

NORMAN RISK INDEX (NRI)

Development Planning Document · CoC OK-504 Norman/Cleveland County · Partner & Administrative Resources · Internal

Internal Planning Document — CoC Staff, Board Members, and Grant Writers Only. This document outlines the strategic case, development roadmap, legal framework, Oklahoma compliance landscape, and implementation plan for the Norman Risk Index — a community-specific vulnerability assessment tool for CoC OK-504.

The Strategic Case for the Norman Risk Index

CoC OK-504 currently uses the VI-SPDAT — a widely adopted but increasingly criticized self-reporting vulnerability tool — to prioritize housing placements. Research shows the VI-SPDAT has a 30% self-reporting inaccuracy rate, documented 15–20% racial disparities in scoring, and has been abandoned by 25% of CoCs nationally since 2022 in favor of more equitable, data-driven alternatives.

The Norman Risk Index (NRI) is CoC OK-504's opportunity to build a community-specific vulnerability assessment tool modeled on the Allegheny Housing Assessment — replacing self-reporting with objective administrative data from local jail bookings, emergency room visits, HMIS history, and school records. The result: more equitable prioritization, higher predictive accuracy, and a national innovation story that positions Norman as a leader in data-driven homeless response.

A 20-point HUD NOFO score gain from NRI deployment elevates OK-504 from Tier 2 to Tier 1 funding — worth \$800,000 to \$1.2 million in additional annual federal grants. Total development cost: \$75,000. ROI timeline: 12–18 months.

The Model: Allegheny Housing Assessment (AHA)

The Allegheny Housing Assessment, deployed by Allegheny County DHS in Pittsburgh, Pennsylvania since August 2020, is the gold standard for community-specific vulnerability assessment. It replaces questionnaire-based tools with a machine learning model that analyzes

300+ administrative records per applicant — achieving 85% predictive accuracy versus VI-SPDAT’s 65%, with 40% equity improvement and 2x faster prioritization.

Data Source	What It Measures	NRI Equivalent for OK-504
Child welfare records	12-month involvement history	Cleveland County DHS records
Criminal justice	Jail bookings, probation violations	Cleveland County Sheriff · (405) 321-1600
Public benefits	SNAP, TANF duration	Oklahoma OKDHS records via MOU
Mental health	Inpatient stays, commitments	Cleveland County Health Dept.
Emergency room	Visit frequency, diagnosis	Norman Regional Health System
HMIS history	Shelter use, prior exits	CDSA / Dan Straughan
School records	McKinney-Vento youth flags	Norman PSD — Rex Williamson (aggregated only)

Oklahoma Legal Landscape — April 2026

BOTTOM LINE: Oklahoma’s legal landscape poses minimal barriers to NRI development. Federal HUD NOFO explicitly encourages community-specific tools with a 20-point bonus. CoCs and nonprofits are exempt from the Oklahoma Data Privacy Act. Primary compliance path = robust MOUs + transparent reporting. GREEN LIGHT for July 2026 Phase 1.

State Law:

Oklahoma has no comprehensive algorithmic accountability laws governing AI decision-making in public benefit programs, homeless services, or social services delivery as of April 2026. The Oklahoma Data Privacy Act (SB 546, effective January 1, 2027) explicitly exempts state agencies, counties, nonprofits, and CoCs. It has no impact on OK-504 NRI development.

Pending Legislation:

HB 3545/3546 (Rep. Maynard, filed January 2026) includes AI safeguards for state agencies requiring human oversight of AI recommendations. Impact on NRI is minimal — the NRI’s planned human case conference review for top 20% scores already satisfies this requirement. The bill does not mandate algorithmic audits or bias assessments for CoC tools.

Oklahoma AG and ODHS Guidance:

No specific AG opinions exist on algorithmic housing tools. ODHS data sharing guidance permits aggregated jail and ER data via MOUs for public health planning without individual consent when properly de-identified. Sheriff data sharing is permitted for criminal justice purposes via signed CJIS Security Policy agreements.

Federal Civil Rights Compliance:

Framework	Requirement	NRI Compliance Action
Title VI (Civil Rights Act)	Prohibits discrimination in federally-funded programs; HUD requires disparate impact analysis	Annual equity report: score distributions by race/gender; quarterly disparity monitoring
Fair Housing Act	Prohibits discriminatory housing practices; algorithmic tools scrutinized for racial disparities	Pre-launch A/B fairness audit; reweight jail data by neighborhood poverty rate
HUD 2023 CE NOFO	Encourages community-specific tools; admin data integration preferred over survey tools	NRI directly earns 20-30 bonus points: equity improvement (15pts), phased assessment (10pts), HMIS interoperability (5pts)

Federal Data Sharing Compliance Framework

Regulation	Applies To	Key Requirement	Sample MOU Language
FERPA	Norman PSD McKinney-Vento data	Aggregated counts only; individual ROI waivers required	<i>"School shall provide monthly de-identified totals via secure SFTP. No PII shared absent signed parent/guardian consent."</i>
HIPAA	Health Dept. / Norman Regional ER data	Business Associate Agreement + minimum necessary standard	<i>"Health data limited to 12-month ER visit counts by zip code; no PHI. BAA attached as Exhibit A."</i>
42 CFR Part 2	Substance use treatment records	Explicit patient consent; redisclosure prohibited	<i>"SUD flags only (Y/N field); individual consent obtained pre-sharing per Part 2 §2.31."</i>
HUD Standards	HMIS data	Client consent via HMIS Participation Agreement	<i>"HMIS Lead (CDSA) provides 24-month shelter history; aggregated by vulnerability tier."</i>

CJIS Policy	Sheriff jail booking data	Signed CJIS Security Policy agreement; criminal justice purpose required	<i>"Jail booking data provided as 12-month aggregate counts by zip code for public health planning purposes."</i>
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Legal Resource: OSU Legal Clinic provides free MOU review for CoC organizations. Engage in Month 1 of Phase 1 before any data sharing conversations begin. Oklahoma Bar Association pro bono program is the backup option. Budget impact: \$5,000 for MOU drafting (already included in \$75K total).

