



Housing Jobs Sustainable Communities Act Three-Year Plan (Fiscal Years 2025-2027)

Prepared by: Housing Authority of the Cherokee Nation

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During the 2024 Cherokee Nation State of the Nation Address, Principal Chief Hoskin and Deputy Chief Warner commissioned a 10-year housing needs assessment to examine the current state of housing in the Cherokee Nation and the projected needs over the next decade. In September 2024, the first phase of the assessment was completed and presented to the Council of the Cherokee Nation in October 2024. The report was also published for review by the general public and citizens of the Cherokee Nation. Additionally in September 2024, Chief Hoskin and Deputy Warner presented a Legislative Act (LA 35-24) to replace and permanently fund the Housing Jobs and Sustainable Communities Act. This Act is a successor to prior authorizations¹ in 2022 (LA 10-22) and 2019 (LA 20-19) and creates a funding process of \$40 million every three years that supports a cyclical housing plans. The housing plan should reflect how funds shall be expended, amounts, areas of priority and shall include efforts to address Cherokee First Language Speaker housing efforts. Further, the legislative act identifies that 85% of the \$40 million (\$34 million) be set aside for housing and the remaining 15% or \$6 million support Community investments. This plan/report is submitted as the inaugural plan for the housing efforts proposed for fiscal years 2025 through 2027.

It is also important to note that the plan can be amended at any time, subject to Council notice and comment period requirements.. During the draft of this document, the Housing Authority of the Cherokee Nation is pending award notification of several grants submitted in recent months. The outcome of this funding may have significant impact on the strategic direction of this funding and future projects. In early December, HACN was made aware of award of the Indian Community Development Block Grant (ICDBG) for a housing project located in North Tulsa. This award of \$2 million will address rental and homeownership opportunities in the community. Other grants will hopefully be received in the months after the submission of this plan. In the event of the receipt of this funding or others, a new plan will be submitted for review and approval.

The Housing Needs Assessment indicates a need for 8,800+ units over the next ten years, throughout the Cherokee Nation Reservation. There is a great demand for housing assistance both inside and outside the Cherokee Nation Reservation. This plan seeks to address many, but not all needs. As the inaugural plan, it is critical to understand the pent-up demand or pending applications and much of the funding will be directed to address those existing and waiting applications rather than taking new applications. The plan provides activities in seven key areas to ensure the most impact for Cherokee citizens, they include:

Activity	Amount
New Construction (NCHOP)	\$14,600,000
Low-Rent Housing	\$7,000,000
Rehabilitation/Replacement Homes	\$6,000,000
Speaker Services	\$3,000,000
Speaker Village	\$3,000,000
Housing Partners Grant	\$75,000
Residential Construction Industry Development Fund	\$25,000
Administrative/Oversight	\$300,000
Total	\$34,000,000.00

¹ Since 2019 predecessor versions of HSJCA, enacted in 2019 and 2022, have funded 5,190 individual housing projects, ranging from individual housing rehab work to replacement homes as well as the construction of 363 new homes and six new housing additions.

New Construction (NCHOP)

Amount: \$14,600,000

Information:

The New Construction Homeownership Program (NCHOP) has provided homeownership opportunities for hundreds of Cherokee households for more than a decade. NCHOP opportunities have varied over the years, including construction under the Indian Housing Block Grant (IHBG), HUD Section 184 lending, American Rescue Plan Act (ARPA). With the sunset of ARPA funding, IHBG and Section 184 lending are two resources that may be tapped. However, the Native American Housing and Self-Determination Act (NAHASDA) is nearly 15 years past due for reauthorization by the U.S. Legislature. Funding levels are insufficient to provide much more than maintenance of existing projects.

The Section 184 guaranteed loan program was used heavily by the previous administration to finance NCHOP in the 2010's placing a significant debt burden upon HACN². Each month HACN pays approximately \$350,000 in mortgage payments for approximately 830 home loans. Therefore, it is our recommendation to utilize any additional loan-based financing carefully, ensuring that HACN is not over-burdened to pay mortgages.

Estimates:

The "pent-up" demand of the existing application pool is over 2,000 households, and there are more than 100 households that are awaiting construction.

Average NCHOP Costs: \$250,0000

Direct NCHOP Units: 60

Finance Amount per Unit: \$70,000

Estimated Monthly Loan Payment per Unit: \$420.00

Total Loan Proceeds: \$4,200,000

Total Estimated Number of Homes to Construct: 75+

HACN would provide another 15 or more homes by leveraging responsible loan proceeds.

