the special needs populations in the City of Broken Arrow.

### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

Each of the member governments in the CDBG Urban County held public hearings to determine which projects to develop within their respective communities. HOME Consortium CHDOs were consulted to develop affordable housing activities based on area needs. The Tulsa County-Tulsa-Broken Arrow Continuum of Care members played a key role in the homelessness discussion.

The Citizen Participation Plan was amended under a CARES Act HUD waiver, to reduce citizen participation notice and public comment periods to 5 days. Tulsa County held a public hearing in April to receive comments on coronavirus needs within the county. Tulsa County consulted with homeless network providers and A Way Home 4 Tulsa, and with area non-profit agencies serving low income population in the jurisdiction, to develop the projects to be funded with the CDBG-CV funds.

### **5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

No comments were received during the Substantial Amendment citizen participation process.

**6. Summary of comments or views not accepted and the reasons for not accepting them**

No comments were received.

**7. Summary**

Tulsa County HOME Consortium and CDBG Urban County will continue to operate similarly as in previous years, letting member communities set their own priorities for CDBG projects and assessing the Con Plan needs to determine affordable housing activities.

## PR-05 Lead & Responsible Agencies - 91.200(b)

### 1. Agency/entity responsible for preparing/administering the Consolidated Plan

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator		INCOG
HOME Administrator		INCOG

Table 1 – Responsible Agencies

### Narrative

Tulsa County serves as the lead entity for both the Tulsa County HOME Consortium and the Tulsa County CDBG Urban County. The HOME Consortium and the Tulsa County CDBG Urban County Entitlement programs are both administered by the staff of the Indian Nations Council of Governments (INCOG).

### Consolidated Plan Public Contact Information

Inquiries and comments regarding the Consolidated Plan may be directed to the INCOG Community and Economic Development Manager at (918)584-7526.

## **AP-10 Consultation - 91.100, 91.200(b), 91.215(l)**

### **1. Introduction**

The Consortium has been working closely with the providers of affordable housing for the elderly and other population groups in the Greater Tulsa area since the MTHC was created in 1994. Consortium/INCOG staff members have developed excellent working relationships with homeless provider agencies through the CoC review process and by monthly attendance at the "A Way Home 4 Tulsa" Governance Council meetings and related events. Consultation for the proposed use of CDBG-CV funds occurred with A Way Home 4 Tulsa, Housing Solutions, non-profit agencies in Urban County jurisdictions and Tulsa County departments.

**Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).**

The Consortium works closely with providers of affordable housing for elderly populations and for populations with mental health disabilities to increase opportunities to housing populations in need.

**Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

The Consortium does not receive funding for homeless prevention, rapid re-housing, or supportive services for the homeless. INCOG staff members serve on the Governance Council of "A Way Home 4 Tulsa" and they also serve on the Review Panel for the Tulsa-Tulsa County-Broken Arrow Continuum of Care application process. Local homeless service providers in Tulsa provide assistance to homeless individuals and families in the greater Tulsa area. As of 2013 the Tulsa & Tulsa County/Broken Arrow Continuum of Care merged with "A Way Home for Tulsa". The AWH4T Governance Council unanimously voted to expand its scope from a single focus on ending *long term* homelessness to a system-wide planning initiative focused on *ending homelessness*. This decision is driven by numerous factors including staffing needs, federal regulations, and positioning the organization to take advantage of numerous opportunities. Leadership from the participating agencies is actively engaged while the agencies are facilitating real change within their own organizations to best support the *A Way Home for Tulsa* Integrated and Coordinated Case Management "Pathways" Program and the HUD funded Homeless Management Information System and Continuum of Care Programs. There are 23 participating agencies, including INCOG, in the AWH4T structure. It is the mission of AWH4T to find

solutions to end homelessness in the Tulsa Metropolitan Area through partnerships among non-profit agencies, private business, governmental entities, philanthropic organizations, the investment community, and private citizens.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

An INCOG staff member attends the monthly meetings of the "A Way Home 4 Tulsa" Governance Council. In addition, an INCOG staff person serves on the Continuum of Care Review Panel for the Tulsa-Tulsa County-Broken Arrow CoC application. In the past, an INCOG staff member has served on the ESG Review Panel for the City of Tulsa. There is frequent contact and interaction with the participating agencies in the AWH4T structure throughout the year.

**2. Agencies, groups, organizations and others who participated in the process and consultations**



**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	MENTAL HEALTH ASSOCIATION IN TULSA, INC.
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	MHAOK was consulted through ongoing interaction between INCOG and MHAOK involving collaboration on a number of projects to assist homeless clients. INCOG was the administrator of a recently completed \$3 million multiyear homeless housing grant funded through the federal Department of Health and Human Services

**Identify any Agency Types not consulted and provide rationale for not consulting**

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Community Service Council of Tulsa	

**Table 3 – Other local / regional / federal planning efforts**

**Narrative**

State agencies such as the Oklahoma Department of Commerce (small city CDBG program); Oklahoma Housing Finance Agency (LIHTC, HOME), and the State Department of Mental Health are partners in assessing housing and community development needs within the region. Coordination is sought when appropriate.

