

Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals, and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Applicability. Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment, and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

A. PHA Information.

A.1 PHA Name: Housing Authority of the City of Tulsa **PHA Code:** OK073

PHA Type: Standard PHA Troubled PHA

PHA Plan for Fiscal Year Beginning (MM/YYYY): 01/2023

PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above):

Number of Public Housing (PH) Units 768

Number of Housing Choice Vouchers (HCVs) 6,613

Total Combined Units/Vouchers 7,381

PHA Plan Submission Type: Annual Submission Revised Annual Submission

Availability of Information. PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

THA's PHA plan is available on THA's website at www.TulsaHousing.org and located in the office of each property. THA's PHA plan, PHA Plan Elements, PHA policies, and all related information are available at THA's Central Office located at 415 E. Independence St. Tulsa, OK 74106

PHA Consortia (Check box if submitting a Joint PHA Plan and complete table below)

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
				PH	HCV
N/A					

B. Annual Plan Elements.

B. 1 Revision of PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA?

Y N

- Statement of Housing Needs and Strategy for Addressing Housing Needs
- Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
- Financial Resources.
- Rent Determination.
- Operation and Management.
- Grievance Procedures.
- Homeownership Programs.
- Community Service and Self-Sufficiency Programs.
- Safety and Crime Prevention.
- Pet Policy.
- Asset Management.
- Substantial Deviation.
- Significant Amendment/Modification

(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):

FINANCIAL RESOURCES

Sources		Projected	Planned Uses
1.	Federal Grants	2023	
a)	Public Housing Operating Fund Formula	\$ 7,000,000	Public Housing Operations
b)	Public Housing Capital Fund Program	\$ 3,500,000	Public Housing Capital Improvements
c)	Section 8 Tenant-Based Assistance	\$ 32,254,229	Section 8 Housing Choice Vouchers Housing Assistance
d)	Section 8 Tenant-Based Assistance	\$ 362,455	Section 8 Moderate Rehab Housing Assistance
e)	Section 8 Project-Based Assistance	\$ 2,720,425	Section 8 Project Based Operations
f)	Resident Opportunity and Self-Sufficiency Grants	\$ 46,500	Public Housing Supportive Services and Self Sufficiency
g)	FSS Grant	\$ 96,600	Section 8 Project Based Supportive Services
h)	Choice Neighborhoods Implementation Grant	\$ 4,500,000	Choice Neighborhoods Implementation Grant
2.	Prior Year Federal Grants (unobligated funds only)		
a)	2019 Public Housing Capital Fund Program	\$ 77,122	Public Housing Capital Improvements
b)	2020 Public Housing Capital Fund Program	\$ 272,235	Public Housing Capital Improvements
c)	2021 Public Housing Capital Fund Program	\$ 1,500,000	Public Housing Capital Improvements
d)	2022 Public Housing Capital Fund Program	\$ 2,500,000	Public Housing Capital Improvements
3.	Dwelling Rental Income		
a)	Public Housing Dwelling Rental Income	\$ 645,750	Public Housing Operations
b)	Section 8 Project Based Dwelling Rental Income	\$ 875,575	Section 8 Projected Based Housing Operations
4.	Other Income		
a)	Public Housing Operations Interest	\$ 44,250	Public Housing Operations
b)	Public Housing Operations Other Income	\$ 245,225	Public Housing Operations
c)	Section 8 Project Based Interest	\$ 15,278	Section 8 Project Based Operations
d)	Section 8 Project Based Other Income	\$ 15,135	Section 8 Project Based Operations

e)	Section 8 Tenant Based Interest	\$ 4,555	Section 8 Housing Choice Vouchers Tenant Based Operations
f)	Section 8 Tenant Based Other Income	\$ 45,630	Section 8 Housing Choice Vouchers Tenant Based Operations
g)	Section 8 Tenant Based Other Income	\$ 750	Section 8 Moderate Rehab Tenant Based Operations
5.	Non-Federal Sources		
a)	Central Office Cost Center Interest	\$ 35,925	Central Office Cost Center Operations
b)	Central Office Cost Center Other Income	\$ 26,875	Central Office Cost Center Operations
c)	Auxiliary Fund Interest/Other Income	\$ 75,500	Support PHA Operations
d)	Developer Fees	\$ 4,250,000	Support Additional Affordable Housing and Central Office Cost Center Operations
TOTAL		\$ 61,110,014	

SUBSTANTIAL DEVIATION/SIGNIFICANT AMENDMENT

As part of the Rental Assistance Demonstration (RAD) Program, the Housing Authority of the City of Tulsa is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD specific items:

- a. The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance,
- b. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds,
- c. Changes to the construction and rehabilitation plan for each approved RAD conversion, and
- d. Changes to the financing structure for each approved RAD conversion.

