



Consolidated Annual Performance and Evaluation Report Program Year 2024

Tulsa County HOME Consortium
and

HOME-American Rescue Plan

Tulsa County Community Development Block
Grant Urban County Program
and

CARES Act

Prepared by INCOG

September 2025

PROGRAM YEAR 2024
CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT
EXECUTIVE SUMMARY

This Consolidated Annual Performance and Evaluation Report (CAPER) is designed to report on the progress of the Tulsa County HOME Consortium, the Tulsa County Community Development Block Grant (CDBG) Urban County program, and the Community Development Block Grant CARES Act program in carrying out the housing and community development goals and objectives set out in its Fiscal Year 2024 Annual Action Plan. The Program Year/Fiscal Year for this report began July 1, 2024 and ended June 30, 2025. In addition, this report provides an opportunity for the HOME Consortium and CDBG Urban County programs to assess annual performance in relationship to meeting overall priorities and objectives stated in the Five-year Consolidated Plan, and to discuss what actions or changes are contemplated as a result of annual performance of the programs.

The 24 communities within the HOME Consortium's jurisdictions covered by this CAPER are: Bartlesville, Bixby, Bristow, Broken Arrow, Catoosa, Claremore, Collinsville, Coweta, Drumright, Glenpool, Hominy, Jenks, Owasso, Pawhuska, Sand Springs, Sapulpa, Skiatook, Sperry, and the unincorporated areas of Creek, Osage, Rogers, Tulsa, Wagoner, and Washington Counties. The HOME Consortium receives a direct allocation of HOME Investment Partnership funds from the U.S. Department of Housing and Urban Development.

The Tulsa County CDBG Urban County is comprised of Tulsa County and the Cities of Bixby, Broken Arrow, Collinsville, Glenpool, Jenks, Owasso, Sand Springs, Sapulpa, Skiatook, and Sperry. The Tulsa County CDBG Urban County receives a direct allocation from the U.S. Department of Housing and Urban Development in the Community Development Block Grant Program. HOME Consortium communities that are not a part of the CDBG Urban County may apply for Community Development Block Grants through the State of Oklahoma program administered by the Oklahoma Department of Commerce.

During the 2020 Program Year through the CARES Act, Tulsa County received a special allocation of CDBG-CV1 and CV3 funds in the cumulative amount of \$2,148,327 from the Department of Housing and Urban Development to be used to prevent, prepare for, and respond to the coronavirus (COVID-19) and amended its 2019 Annual Action Plan in May 2020 and May 2021 to include the program. CDBG CV funds were awarded to subrecipients for a variety of Coronavirus-related activities and funds were expended during this program year.

Tulsa County HOME Consortium:

Total HOME Funds Expended During Program Year: \$774,204.14

During the FY 2024 program year, funds were spent on the following HOME activities:

Homebuyer Assistance (Down payment & Closing Costs):

Four (4) households were assisted in the purchase of homes through assistance in down payment and closing cost forgivable loans. Through this program, mortgages in the amount of \$498,500 were executed with local lending institutions. This was an average mortgage amount of \$124,625, an average mortgage amount approximately \$1,056 lower than in the FY2023 program year.

Total Expended in Program Year: \$14,007.00
\$12,339.29 HOME
\$ 1,667.71 Program Income

Rental Housing

Hickory Crossing Elderly Apartments

Tulsa County awarded HOME funding to Vintage Housing for improvements to Hickory Crossing Elderly Apartments in Sapulpa in the amount of \$1,139,000 in September 2023. Construction of the energy efficiency improvements to the units in the complex began in January 2024 during the FY2023 program year and was completed in February 2025 during the FY2024 program year.

Total Expended in Program Year: \$607,266.60
FY2022: \$420,764.25
FY2023: \$186,502.35

HOME Program Administration:

Total Expended in Program Year: \$152,930.54
FY2022: \$69,526.92
FY2023: \$83,403.62

Administration costs of general program; financial and program compliance; development of prospective housing activities.