## **AP-12 Participation - 91.401, 91.105, 91.200(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

A Citizen Participation Plan is in place for the Consolidated Plan process. The Plan details participation of groups impacted by CDBG and HOME funding, and encourages participation of low and moderate income residents, minorities and non-English speaking persons where significant populations exist, residents of assisted housing, and residents of targeted areas. The member cities of the CDBG Urban County are required to hold a community development Needs Public Hearing within their communities, per the Tulsa County CDBG Urban County Application guidance. Several of the communities hold informational meetings in neighborhoods targeted for CDBG project assistance. Notice of the public hearings are given via community newspaper publication or by posting. The Policy Committee, comprised of public officials from the local jurisdictions, is apprised of the public participation process, and actively solicits participation in their communities. The new Revolving Entities rotation did not require Glenpool, Skiatook or Sperry to hold a 2019 needs public hearing. CDBG Needs Public Hearings were held in these communities in 2019:

Bixby: March 11, 2019 at 6:00 PM

Broken Arrow: April 2, 2019 at 5:00 PM

Collinsville: March 4, 2019 at 5:30 PM

Owasso: March 5, 2019 at 6:30 PM

Sand Springs: February 26, 2018 at 7:00 PM

Sapulpa: March 19, 2018 at 7:00 PM

Tulsa County: March 5, 2018 at 9:30 AM

Sand Springs: March 25, 2019 at 7:00 PM

Sapulpa: March 18, 2019 at 7:00 PM

Tulsa County: March 11, 2019 at 9:30 AM

#### **CDBG-CV1 Needs Public Hearing:**

April 20, 2020

**CDBG-CV3 Needs Public Hearing:**

January 25, 2021

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Minorities Non-English Speaking - Specify other language: Spanish Non-targeted/broad community Residents of community project areas	A CDBG Needs Public Hearing can be held separately or in conjunction with a regularly scheduled City Council meeting. Most of the member communities chose to have the public hearing at the City Council meeting so the attendance can be very large.	No comments received.		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Newspaper Ad	Non-targeted/broad community	Suburban Newspapers serve all of the Tulsa County CDBG communities with the exception of Sperry which does not have its own weekly newspaper. Sperry relies on the nearby Skiatook Journal. These suburban newspapers are well read in the communities and are a good source of local information for citizens.	No comments received.		
3	Internet Outreach	Non-targeted/broad community	Notice of public hearing and draft Action Plan published on Tulsa County website and INCOG website	No comments received.		

**Table 4 – Citizen Participation Outreach**

## Expected Resources

### AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

#### Introduction

The Urban County anticipates receiving both a direct allocation of federal CDBG funds and state CDBG funds to address community development needs. Member jurisdictions will also have available sources of funds which include Oklahoma Department of Commerce programs REAP, CDBG-EDIF, CSBG, EHP and LIHEAP; Emergency Food and Shelter program through FEMA; and private United Way grants. Resources to leverage with HOME funds include LIHTC, Federal Home Loan Bank- Affordable Housing Program, Public Housing CFP and Section 8. In March 2020, Tulsa County was awarded an additional amount of special CDBG-CV funding in the amount of \$861,792 for projects related to preventing, preparing and responding to the threat of the COVID-19 virus in local communities. In September 2020, Tulsa County was awarded an additional amount of special CDBG-CV funding in the amount of \$1,286,535, making the cumulative amount for all CDBG CV allocation rounds \$2,148,327.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,391,322	0	0	1,391,322	4,173,966	CDBG funds will be leveraged with local jurisdiction funds to increase the impact of activities.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,001,261	0	0	1,001,261	3,003,783	HOME funds will be leveraged with tax credit funding to develop affordable housing in the region
Other	public - federal	Other	2,148,327	0	0	2,148,327	0	CDBG-CV funds to be used to prevent, prepare for, and respond to the Coronavirus.

Table 2 - Expected Resources – Priority Table

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

Federal CDBG funds will be leveraged with local city funds in order to construct larger projects with greater impact to the community. CDBG Public Services funds will be combined with local United Way grants to provide funding to social agencies to impact low and moderate income residents in need. Each participating jurisdiction receiving HOME funds is required to provide a 25% match. That match may be in the form of direct subsidies, infrastructure improvements in the targeted area and/or the waiving of related construction fees. Currently, the HOME Consortium has available over \$3 million in banked match to apply towards HOME projects within the service area.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

Limited publically owned land or property located within the jurisdictions will be used to address the needs.