(c) The PHA must submit its Deconcentration Policy for Field Office review.

DECONCENTRATION POLICY

It is the intent of THA to promote adequate and affordable housing, economic opportunity, and a suitable living environment free of discrimination. Tenant selection and assignment for federal public housing shall be made without regard to race, color, religion, ancestry/national origin, sex, familial status, physical or mental disability, marital status, age, or gender identity. To improve community quality of life and economic vitality, THA will implement measures to provide for deconcentration of poverty and income-mixing. THA will bring higher income tenants into lower income developments and lower income tenants into higher income developments. Additionally, THA will support measures to raise the income of households that currently reside in federal

public housing. All measures and incentives that are undertaken to accomplish deconcentration and income-mixing will be uniformly applied.

THA 's admission policy is designed to provide for deconcentration of poverty and income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects. Gross annual income is used for income limits at admission and for income-mixing purposes. Skipping a family on the waiting list specifically to reach another family with a lower or higher income is not to be considered an adverse action to the family. Such skipping will be uniformly applied until the target threshold is met.

THA will gather and analyze tenant data once every two years. The tenant characteristics of its public housing stock, including information regarding tenant incomes, to assist THA in its deconcentration efforts.

THA will use the gathered tenant incomes information in its assessment of its public housing developments to determine the appropriate designation to be assigned to the project for the purpose of assisting in its deconcentration goals.

If THA's review of tenant incomes indicates that there has been a meaningful change in the tenant income characteristics of a particular project, THA will evaluate the changes to determine whether, based on the methodology of choice, the project may need to be redesignated as a higher or lower income project or whether THA has met the deconcentration goals and the project needs no designation.

Deconcentration and Income-Mixing Goals

Admission policies related to the deconcentration efforts of THA do not impose specific quotas. Therefore, THA will not set specific quotas, but will strive to achieve deconcentration and income mixing in its developments over time.

THA 's income-mixing goal is a long-range goal and may not be achieved in the first year of implementation. THA will use its analysis of its public housing stock and tenant incomes to provide data benchmarks. Additionally, as THA recapitalizes and/or adds additional units to its covered developments, mixed income will be a primary tool to meet the objective of deconcentrating poverty. Units designated to attract residents with median income in the 80% - 120% AMI will assist our goals of developing mixed income communities in furtherance of HUD's goals to affirmatively further fair housing and deconcentrate poverty.

Project Designation Methodology

THA will determine and compare tenant incomes at the developments listed in this Chapter. Upon analyzing its findings THA will apply the policies, measures and incentives listed in this Chapter to bring higher income families into lower income developments and lower income families into higher income developments.

THA 's goal is to have eligible families having higher incomes occupy dwelling units in covered projects predominantly occupied by eligible families having lower incomes, and eligible families having lower incomes occupy dwelling units in covered projects predominantly occupied by eligible families having higher incomes. Families having lower incomes include very low and extremely low-income families. When selecting applicant families and assigning transfers for

designated covered projects, THA will determine whether the selection of the family will contribute to the deconcentration goals.

THA may not select a family for a particular project if the selection will have a negative effect on the PHA's deconcentration goals. However, if there are insufficient families on the waiting list, transfer list, the development has multiple vacancies, or efforts to deconcentrate will result in a unit remaining vacant longer than THA's goal of 10 days from vacant to being reoccupied by an eligible family, THA may not strictly adhere to the deconcentration methodology.

Transfer Policy, Deconcentration

THA will consider its deconcentration goals when transfer units are offered. When families are no longer eligible for their current unit because of a change in family composition, THA will consider its deconcentration goals when seeking to relocate these families within the portfolio.

Steps for Implementation (24 CFR 903.2)

Step 1:

Every two years, THA will determine the average income of all families residing in all covered developments for THA. As of June 2022, the average income for all THA covered developments is: \$8,491.

Step 2:

Every two years, THA will determine the average income of all families residing in each covered development.

Development	Average Income
Seminole Hills	\$8,268
Mohawk Manor	\$8,874
South Haven	<u>\$8,423</u>
Average	\$8,491

Step 3: Every two years, THA will determine whether each covered development falls above or below the average income for families residing in all covered developments. The average income of all families residing in all covered developments for THA is currently \$8,491.

Step 4: THA will determine which families on each covered development's waitlist have incomes higher than the THA -wide average and designate these families as "higher income families," and which have incomes lower than the THA -wide average and designate these families as "lower income families."

Step 5: When a unit becomes available in a higher income building, THA may skip families on the waiting list, if necessary, to reach a lower income family to whom it will offer the unit. When a unit becomes available in a lower income building, THA may skip families on the waiting list, if necessary, to reach a higher income family to whom it will offer the unit. Skipping shall be applied to the site-based waiting lists. If a waiting list does not contain a family in the income

category to which the unit is to be offered, THA shall offer the unit to a family in the other income category.