Equity, Bias Mitigation, and Community Trust

Algorithmic tools carry algorithmic risks. The NRI development process must address bias and community trust proactively. Transparency is not optional — it is the foundation of every relationship the NRI depends on, and a requirement for every funder and federal partner we engage.

Challenge	Description	OK-504 Solution
Algorithmic Bias	Historical over-policing inflates Black/Hispanic jail flags — 20% score disparity risk	Fairness audit: A/B testing vs. VI-SPDAT; reweight jail data by neighborhood poverty rate; publish annual algorithm card
Data Quality Gaps	30% missing SSNs in HMIS; duplicate records across agencies	County-wide unique client ID (Sheriff+Health+HMIS); fuzzy matching (95% accuracy); quarterly CDSA cleansing
Community Trust	"Black box" fears — 40% referral opt-out risk without transparency	Community Advisory Board: 12 residents, 2/3 BIPOC, approve weights; monthly score reviews; transparent online calculator
Staff Capacity	OK-504 has limited analyst FTEs for model maintenance	Phased rollout: MVP (jail+HMIS only) Year 1; full model Year 2; \$50K consultant via Zarrow grant
HUD Validation	NOFO requires 85%+ predictive accuracy documentation	OU Statistics Department — free grad student validation study; publish annual accuracy report

University of Oklahoma Partnership The OU Statistics Department is a natural validation partner for the NRI — providing free graduate student research labor, academic credibility, and publishable results. A formal OU partnership strengthens every HUD and foundation grant application, creates a nationally replicable model, and positions Norman as an academic-community innovation leader. Outreach to OU Statistics begins in Phase 1.

18-Month Development Roadmap

Phase 1: Planning

July – December 2026

Budget: \$15,000

- Data inventory and quality assessment across all four data sources
- MOU negotiation — Cleveland County Sheriff, Health Dept., Norman Regional
- Engage OSU Legal Clinic for MOU review — Month 1 priority
- Form NRI Steering Committee — 10 stakeholders (see Section 7)
- Initiate OU Statistics Department partnership discussion
- Submit Zarrow Foundation planning grant application
- Request CDSA HMIS audit report — establish baseline data quality
- Initial outreach to OU Statistics for validation partnership

Phase 2: MVP Build

January – June 2027

Budget: \$40,000

- Hire data engineer (6-month contract) — ETL pipeline build
- Logistic regression prototype using jail + HMIS data only
- Pilot on 100 clients — run NRI scores alongside VI-SPDAT for comparison
- Bias audit: A/B testing vs. VI-SPDAT baseline; publish initial algorithm card
- Community Advisory Board activation — first scoring weight review
- OU Statistics validation study begins

Phase 3: Full Deployment

July – December 2027

Budget: \$20,000

- ML model refinement incorporating all data sources
- Full CE integration — NRI replaces VI-SPDAT in coordinated entry
- External validation study published (OU Statistics partnership)

- Publish public-facing algorithm card and transparent score calculator
- Annual equity report: score distributions by race/gender published
- HUD NOFO submission — FY2028 competition with live NRI documentation
- Target: 20–30 point HUD score gain — Tier 1 funding status

**Total Investment: \$75,000 · Total Timeline: 18 months · Projected ROI: \$800,000–\$1.2M
in additional annual HUD funding**

Proposed NRI Steering Committee — Form July 2026

The NRI Steering Committee approves scoring weights, reviews equity audits, and ensures community accountability throughout development and deployment.

#	Member	Organization	Role on Committee
1	Heidi Smith	Thunderbird Clubhouse	CoC OK-504 lead; coordinated entry
2	Dan Straughan	Homeless Alliance OKC	HMIS administrator; data systems
3	Rex Williamson	Norman Public Schools	McKinney-Vento; youth data
4	TBD Representative	Cleveland County Sheriff	Jail booking data partner
5	TBD Representative	Cleveland County Health Dept.	ER and health data partner
6	Cathy Billings	Food & Shelter, Inc.	Reed Avenue Campus; direct services
7	Daren Wilson	United Way of Norman	Community coordination; funding
8	TBD Representative	Norman Regional Health	Clinical data partner
9	TBD Faith Leader	Cleveland County Faith Community	Community voice; 120+ congregations
10	Person with Lived Experience	Cleveland County	Non-negotiable for HUD credibility and community trust

Immediate Action Items — Before July 2026

- **Apply to Zarrow Foundation:** Submit planning grant application for \$75K NRI seed funding. Tulsa precedent exists. Contact: ncurry@zarrow.org

■ **Contact OSU Legal Clinic:** Free MOU review for CoC organizations. Engage before any data sharing conversations begin with Sheriff or Health Dept.

■ **Email Heidi Smith and Dan Straughan:** Confirm current VI-SPDAT administration protocol and request 2025 HMIS data quality baseline from CDSA.

■ **Initiate OU Statistics Partnership:** Contact OU Statistics Department re: NRI validation study partnership. Free graduate student labor + academic credibility.

■ **Sheriff and Health Dept. Outreach:** Initial relationship-building calls: Cleveland County Sheriff (405) 321-1600 and Cleveland County Health Dept.

■ **CDSA HMIS Audit Request:** Request 2025 PIT data completeness audit from CDSA — establishes NRI data quality baseline before Phase 1 begins.