**Discussion**

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Rental Housing for Elderly Households	2018	2022	Affordable Housing		Rental Housing for Elderly	HOME: \$451,135	Rental units rehabilitated: 40 Household Housing Unit
2	New Construction of Single Family Rental Units	2018	2019	Affordable Housing		Availability of Rental and Owner-Occupied Housing	HOME: \$450,000	Rental units constructed: 20 Household Housing Unit
4	Construction of Public Facilities and Services	2018	2022	Non-Housing Community Development		Sustainability of Community	CDBG: \$70,578	Public service activities other than Low/Moderate Income Housing Benefit: 45749 Persons Assisted
5	Construction of Public Infrastructure	2018	2022	Non-Housing Community Development		Sustainability of Community	CDBG: \$1,105,726	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 3282 Persons Assisted

Table 3 – Goals Summary



## Goal Descriptions

1	<b>Goal Name</b>	Rental Housing for Elderly Households
	<b>Goal Description</b>	
2	<b>Goal Name</b>	New Construction of Single Family Rental Units
	<b>Goal Description</b>	
4	<b>Goal Name</b>	Construction of Public Facilities and Services
	<b>Goal Description</b>	
5	<b>Goal Name</b>	Construction of Public Infrastructure
	<b>Goal Description</b>	

## AP-35 Projects - 91.420, 91.220(d)

### Introduction

This Second Program Year Annual Action Plan outlines the activities which will be undertaken during the 2019 program year, beginning July 1, 2019 and ending June 30, 2020 using federal funds allocated to the Tulsa County HOME Consortium and the Tulsa County CDBG Urban County Entitlement program. Programs and activities described in this Action Plan will principally benefit low and moderate income populations of the service areas. In Program Year 2019 (Second Program Year of a new Five-Year Consolidated Plan), the HOME Consortium will provide an affordable housing program, Rehabilitation of Elderly Congregate Housing, that will serve 40 low to moderate income seniors over 62 years of age, and the construction of 20 HOME rental units for persons with developmental disabilities. Program Year 2019 is the twelfth year for the Tulsa County Community Development Block Grant Urban County. Unincorporated Tulsa County and ten Tulsa County incorporated places, which includes the City of Sapulpa (whose city limits include a portion of Tulsa County) participate as members of the Tulsa County CDBG Urban County Program. The City of Broken Arrow, formerly a CDBG Entitlement city relinquished its status as an entitlement in order to join the Urban County. The City of Tulsa is not a member.

In March 2020, the CARES Act allocated a supplemental CDBG-CV amount of \$861,792 for projects to prevent, prepare for and respond to the Coronavirus. In May, a Substantial Amendment to this 2019 Action Plan created new projects for the CDBG-CV funds. In September 2020, Tulsa County was allocated additional supplemental CDBG CV funds in the amount of \$1,286,535. In May 2021, Substantial Amendment 2 to this 2019 Action Plan created new projects for the CDBG CV funds.

#	Project Name
1	City of Bixby Storm Sewer Improvements Phase III
2	City of Broken Arrow Street Rehabilitation
3	City of Collinsville Waterline and Fire Hydrant Replacement
4	City of Owasso Sewer Line Replacement
5	City of Sand Springs Water Line Replacement
6	City of Sapulpa Street Rehabilitation
7	Rehabilitation of Congregate Rental Apartments for the Elderly
8	Broken Arrow Neighbors Senior Complexes Outreach
9	Broken Arrow Neighbors
10	Child Abuse Network
11	Broken Arrow Seniors
12	2019 Administration
17	CV- Public Services Housing Financial Assistance

#	Project Name
18	CV- Public Services Emergency Overflow Shelter Operations
19	CV- Public Services HMIS Data Collection and Evaluation
20	CV Public Services Administration
21	CV- Public Services Emergency Homeless Hotel Shelter Operations
22	CV- Public Services Multifamily Minor Rehabilitation

**Table 4 – Project Information**

**Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

Allocation priorities are established by individual members of the CDBG Urban County based on needs within their own communities. HOME priorities are based on evaluation of data in the Strategic Plan of the Consolidated Plan.