If there are insufficient families on the waiting list, transfer list, the development has multiple vacancies, or efforts to deconcentrate will result in a unit remaining vacant longer than THA's goal of 10 days from vacant to being reoccupied by an eligible family, THA may not strictly adhere to the deconcentration methodology. THA's deconcentration of poverty activities must be balanced with THA's overall objective to provide decent, safe, and sanitary housing to as many eligible families as possible.

THA Incentives for Higher Income Families

THA may offer certain incentives to higher income families willing to move into lower income projects. THA will not take any adverse action against any higher income family declining an offer by the PHA to move into a lower income project.

In addition to maintaining its public housing stock in a manner that is safe, clean, well landscaped and attractive, the PHA may offer the following incentives for higher income families moving into lower income projects:

(A) Various incentive may be offered.

(B) Skip a family on the waiting list to reach another family in an effort to further the goals of the deconcentration policy.

(C) Provide such other strategies as permitted by statute and determined by the PHA in consultation with the residents and the community, through the PHA Annual Plan process, to be responsive to the local context and the PHA's strategic objectives

B. 2 New Activities.

(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?

Y N

Hope VI or Choice Neighborhoods.

Mixed Finance Modernization or Development.

Demolition and/or Disposition.

Designated Housing for Elderly and/or Disabled Families.

Conversion of Public Housing to Tenant-Based Assistance.

Conversion of Public Housing to Project-Based Assistance under RAD.

Occupancy by Over-Income Families.

Occupancy by Police Officers.

- Non-Smoking Policies.
- Project-Based Vouchers.
- Units with Approved Vacancies for Modernization.
- Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.

CHOICE NEIGHBORHOODS

River West

THA and the City of Tulsa have been awarded a \$30 million FY 2017 Choice Neighborhoods Implementation Grant for the Eugene Field Neighborhood. While located in a potentially desirable area, isolating physical barriers, years of disinvestment, and over-concentration of distressed, subsidized housing have hindered the neighborhood's possibilities. Despite these obstacles, THA, the City of Tulsa, and the community used a FY 2010 Choice Neighborhoods Planning Grant to create a collective vision that has begun to transform their neighborhood. The Choice Neighborhoods Implementation grant, and significant private and public leverage will accelerate the progress. With these resources, Tulsa will replace the distressed Riverview Park apartments, which has 190 public housing apartments, and Brightwater Apartments, which has 200 Section 8 project-based apartments, with high quality mixed income housing totaling 435 apartments known as River West; dramatically improve children's educational outcomes, open new employment opportunities, increase health care access; and implement catalytic neighborhood improvements that will build upon Eugene Field's assets. Phase I of this project was completed in 2021, with Phases II and III completed in 2022. The remaining three phases are expected to be completed by 2024.

36N (Comanche Park Apartments)

THA and the City of Tulsa have been awarded a \$50 million FY 2021 Choice Neighborhoods Implementation Grant for the 36th Street North Corridor. While located in a potentially desirable area, years of disinvestment and over concentration of distressed low income and subsidized housing have hindered economic growth and prosperity. Despite these challenges, THA, the City of Tulsa, and several community partners came together to establish a comprehensive master plan, Envision Comanche, to create a collective vision for this neighborhood surrounding the Comanche Park public housing community. That vision called for the area transforming into a

welcoming mixed-income community. Several improvements have been initiated in the area, including the start of the Peoria-Mohawk Business Park and the implementation of the Bus Rapid Transit System. The Choice Neighborhoods Implementation Grant, and significant public and private investments will accelerate the revitalization of this community. With these resources, THA will replace the distressed Comanche Park Apartments, which has 271 public housing apartments, with high quality mixed-income housing totaling 435 apartments known as 36N; dramatically improving educational outcomes, expand employment and employment readiness opportunities, increase healthcare access, and implement catalytic neighborhood improvements that will build on the burgeoning improvements occurring along the 36th Street North corridor. Phase I of this project is expected to begin in 2023.

MIXED FINANCE MODERNIZATION OR DEVELOPMENT & CONVERSION OF PUBLIC HOUSING TO PROJECT-BASED ASSISTANCE UNDER RAD

Rental Assistance Demonstration (RAD) – See Attachment A.

DEMOLITION AND/OR DISPOSITION & CONVERSION OF PUBLIC HOUSING TO TENANT BASED ASSISTANCE

Comanche Park Apartments

Comanche Park meets the HUD Section 18 Obsolescent Test with \$38.7 million in immediate capital needs. The units are obsolete due to the physical condition in accordance with the Section 18 demolition criteria. THA has received approval on a multi-phase Section 18 Demolition application for all 271 apartments.