Total HOME-ARP Funds Expended During Program Year: \$15,743.94

HOME ARP Program Administration:

Total Expended in Program Year: \$15,743.94
FY2021: \$15,743.94

Administration costs of preparation of required Allocation Plan defining program activities.

Tulsa County CDBG Urban County:

Total CDBG Funds Expended During Program Year: \$1,199,472.91

	Disbursements	Percentage
Energy Efficiency Improvements	\$ 4,267.64	0.36%
Housing	\$ 4,267.64	0.36%
Flood Drainage Improvements	\$ 232,886.98	19.42%
Water/Sewer Improvements	\$ 192,931.14	16.08%
Street Improvements \$	\$ 452,014.71	37.68%
Public Facilities and Improvements	\$ 877,832.83	73.18%
Senior Services	\$ 35,946.00	3.00%
Abused and Neglected Children	\$ 20,500.00	1.71%
Food Banks	\$ 22,824.00	1.90%
Subtotal for : Public Services	\$ 79,270.00	6.61%
Planning and General Administration	\$ 238,102.44	19.85%
Total Disbursements	\$1,199,472.91	100.00%

During the program year, funds were spent on the following CDBG activities from FY2024 program:

2024 Program Year Major Initiatives and Highlights

<u>Program Yr.</u>	<u>Activity #</u>	<u>Activity Name</u>	<u>Status</u>	<u>Expenditures</u>
2022	1483	City of Broken Arrow Storm Drain Replacement	Completed	\$144,973.00
2023	1477	City of Bixby Dawes Ave Storm Sewer and Sidewalk Construction	Completed	\$87,913.98
2023	1479	City of Owasso Hale Acres Water Line Replacement Phase 2 (2023)	Completed	\$159,894.62
2023	1482	City of Skiatook Sanitary Sewer Rehabilitation	Completed	\$33,036.52
2023	1496	City of Broken Arrow lola Street Rehabilitation	Completed	\$332,189.71
2024	1498	Tulsa County Collector Road Rehabilitation in Turley Community	Completed	\$119,825.00

2022	1458	Broken Arrow Emergency Repairs to Housing Units	Completed	\$1,030.81
2023	1474	City of Broken Arrow Emergency Repairs to Housing	Completed	\$3,236.83
2024	1489	Broken Arrow Neighbors Outreach	Completed	\$22,824.00
2024	1490	Broken Arrow Neighbors Senior Complexes Outreach	Completed	\$8,946.00
2024	1491	Child Advocacy Network	Completed	\$20,500.00
2024	1492	Broken Arrow Seniors	Completed	\$27,000.00

Infrastructure, Housing, and Public Services

Total Expended:

\$961,370.47

Total CDBG-CV Funds Expended During Program Year: \$12,967.53

	Disbursements	Percentage
General Program Administration	\$ 13,696.51	100.00%
Total Disbursements	\$ 13,696.51	100.00%

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan.

91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

Tulsa County CDBG Urban County:

Total CDBG Funds Expended During Program Year: \$1,199,472.91

Infrastructure: \$877,832.83

Social Services: \$79,270.00

Housing: \$4,267.74

Design Services: \$48,875.00

General Program Administration: \$189,227.44

Tulsa County CDBG Coronavirus (CV):

Total CDBG-CV Funds Expended During Program Year: \$13,696.51

General Program Administration: \$13,696.51

Tulsa County HOME Consortium:

Total HOME Funds Expended During Program Year: \$774,204.14

Homebuyer Assistance (Downpayment & closing costs): \$12,339.29

Program Income for HBA: \$1,667.71

Rental Housing (Elderly Housing Rehabilitation): \$607,266.60

General Program Administration: \$152,930.54

Tulsa County HOME -ARP Consortium:

Total HOME-ARP Funds Expended During Program Year: \$15,743.94

HOME ARP Program Administration: \$15,743.94

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Construction of Public Facilities and Services	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	77225	70101	90.78%	15445	36307	235.07%
Construction of Public Infrastructure	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	25130	3677	14.63%	5026	1890	37.60%
Homeownership Opportunities for Low Income	Affordable Housing	HOME: \$	Direct Financial Assistance to Homebuyers	Households Assisted	90	0	0.00%			
New Construction of Multi Family Rental Units	Affordable Housing Non-Homeless Special Needs	HOME: \$	Rental units constructed	Household Housing Unit	12	0	0.00%			
Rental Housing for Elderly Households	Affordable Housing	HOME: \$	Rental units rehabilitated	Household Housing Unit	80	40	50.00%	40	40	100.00%