Use of Funds:

Construction of 75+ homes relieving the pent-up demand in the existing application pool. Some of the funding would including loan proceeds by leveraging the home values created during construction.

If HACN finances 28% of the home construction cost this would incur \$4,200,000 of debt /loan proceeds, and an estimated \$70,000 per house average. The remainder would be provided from HJSCA and would total no more than \$14,600,000 for the initial three-year funding. HACN would only use lending when interest rates do not exceed 6%, ensuring payback requirements for homeowners is affordable and reasonable. This estimate would project a \$420 monthly payment for 30 years but does not include property taxes (payment in lieu of taxes) and property insurance (estimated to include another \$180/month). Using these assumptions, the projected payment to cover financing, taxes and insurance would be approximately \$600, matching the current maximum lease payment of \$600.

² NCHOP homes constructed under the Hoskin / Warner Administration have not added to the debt load as a result of the funding sources used under HJSCA.

Low-Rent Housing

Amount: \$7,000,000

Information:

The Housing Authority of the Cherokee Nation maintains/operates approximately 1,000 low-rent units. Those units have adjustable rental rates based on occupant household income. Some rates may be \$0.

Total number of units identified in the report: 5,400

Waitlist for assistance: 1,431

County	Rental/Low Rent Applications
Adair	130
Cherokee	612
Craig	15
Delaware	117
Mayes	148
McIntosh	0
Muskogee	39
Nowata	22
Ottawa	0
Rogers	260
Sequoyah	0
Tulsa	0
Wagoner	16
Washington	72
Total	1431

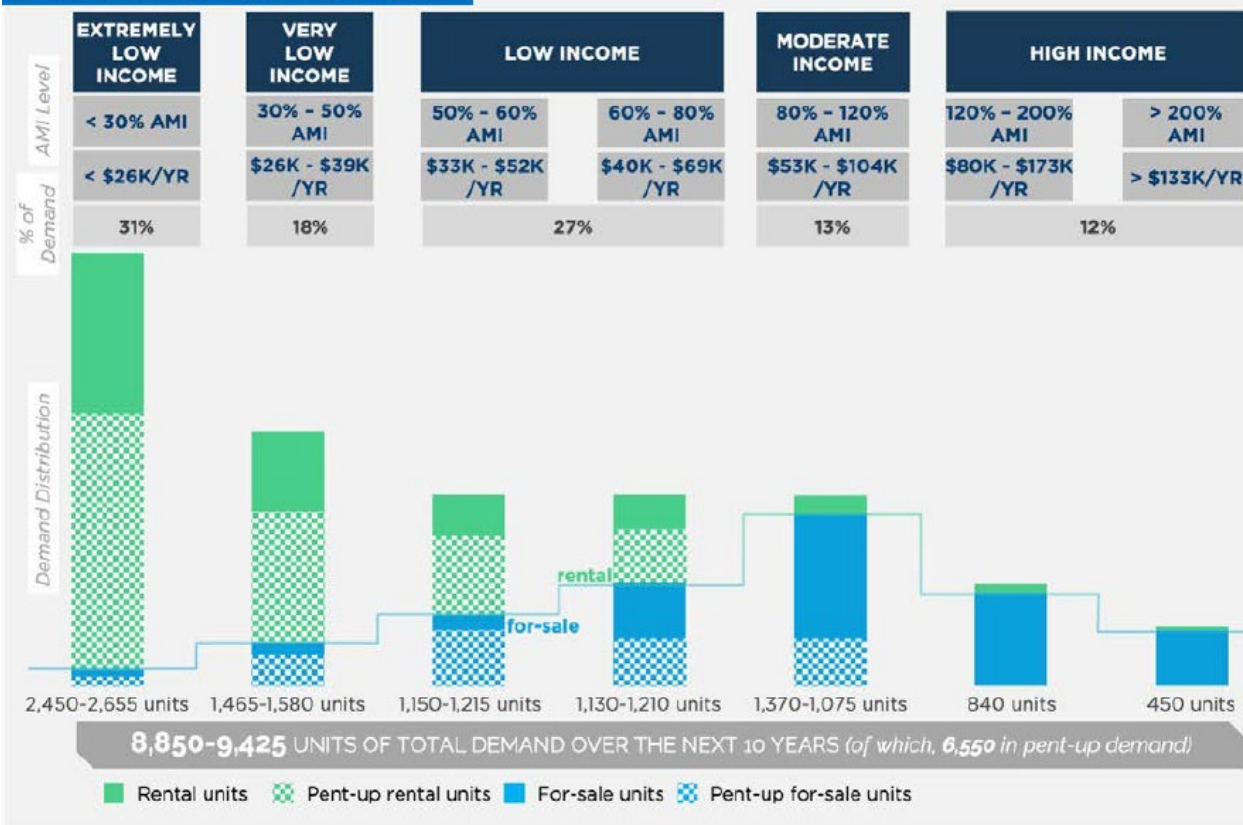
With the high demand of rehabilitation and new construction homes, the Housing Authority of the Cherokee Nation will utilize this funding to kickstart efforts and pursue Low Income Housing Tax Credits (LIHTC) or loan programs to offer additional rental housing, especially in Adair, Cherokee, Mayes and Rogers County where the current waitlist is between 7 to 8 years.