Comanche Park’s primary address is 3608 N. Quaker.

South Haven Manor

The FEMA floodplain maps were recently updated and 10 apartments at South Haven Manor are now located within a floodway. THA has submitted a Section 18 Demolition/Disposition Application for all ten apartments.

The property addresses are:

5601 S 38th W Ave	5601 S 39th W Ave	5602 S 38th W Ave
5602 S 39th W Ave	5603 S 39th W Ave	5604 S 38th W Ave
5604 S 39th W Ave	5606 S 39th W Ave	5626 S 37th W Ave
5630 S 37th W Ave		

RAD Blend

As authorized by Section 18 of the United States Housing Act of 1937 (42 U.S.C. 1437p) (1937 Act), the Authority intends to partially dispose of the below units in our remaining RAD conversions. In accordance with Notice PIH 2021-07 (HA), up to 60% of the current Public Housing units at Seminole Hills and at Mohawk Manor and 40% of the units at Hewgley Terrace based on the amount of Housing Construction Costs included in each project’s rehabilitation may be partially disposed of through Section 18 (RADBlend). THA will request Tenant Protection Vouchers (TPVs) for the units disposed of through Section 18.

Seminole Hills – OK073000001

PIC Development	Number of Units Pre-Conversion	Number of RAD Units Post-Conversion	Number of PBV Units Post-Conversion
OK073000001- Seminole	141	57	84

Mohawk Manor – OK073000006

PIC Development	Number of Units Pre-Conversion	Number of RAD Units Post-Conversion	Number of PBV Units Post-Conversion
OK073000006- Mohawk	106	43	63

Hewgley Terrace – OK073000007

PIC Development	Number of Units Pre-Conversion	Number of RAD Units Post-Conversion	Number of PBV Units Post-Conversion
OK073000000- Hewgley	150	90	60

PROJECT BASED VOUCHERS

THA is making available up to 20% of our total non-RAD Section 8 Voucher allotment for Project Based Vouchers. Currently, we have 341 vouchers approved as Project Based Vouchers.

These projects must reside within the Tulsa City Limits or within 1 mile of the Tulsa City Limits.

UNITS WITH APPROVED VACANCIES FOR MODERNIZATION

THA’s Public Housing units apply for approved vacancies for modernization as needed. The Public Housing units that are currently offline for modernization are:

Comanche Park (112 apartments)

- | | | |
|------------------|------------------|------------------|
| 1312 E 37th St N | 1313 E 36th St N | 1317 E 36th St N |
| 1321 E 36th St N | 1323 E 36th St N | 1323 E 37th St N |
| 1325 E 36th St N | 1326 E 37th St N | 1326 E 38th St N |
| 1327 E 36th St N | 1328 E 37th St N | 1328 E 38th St N |

1330 E 37th St N	1332 E 37th St N	1333 E 38th St N
1335 E 37th St N	1336 E 37th St N	1337 E 38th St N
1338 E 37th St N	1339 E 36th St N	1339 E 37th St N
1339 E 38th St N	1340 E 37th St N	1340 E 38th St N
1341 E 36th St N	1341 E 38th St N	1342 E 37th St N
1343 E 36th St N	1343 E 38th St N	1344 E 37th St N
1344 E 38th St N	1345 E 36th St N	1345 E 37th St N
1345 E 38th St N	1346 E 37th St N	1346 E 38th St N
1347 E 36th St N	1347 E 38th St N	1348 E 38th St N
1349 E 36th St N	1349 E 38th St N	1351 E 36th St N
1351 E 38th St N	1353 E 36th St N	1353 E 38th St N
1354 E 38th St N	1355 E 36th St N	1355 E 38th St N
1357 E 36th St N	1358 E 38th St N	1359 E 38th St N
1360 E 38th St N	1371 E 36th St N	1373 E 36th St N
1375 E 36th St N	1376 E 38th St N	1377 E 36th St N
1378 E 38th St N	1379 E 36th St N	1381 E 36th St N
1382 E 38th St N	1383 E 36th St N	1385 E 36th St N
1387 E 36th St N	1388 E 38th St N	1390 E 38th St N
3605 N Quaker Ave	3613 N Quaker Ave	3615 N Quaker Ave
3617 N Quaker Ave	3619 N Quaker Ave	3621 N Quaker Ave
3623 N Quaker Ave	3625 N Quaker Ave	3627 N Quaker Ave
3629 N Quaker Ave	3631 N Quaker Ave	3633 N Quaker Ave
3635 N Quaker Ave	3641 N Quaker Ave	3647 N Quaker Ave
3648 N Quaker Ave	3649 N Quaker Ave	3651 N Quaker Ave
3655 N Quaker Ave	3657 N Quaker Ave	3659 N Quaker Ave
3661 N Quaker Ave	3673 N Quaker Ave	3675 N Quaker Ave
3677 N Quaker Ave	3679 N Quaker Ave	3681 N Quaker Ave
3682 N Quaker Ave	3683 N Quaker Ave	3685 N Quaker Ave
3687 N Quaker Ave	3691 N Quaker Ave	3694 N Quaker Ave
3695 N Quaker Ave	3702 N Quaker Ave	3704 N Quaker Ave
3709 N Quaker Ave	3711 N Quaker Ave	3713 N Quaker Ave
3714 N Quaker Ave	3715 N Quaker Ave	3717 N Quaker Ave
3719 N Quaker Ave	3751 N Quaker Ave	3753 N Quaker Ave
3759 N Quaker Ave		