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

CDBG activities for the Urban County are selected by the individual member communities, based on their own priorities rather than Urban County-wide priorities. Since affordable housing for elderly low-income households is a key focus of the HOME Consortium, efforts during a program year typically aim to maintain quality and energy-efficient units for elderly residents. This is achieved through funding the rehabilitation of elderly congregate housing originally developed by the Consortium over 20 years ago.

In June 2022, funds were awarded for single-phase energy efficiency improvements at a 40-unit elderly housing complex in Sapulpa. Construction began in October 2023, and the project completed in February 2025 during the FY24 program year. Additionally, during the performance year, four Homebuyer Assistance units were completed using 2017 funds.

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CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG	HOME
White	35,671	12
Black or African American	1,512	1
Asian	1,285	0
American Indian or American Native	2,358	1
Native Hawaiian or Other Pacific Islander	33	0
Total	40,859	14
Hispanic	667	0
Not Hispanic	35,084	14

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

In Program Year FY24, the HOME Consortium provided Homebuyer Assistance to four households through Community Action Resource and Development (CARD). All of the households were identified as White. The racial and ethnic composition reported in the table above for the HOME and CDBG activities generally reflects the demographic composition of the region. Approximately 84% of the households assisted were reported as White, 5.5% as American Indian/Native American, 3.9% as multiracial, 3.5% as Black/African American, and 3% as Asian. Smaller proportions were reported as Native Hawaiian or Other Pacific Islander (0.1%), and American Indian/Alaskan Native & White (0.2%).

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,492,079	1,199,473
HOME	public - federal	1,049,423	774,204

Table 3 - Resources Made Available

Narrative

The Actual Amount Expended is the amount expended on activities during the Performance period, and includes amounts expended from prior years' funding. The CDBG amount expended includes CDBG-CV funds in the amount of \$13,696.51.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description

Table 4 – Identify the geographic distribution and location of investments

Narrative

The Action Plan did not identify Target Areas for distribution of funds. During the performance year, HOME funds were expended in various communities within the HOME Consortium service area of 6 counties and 18 cities. Homebuyer Assistance was provided to purchase homes in Owasso (1), Bartlesville (1), Coweta (1), and Skiatook (1). The rehabilitation of 40 units of elderly housing in Sapulpa was listed in IDIS as Completed, with construction started in October 2023 and was completed in February 2025 during the 2024 program year. Additionally, CDBG-CV funds in the amount of \$13,696.51 were expended for administrative costs.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

Based on the expenditure of HOME funds for the rehabilitation of Hickory Crossing apartments in Sapulpa (\$607,266.60) and Homebuyer Assistance in the amount of \$12,339.29, the HOME expenditures requiring the 25% match were \$607,266.60, resulting in a match liability amount of \$151,816.65. The Consortium requested a match waiver for this program year based on a Robert T. Stafford Major Disaster Declaration, and HUD granted the match waiver. IDIS report PR-33 was updated to reflect a liability amount of \$0.00. Additionally, many of the CDBG Urban County communities provided leveraged funds to contribute to their projects.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	3,866,055
2. Match contributed during current Federal fiscal year	0
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	3,866,055
4. Match liability for current Federal fiscal year	0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	3,866,055

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at begin-ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
0	1,668	1,668	0	0

Table 7 – Program Income

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Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	0	0	0	0	0	\$1,390,000
Number	0	0	0	0	0	1
Sub-Contracts						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male	DRAFT		
Contracts						
Dollar Amount	0	0	\$1,390,000			
Number	0	0	1			
Sub-Contracts						
Number	0	0	0			
Dollar Amount	0	0	0			