Pairing this funding with tax credits or loan proceeds will “kickstart” rental housing. LIHTCs provide applicant organizations with capital to construct and investors with offsetting tax benefits. However, LIHTCs are heavily regulated during the application process as well as the calculations of rent rates. Utilizing LIHTCs will provide opportunities to all households within the area, including Cherokee citizens. Using this model will provide opportunities to make a positive change in each community for all parties needing safe, stable, affordable housing.

Estimates:

In the Housing Assessment, there are more than 3,915 total units needed in extremely low and very low-income groups, and it represents 49% of the total housing need. Most of those households will need affordable rental units. The chart below, illustrates the need for rental housing (green).

TEN YEAR DEMAND SUMMARY



The greatest challenge related to low-rent housing is the capital to construct the units and the subsidy to provide rents relevant to household income. Dependent upon site specifics total cost per bedroom unit is estimated between \$90,000 and \$120,000.

Use of Funds:

Initiate design and construction of units in Tahlequah and Stilwell, as the greatest demand based on applications is located within this area. Additional funds will be used to leverage additional capital to construct additional units in other locations.

It is important to note that HACN was recently awarded an ICDBG grant to supply housing in Tulsa County. The application waitlist is "0" for Tulsa County as there are currently no rental housing units in Tulsa County. HACN is aware of rental housing needs in Tulsa, and we have sought partnerships and grant sources to address this shortfall.

Rehabilitation/Replacement Homes

Amount: \$6,000,000

Information:

Since the inception of HJSCA, the Housing Authority of the Cherokee Nation has completed more than 4,700 rehabilitations using a variety of funding sources, but the majority have been addressed using HJSCA funding. Those rehabilitations include emergency repairs, accessibility, major rehabilitations, and replacements (when needed). However, more than 1,600 households have submitted applications and are awaiting rehabilitation repairs. Pending applications, including those that have been inspected, but awaiting repair represent citizens anticipating

repair or replacement of the current home. These households contain citizens living in sub-standard housing with little or no alternative for resolution.

County	Rehab Applications
Adair	135
Cherokee	275
Craig	85
Delaware	232
Mayes	164
McIntosh	18
Muskogee	107
Nowata	35
Ottawa	29
Rogers	124
Sequoyah	250
Tulsa	85
Wagoner	12
Washington	86
Total	1637

Moreover, the “pent up demand” identified in the housing assessment is also applicable for this identified funding priority. Hundreds of Cherokee households were in process under the ARPA-funded HJSCA efforts, and many will require replacement homes. There are extremely limited funds for replacement under NAHASDA and no available under the Department of Treasury’s Homeowner Assistance Funds (HAF).

Current Funds:

ARPA-funded HJSCA are committed or spent as of December 31, 2024. NAHASDA funds are limited and require extensive environmental and fiscal reporting. Homeowner Assistance Funds (HAF) are provided from the Department of Treasury to respond to COVID-19 but cannot be used for replacement homes, only rehabilitations not exceeding \$50,000.

Estimates:

Approximately 20% of those applications are projected to need replacement homes (400).

Average Rehabilitation Costs: \$42,000

Average Replacement Costs: \$275,000 (including demolition, utilities, relocation, and other costs)

Use of Funds:

The \$6,000,000 will address the “pent-up” demand and the citizens awaiting services for rehabilitation or replacement. This effort will be matched with other funding sources to serve the most citizens possible. The HJSCA funding will be used to primarily address the households needing replacement but will also be used to address other rehabilitations, as necessary.

Speaker Services

Amount: \$3,000,000

Information:

Speaker Services is a program designed to provide a stable home environment for Cherokee First Language Speakers. The Language Department has made significant investments in time and resources to address many of the housing needs of Speakers across the reservation.

