

State of Oklahoma

Disaster Recovery Program

Action Plan

\$93.7 Million Allocation

Incorporating

Substantial Amendment #15

8/28/2020

Submitted to the

U.S. Department of Housing and Urban Development

By The State of Oklahoma

Table of Contents

Executive Summary	1
SECTION ONE - \$10.6 MILLION ALLOCATON: (Released by HUD on December 16, 2013, Federal Register Notice Vol. 78, No. 241, Page 76154).....	1
I. Introduction.....	6
II. Disaster Impact and Response.....	8
Overview	8
City of Oklahoma City	9
City of Shawnee	11
City of Norman.....	12
Balance of State	12
Demographics.....	13
Affected Census Tracts	15
Canadian County.....	15
Cleveland County.....	15
Pottawatomie County.....	16
Oklahoma County.....	16
Cleveland County (Outside of Moore and Oklahoma City).....	17
Pottawatomie County (Outside Oklahoma City).....	18
Le Flore County.....	19
Lincoln County.....	20
McClain County.....	21
Okfuskee County.....	21
Okmulgee County	22
III. Unmet Needs Assessment	23
Housing Needs Assessment.....	23
Owner-Occupied Unmet Need	23
Multifamily Unmet Need.....	24
Homelessness, Transitional and Supportive Facilities, Units and Populations	24

Economic Revitalization Needs Assessment (Impact to the State’s Economy)	25
Unmet Economic Development Needs	25
Infrastructure Needs Assessment	26
Public Facilities Needs Assessment	27
Mitigation & Resiliency Needs Assessment	28
Housing (Rehabilitation, Reconstruction & New Construction)	31
Infrastructure	36
Public Facilities	39
Economic Revitalization	39
Mitigation & Resiliency	41
Planning	42
Administration	44
 SECTION TWO - \$83.1 MILLION ALLOCATION: (Released by HUD on June 3, 2014, Federal Register Notice Vol. 79, No. 106, Page 31964)	
I. Introduction	51
II. Disaster Impact and Response	55
Overview	55
III. Unmet Needs Assessment	57
Housing Needs Assessment	59
Owner-Occupied Unmet Need	59
Multifamily Unmet Need	59
Homelessness, Transitional and Supportive Facilities, Units and Populations	60
Economic Revitalization Needs Assessment (Impact to the State’s Economy)	60
Infrastructure Needs Assessment	60

Public Facilities Needs Assessment	62
Mitigation & Resiliency Needs Assessment	62
IV. Proposed Allocation of the Funding	63
Housing (Rehabilitation, Reconstruction & New Construction).....	67
Infrastructure	71
Public Facilities	74
Economic Revitalization	75
Mitigation & Resiliency	75
Planning.....	77
Administration.....	78
V. Federal, State, Local, Non-profit, and Individual Sources of Funding to be Leveraged.....	80
VI. USE OF IMPACT AND UNMET NEEDS ASSESSMENT AND THE COMPREHENSIVE RISK ANALYSIS ...	82
VII. Other Requirements	88
Climate Assessment	88
Risk Based Analysis.....	95
Calculated Priority Risk Index (CPRI)	97
SECTION THREE – OTHER PROGRAM REQUIREMENTS	103
Green Building Standards.....	103
Compliance and Monitoring.....	105
Duplication of Benefits	106
Program Income	108
Minority Owned, Women Owned and Sections 3 (Disadvantaged) Business.....	110

Citizen Participation.....	112
Action Plan Amendments	114
Substantial Amendments to the Action Plan	114
Non-Substantial Amendments to the Action Plan	115
Individuals with Disabilities or Language Impairments.....	116
Individuos con Discapacidades o Impedimentos de Lenguaje	117
Technical Assistance.....	117
Citizen Complaint Procedures.....	118
Performance Reports	119
Public Outreach History.....	119

APPENDICES 122

Appendix A:	Damage Assessment Report
Appendix B:	Citizen Participation Comments & Other Records
Appendix C:	Fair Housing
Appendix D:	CDBG DR Action Plan Amendments
Appendix E:	Duplication of Benefits / Supporting Documentation

Executive Summary

The State of Oklahoma Action Plan for Community Development Block Grant Program Disaster Recovery (this “Action Plan”) must be submitted by the State of Oklahoma (the “State”) to the U.S. Department of Housing and Urban Development (“HUD”) as a condition to its receipt of \$93,700,000 of federal funding under the Community Development Block Grant – Disaster Recovery (CDBG DR) Program (the “Funding”). The Oklahoma Department of Commerce / Community Development (ODOC/CD) has officially been awarded a total of \$93.7 million in CDBG DR funding through two separate allocations (\$10.6 & \$83.1 Million). The first allocation (\$10.6 Million) was released by HUD on March 5, 2013, in the Federal Register at Vol. 78, No. 43, Page 14329 and the second allocation (\$83.1 Million) was released by HUD on June 3, 2014, in the Federal Register at Vol. 79, No. 106, Page 31964. Originally, the Funding was authorized under the Disaster Relief Appropriations Act (the “Act), which was signed into law by President Barack Obama on January 29, 2013. The allocation of the Funding to the State is intended primarily to enable it to address immediate unmet housing and economic revitalization needs in those counties and jurisdictions.

The State is required to submit this Action Plan and obtain its approval by HUD before it can receive any portion of the Funding. This Action Plan describes the programs and activities for which the State intends to expend the Funding in compliance with the federal requirements set forth in public notices released by HUD on March 5, 2013, in the Federal Register at Vol. 78, No. 43, Page 14329 entitled: “Allocations, Common Application, Waivers and Alternative Requirements for Grantees Receiving Community Development Block Grant (CDBG) Disaster Recovery Funds in Response to Hurricane Sandy” (FR–5696–N–01); April 19, 2013 in the Federal Register at Vol. 78, No. 76, page 23578 entitled: “Clarifying Guidance, Waivers and Alternative Requirements for Hurricane Sandy Grantees in Receipt of Community Development Block Grant Disaster Recovery Funds” (FR–5710–N–01); and December 16, 2013 in the Federal Register at Vol. 78, No. 241 page 76154 “Allocations, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013” (FR-5696-N-07) (collectively, the “Federal Register Notice”). On June 3, 2014, HUD released its CDBG DR Program allocations and program requirements in the Federal Register at Vol. 79, No. 106, Page 31964 in a notice entitled: “Second Allocation, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013”.