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		0		0		
Businesses Displaced		0		0		
Nonprofit Organizations Displaced		0		0		
Households Temporarily Relocated, not Displaced		0		0		
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 10 – Relocation and Real Property Acquisition

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CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	0	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	0	0

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	40	40
Number of households supported through Acquisition of Existing Units	0	0
Total	40	40

Table 12 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

There were 4 homebuyer locations in the FY24 HOME Program through CARD-Community Action Resource & Development, Inc. These units were assisted under FY2017 HOME funding. The rehabilitation of 40 units of elderly housing in Sapulpa was listed in IDIS as Completed, with construction started in October 2023 and was completed in February 2025 during the 2024 program year and is reflected in the chart above.

Discuss how these outcomes will impact future annual action plans.

The HOME Consortium feels that goals developed are on track for the affordable housing market in the region, and no changes are anticipated.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	0	5
Low-income	0	6
Moderate-income	0	3
Total	0	14

Table 13 – Number of Households Served

Narrative Information

The Tulsa HOME Consortium does not fund affordable housing through CDBG, so those figures are reflected as zeros.

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CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

Three different Continuum of Care organizations cover the geographic area of the Tulsa Metropolitan HOME Consortium. Tulsa-Tulsa County-Broken Arrow combine to form an urban Continuum of Care. Creek and Osage Counties are part of the rural North Central Oklahoma CoC. Rogers, Wagoner, and Washington Counties are part of the rural Northeast Oklahoma CoC. In January 2020, the Tulsa City & County Continuum of Care, known as A Way Home for Tulsa, reconstituted and adopted a new Governance Charter. A new Leadership Council, which serves as the board of AWH4T, was formed to oversee the Tulsa-Tulsa County Continuum of Care process. The Leadership Council is comprised of four Appointed Members; five Elected Members who are providers; and six Invited Members from various advocacy groups. A Senior management staff member of the INCOG Community Development department was appointed to the Leadership Council, as well as a Tulsa County Commissioner. In addition, INCOG staff members have previously participated each January in the One-night Consumer Survey or PIT-“Point-in-Time” count of the Tulsa area homeless population. The 2025 PIT Survey was held in January. A total of 1,449 individuals, including children, were experiencing homelessness in the Tulsa area.

A special tabulation of the demographics of the count in unincorporated Tulsa County was provided by Housing Solutions, the AWH4T CoC lead. The count found a total of 24 individuals or families experiencing homelessness in various locations around the unincorporated county. All 24 were counted at unsheltered locations, with none in emergency shelters, including hotels paid for by emergency shelters. Sixty-seven percent (67%) were single persons and thirty-three percent (33%) were with a spouse or partner. No households with children were counted. Sixty-seven percent (67%) met the definition of chronic homelessness, including the presence of a disability and a long-term or episodic homeless experience. By race, forty-six percent (46%) of the population identified as White, twenty-nine percent (29%) as multi-racial, thirteen percent (13%) as American Indian, four percent (4%) as Black, four percent (4%) as Native Hawaiian, and four percent (4%) as Hispanic/Latino. Thirteen percent (13%) of the persons counted were homeless due to domestic violence.

Addressing the emergency shelter and transitional housing needs of homeless persons

The HOME Consortium does not receive Emergency Solutions Grant (ESG) funding. The HOME Consortium does not allocate or receive funding from the Tulsa-Tulsa County Continuum of Care (CoC) or any other CoC. INCOG staff members do participate in the local meetings of the Leadership Council of AWH4T-A Way Home for Tulsa. The emergency shelters that serve the City of Tulsa also serve the suburban areas of Tulsa County. Some of the shelters serve clients from outlying communities in

Northeastern Oklahoma. The provider agencies that are members of the AWH4T all provide some level of emergency and transitional housing with the goal of finding permanent housing for all of their clients.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

In previous years, the HOME Consortium did not receive or allocate funding for housing activities that directly impacted homeless persons or at-risk/potentially homeless individuals and families. However, during the FY2021 program year, CDBG-CV funding was used to address homeless populations. The expenditure of these funds continued for program administration during the FY2024 program year.