Since its inception, the Speaker Services program has successfully completed over 1,700 projects with a cumulative investment exceeding thirty-four million dollars. This includes the replacement of over fifty homes, establishment of four villages comprising twenty-seven homes, and extensive rehabilitation projects enhancing accessibility and quality of life for over seven hundred households. Additionally, the comprehensive support extends to medical equipment provision, legal aid, addiction recovery services, and more, embodying our commitment to the holistic welfare of the Cherokee speakers.

Beyond addressing physical infrastructure, the investments have supported behavioral health, addiction recovery, and socioeconomic stability—demonstrating that Speaker Services is more than a housing program; it is a comprehensive support system for our speakers' well-being.

Estimates:

Housing Rehabilitations: 30

Emergency Housing Repair: 300

Rental Assistance: 30

Use of Funds:

A variety of Speaker Services will be used to address the needs of those first language speakers. However, some of the major components include Emergency Housing Repair, Housing Rehabilitations, Emergency Appliances, Rental Assistance, and Speaker Village maintenance. As noted, below, the Executive Director of Housing Programs has been designated as the administrator of all HJSCA funds under this plan, though the Executive Director may delegate this responsibility to the Language Department at his discretion as he deems warranted.

Speaker Village

Amount: \$3,000,000

Information:

The Bonnie Kirk Speaker Village is located due west of the Durbin Feeling Language Center in Tahlequah, OK. The housing was constructed in 2021 during the Cherokee Nation's response to COVID-19, under the Respond, Recover and Rebuild Plan, and provides safe, stable housing for elder speakers ensuring that Cherokee first language speakers are safely housed in a community that fosters language growth and sharing. The goal is to provide a community where multiple generations of speakers and learners can live, learn, and work, immersed in the language. Relatedly the village concept can help address unmet housing needs of fluent speakers or provide transitional living services for those in need³. It is fulfilling the dream of Durbin Feeling and helps meet the objectives of the Durbin Feeling Language Preservation Act.

³ For example, a speaker village concept project in Kenwood, funded under the Respond, Recover and Rebuild plan, focuses mainly on addressing housing insecurity for fluent speakers in the area on a transitional basis.

The success of that development has led to more speaker housing establishment of three villages comprising twenty-seven total homes where speakers can thrive, and thus the language thrive.

Use of Funds:

This \$3,000,000 funding would fund or help fund one or more additional speaker villages, consisting of six to 10 housing units complete with infrastructure and amenities. Administration, HACN and the Language Department have identified Adair and Sequoyah Counties as potential geographic areas for the additional village or villages. The Principal Chief has directed that the Council be notified when specific sites within those geographic areas are identified.

Housing Partners Grant

Amount: \$75,000 (\$25,000 per year)

Information:

HJSCA provides opportunities to grant funds to third parties to help meet the housing objectives identified in the Act. HACN will work to identify potential third-party non-profit organizations to help achieve those objectives in geographic areas and other circumstances that render HACN ill-suited to do so. The plan embraces a relatively small amount of funding to provide grants on a pilot basis for this inaugural HJSCA funding cycle.

In identifying potential third parties, Administration will prioritize entities that can make a demonstrable impact with the modest allocation of funding and in a way that does not duplicate existing Cherokee Nation programs and services. Given that HJSCA expressly permits the provision of assistance to at-large citizen, a focus on at-large citizen through a third-party grant is consistent with HJSCA. Accordingly, Administration will in this inaugural cycle prioritize at-large assistance through memoranda of understanding with non-profits that can provide housing and housing related services to at-large citizens in a manageable way.

Administration has identified Cherokee Nation At-Large Mutual Assistance Association (CNALMA), a Tulsa-based non-profit as a potential partner. CNALMA already provides housing related assistance to at-large citizens in the Tulsa metro area, particularly emergency assistance⁴. CNALMA has a track record of working with Cherokee Nation in providing these services and doing so as good stewards of Cherokee Nation funding⁵. CNALMA also has the confidence of a number of Cherokee Nation leaders, as expressed by Councilors Kidwell and Coates, who assisted in the formation of this independent non-profit⁶, as well as by Chief Hoskin. Although Administration will follow extant laws, policies and procedures relating to procurement as it seeks, evaluates and selects potential third party partners, CNALMA appears to be well positioned to provide the type of services funded by an HACN "Housing Partners Grant" contemplated by HJSCA..

⁴ For example, CNALMA has provided emergency utility assistance to at-large citizens. CNALMA has a broad commitment to assisting at-large citizens with unforeseen emergencies. See CNALMA.org

⁵ CNALMA was awarded a Community Partners Grant and utilizes a Gadugi Corps National Service Participant in conducting its day-to-day work.