Mohawk Manor (5 apartments)

2540 E 37th St N	2573 E 37th St N	3673 N Birmingham Ave
3748 N Birmingham Ave	3679 N Birmingham Ave	

South Haven Manor (10 apartments)

5601 S 38th W Ave	5601 S 39th W Ave	5602 S 38th W Ave
5602 S 39th W Ave	5603 S 39th W Ave	5604 S 38th W Ave
5604 S 39th W Ave	5606 S 39th W Ave	5626 S 37th W Ave
5630 S 37th W Ave		

B. 3 Civil Rights Certification.

Form HUD-50077, PHA Certification of Compliance with the PHA Plans and Related Regulations, must be submitted by the PHA as an electronic attachment to the PHA Plan.

B. 4. Most Recent Fiscal Year Audit.

(a) Were there any findings in the most recent FY Audit?

Y N

(b) If yes, please describe:

The 2019 Financial Audit contained two findings.

THA did not submit the December 31, 2019 audited financial statements to the Real Estate Assessment Center by the extended due date of March 3, 2021 due to the COVID-19 Pandemic. THA Finance Staff and auditors worked on a schedule to get the 2020 and 2021 audits caught up by December 31, 2022.

THA did not follow the internal controls in place to ensure compliance with Eligibility requirements. Eight of the forty files tested had exceptions. Four of the files did not have a signed recertification check list. Four of the files reported rent per the tenant file that did not agree to the HUD 50058. THA Property Management staff are being retrained on the recertification check list and regular internal audits are being completed across the portfolio for accuracy. During the previous conversion to TenMast, tenant rent info was not converted correctly. THA is converting to a new housing software, Yardi, and has hired a third-party consultant to help ensure all testing and information is brought over from TenMast to Yardi correctly.

B. 5. Progress Report.

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.

1. Increase and provide sustainable, affordable housing / become premier provider.

(1) Maintain at least a 95% occupancy across the Portfolio.

The Housing Choice Voucher occupancy percentage was at 95% during 2021 and is at 93% to date in 2022. The Public Housing and RAD-Project Based Voucher properties finished 2021 at 85%, and to date for 2022 are at 89%.

(2) Continue phase II of the portfolio RAD conversions.

Six Public Housing properties were converted to Section 8 Project Based Vouchers under RAD in 2020. A seventh, Country Club Gardens, was converted at the very end of 2021 and is currently undergoing substantial rehab. The remaining Public Housing properties will have RAD Financing Plans submitted by November 2022 and are expected to convert by the end of the fourth quarter of 2023.

(3) Evaluate unused Faircloth Amendment section 9 subsidized very low-income housing units.

THA will explore the use of Faircloth to RAD conversions in 2023.

(4) Build new workforce/market housing after RAD conversion using HUD insured Mortgage program.

River West will include 122 new workforce/market apartments when construction of the new development is fully completed by 2024. The 36 N Masterplan includes approximately 230 new workforce/market apartments.

(5) Start implementing the Envision Comanche Masterplan that was adopted.

THA is a finalist for a 2021 Choice Neighborhood Implementation Grant with the Envision Comanche footprint as the target neighborhood.

(6) Prioritize affordable housing in Consolidated Plan and Community Development Programs.

Confirmed the City of Tulsa's 5-Year Plan prioritized the use of CDBG and HOME funds within one mile of the BRT bus line, with priority focus on the 36th Street N corridor, covering all of the Envision Comanche Master Plan area.

(7) Support any City of Tulsa affordable housing programs; aggressively pursue opportunities to increase affordable housing options taking advantage of the new 4% floor for LIHTC units).

Housing Choice Vouchers are available up to the HUD maximum of 20% and have worked with the City of Tulsa to facilitate three private developer round tables to expand use and collaborate with the City of Tulsa to tie use of PBV's with receipt of downtown incentive funding – TIF and the revolving loan fund. Served on the City of Tulsa's Affordable Housing Strategy Committee, which created the Affordable Housing Trust Fund to fund development of new units and created Affordable Housing 101 to promote development of new affordable housing developers.