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

In past years, the HOME Consortium did not receive or allocate funding for housing activities that impacted the lives of homeless persons or at-risk/potentially homeless individuals and families. During the FY2021 program year, CDBG CV funding was awarded to address homeless populations. The expenditure of these funds was continued during the FY24 program year. INCOG staff members will continue to be involved with the AWH4T Leadership Council and the urban Tulsa-Tulsa County CoC. INCOG staff will maintain contacts with the two adjacent rural Continuum of Care organizations in order to address these issues.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

There are three public housing authorities in the HOME Consortium Area: Bristow, Drumright, and Osage County. The Bristow PHA has 159 units, the Drumright PHA has 148 units, and the Osage County PHA has 280 units at six individual locations: Barnsdall, Cedar Ridge near Pawhuska, Fairfax, Hominy, Osage, and Shidler. The three public housing authorities in the HOME area received annual Public Housing Capital Fund Program grants (CAP awards) for the continued maintenance and upgrade of their housing units. There are no plans to expand the current number of units at these locations. The HOME Consortium is not a funding source for public housing agencies.

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

Any actions in this area would be initiated by the individual housing authorities.

Actions taken to provide assistance to troubled PHAs

None of the three Public Housing Authorities in the HOME Consortium Area are designated as troubled PHA's.

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CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken 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. 91.220 (j); 91.320 (i)

Fair Housing education is an important first step in eliminating any barriers to affordable housing that may be encountered by low income and minority citizens. Cities and counties in the HOME 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 taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

No additional actions undertaken.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

As they have for the past three years, Tulsa County and INCOG staff continued to provide technical assistance to the Tulsa Health Department in the administration of the HUD Healthy Homes Lead Paint Reduction grant awarded to the THD.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

During the FY2024 reporting period, Community Action Project Tulsa County (CAPTC) and Community Resource Development, Inc. (CARD) provided a variety of services in the HOME Consortium area. Programs included Head Start (health, nutrition, family literacy, disabilities, and education services), Weatherization (energy efficiency improvements in older homes), Community Outreach (self-sufficiency and management skills training), Youth Programs (employment and training opportunities), and Senior Nutrition (meals, transportation, and social activities).

CARD also administered a Homeless Program (financial assistance, case management, and counseling), Emergency Assistance (food, shelter, utilities, clothing, and medical care), and Economic Development initiatives (career counseling, business development, and entrepreneurial support). In addition, CARD maintains an extensive referral system connecting clients to employment, housing, and emergency services.

Broken Arrow Neighbors (BAN) received CDBG funds for an outreach coordinator and provided food, rental and utility assistance, and job and résumé support. CAPTC continued to help low-income families build and manage assets to achieve economic stability, while CARD in Claremore offered a range of

social services to local clients.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

No gaps in institutional structure were identified in the FY24 Annual Action Plan. No changes are contemplated at this time.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

Tulsa County participated in the A Way Home 4 Tulsa Leadership Council and the efforts by all social service agencies involved to address the critical issue of evictions.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

The HOME Consortium is a member of the Tulsa Area Fair Housing Partnership, a collaboration of local entities and agencies whose mission is to raise awareness of the right to equal opportunity in housing of all people in the metropolitan Tulsa area. During the reporting period, the Partnership continued to provide fair housing education in the region and continued to direct efforts towards a variety of significant and high-profile events and activities to bring attention to equal housing opportunity.

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CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Tulsa County has established monitoring policies and procedures that outline the frequency and standards for staff oversight. CDBG funds are monitored either after the final draw request or at the end of the fiscal year. HOME housing units are monitored every three years. INCOG Staff members conducted robust and vigorous monitoring visits during the 2024 program year of all the CDBG Urban County members who had disbursements during the reporting period. The purpose of the monitoring visits was to review original source documentation for the payments to contractors on CDBG projects within 60 days of payment for complete draws and within 60 days of the program ending for partial draws. The City of Broken Arrow was monitored for the Old Town Waterline and Emergency Home Repair Program projects in August 2024 and again in March 2025 for their Elm Avenue Drainage Improvements Project. The City of Jenks was monitored for their Adult Activity Design project in August 2024. The City of Bixby was monitored in December 2024 for their Dawes Ave Sidewalk project in December 2024. No deficiencies were identified.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