It should be noted that this single \$93.7 million CDBG DR Action Plan document has been created from two separate formally HUD approved Action Plans consisting of both the initial \$10.6 million allocation Action Plan and second \$83.1 million second Action Plan. Per guidance contained in Federal Register Notice Vol. 78, No. 43 /Tuesday, March 5, 2013 /Notices 14337 under section VI. “Applicable Rules, Statutes, Waivers, and Alternative Requirements”, the State is required to combine both Action Plans into a single document. As a result of the \$93.7 million in CDBG DR

funding being awarded through two separate allocations (\$10.6 & \$83.1 Million), this Action Plan for the combined 93.7 million reflects two distinct funding allocations. The first allocation (\$10.6 Million) was released by HUD on December 16, 2013, in the Federal Register at Vol. 78, No. 241, Page 76154 and the second allocation (\$83.1 Million) was released by HUD on June 3, 2014, in the Federal Register at Vol. 79, No. 106, Page 31964. The Federal Register Notices contain differences in program requirements and therefore were developed using slightly different standards. These Federal Register Notice differences include such things as changes in funding area priorities, expansion of eligible disaster types, and areas affected by disaster. These differences combined with the fourteen-month funding allocation notice and release time difference between both the \$10.6 million and \$83.1 million allocations has necessitated the need to address the allocations separately. It was not known that a second round of CDBG DR funding (\$83.1 million) would be available at the creation and implementation of the initial \$10.6 million program. However, the overall program \$93.7 million totals will be addressed in the Plan body. The subsequent modification requests also will address the Plan as terms of the aggregate \$93.7 million in disaster funding.

Funding Allocation Summary (93.7 Million)

The following tables illustrate the State’s requested CDBG DR funding allocations and are current to the revision time as denoted in the table below. As noted earlier, the first allocation (\$10.6 Million) was released by HUD on December 16, 2013, in the Federal Register at Vol. 78, No. 241, Page 76154 and the second allocation (\$83.1 Million) was released by HUD on June 3, 2014, in the Federal Register at Vol. 79, No. 106, Page 31964. Given this, please note that the following tables account for the collective \$93.7 million in State CDBG DR funding. The table below reflects the most current CDBG DR category funding amounts and is updated each time a request for an additional round of funding is submitted. Each numbered amendment submitted to HUD for approval is meant to supersede the earlier category totals in the earlier published Action Plan.

SUBSTANTIAL AMENDMENT #15

Amendment #15						
Activity Category	Current Allocation by Program	Subrecipient Admin Converted to Activity Delivery	ODOC Recaptured Funds	HUD Recapture of Expired Funds	Prior Non-Substantial Action Plan Amendments	Amended Allocation by Program
Housing	\$ 6,970,535.89	\$ 40,000.00	\$ -	\$ -	\$ 126,539.49	\$ 7,137,075.38
Infrastructure	\$ 60,310,634.34	\$ 1,100,301.91	\$ (804,706.90)	\$ (2,753,755.43)	\$ 1,250,197.95	\$ 59,102,671.87
Resiliency & Mitigation	\$ 20,147,127.99	\$ 352,336.25	\$ -	\$ (289,585.57)	\$ (8,895.45)	\$ 20,200,983.22
Public Facilities	\$ -	\$ -	\$ -	\$ -		\$ -
Economic Revitalization	\$ -	\$ -	\$ -	\$ -		\$ -
Planning	\$ 1,602,873.83	\$ -	\$ -	\$ 29,693.58		\$ 1,632,567.41
Administration	\$ 4,668,827.95	\$ (1,492,638.16)	\$ 804,706.90	\$ -	\$ (1,367,841.99)	\$ 2,613,054.70
Total	\$ 93,700,000.00	\$ -	\$ -	\$ (3,013,647.42)	\$ -	\$ 90,686,352.58

Pursuant to these aforementioned Federal Register Notices and as outlined in the State's original CDBG DR Action Plans (1st Allocation, \$10.6 Million & 2nd Allocation \$83.1 Million) submitted to HUD, the State has reserved the right to "tranche" or segment the CDBG DR allocation in order to enable the completion of large infrastructure projects under taken by the disaster recovery funding. Based on this "tranche" methodology, the State now must update the requested tranche amounts indicated in the State's original CDBG DR Action Plans submitted to HUD.

Although this Action Plan Amendment identifies the State's revised tranche request for the expenditure of disaster recovery funding, the plan fully complies with the Federal Register Notices and describes the State's intended use of all of the disaster funding. It is important to note that the amount of the disaster funding is subject to increase, reduction or other modification by Congress, including, without limitation, an act making permanent the impact of sequestration. All amounts based on the amount of the disaster funding set forth in the Federal Register Notice are subject to change consistent with any change in the amount of the disaster funding.

ODOC/CD reserves the right to adjust any of the CDBG DR funding to ensure the maximum utilization of funds. Such adjustments would be in conjunction with unforeseen events such as the cancellation of projects; projects completed under budget; or from funds designated but not allocated. These adjustments may be used to offset any unforeseen eligible project cost increases such as in the case of construction. Such adjustments, if made available by ODOC/CD, shall be the minimum amount necessary to fund projects efficiently. ODOC/CD will make adjustments as necessary using funding priorities outlined under the earlier published Action Plans.

SECTION ONE - \$10.6 MILLION ALLOCATON: (Released by HUD on December 16, 2013, Federal Register Notice Vol. 78, No. 241, Page 76154)

The State of Oklahoma Action Plan for Community Development Block Grant Program Disaster Recovery (this “Action Plan”) must be submitted by the State of Oklahoma (the “State”) to the U.S. Department of Housing and Urban Development (“HUD”) as a condition to its receipt of \$10,600,000 of federal funding under the Community Development Block Grant – Disaster Recovery (CDBG DR) Program (the “Funding”). The Funding was authorized under the Disaster Relief Appropriations Act (the “Act”), which was signed into law by President Barack Obama on January 29, 2013. The allocation of the Funding to the State is intended primarily to enable it to address immediate unmet housing and economic revitalization needs in those counties and jurisdictions that were most severely impacted by the tornadoes of May 18th through June 2nd, 2013.

The State is required to submit this Action Plan and obtain its approval by HUD before it can receive any portion of the Funding. This Action Plan describes the programs and activities for which the State intends to expend the Funding in compliance with the federal requirements set forth in public notices released by HUD on March 5, 2013, in the Federal Register at Vol. 78, No. 43, Page 14329 entitled: “Allocations, Common Application, Waivers and Alternative Requirements for Grantees Receiving Community Development Block Grant (CDBG) Disaster Recovery Funds in Response to Hurricane Sandy” (FR-5696-N-01); April 19, 2013 in the Federal Register at Vol. 78, No. 76, page 23578 entitled: “Clarifying Guidance, Waivers and Alternative Requirements for Hurricane Sandy Grantees in Receipt of Community Development Block Grant Disaster Recovery Funds” (FR-5710-N-01); and December 16, 2013 in the Federal Register at Vol. 78, No. 241 page 76154 “Allocations, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013” (FR-5696-N-07) (collectively, the “Federal Register Notice”).