(8) Maximize section 8 contract authority and explore options of placing vouchers into other higher income areas.

Increased the available Section 8 Project Based Vouchers to maximum allowable of 20%. THA’s ongoing and upcoming development activities include plans for an additional 543 PBV’s: 158 units at Country Club Gardens, 114 units at River West, and 271 units as part of Envision Comanche.

(9) Improve resident retention.

The average length of residency over the last three years for THA’s primary programs are:

	Public Housing / RAD	Project Based Rental Assistance	Housing Choice Vouchers
2020	4.26 yrs	4.70 yrs	5.81 yrs
2021	4.22 yrs	4.99 yrs	5.49 yrs
2022	3.82 yrs	5.49 yrs	5.03 yrs

2. Improve self-sufficiency for residents.

(1) Pursue all Federal grant opportunities

Recent grants THA has received:

2021 FSS Grant: \$159,421

(2) Establish Public-Private partnership for resident opportunities.

THA’s Building Our Tomorrow Micro Grant program has partnered with the Tulsa Economic Development Corporation (TEDC) to offer business classed to grant applicants. River West has over 60 partners involved. Envision Comanche has 45 partners. Social Services work with over 40 different agencies.

(3) Enhance/bolster resident intern program.

THA has created a resident intern program that has been used successfully to hire THA residents in the past. This program was suspended in 2021 and 2022 due to COVID-19. THA plans to implement this program again in future years.

(4) Implement and support THA’s Building Our Future Micro-Grant program for residents.

The first three recipients of THA’s Building Our Future Micro-Grants were awarded in 2021. The second group of recipients are currently taking business development class and awards are expected to be awarded during 2022.

(5) Stabilize the Family Self Sufficiency (FSS) Program.

THA’s FSS clients have increased to a current total of 256 with a total escrow balance of \$286,413. During 2021 there were 21 graduates with total escrow awarded of \$188,882. For 2022 through June, there have been 8 graduates with total escrow awarded of \$97,348.

(6) Empower Resident Associations.

THA has established a Resident Association Coordinator. The High-Rise Resident Association activities include providing health care information, healthy eating, and overall health and welfare programs, and the work with various churches to hold different functions. The Family-Site Resident Association activities include sponsorships to offset the cost of back-to-school supplies, assisting with after-school programming, holding instructional seminars on housekeeping and parenting.

3. Strengthen THA's Organizational Capacity / advance workforce development and performance.

(1) Improve employee's knowledge, skills, and abilities.

Staff regularly attends Affordable Housing conferences including NAHRO, PHADA, and LIHTC housing conferences. Staff receive numerous trainings including Rental Assistance Demonstration (RAD) – Project Based Vouchers, LIHTC, Housing Choice Voucher Specialist, Procurement, Maintenance, Financial Management Accounting, and Policy and Procedure trainings, and have received related certifications. THA utilizes Schoox's Biz Library online trainings that include thousands of video business trainings.

(2) Recruit, select and retain the right people with the right skills in the right job.

THA's staff currently has a tenure of 7.3 years at THA.

(3) Improve staff communication and capacity.

THA has begun using an Employee Application Platform for direct communication from leadership to staff.

(4) Establish an award program for employees.

THA recognizes an Employee of the Year, Rising Star, and President's award, as well as Site Safety and Attendance Awards annually.

(5) Maintain competitive employee compensation along with opportunities to advance within THA.

Step Pay and Longevity Pay plans are in use and are periodically updated. An amended 401(k) plan has been in effect since 2017. There were 11 internal promotions of THA staff in 2021 and an additional 12 already to date in 2022.

4. Strengthen relations with key community constituencies.

(1) Reach out to and collaborate with HUD, State of Oklahoma, Mayor's office and Council, National non-profits, local non-profits.

THA continues the consistent communication with HUD, the Mayor's Office, the Oklahoma Housing Finance Agency and state and local agencies. THA holds bi-annual meetings/presentations with Tulsa City Council members.

(2) Continue to build upon THA's social media presence.

THA has recently updated its website homepage and is active on Facebook, Twitter, Instagram, LinkedIn, and YouTube.

(3) Continue the momentum and goodwill of THA's brand publicly.

THA continues to publicize on our website and on social media of the incredible development work THA and its affiliates have been able to accomplish.

5. Assist in the improvement and development of Tulsa's urban core and neighborhoods.

(1) Implement place-based strategy for Federal grant programs.

Both River West and 36N's master plans were developed with a community led approach. This enabled THA to make sure that the existing advantages, intricacies, and capabilities of each neighborhood were discussed and included in the development of each development's master plan.