## AP-38 Project Summary

### Project Summary Information

1	<b>Project Name</b>	City of Bixby Storm Sewer Improvements Phase III
	<b>Target Area</b>	
	<b>Goals Supported</b>	Construction of Public Infrastructure
	<b>Needs Addressed</b>	Sustainability of Community
	<b>Funding</b>	CDBG: \$82,973
	<b>Description</b>	Construction of 460 linear feet of new storm sewer along East Needles.
	<b>Target Date</b>	10/31/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	256 low income households will benefit from improved storm sewers.
	<b>Location Description</b>	East Needles Avenue from Montgomery to Stanley Street. 23-T17N-R13E
	<b>Planned Activities</b>	Construction of 460 linear feet of <b>new</b> storm sewer (Size: 30" RCP, Class III) along East Needles.
2	<b>Project Name</b>	City of Broken Arrow Street Rehabilitation
	<b>Target Area</b>	
	<b>Goals Supported</b>	Construction of Public Infrastructure
	<b>Needs Addressed</b>	Sustainability of Community
	<b>Funding</b>	CDBG: \$399,943
	<b>Description</b>	The project will provide mill, patch and overlay to Detroit St. from 1st to 4th Street, adding sidewalks and ADA ramps. Curbs and gutters will be added, eliminating borrow ditches where possible or rehabilitating where necessary.
	<b>Target Date</b>	6/30/2020

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The population served will be 719 low income households.
	<b>Location Description</b>	Along Detroit Street from North 1st Street to North 4th Street.
	<b>Planned Activities</b>	The project will provide mill, patch and overlay to Detroit St. from 1st to 4th Street, adding sidewalks and ADA ramps. Curbs and gutters will be added, eliminating borrow ditches where possible or rehabilitating where necessary.
<b>3</b>	<b>Project Name</b>	City of Collinsville Waterline and Fire Hydrant Replacement
	<b>Target Area</b>	
	<b>Goals Supported</b>	Construction of Public Infrastructure
	<b>Needs Addressed</b>	Sustainability of Community
	<b>Funding</b>	CDBG: \$235,261
	<b>Description</b>	Replacement of deteriorating 2 inch and 4 inch waterline with 8 inch waterlines. Fire hydrants in the target areas will be replaced for better fire prevention.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	In the project area, 18 households consisting of 45 low income persons will be assisted.
	<b>Location Description</b>	Along 9th Street, from Maple Street to Union Street. Along 10th Street, from Maple Street to Union Street.
<b>Planned Activities</b>	Replacement of deteriorating 2 inch and 4 inch waterline with 8 inch waterlines. Fire hydrants in the target areas will be replaced for better fire prevention.	
<b>4</b>	<b>Project Name</b>	City of Owasso Sewer Line Replacement
	<b>Target Area</b>	
	<b>Goals Supported</b>	Construction of Public Infrastructure
	<b>Needs Addressed</b>	Sustainability of Community
	<b>Funding</b>	CDBG: \$133,117

	<b>Description</b>	Replacement of 1,700 LF of failing 8-inch clay pipe sanitary sewer lines by bursting the existing 8 inch 8" clay pipe with HDPE pipe in the Hale Acres subdivision.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Benefit to 866 low income persons in the Hale Acres subdivision.
	<b>Location Description</b>	Location: Alley between North 106th East Ave and North 112th East Ave. NE corner of S7-T21N-R14E
	<b>Planned Activities</b>	Replacement of 1,700 LF of failing 8-inch clay pipe sanitary sewer lines by bursting the existing 8" clay pipe with HDPE pipe in the Hale Acres subdivision.
<b>5</b>	<b>Project Name</b>	City of Sand Springs Water Line Replacement
	<b>Target Area</b>	
	<b>Goals Supported</b>	Construction of Public Infrastructure
	<b>Needs Addressed</b>	Sustainability of Community
	<b>Funding</b>	CDBG: \$96,303
	<b>Description</b>	Replacement of 4 inch water lines with 8 inch water lines along Lincoln Avenue from 4th to 6th Streets.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	In the target area, 615 low income persons will be assisted.
	<b>Location Description</b>	Lincoln Avenue from 4th Street to 6th Street.
	<b>Planned Activities</b>	Replacement of approximately 980 linear feet of 4 inch cast iron water line with 8 inch PVC water lines.
<b>6</b>	<b>Project Name</b>	City of Sapulpa Street Rehabilitation
	<b>Target Area</b>	
	<b>Goals Supported</b>	Construction of Public Infrastructure
	<b>Needs Addressed</b>	Sustainability of Community