In accordance with the Federal Register Notice, this Action Plan must also provide an assessment of the need for the Funding, the State’s public outreach and citizen participation practices. The State is obligated to ensure that the processes, procedures, and fiscal and administrative controls it will use in the course of expending the CDBG DR funding are sufficient to safeguard the Funding from waste, fraud and abuse.

The Federal Register Notice also imposes strict expenditure and compliance deadlines on the State. Accordingly, HUD is allowing Grantees to request less than the full funding amount in a Partial Action Plan. The State of Oklahoma, like other states to which CDBG DR Program funds were allocated by HUD, will pursue incremental obligation of the Funding to support its tornado relief and restoration programs and activities to ensure compliance with HUD’s deadlines. Specifically, the State is requesting that HUD make **\$4,246,016** available immediately upon approval of this Action Plan. HUD has assured the State that as it submits additional requests for additional portions

of the Funding to be released, so long as everything is in order, they will approve the request promptly and without delay.

Although this Action Plan identifies the State’s current request for the expenditure of **\$4,246,016** the plan fully complies with the Federal Register Notice and describes the State’s intended use of all of the Funding. It is important to note that the amount of the Funding is subject to increase, reduction or other modification by Congress, including, without limitation, an act making permanent the impact of sequestration. All amounts based on the amount of the Funding set forth in the Federal Register Notice are subject to change consistent with any change in the amount of the Funding.

TABLE 1: STATE OF OKLAHOMA: CDBG DR Allocations		
Activity	Allocation	Request for Partial Allocation
Housing (Owner-Occupied and Multi-family Housing)	\$ 1,867,505.70	\$434,334.89
Infrastructure	\$5,588,230.00	\$2,314,834.10
Mitigation & Resiliency	\$1,020,000.00	\$206,969.81
Public Facilities	\$0.00	\$0.00
Economic Revitalization	\$0.00	\$0.00
Administration	\$534,264.30	\$359,877.20
Planning	\$1,590,000.00	\$930,000.00
TOTAL	\$10,600,000.00	\$4,246,016.00

The Act provides that funding under the CDBG DR Program must be used “for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas resulting from a major disaster.”

In addition to specifying the amount of funds allocated to the State, the Federal Register Notice also sets forth, among other requirements, the areas within the State where the Funding can be expended, the programs or activities for which the Funding can be used, and the national objectives that each program or activity must meet.

The only areas in which the Funding can be expended are areas directly impacted by the tornadoes of May 18th through June 2nd, 2013 in various areas of the State. This requirement is consistent with the damage and impact assessments that were reported by the Federal Emergency Management Agency (“FEMA”), the U.S. Small Business Administration (“SBA”) and the Oklahoma Department of Emergency Management, as well as directly impacted municipalities within the impacted counties. Within these eligible areas, the Federal Register Notice requires that 30.4% of the Funding must be expended in Cleveland County.

As outlined by the Federal Register Notice, the City of Moore will receive a separate CDBG DR Program funding allocation which will remain independent of the State's CDBG DR Program funding allocation. Given this, the City of Moore is charged with submitting an independent CDBG DR Action Plan to HUD on the City's behalf. The City of Moore expects to use its Community Development Block Grant Disaster Recovery allocation to render disaster aid within that respective jurisdiction. It is for this reason that the State's Community Development Block Grant - Disaster Recovery plan will NOT contain any direct disaster related information and will NOT provide any additional funding allocation to the City of Moore.

Broad categories for CDBG DR Program eligible activities include: Housing, Infrastructure, Public Facilities, Economic Revitalization, and Planning. A limited portion of the funds may be used for the cost of administering the CDBG DR Program.

Some of the specific CDBG DR Program eligible activities that HUD has identified include the following:

- Acquisition of real property;
- Acquisition, rehabilitation and construction of public works and facilities;
- Buyouts;
- Code enforcement;
- Relocation assistance;
- New construction, reconstruction and rehabilitation of residential and nonresidential properties;
- New construction, reconstruction and rehabilitation of public housing;
- Repair or rehabilitation of infrastructure;
- American Disability Act improvements;
- Rental assistance (limited); storm mitigation measures;
- Special economic development including: grants and loans to SBA-defined small businesses, job training, and the revitalization of business districts;
- Fair housing counseling;
- Homeownership counseling and assistance;
- Assistance to Community-Based Development Organizations for neighborhood revitalization, community economic development, energy conservation projects, homeownership assistance, fair housing, planning, and administrative costs, including actions to meet the grantee's certification to affirmatively further fair housing.

With respect to CDBG DR Program eligible activities, the State must also ensure that at least 50% of its CDBG DR grant funds are used for activities that benefit low- and moderate-income ("LMI") persons. LMI persons are defined for the purposes of the CDBG DR Program as persons and families whose income does not exceed

80% of the area median income (“AMI”), as determined by HUD. This 50% requirement applies to the State’s expenditure of the entirety of the Funding, less administration and planning, and does not apply to each individual program or activity. For the purposes of this Action Plan, that would mean a minimum of **\$4,315,000** of these funds must be obligated to the national objective of benefitting low- and moderate- income persons.

As set forth in the Federal Register Notice, the Funding cannot be used for any of the following purposes: to assist second homes (as defined in IRS Publication 936); and to assist private utility companies or organizations.

In addition, all expenditures of the Funding, other than Administration and Planning, must meet at least one of the three federally-mandated national objectives (each a “National Objective”): low- and moderate income benefit; elimination of slum and blight; and urgent need.

Any activity not listed in the Housing and Community Development Act, as modified by the Federal Register Notice, is not an activity for which any of the Funding can be used unless a specific waiver of such ineligibility has been granted by HUD and/or the federal Office of Management and Budget.

States may request additional waivers of program requirements by providing sufficient evidence that such waiver is necessary for the effective administration of the Funding. As of the date of this Action Plan, the State has not requested any such specific waivers. The State reserves the right to pursue such waivers under all broad program categories as may be appropriate and necessary as additional information relative to “unmet need” and other parameters are obtained.