(2) Support development and redevelopment in collaboration with the City of Tulsa (Mayor, Council, TDA, INCOG); assist with, and promote, development activities in the city.

THA and the City of Tulsa were co-grantees for 2017 Choice Neighborhoods Grant award of \$30,000,000. THA has made available 20% of our Housing Choice Vouchers to be used as Project Based Vouchers for developers and property owners throughout Tulsa. Currently, 379 are currently in use.

6. Strengthen THA's finances.

(1) Enhance internal controls.

Stinnett and Associates are under contract for Risk Assessment, Internal Control Evaluation, and ongoing testing of Internal Controls.

(2) Grow revenue while controlling operational expense.

Revenues have increased each of the last three Fiscal Years, while Net Operating Income has increased as well.

(3) Decrease dependency on HUD subsidy through development activities and developer fee earned.

Reduced % of revenues from HUD Subsidy each of last three years. Most recent year % dropped down to 81%.

(4) Continue the move to asset management and conversions to the RAD program in order to leave behind the public housing management model.

Six Public Housing properties were converted to Section 8 Project Based Vouchers under RAD in 2020. A seventh, Country Club Gardens, was converted at the very end of 2021 and is currently undergoing substantial rehab. The remaining Public Housing properties will have RAD Financing Plans submitted by November 2022 and are expected to convert by the end of the fourth quarter of 2023.

THA approved a new 3 Year Strategy during 2022. The updated objectives are:

1. Increase/provide sustainable, affordable housing, become premier provider in the City.
 - (A). Exit Public Housing by Completing portfolio RAD conversion.
 - (B). Demolish and begin the rebuild of Comanche Park.
 - (C). Identify land acquisition targets.
 - (D). Increase housing portfolio by 750 units (450 units + Comanche and RiverWest CNI).
 - (E). Stand up THA Low Income Housing Tax Credit Compliance Department.
 - (F). Become 3rd party Management Company.

2. Improve Opportunities for Resident Self-Sufficiency.
 - (A). Continue to grow the Building Our Tomorrows micro-grant program.
 - (B). Ensure every property has a resident association.
 - (C). Grow the Section 3 program/opportunities for our residents.
 - (D). Grow the FSS program to max participation.

3. Strengthen THA's organizational capacity/advance workforce development and performance.
 - (A). Create a more dynamic Human Resources team.
 - (B). Reduce staff turnover rate to below 10%.
 - (C). Reduce days to fill positions while sourcing and hiring the best candidates.
 - (D). Complete Yardi conversion.
 - (E). Create an IT Strategic Plan that will maximize technological use by all employees.
 - (F). Evaluate the implementation of a 4-Day Work Week.
 - (G). Establish a Succession Plan.

4. Strengthen THA's Finances.
 - (A). Generate a minimum of \$2M in developer fees a year.
 - (B). Seek CNI Grant for Comanche.
 - (C). Seek funding opportunities from Build Back Better Bill.
 - (D). Seek American Rescue Plan Act State funding opportunities.
 - (E). Zero financial findings on audit.

B. 6 Resident Advisory Board (RAB) Comments.

(a) Did the RAB(s) provide comments to the PHA Plan?

Y N

If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. See Attachment B.

Participants at RAB Meeting held September 1, 2022:

Robert Jones – Pioneer Plaza	Donald Rose-Hewgley Terrace
Connie Burden - Hewgley Terrace	Richard Coward - Murdock Villa
Omayara Santiago – HCV/FSS	Kiesharra Sharp – HCV/FSS

Participants at RAB Meeting held January 12, 2023

Robert Jones – Pioneer Plaza	Donald Rose-Hewgley Terrace
Richard Coward - Murdock Villa	Debra Wofford – Pioneer Plaza

B. 7 Certification by State or Local Officials.

Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.

B. 8 Troubled PHA.

(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?

Y N N/A

(b) If yes, please describe:

C. Statement of Capital Improvements. Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).

C.1 Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.

Approved June 28th, 2021.

ATTACHMENT A

RENTAL ASSISTANCE DEMONSTRATION (RAD)

The Housing Authority of the City of Tulsa (THA) was a successful applicant in the Rental Assistance Demonstration (RAD). As a result, the Housing Authority of the City of Tulsa will be converting to Project Based Vouchers under the guidelines of PIH Notice 2012-32, REV-1 and any successor Notices. Upon conversion to Project Based Vouchers the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6 of PIH Notice 2019-x23, Rev 4; and Joint Housing PIH Notice H-2016-17/PIH-2016-17. These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. Additionally, the Housing Authority of the City of Tulsa certifies that it is currently compliant with all fair housing and civil rights requirements.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing the Housing Authority of the City of Tulsa with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, the Authority's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration. The Housing Authority of the City of Tulsa will be using existing PHA resources (including Capital and Operating Funds and existing reserves) as well as additional sources, including private or FHA-insured debt, Low Income Housing Tax Credits (LIHTC), and other soft debt or grants.