Following the adopted Tulsa County Citizens Participation Plan, a public hearing to review the FY 2024 performance of the HOME Consortium, CDBG Urban County, and CDBG-CV programs was held during the regular Tulsa County Board of Commissioners meeting on Tuesday, September 2, 2025. Notification of the public hearing was published in the regional *Tulsa World* newspaper 14 days prior to the hearing and posted on the Tulsa County website and the INCOG website. Additionally, copies of the draft CAPER were posted on the Tulsa County and INCOG websites to allow public review of the document.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The Urban County program focused efforts during the FY 2024 program year on encouraging participating jurisdictions to speedily expend grant funds. A review of the PR56 CDBG Timeliness Report for the test date of May 2, 2025 showed a 1.30 Draw Ratio for Tulsa County, so Tulsa County met the timeliness test.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

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CR-50 - HOME 24 CFR 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in 24 CFR §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

Per §92.504(d), on-site inspections are required at least once every three years during the period of affordability. INCOG staff conducted physical inspections of four Vintage Housing elderly apartment projects and one Valhalla Management property (the Wells Building in Sapulpa) in November and December 2023. As a result, no additional on-site inspections were due during the FY24 program year. However, INCOG staff conducted regular construction inspections of the 40 elderly apartment units rehabilitated with HOME funds during this period to ensure compliance with applicable housing codes and HOME program requirements.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 24 CFR 91.520(e) and 24 CFR 92.351(a)

The Tulsa County HOME Consortium developed and adopted an affirmative marketing plan in accordance with 24 CFR. 92.351 (b). Additionally, the Consortium has approved separate marketing plans for all of the affordable housing developments funded with Consortium funds. The marketing plans are consistent with the affirmative marketing plan requirements specified in federal requirements.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

During the 2024 Program Year, the HOME Consortium used \$1,667.71 in program income to assist four households with a portion of their Homebuyer Assistance downpayment and closing costs. The households assisted with program income were owner-occupied.

Describe other actions taken to foster and maintain affordable housing. 24 CFR 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 24 CFR 91.320(j)

The HOME Consortium accepted RFPs from CHDO developers during the FY2022 program period to rehabilitate affordable housing units for the elderly and awarded funding to Vintage Housing for the rehabilitation of the 40-unit elderly project in Sapulpa, Hickory Crossing. Construction started in October 2023 and was completed in February 2025 during the FY24 program year.

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Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	1	1	0	0	0
Total Labor Hours	2,457	6,414			
Total Section 3 Worker Hours	0	0			
Total Targeted Section 3 Worker Hours	0	0			

Table 14 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers					
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.					
Direct, on-the job training (including apprenticeships).		1			
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.					
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).					
Outreach efforts to identify and secure bids from Section 3 business concerns.					
Technical assistance to help Section 3 business concerns understand and bid on contracts.					
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.					
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.					
Held one or more job fairs.					
Provided or connected residents with supportive services that can provide direct services or referrals.					
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.		1			
Assisted residents with finding child care.					
Assisted residents to apply for, or attend community college or a four year educational institution.					
Assisted residents to apply for, or attend vocational/technical training.					
Assisted residents to obtain financial literacy training and/or coaching.					
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.					
Provided or connected residents with training on computer use or online technologies.					
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.					
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.					
Other.	1	1			

Table 15 – Qualitative Efforts - Number of Activities by Program

Narrative

During the 2024 reporting period, two activities met the federal Section 3 project threshold of \$200,000 in HUD assistance. The Hickory Crossing elderly apartments rehabilitation, funded through HOME, qualified as a Section 3 project. Within the Urban County CDBG program, the City of Broken Arrow's Iola Street Rehabilitation was the only infrastructure activity that exceeded the threshold. While no Section 3 labor hours were reported for these projects during this program year, both were monitored for compliance, and contractors were made aware of their obligations under Section 3.

DRAFT