Governor Mary Fallin has designated the Oklahoma Department of Commerce (“ODOC”) the principal state agency for the allocation and administration of Funding. ODOC will administer the Funding through application processes. The eligibility requirements identified by ODOC include the following (though not all requirements will apply to all types of projects):

- Applicants must be “Eligible Applicants” as defined by HUD program regulations, as modified by the Federal Register Notice;
- Each proposed activity must be an “Eligible Activity” as defined by HUD program regulations, as modified by the Federal Register Notice;
- Each project must meet at least one National Objective and such National Objective(s) must be fully supported within the application;
- Consistency with the goals and strategies of the Action Plan must be demonstrated;

- Fair Housing and Equal Opportunity compliance must be evidenced by a Fair Housing Action Plan that complies with ODOC's guidelines/policies; and
- Each applicant must be in compliance with all existing assistance agreements with ODOC and cannot be in default under any OHFA or HUD-administered program.

In addition to meeting the federal obligations associated with the Funding, this Action Plan reflects the fact that the State's first priority is to get financial assistance to as many affected residents as possible, assisting them in the repair or reconstruction of their homes to get their lives back in order, and to small businesses to get their business running and get our local economy back in business. The State, acting through ODOC, will use the Funding to provide financial assistance directly to assist eligible homeowners, multi-family property owners (possibly including public housing authorities), small businesses, municipalities and other eligible recipients to ensure the State's recovery from the damage caused by the tornadoes in all areas for which the Funding can be used under applicable federal regulations.

This Action Plan describes the priorities that the State has used to allocate the Funding among the eligible activities. Again, it is important to note that this Action Plan requests immediate access to the first tranche of the CDBG DR funding but is in no way an indication that the State does not intend to expend all of the Funding as quickly and effectively as possible.

I. Introduction

In January 2013, in response to the extraordinary destruction caused by Hurricane Sandy, Congress passed, and the President signed into law, The Disaster Relief Appropriations Act, also known as Public Law 113-2 (the “Act”), which, among other things, appropriated approximately \$50 billion for recovery efforts related to Hurricane Sandy and other natural disasters specified in the Act (supplementing almost \$10 million that Congress had appropriated for the National Flood Insurance Program earlier that month). Of those funds, approximately \$16 billion was set-aside for the Community Development Block Grant - Disaster Recovery Program (the “CDBG DR Program”) to be administered by the United States Department of Housing and Urban Development (“HUD”).

On December 16, 2013, HUD released its initial CDBG DR Program allocations and program requirements in the Federal Register at Vol. 78, No. 241, Page 76154 in a notice entitled: “Allocations, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013”.

HUD’s allocation of CDBG DR Program funds was based on its estimate of critical unmet needs for repairing and rebuilding housing and infrastructure and economic revitalization in the most impacted areas, primarily using data provided by FEMA.

This Action Plan primarily focuses on the State’s proposed use of the Funding, specifically the immediate unmet needs of individuals and families for housing and business assistance affected by the tornadoes as well as assisting local governments in repairing, rebuilding and making more resilient their infrastructure and public facilities and planning for rebuilding and resiliency of infrastructure and public facilities at the State and local level. The State expects to use future allocations of CDBG DR Program funds by HUD to fund infrastructure and public facility repair and resilience efforts as well as to continue to address the unmet needs of homeowners, owners of multifamily dwellings and small businesses, primarily in Oklahoma City.

Governor Fallin has designated the Department of Housing (“ODOC”) as the principal state agency for the administration of the Funding. ODOC will oversee the expenditure of the Funding to assist impacted residents, organizations and municipalities with their recovery and rebuilding efforts. ODOC will administer the Funding directly or through Units of Local Government (“ULG’s”) to benefit homeowners, property owners, business owners and other beneficiaries.

In accordance with the Federal Register Notice, the State is required to prepare and submit this Action Plan to describe the proposed use of the Funding, including:

- The proposed use of the Funding;

- The criteria for eligibility under any program or activity for which the Funding is to be used;
- How the use of the Funding will address the long-term recovery, restoration of housing, infrastructure and economic revitalization in most impacted and stressed areas;
- The process for Citizen Participation; and
- The standards for grant administration.

This Action Plan must be submitted to HUD within 90 days of the Effective Date of the Federal Register Notice (i.e. December 23rd, 2013). The State must obtain HUD’s approval of the Action Plan before the State can access the Funding. The programs and activities set forth in this Action Plan and the policies, processes, and procedures in accordance with which ODOC will administer the Funding will comply with all applicable federal requirements, including all requirements specifically set forth in the Federal Register Notice. Without limitation, these requirements include the requirement that at least 30.4% of the Funding must be expended in the most affected areas in Cleveland County; that 50% must be expended to benefit low- and moderate-income (“LMI”) persons, and that all of the Funding must be used for eligible activities that achieve at least one of the three federally-mandated national objectives (each a “National Objective”): low- and moderate income benefit; elimination of slum and blight; and urgent need.

The Federal Register Notice also imposes strict expenditure and compliance deadlines on the State. Accordingly, HUD has strongly recommended that the State not request the entire Funding at the time of its submission of this Action Plan. Based on this advice, the State, like other states to which CDBG DR Program funds were allocated by HUD, will pursue the incremental obligation (tranches) of the Funding to support its tornado relief and restoration programs and activities (as applications are approved and projects become shovel ready) to ensure compliance with HUD’s deadlines. Specifically, the State is requesting that HUD make **\$4,246,016** available immediately upon approval of this Action Plan. HUD has assured the State that as it submits additional requests for additional portions of the Funding to be released; such funds will be available promptly and without delay.

This Action Plan was developed after extensive public outreach, data collection, consultation and input from a host of stakeholders, constituents, organizations and other state agencies, as described in more detail in this Action Plan.

II. Disaster Impact and Response

Overview

The Oklahoma tornadoes and related events include not only the Moore, OK tornado, but a total of 14 impacting events that occurred during a 45-day period (from April 14-May 31, 2013). Causing the most death and destruction, the tornado that struck Moore on May 20th, was sandwiched between two sets of storms - one set the preceding day and another 11 days later. These three sets of events include:

1. Tornadoes on May 19th, 2013

Arcadia (EF 0; 0 fatalities; .3 miles in length)

Carney, Luther and Prague (EF 3,0 fatalities, 20 miles in length)

Edmond and OKC (EF 1,0 fatalities, 7 miles in length)

Little Axe, OKC and Shawnee (EF 4, 2 fatalities, 20 miles in length)

2. Tornado on May 20th, 2013

New Castle, Moore, and OKC (EF 5, 23 fatalities, 17.5 miles in length & 1.3 miles wide)

3. Tornadoes & Flashfloods on May 31st, 2013

El Reno, Southwest OKC and Southeast OKC tornadoes (EF 5/1, 9 fatalities); OKC flashfloods

These storms' impacts resulted in an initial Presidential Disaster Declaration and amendments covering a large set of effected communities in Oklahoma -- specifically these 4 cities and 6 counties:

- Moore, Oklahoma City, Edmond, and Shawnee
- Canadian, Cleveland, Lincoln, McClain, Oklahoma, Pottawatomie.