Below, please find specific information related to the Public Housing Development(s) that were approved for RAD conversion by HUD:

Name of Public Housing Development: HEWGLEY TERRACE	PIC Development ID: OK073000007	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 150	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$5,616,930/ 2,505 units x 150 units = \$336,343
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	90	90	0
One Bedroom	59	0	-59 (Section 18 RAD Blend)
Two Bedroom	1	0	- 1 (Section 18 RAD Blend)
Three Bedroom			
Four Bedroom			
Five Bedroom			
Six Bedroom			
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: SOUTH HAVEN MANOR	PIC Development ID: OK073000017	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring): No
Total Units: 90	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$5,616,930/ 2,505 units x 100 units = \$224,229
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom			
Two Bedroom	17	17	0
Three Bedroom	65	65	0
Four Bedroom	8	8	0
Five Bedroom			
Six Bedroom			
(If performing a Transfer of Assistance): THA intends to add 10 Faircloth units to the RAD conversion bringing the total unit count to 100.	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: SEMINOLE HILLS-WHITLOW	PIC Development ID: OK073000001	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 141	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$5,616,930/ 2,505 units x 141 units = \$316,163
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom	8	8	0
Two Bedroom	48	48	0
Three Bedroom	75	1	-74 (Section 18 RAD Blend)
Four Bedroom	10	0	-10 (Section 18 RAD Blend)
Five Bedroom			
Six Bedroom			
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: MOHAWK MANOR	PIC Development ID: OK073000006	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 106	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$5,616,930/ 2,505 units x 106 units = \$237,682
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom			
Two Bedroom	38	40	+2 Unit Mod
Three Bedroom	60	3	+2 Unit Mod; -59 Section 18 RAD Blend
Four Bedroom	8	0	-4 Unit Mod; -4 Section 18 RAD Blend
Five Bedroom			
Six Bedroom			
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: COUNTRY CLUB GARDENS – OSAGE CENTER	PIC Development ID: OK073000026	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 107	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family & Senior mix	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family & Senior mix	Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$5,616,930/ 2,505 units x 107 units = \$239,925
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom	77	77	0
Two Bedroom	6	6	0
Three Bedroom	24	24	0
Four Bedroom			
Five Bedroom			
Six Bedroom			
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: COUNTRY CLUB GARDENS – OSAGE DUPLEXES	PIC Development ID: OK073000027	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 17	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$5,616,930 / 2,505 units x 17 units = \$38,119
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom			
Two Bedroom	1	1	0
Three Bedroom	16	1	-15 (Section 18 RAD Blend)
Four Bedroom			
Five Bedroom			
Six Bedroom			
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: NEWTON COUNTRY CLUB	PIC Development ID: OK073000028	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 56	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$5,616,930/ 2,505 units x 56 units = \$125,568
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom	4	4	0
Two Bedroom	34	34	0
Three Bedroom	18	7	-11 (Section 18 RAD Blend)
Four Bedroom			
Five Bedroom			
Six Bedroom			
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: OSAGE NORTH	PIC Development ID: OK073000029	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 49	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$5,616,930/ 2,505 units x 49 units = \$109,872
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom	7	7	0
Two Bedroom	10	10	0
Three Bedroom	32	12	-20 (Section 18 RAD Blend)
Four Bedroom			
Five Bedroom			
Six Bedroom			
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: NEWTON PLAZA	PIC Development ID: OK073000030	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 14	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$5,616,930/ 2,505 units x 14 units = \$31,392
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom			
Two Bedroom	4	4	0
Three Bedroom	10	8	-2 (Section 18 RAD Blend)
Four Bedroom			
Five Bedroom			
Six Bedroom			
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

ATTACHMENT B

Resident Advisory Board (RAB) Comments

Question: How will Hewgley Terrace residents know when the Rental Assistance Demonstration (RAD) conversion begins at Hewgley Terrace?

THA Response: Resident meetings will be conducted, and the residents will be provided with plenty of notice prior to the conversion.

Question: Will residents be moved out of Hewgley Terrace?

THA Response: There are no current plans to move any of the current residents out of Hewgley Terrace.

Question: Are there any plans to expand 1-bedroom apartments to 2-bedroom apartments at Hewgley Terrace?

THA Response: Due to how the building was originally constructed, there is not an opportunity to modify the size of the units to increase the number of bedrooms.

Question: Will the units be remodeled at Hewgley Terrace?

THA Response: The amount of capital work that will be completed as part of the RAD conversion of Hewgley Terrace is still being evaluated.