	<b>Funding</b>	CDBG: \$158,129
	<b>Description</b>	Repair and replacement of East Washington Avenue from South Water Street to Maple Street.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	In the target area, 587 persons will benefit from the improved road.
	<b>Location Description</b>	East Washington Avenue from South Water Street to Maple Street.
	<b>Planned Activities</b>	Repair and replacement of East Washington Avenue
<b>7</b>	<b>Project Name</b>	Rehabilitation of Congregate Rental Apartments for the Elderly
	<b>Target Area</b>	
	<b>Goals Supported</b>	Rental Housing for Elderly Households
	<b>Needs Addressed</b>	Rental Housing for Elderly
	<b>Funding</b>	HOME: \$901,135
	<b>Description</b>	The rehabilitation of apartment units in an elderly congregate complex.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Forty (40) units of elderly housing for households on fixed income will be rehabilitated to incorporate energy efficiency improvements.
	<b>Location Description</b>	Carriage Crossing Apartments in Coweta, OK
	<b>Planned Activities</b>	Rehabilitation of elderly apartments to include energy efficient improvements will be undertaken.
<b>8</b>	<b>Project Name</b>	Broken Arrow Neighbors Senior Complexes Outreach
	<b>Target Area</b>	
	<b>Goals Supported</b>	Construction of Public Facilities and Services
	<b>Needs Addressed</b>	Sustainability of Community
	<b>Funding</b>	CDBG: \$8,505
	<b>Description</b>	Outreach coordinator salary for 4 hours per week at 3 senior residence complexes with services geared toward specific needs of elderly and disabled persons.

	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	368 low income elderly and disabled residents will benefit with referral services.
	<b>Location Description</b>	Three apartment complexes serving the elderly and disabled in Broken Arrow.
	<b>Planned Activities</b>	Outreach coordinator salary for 4 hours per week at 3 senior residence complexes with services geared toward specific needs of elderly and disabled persons.
<b>9</b>	<b>Project Name</b>	Broken Arrow Neighbors
	<b>Target Area</b>	
	<b>Goals Supported</b>	Construction of Public Facilities and Services
	<b>Needs Addressed</b>	Sustainability of Community
	<b>Funding</b>	CDBG: \$21,702
	<b>Description</b>	Personnel for advocacy & referral services at BAN Outreach office at main location.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 276 low income clients will be served
	<b>Location Description</b>	Broken Arrow Neighbors
	<b>Planned Activities</b>	Personnel for advocacy & referral services at BAN Outreach office at main location.
<b>10</b>	<b>Project Name</b>	Child Abuse Network
	<b>Target Area</b>	
	<b>Goals Supported</b>	Construction of Public Facilities and Services
	<b>Needs Addressed</b>	Sustainability of Community
	<b>Funding</b>	CDBG: \$19,500
	<b>Description</b>	Support of CAN's Forensic Interviewing/Mental Health Consultations Programs for allegedly abused children who reside in the City of Broken Arrow.



	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 124 children who were allegedly abused will be interviewed and counseling provided.
	<b>Location Description</b>	Child Abuse Network offices
	<b>Planned Activities</b>	Support of CAN's Forensic Interviewing/Mental Health Consultations Programs for allegedly abused children who reside in the City of Broken Arrow.
<b>11</b>	<b>Project Name</b>	Broken Arrow Seniors
	<b>Target Area</b>	
	<b>Goals Supported</b>	Construction of Public Facilities and Services
	<b>Needs Addressed</b>	Sustainability of Community
	<b>Funding</b>	CDBG: \$20,871
	<b>Description</b>	Partial staff support and operating expenses for Senior Center.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 45,700 older residents of Broken Arrow will visit the Senior Center to engage in a variety of activities
	<b>Location Description</b>	Broken Arrow Senior Center 1800 S Main St, Broken Arrow OK
	<b>Planned Activities</b>	Partial staff support and operating expenses for Senior Center
<b>12</b>	<b>Project Name</b>	2019 Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	Rental Housing for Elderly Households New Construction of Single Family Rental Units Construction of Public Facilities and Services Construction of Public Infrastructure
	<b>Needs Addressed</b>	Rental Housing for Elderly Availability of Rental and Owner-Occupied Housing Sustainability of Community
	<b>Funding</b>	CDBG: \$215,018 HOME: \$100,126

	<b>Description</b>	General administration activities of HOME and CDBG program for FY2019 program year
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	500 S Denver Ave, Tulsa OK
	<b>Planned Activities</b>	General administration activities of HOME and CDBG program for FY2019 program year
<b>13</b>	<b>Project Name</b>	CV- Public Services Housing Financial Assistance
	<b>Target Area</b>	
	<b>Goals Supported</b>	Construction of Public Facilities and Services
	<b>Needs Addressed</b>	Sustainability of Community
	<b>Funding</b>	CDBG-CV: \$513,832
	<b>Description</b>	Project to prevent, prepare for and respond to the Coronavirus in Tulsa County by providing financial assistance for households experiencing housing crisis as a result of loss of income.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 500 low and moderate income persons who are impacted by the Coronavirus through employment loss and inability to pay rent and utilities will benefit from the proposed activities under this project.
	<b>Location Description</b>	Tulsa County
	<b>Planned Activities</b>	Financial assistance includes housing assistance of emergency payments of short-term rental assistance up to three months; medium-term rental assistance up to six months; utility payments; to income eligible households who have experienced income loss due to COVID-19, resulting in inability to make payments related to housing costs. Non-profit agencies serving the Tulsa County area will receive funding to disperse to clients.
<b>14</b>	<b>Project Name</b>	CV- Public Services Emergency Overflow Shelter Operations
	<b>Target Area</b>	