In response to the storms' impact, the State coordinated disaster response with local Offices of Emergency Management. HUD directed TDA, Inc., a technical assistance provider, to provide a two-phase delivery of technical assistance designed to assist the state's entitlement grantees: first, to determine interim assistance that can respond to the events; and second to plan for disaster recovery in their communities. (The technical assistance was authorized under a HUD OneCPD Work Plan: Oklahoma CDBG TA-#TDA-O-11-008-04.)

A team of consultants began delivering the assistance on June 18th -- less than a month after the May tornadoes -- at a kick-off meeting convened by the Oklahoma HUD Field Office. Over the span of five weeks, this early intervention offered representatives of the City of Moore, the City of Oklahoma City and the State of Oklahoma timely guidance on strategies to gather complete information on the disaster's impacts (both direct and indirect), to address the disaster with upfront planning and engagement of all stakeholders as well as to prepare for

implementing recovery activities. Because FEMA could not completely assess the storm's damage and turned to the Oklahoma HUD Field Office for help, the team also assisted HUD in presenting this full picture of the conditions resulting from the disaster.

City of Oklahoma City

Oklahoma City (OKC) was impacted by all three of the major storm-related events: including six tornadoes and a flash flood. The May 20th tornado caused significant damage, but the other five events were destructive as well.

A recap of the events and the City's Office of Emergency Management (OEM) damage assessment report follows separately for each event:

OKC Event #1

- May 19th Arcadia Tornado (EF 0; 0 fatalities; Length .3 miles; Width 200 yards); Arcadia part of OKC;
- May 19th Carney, Luther, Prague Tornado (EF 1; 0 fatalities; Length 7 miles; Width Unknown); Portion within OKC's City limits;
- May 19th Little Axe Tornado (EF 4; 0 fatalities; Length 20 miles; Width Unknown); Portion within OKC's City limits.

In determining the damages attributable to Event #1, OKC - OEM supplemented FEMA data with locally gathered data and provided ODOC with the result. Table 2 provides a breakdown of the damages in FEMA categories for all tornadoes in Event #1.

TABLE 2: MAY 19TH TORNADO DAMAGE IN OKLAHOMA CITY					
EVENT #1: ARCADIA; CARNEY & LITTLE AXE TORNADOS					
TYPE	AFFECTED	MINOR	MAJOR	DESTROYED	TOTALS
Single Family	12	2	1	1	16
Mobile Home	8	2	2	2	14
Apartment					0
Business					0
Public Facilities	1				1
Total:	21	4	3	3	31

OKC Event #2

- May 20th New Castle, Moore, OKC Tornado (EF 5; 23 fatalities; Length 17.5 miles; Width 1.3 miles). Portion within OKC's City limits.

In determining the damages attributable to Event #2, OKC - OEM supplemented FEMA data with locally gathered data and provided ODOC with the result. Table 3 provides a breakdown of the damages for the tornado in Event #2.

TABLE 3: MAY 20TH TORNADO DAMAGE IN OKLAHOMA CITY					
EVENT #2: NEW CASTLE, MOOR, OKC TORNADO					
TYPE	AFFECTED	MINOR	MAJOR	DESTROYED	TOTALS
Single Family	267	114	198	447	1026
Mobile Home			1	1	2
Apartment			0	0	0
Business	3		1	5	9
Public Facilities			0	1	1
Total:	270	114	200	454	1038

OKC Event #3:

- May 31st SW OKC Tornado (EF 1; 0 fatalities; Length .4 miles; Width: 250 yards);
- May 31st SE OKC Tornado (EF 1; 0 fatalities; Length 10 miles; Width: 250 yards);
- May 31st Flash Floods (2 fatalities); Damage within OKC including public housing development flooded; public buildings flooded; infrastructure damaged;

In determining the damages attributable to Event #3, OKC - OEM supplemented FEMA data with locally gathered data and provided ODOC with the result. Table 4 provides a breakdown of the damages.

TABLE 4: MAY 31TH TORNADO AND FLASH FLOOD DAMAGE IN OKLAHOMA CITY					
EVENT #3: SE AND SW OKC					
TYPE	AFFECTED	MINOR	MAJOR	DESTROYED	TOTALS
Single Family	424	10	1	0	435
Mobile Home	120	12	4	0	136
Apartment	83	3	6	0	92

Business	60	23	11	0	94
Public Facilities	7	0	0	0	7
Total:	694	48	22	0	764

For Oklahoma City, the three events -- Event #1, Event #2 and Event #3 -- caused significant damages to housing. A total of 1,833 structures were damaged within the city limits. Damages from the Moore Tornado (Event #2) occurred along the eastern border of Moore as depicted in the photograph below.



Figure 1: Damage within Oklahoma City

City of Shawnee

Shawnee was impacted by a tornado in the first event that struck the area touching ground in the nearby City of Oklahoma City and causing considerable damage, particularly to a rural section within the city limits.

- May 19th Little Axe, OKC and Shawnee Edmond, OKC Tornado (EF 4; 2 fatalities; Length 20 miles; Width Unknown; Location adjacent to OKC's City limits.

A report provided by Shawnee on July 9th indicates the following:

TABLE 5: MAY 19TH TORNADO DAMAGE IN CITY OF SHAWNEE					
TYPE	AFFECTED	MINOR	MAJOR	DESTROYED	TOTALS
Single Family	2	22	12	18	54
Mobile Home	0	0	0	0	0

Apartment	0	0	0	0	0
Business	0	0	0	0	0
Public Facilities	0	0	0	1	1
Total:	2	22	12	19	55

City of Norman

Norman was impacted by a tornado in the first event that struck the area touching ground in the nearby City of Oklahoma City and causing limited damage.

- May 19th Little Axe, OKC and Shawnee Edmond, OKC Tornado (EF 4; 2 fatalities; Length 20 miles; Width Unknown; Location adjacent to OKC's City limits.