⁶ CNALMA is a non-profit corporation organized under the laws of the state of Oklahoma and meets is a 501(c)(3) charity. It is governed by a three-member board of directors. Cherokee Nation's connection with the organization's governance is indirect, as the CNALMA board of directors will consider recommendations for candidates for board seats from Principal Chief Hoskin and the at-large councilors.

Use of Funds:

Annual grant of \$25,000 per year for a total of \$75,000 provided to the selected non-profit. "Housing Partners" grantee . The grantee will provide emergency housing assistance for citizens residing in Tulsa County at-large. Projects will include emergencies such as loss of heating/cooling, roof repairs, accessibility, and other projects typically below \$2,000 for each instance.

Residential Construction Industry Development Fund

Amount: \$25,000

Information:

The last several years of capital investments across the Cherokee Nation have provided numerous opportunities for contractors in the residential and commercial construction trades. Those projects will continue over the next several years until completion. Those projects have highlighted needs across several trades for more Cherokee-owned business to participate and succeed. This money will be used to conduct annual residential contractor summits, recruit new contractors and outreach for new or prospective contractors.

Successful Cherokee-owned businesses provide safe, decent, and stable housing for citizens, provide livable-wage careers, and keep the dollars moving throughout Cherokee communities.

Additionally, through a joint effort with Career Services (TERO), Commerce Services, Housing Authority, and Information Technology teams we developed an opportunity notification system. When posting contract opportunities, HACN staff input keyword attributes matching the TERO certifications. When the opportunity is posted to cherokeeids.org, each TERO contractor matching that certification, receives a text message or email to connect them directly to that bid opportunity. This process has made it easier to engage contractors and provide greater responsiveness to each opportunity.

Estimates:

There are 174 TERO Contractors with "Construction-Residential/General Contractor" certification.

There are a variety of other TERO certified residential trades including, electrical, plumbing, HVAC, and others.

Use of Funds:

Provide annual educational and trade fairs to connect Cherokee-owned businesses with opportunities. Additionally, we will enhance and expand the alert system to engage more Cherokee-owned businesses.

Administrative/Oversight

Amount: \$300,000

Pursuant to Section 5, subsection 3, part B of HJSCA, \$300,000 will be used for expenses incurred, including staffing, that may not be allowable expenses under NAHASDA guidance and provide the housing programs greater flexibility to achieve the outcomes outlined in the HJSCA. This funding is not anticipated to support a full-time staff person but will allow staff to charge time against it for activities in support of this plan.

Excluded Authorized Programs; Programs Incidentally Included

The Act requires that the Three-Year Plan explain any authorized programs under Section 5 subsection 2 of the Act that are not included in the plan. Mortgage Assistance Program and Crisis / Transitional Housing, though authorized by HJSCA, are not included in this plan. Mortgage Assistance is excluded because it presently has an adequate funding source and, relative to other priorities identified herein, the provision of HJSCA funding is not warranted. Crisis and Transitional Housing has been a major initiative of the Hoskin / Warner administration, including the construction of a \$10 million crisis shelter under the predecessor HJSCA and the construction of the OneFire transitional living facility under the Respond, Recover and Rebuild Plan. Although opportunities to expand crisis and transitional living capacity may arise over the three fiscal years covered by this plan, construction and operating dollars are better suited for other funding sources⁷ given the needs address herein regarding new home construction, housing rehab / replacement and low-income housing units.

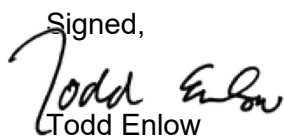
HJSCA authorizes “land acquisition” to support other HJSCA purposes and “housing maintenance,” for specified existing housing units. Those activities may be incidental to the housing programs included in this plan and, for that reason, some of the funding allocation identified herein may include those authorized uses.

Designation of “Administrator of Housing Programs” under HJSCA

Pursuant to Section 5, subsection 3, part a, the Principal Chief has designated the Executive Director of Housing Programs, Todd Enlow, as the Administrator of all HJSCA Housing Programs. With respect to Speaker Services and Speaker Villages funded under this plan, Executive Director Enlow may delegate the administration of those programs to the Language Department as warranted or may administer funding for Speaker Services and Speaker Villages Directly, at this discretion.

This three-year plan is respectfully submitted for review and comment by the Council of the Cherokee Nation, pursuant to Section 5, subsection 4, part A of HJSCA.

Signed,



Todd Enlow

Executive Director of Housing Programs

Approved December 31, 2024:



Chuck Hoskin, Jr.

Principal Chief of the Cherokee Nation

⁷ For example, the Public Health and Wellness Fund Act may in some circumstances be used to construct and operate crisis shelters and transitional living units.