	<b>Goals Supported</b>	Construction of Public Facilities and Services
	<b>Needs Addressed</b>	Sustainability of Community
	<b>Funding</b>	CDBG-CV: \$251,960
	<b>Description</b>	Project to prevent, prepare for and respond to the threat of COVID-19 by providing support for the operations of the newly-opened emergency overflow shelter for the homeless at the former Tulsa County Juvenile Center.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 46 beds will be provided for homeless persons.
	<b>Location Description</b>	Tulsa County
	<b>Planned Activities</b>	Costs for supporting the operations of the newly-opened emergency overflow shelter for the homeless at the former Tulsa County Juvenile Center to include funds for staffing by Day Center for the Homeless, Salvation Army; security, cleaning, laundry, rental of temporary restrooms; maintenance.
15	<b>Project Name</b>	CV- Public Services HMIS Data Collection and Evaluation
	<b>Target Area</b>	
	<b>Goals Supported</b>	Construction of Public Facilities and Services
	<b>Needs Addressed</b>	Sustainability of Community
	<b>Funding</b>	CDBG-CV: \$10,000
	<b>Description</b>	Project to prevent, prepare for and respond to threat of COVID-19 by providing funds for costs associated with operating HUD-approved homeless management information systems (HMIS) for purposes of collecting unduplicated counts of homeless persons and analyzing patterns of use of COVID-19 funds.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Data collection to support approximately 46 homeless population.
	<b>Location Description</b>	Tulsa County

	<b>Planned Activities</b>	Data collection and evaluation includes costs associated with operating HUD-approved homeless management information systems (HMIS) for purposes of collecting unduplicated counts of homeless persons and analyzing patterns of use of COVID-19 funds. Community Service Council is the lead agency to receive funding
<b>16</b>	<b>Project Name</b>	CV Public Services Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	Construction of Public Facilities and Services
	<b>Needs Addressed</b>	Sustainability of Community
	<b>Funding</b>	CDBG-CV: \$129,000
	<b>Description</b>	CV general program oversight requirements and reporting to HUD by participating agencies.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	General administration activities.
	<b>Location Description</b>	Tulsa County
	<b>Planned Activities</b>	Administration of general program requirements and reporting to HUD by participating agencies who are responding with COVID-19 activities.
<b>17</b>	<b>Project Name</b>	CV- Public Services Emergency Homeless Hotel Shelter Operations
	<b>Target Area</b>	
	<b>Goals Supported</b>	Construction of Public Facilities and Services
	<b>Needs Addressed</b>	Sustainability of Community
	<b>Funding</b>	CDBG-CV: \$400,000
	<b>Description</b>	Support of two months of additional lease costs for temporary emergency hotel rooms for the period of June 1 through July 31, 2021, and two months of additional operating costs to cover staffing. Temporary housing to allow transition of homeless clients into affordable units.
	<b>Target Date</b>	7/31/2021

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Serving approximately 260 people with a goal of placing 85% of those served into permanent housing.
	<b>Location Description</b>	10918 E 41st St, Tulsa, OK 74146
	<b>Planned Activities</b>	Support of two months of additional lease costs for temporary emergency hotel rooms for the period of June 1 through July 31, 2021, and two months of additional operating costs to cover staffing. Temporary housing to allow transition of homeless clients into affordable units.
<b>18</b>	<b>Project Name</b>	CV- Public Services Multifamily Minor Rehabilitation
	<b>Target Area</b>	
	<b>Goals Supported</b>	Construction of Public Facilities and Services
	<b>Needs Addressed</b>	Sustainability of Community
	<b>Funding</b>	CDBG-CV: \$821,535
	<b>Description</b>	Minor rehabilitation of 100 units at 17 properties owned by Mental Health Association Oklahoma, consisting generally of drywall repair, painting, replacement carpeting is necessary to bring these units back online and available to persons who have been homeless or are at risk of being homeless due to the COVID-19 pandemic.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Serving approximately 100 persons who are homeless or at risk of homelessness with permanent affordable rental housing.
	<b>Location Description</b>	17 properties owned by Mental Health Association in City of Tulsa.
	<b>Planned Activities</b>	Minor rehabilitation of 100 units at 17 properties, consisting generally of drywall repair, painting, replacement carpeting is necessary to bring these units back online and available to persons who have been homeless or are at risk of being homeless due to the COVID-19 pandemic.