A report provided by Norman on July 26th indicates the following:

TABLE 6: MAY 19TH TORNADO DAMAGE IN CITY OF NORMAN					
TYPE	AFFECTED	MINOR	MAJOR	DESTROYED	TOTALS
Single Family	97	43	16	13	169
Mobile Home	0	0	0	0	0
Apartment	0	0	0	0	0
Business	0	0	0	0	0
Public Facilities	0	0	0	0	0
Total:	97	43	16	13	169

Balance of State

A large number of structures were damaged in the state of Oklahoma outside the above-named local jurisdictions. This "balance of the state" damage includes Pottawatomie County near Shawnee; Cleveland County near Norman; Okmulgee; as well as Okfuskee and Le Flore counties. Emergency management officials did not report the balance of state damage by type of structure. Damaged structures were assumed to be single family or mobile homes and have been categorized as single family housing. (Damages to the housing units were verified by the Oklahoma HUD Field Office.) A total of 391 housing units were included in the reports. Most notable is a 90-unit mobile home park near Shawnee.

The Damage Assessment Report submitted to HUD August 6, 2013 appears as Appendix A.

Since the initial assessment of the storms' impact, inquiries have been made to the State of Oklahoma Department of Emergency Management to update disaster impacts. However, the Department reported that there is no additional State disaster information available. Because several months have passed and vigorous steps have been taken toward recovery, the State determined that a survey was needed to update recovery efforts and determine the unmet needs still existing. As mentioned previously, CDBG DR funds must be used to cover "unmet" storm related disaster needs. Given these circumstances, the State prepared and mailed a survey to representatives of various units of general local governments (counties, cities, towns), HUD assisted housing, and LITHC housing located within the eligible disaster areas. US Census (American Community Survey) data was also examined as well to help better identify targeted groups which could possibly address the LMI requirement set forth in the Federal Register Notice.

Demographics

Because the Action Plan and expenditure of funds must address the LMI requirement set forth in the Federal Register Notice and a prescribed percentage of those funds must be spent within a particular county, damages were assessed with respect to affected counties and census tracts within the disaster impacted area.

Oklahoma City, which was impacted by all three of the major storm-related events (including six tornadoes and a flash flood), extends into four counties: Canadian, Cleveland and Pottawatomie counties. As noted, a total of 1,833 housing units were damaged within the jurisdiction's city limits.

In total, some seventy-one (71) census tracts were affected within the city limits by either a tornado or the flooding of May 31st. The map below provides an overview of the tornado affected areas (in red outlines) and the flood damages (blue shading).

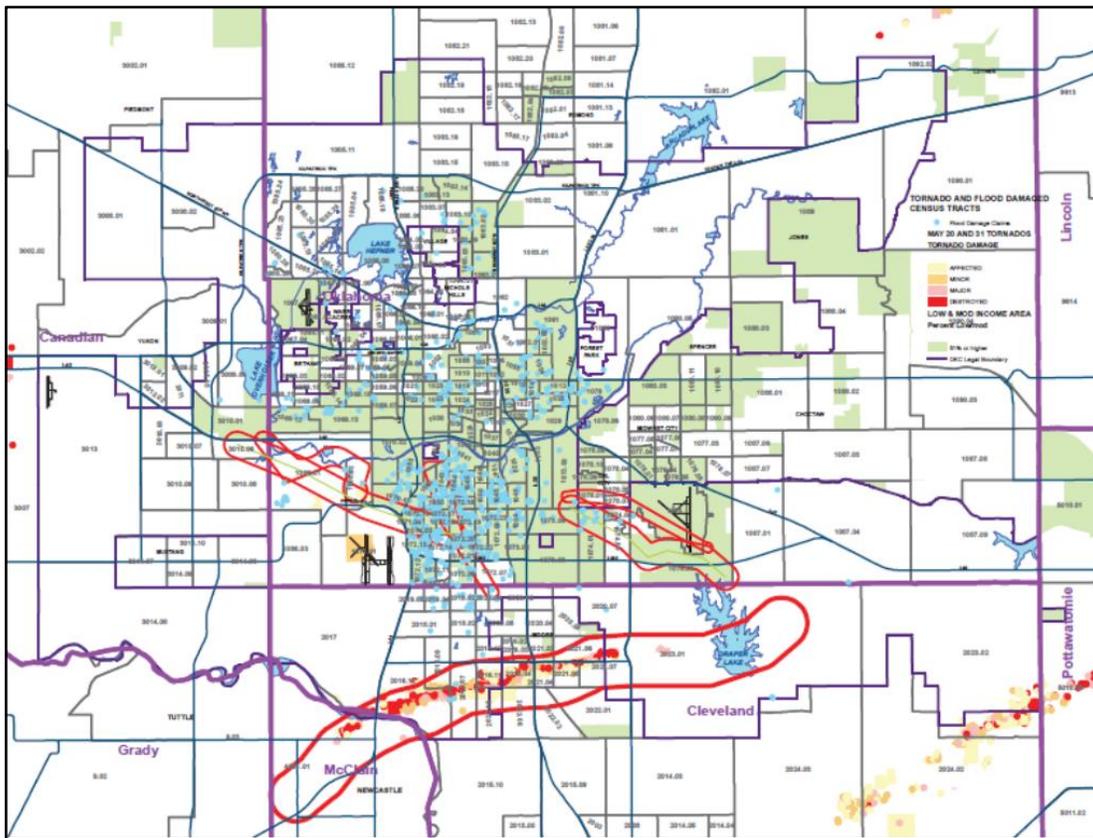


Figure 2: Tornado and Flood Impacted Areas in Oklahoma City

Before describing the demographics of the affected census tracts, the overall demographics of Oklahoma City are as follows:

- The City’s total population in 2012 was 581,094. Thirty-three percent (33%) of the City’s population is minority. The largest minority populations are African American and Some Other Race with 17.0% and 10.3% of the population, respectively. Twenty-two (22.3%) of the population is elderly.
- Oklahoma City as a whole has a poverty rate of 13.6%, above the State’s overall poverty rate of 12.3%.
- The City’s estimated median household income in 2012 was \$45,704, higher than the State’s median household income of \$44,891.
- The City’s homeownership rate in 2012 was 60.4%, lower than the State’s homeownership rate of 67.2%. The 2012 estimated median house or condo value for the City is \$131,000. The 2012 median rent was \$796 a month for a three bedroom, two bath unit¹.
- There are eighty-six (86) census tracts within the City that are designated low income².

¹ State and City Data from American Community Survey (Accessed: Jan 23, 2014)

² QCT Database: Accessed Jan 15, 2014

<http://qct.huduser.org/tables/1metrottable.odt?areaname=Oklahoma+City%2C+OK+MSA&DDAYEAR=2014>

Affected Census Tracts

As mentioned above, seventy-one census tracts within Oklahoma City (OKC) were affected. Table 7 provides a breakdown by County of affected tracts.

TABLE 7: TOTAL AFFECTED CENSUS TRACTS IN OKLAHOMA CITY	
County	Number of Affected Census Tracts
Canadian	13
Cleveland	19
Oklahoma	37
Pottawatomie	2
Total	71

Damages were concentrated in the Oklahoma and Cleveland county areas of OKC. The following is a breakdown of key demographic data by County and Census Tract. Detailed demographics tables for OKC Counties are included as Appendix B.

Canadian County

The total affected population in Oklahoma City's portion of Canadian County was 59,708. Approximately 16.1% of the City's population in Canadian County is minority. The largest minority populations are Asian and Some Other Race with 8.0% and 5.9% of the population, respectively. Sixteen (16.2%) of the population is elderly.

On average, the estimated median household income in the affected census tracts was \$66,355, higher than the City's median household income of \$45,704 and higher than the State's median household income of \$44,891. The estimated poverty rate for the affected census tracts was 5.8%, significantly lower than the City poverty rate of nearly fourteen percent (13.6%) and the State's poverty rate of 12.3%.

On average, the homeownership rate in the affected census tracts was 78.8%, significantly higher than the City's homeownership rate of 60.4%, and the State's homeownership rate of 67.2%. None of the affected census tracts within Canadian County are designated low income.

Cleveland County

The total affected population in Cleveland County was 71,809. Approximately 19.3% of the City's population in Cleveland County is minority. The largest minority populations are Some Other Race and Other Race with 8.9% and 8.7% of the population, respectively. Thirteen (13.2%) of the population is elderly.

On average, the estimated median household income in the affected census tracts was \$65,567, higher than the City's median household income of \$45,704 and higher than the State's median household income of \$44,891. The estimated poverty rate for the affected census tracts was 7.6%, significantly lower than the City poverty rate of nearly fourteen percent (13.6%) and the State's poverty rate of 12.3%.

On average, the homeownership rate in the affected census tracts was 81.73%, significantly higher than the City's homeownership rate of 60.4% and the State's homeownership rate of 67.2%.

None of the affected census tracts within Cleveland County are designated low income.

Pottawatomie County

The total affected population in Pottawatomie County was 13,110. Approximately 16.7% of the affected population in Pottawatomie County is minority. The largest minority populations are American Indian and Two or More Race with 6.4% and 5.8% of the population, respectively. Nineteen (19%) of the population is elderly.

On average, the estimated median household income in the affected census tracts was \$50,580, higher than the City's median household income of \$45,704 and higher than the State's median household income of \$44,891. The estimated poverty rate for the affected census tracts was 14.8%, significantly higher than the City poverty rate of nearly fourteen percent (13.6%) and the State's poverty rate of 12.3%.

On average, the homeownership rate in the affected census tracts was 84.4%, significantly higher than the City's homeownership rate of 60.4%, and the State's homeownership rate of 67.2%. None of the affected census tracts within Pottawatomie County are designated low income.

Oklahoma County

The total affected population in Oklahoma County was 113,995. Approximately 37.3% of the City's population in Oklahoma County is minority. The largest minority populations are Two or More Races and African American with 8.0% and 18% of the population, respectively. Sixteen percent (15.7%) of the population is elderly.

On average, the estimated median household income in the affected census tracts was \$39,099, lower than the City's median household income of \$45,704 and lower than the State's median household income of \$44,891. The estimated poverty rate for the affected census tracts was 20.3%, significantly higher than the City poverty rate of nearly fourteen percent (13.6%) and the State's poverty rate of 12.3%.

On average, the homeownership rate in the affected census tracts was 59.2%, lower than the City's homeownership rate of 60.4%, and the State's homeownership rate of 67.2%. Thirteen (13) of the affected census

tracts within Oklahoma County are designated low income. Table 8 summarizes the demographic data for each affected county area within Oklahoma City.

TABLE 8: OKLAHOMA CITY														
SUMMARY OF DEMOGRAPHICS FOR ALL COUNTIES & AREAS AFFECTED WITHIN OKLAHOMA CITY ³														
			Top Two Minority Population Segments											
Tract	Total Pop	Percent Minority	African-American	American Indian	Asian	Other	Two or More Races	Percent Elderly	Income	Household Median	in Poverty	Percent of Families	Rate	Homeownership
Canadian	59,708	16.10%	4.40%	5.76%	8.03%	4.80%	5.87%	16.16%	\$66,355		5.83%		78.82%	
Cleveland	71,809	19.3%	8.0%	5.9%	7.5%	8.7%	8.9%	13.2%	\$65,567		7.61%		81.73%	
Oklahoma	113,995	37.3%	18.0%	7.5%	10.4%	19.5%	11.4%	15.7%	\$39,099		20.3%		59.2%	
Pottawatomie	13,110	16.7%	-	6.4%	-	-	5.8%	19.0%	\$50,580		14.8%		84.5%	

Cleveland County (Outside of Moore and Oklahoma City)

On the afternoon of May 19th, northeastern portions of Cleveland County were hit by the Lake Thunderbird – Shawnee tornado. On the afternoon of May 20th, Cleveland County was hit by an EF-5 tornado known as the New Castle - Moore – Little Axe tornado. Cleveland County’s damage is largely concentrated in the entitlements of Moore and Oklahoma City. Moore received a direct allocation and will provide a separate Action Plan. Damages within Oklahoma City are identified above. The remaining concentration of damage in Cleveland County occurred primarily in the eastern portion of the County between the Moore City limits and Draper Lake.

In total, Cleveland County’s FEMA housing damage assessment included 2324 units, of which 2003 were affected units; 47 units had minor damage; 203 units had major damage and 41 units were destroyed.

³ American Community Survey; Accessed Jan 12, 2014

Only three percent (3%) of Cleveland County's damages can be isolated to areas not within the City of Moore or Oklahoma City. In total, 69 units received a damage assessment; of which 60 were affected units; 1 unit had minor damage; 6 units had major damage and 2 units were destroyed. In total, housing damages reported to FEMA exceeded \$1.2 million. FEMA Housing payments in Cleveland County were approximately \$608,000.

Eleven percent (11.1%) of owners were uninsured; indicating the total estimated unmet need for owner-occupied rehabilitation in Cleveland County outside of Moore and Oklahoma City is approximately \$685,000.