## **AP-50 Geographic Distribution - 91.420, 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

The Metropolitan Tulsa HOME Consortium, formed in 1994, consists of 24 member governments in the northeastern part of Oklahoma. There are six county governments: Tulsa, Creek, Osage, Rogers, Wagoner, and Washington Counties. The eighteen cities within those counties who are members range in size from the largest member, Broken Arrow to the smallest member, Sperry. The estimated total 2017 population of the MTHC Consortium area was 545,551. HOME funds are targeted to low to moderate income households or individuals for all housing programs conducted by the Consortium.

The Tulsa County CDBG-Community Development Block Grant Urban County with eleven member governments was formed in 2008. Tulsa County is the lead entity. The CDBG Urban County consists of the unincorporated areas of Tulsa County and ten Tulsa County communities. The City of Broken Arrow, a former CDBG Entitlement, receives an annual allocation from the Urban County program. The City of Broken Arrow will continue to use funds in target areas encompassing the original town site, to administer a comprehensive neighborhood improvement program. The Cities of Bixby, Broken Arrow, Owasso, Sand Springs, and Sapulpa receive funding allocations as Metro Cities. The remaining cities of Collinsville, Glenpool, Jenks, Skiatook, and Sperry, along with Tulsa County are in a 3-year rotational category. All members of the Urban County establish their own priorities for use of CDBG funds, and determine which activities they wish to fund.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>

**Table 5 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

Within the CDBG Urban County, each member government conducts a needs public hearing annually to request citizen comments. Projects are selected that will provide an area-wide benefit to a census tract or block group that has 51% or more to low to moderate income population. For some projects, an income survey is provided for a targeted neighborhood. A community may choose a project that benefits a limited clientele population such as senior citizens. The HOME program benefits low to moderate income individuals throughout the six- county HOME Consortium area, most commonly on a household basis such as homebuyer assistance or homeowner housing rehabilitation. Elderly Congregate Housing projects are developed in communities where an extensive market analysis shows

the need for affordable apartments for senior citizens.

## **Discussion**

## Affordable Housing

### AP-55 Affordable Housing - 91.420, 91.220(g)

#### Introduction

Forty (40) units of affordable rental apartments are proposed to receive energy efficiency improvements at an elderly congregate housing complex in Coweta. Twenty new units of rental multi family supportive housing will provide affordable housing to low income individuals with developmental disabilities.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	0
Special-Needs	20
Total	20

**Table 6 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	20
Rehab of Existing Units	40
Acquisition of Existing Units	0
Total	60

**Table 7 - One Year Goals for Affordable Housing by Support Type**

#### Discussion



## **AP-60 Public Housing - 91.420, 91.220(h)**

### **Introduction**

#### **Actions planned during the next year to address the needs to public housing**

The small number of units of public housing in the Consortium service area are self-sufficient and self contained, and do not present opportunities for utilization of the Consortium's limited funding resources.

#### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

No actions are planned by the Consortium.

#### **If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

No PHA's within the Consortium service area are designated as troubled.

### **Discussion**

## **AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i)**

### **Introduction**

INCOG staff members attend the monthly meetings of the AWH4T (A Way Home for Tulsa) Governance Council which oversees the Tulsa-Tulsa County Continuum of Care process. In addition staff members attend the bi-monthly meeting of the Homeless Services Network. An INCOG staff member serves on the Continuum of Care Review Panel that is convened on an annual basis to review the local CoC renewal application and to conduct the annual new project ranking for submission in the CoC Consolidated Supportive Housing Program application. In addition, INCOG staff members participate each January in the *One-night Consumer Survey* or PIT-“Point-in-Time” count of the Tulsa area homeless population. The INCOG staff focuses on the City of Broken Arrow during the One-night survey.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

An INCOG staff member participates with local volunteers each January in the One-night Consumer Survey or the "Point in Time Count" of the local homeless population. INCOG coordinates the survey in the City of Broken Arrow and consults with Broken Arrow Neighbors on locations and situations to be checked on the night of the survey. In addition, the Homeless Outreach Team Coordinator contacted the Broken Arrow Police Department to see if there were other locations to be checked. The 2019 PIT Survey was held on the night of January 24, 2019 and a volunteer from Street Church Tulsa assisted INCOG staff in Broken Arrow. There were no persons counted as homeless in Broken Arrow on that evening; however the volunteer found former camp sites where people had been living outdoors in the warmer months. The overall count in Greater Tulsa found 296 persons living on the streets that evening and 659 persons in emergency shelters. Other locations in Greater Tulsa that were checked included HUD Permanent Supportive housing locations; Veteran's housing programs such as HUD VASH; and Safe Haven and Transitional Housing programs. Jail and Detox treatment facilities were also counted.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The MTHC does not receive or administer funding for this homeless population. INCOG staff members continue working as active participants on the AWH4T Governance Council and in the local Continuum

of Care process. There has been an expanded outreach effort in Broken Arrow for the "Point-in-Time" count in January with added volunteers and guidance provided from the staff of Broken Arrow Neighbors.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

The MTHC does not receive or administer funding for this homeless population. INCOG staff members continue working as active participants on the AWH4T Governance Council and in the local Continuum of Care process. There has been an expanded outreach effort in Broken Arrow for the "Point-in-Time" count in January with added volunteers and guidance provided from the staff of Broken Arrow Neighbors.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

The MTHC does not receive or administer funding for this homeless population. INCOG staff members continue working as active participants on the AWH4T Governance Council and in the local Continuum of Care process. There has been an expanded outreach effort in Broken Arrow for the "Point-in-Time" count in January with added volunteers and guidance provided from the staff of Broken Arrow Neighbors.

## **Discussion**

## **AP-75 Barriers to affordable housing -91.420, 91.220(j)**

### **Introduction**

There are several complex factors which prevent lower income households from obtaining affordable housing. Many of these factors are influenced by elements which are beyond the control of government. These factors include; economic conditions, interest rates, labor and material cost, wage levels, and non local tax policies. We should encourage our 24 local governments to look at factors such as land use and development regulations, development fees and building codes that may not be conducive to creating affordable housing. Cities and counties in the Consortium all participate in the promotion of fair housing within their communities. All 24 local governments are current or former recipients of CDBG funds and have conducted activities to promote fair housing. Such activities have included promoting April as Fair Housing Month, adopting or updating local Fair Housing Ordinances and making available a Fair Housing Brochure.

**Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

The Tulsa Metropolitan Area does not generally have restrictive public policies in place that might be barriers to the creation of affordable housing. Housing costs in Oklahoma and the Tulsa region are generally some of the most affordable in the country.

### **Discussion**

## **AP-85 Other Actions - 91.420, 91.220(k)**

### **Introduction**

#### **Actions planned to address obstacles to meeting underserved needs**

No actions planned.

#### **Actions planned to foster and maintain affordable housing**

The HOME Consortium will continue to fund energy efficient improvements to elderly apartment units in order for residents to have access to affordable housing.

#### **Actions planned to reduce lead-based paint hazards**

No funds are anticipated to be directed to lead based paint hazard mitigation, due to limited HOME funds.

#### **Actions planned to reduce the number of poverty-level families**

No actions planned.

#### **Actions planned to develop institutional structure**

No specific actions planned.

#### **Actions planned to enhance coordination between public and private housing and social service agencies**

INCOG, as a regional planning agency coordinating transportation, housing, planning and zoning, will continue to collaborate with public and private housing and social service agencies on a wide range of

topics and initiatives not necessarily funded through HUD.

## **Discussion**

# Program Specific Requirements

## AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

### Introduction

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>0</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

#### HOME Investment Partnership Program (HOME)

##### Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

It is anticipated that CHDOs and Non-Profit developers will utilize Federal Home Loan Bank of Topeka- Affordable Housing Program grants in projects to perform energy efficiency improvements

to elderly congregate apartments and in the new construction of single family rental units.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Tulsa County contracts with Subrecipients to operate a Homebuyer Down payment and Closing Costs Assistance program within the HOME Consortium region. Qualified homebuyer applicants may obtain a self-amortizing five (5) year zero percent (0%) interest loan with a due on sale clause secured by a mortgage instrument. One-Fifth (1/5) of the loan is forgiven each year of occupancy to encourage neighborhood stability. The Homebuyer programs use only the Recapture provisions to recapture the amount of HOME investment in a homebuyer unit. The amount of direct HOME subsidy will be reduced on a daily pro-rata basis for the time the homebuyer has owned and occupied the housing, measured against the required affordability period. The original homebuyer may sell the property to any willing buyer, regardless of subsequent buyer's income level, during the period of affordability. Tulsa County will recapture a pro-rated portion of the HOME-assistance provided to the original homebuyer at the time of transfer of title, provided that net proceeds from the sale are sufficient to repay the balance remaining on the pro-rated direct HOME subsidy amount. The pro rata amount recaptured by Tulsa County cannot exceed what is available from net proceeds. The Closing Disclosure document prepared at the time of transfer of title will state the net proceeds available to the Owner to determine the amount available to Owner. The net proceeds are the sales price minus loan repayment (other than HOME funds) and closing costs. The amount subject to recapture is limited to the net proceeds available from the sale. If there are insufficient net proceeds available at sale to recapture the full pro rata amount due, the Owner is not required to repay the difference between the prorated direct HOME subsidy due and the amount to recapture from available from net proceeds.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

No units will be acquired with HOME funds.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Tulsa County has a policy in place which does not allow HOME funds to be used to refinance existing debt on multifamily housing.