Cleveland County's total population in 2012 was 256,550. Twenty percent (20.01%) of Cleveland County's population is minority. The largest minority populations are American Indian and African-American with 4.1% and 4.1% of the population, respectively. Twenty-one percent (21.2%) of the population is elderly.

Cleveland County's estimated median household income in 2012 was \$54,883, higher than the State's median household income of \$44,891. The estimated poverty rate for Cleveland County was nearly eight percent (7.9%) lower than the State's poverty rate of 12.3%.

Cleveland County's homeownership rate in 2012 was 68.5%, higher than the State's homeownership rate of 67.2%. The current estimated median house or condo value for the County is \$138,500. The median rent is \$784 a month for a three bedroom, two bath unit. Mobile homes constitute 6.9% of all housing units. There are six (6) census tracts within the County and outside the City limits of Moore and Oklahoma City that are designated low income.

Pottawatomie County (Outside Oklahoma City)

Pottawatomie County's damage is concentrated in the Steelman Estates Mobile Home Park located within the County, but directly adjacent to the entitlement of Shawnee. The tornado struck on the evening of May 20th. Pottawatomie County's FEMA housing damage assessment included 300 units, of which 200 were affected units; 12 units had minor damage; 57 units had major damage and 31 units were destroyed. FEMA Housing payments in Pottawatomie County were approximately \$3,401,000.

Approximately thirty-three percent (32.5%) of owners were uninsured; indicating the total estimated unmet need for owner-occupied rehabilitation in Pottawatomie County is approximately \$5.4 million.

Pottawatomie County's total population in 2012 was 69,442. Approximately 24 percent (24.1%) of Pottawatomie County's population is minority. The largest minority populations are American Indian and African-American with 11.7% and 2.7% of the population, respectively. Twenty-six percent (26.1%) of the population is elderly.

Pottawatomie County’s estimated median household income in 2012 was \$42,467, lower than the State’s median household income of \$44,891. The estimated poverty rate for Pottawatomie County was above fourteen percent (14.1%) higher than the State’s poverty rate of 12.3%.

Pottawatomie County’s homeownership rate in 2012 was 72.2%, higher than the State’s homeownership rate of 67.2%. The current estimated median house or condo value for the County is \$95,600. The median rent is \$634 a month for a three bedroom, two bath unit. Mobile homes constitute 13.2% of all housing units. There are two (2) census tracts within Pottawatomie County that are designated low income.



Figure 3: Damages at the Steelman Estates Mobile Home Park, Pottawatomie County

Le Flore County

On the evening of May 20th, Le Flore County was hit by a total of two tornadoes. Le Flore County’s FEMA housing damage assessment included 26 units, of which 14 were affected units; 3 units had minor damage; 8 units had major damage and 1 unit was destroyed. In total, housing damages reported to FEMA exceeded \$3.7 million. FEMA Housing payments in Le Flore County were approximately \$410,000.

Sixty-one percent (61.1%) of owners were uninsured; indicating the total estimated unmet need for owner-occupied rehabilitation in Le Flore County is approximately \$1 million.

Le Flore County's total population in 2012 was 50,056. Nearly 25 percent (24.9%) of Le Flore County's population is minority. The largest minority populations are American Indian and African-American with 17.2% and 2.8% of the population, respectively. Twenty-eight percent (28.2%) of the population is elderly.

Le Flore County's estimated median household income in 2012 was \$36,084, lower than the State's median household income of \$44,891. The estimated poverty rate for Le Flore County was nearly seven percent (6.6%) lower than the State's poverty rate of 12.3%.

Le Flore County's homeownership rate in 2012 was 74.4%, higher than the State's homeownership rate of 67.2%. The current estimated median house or condo value for the County is \$76,400. The median rent is \$540 a month for a three bedroom, two bath unit. Mobile homes constitute 17.2% of all housing units. There are three (3) census tracts within Le Flore County that are designated low income.

Lincoln County

The tornado struck on the afternoon of May 19th near Carney destroying 14 homes. Lincoln County's FEMA housing damage assessment included 88 housing units, of which 62 were affected units; 4 units had minor damage; 15 units had major damage and 7 units were destroyed. FEMA Housing payments in Lincoln County were approximately \$975,000.

Forty percent (40.0%) of owners were uninsured; indicating the total estimated unmet need for owner-occupied rehabilitation in Lincoln County is \$1.6 million.

Lincoln County's total population in 2012 was 34,273. Approximately 8.5 percent (8.5%) of Lincoln County's population is minority. The largest minority populations are American Indian and African-American with 10.5% and 2.4% of the population, respectively. Twenty-nine percent (28.7%) of the population is elderly.

Lincoln County's estimated median household income in 2012 was \$42,953, lower than the State's median household income of \$44,891. The estimated poverty rate for Lincoln County was above twelve percent (12.4%) slightly higher than the State's poverty rate of 12.3%.

Lincoln County's homeownership rate in 2012 was 77.8%, higher than the State's homeownership rate of 67.2%. The current estimated median house or condo value for the County is \$89,800. The median rent is \$545 a month for a three bedroom, two bath unit. Mobile homes constitute 21.2% of all housing units. There are no census tracts within Lincoln County that are designated low income.

McClain County

McClain County was the starting point of the F5 Newcastle - Moore – SE Oklahoma City tornado. The tornado struck on the afternoon of May 20th near Newcastle. McClain County's FEMA housing damage assessment included 25 housing units, of which 21 were affected units; 3 units had major damage and 1 unit was destroyed. FEMA Housing payments in McClain County were approximately \$219,000.

Fourteen percent (14.1%) of owners were uninsured; indicating the total estimated unmet need for owner-occupied rehabilitation in McClain County is \$255,000.

McClain County's total population in 2012 was 34,506. Approximately 8 percent (8.2%) of McClain County's population is minority. The largest minority populations are American Indian and Some Other Race with 10.6% and 2.0% of the population, respectively. Twenty-six percent (25.5%) of the population is elderly.

McClain County's estimated median household income in 2012 was \$54,544, higher than the State's median household income of \$44,891. The estimated poverty rate for McClain County was above eight percent (8.2%) lower than the State's poverty rate of 12.3%.

McClain County's homeownership rate in 2012 was 81.5%, significantly higher than the State's homeownership rate of 67.2%. The current estimated median house or condo value for the County is \$126,300. The median rent is \$691 a month for a three bedroom, two bath unit. Mobile homes constitute 17.2% of all housing units. There are no census tracts within McClain County that are designated low income.

Okfuskee County

In total two tornadoes ranged through Okfuskee County on May 19th and May 20th. Okfuskee County's FEMA housing damage assessment included 32 housing units, of which 29 were affected units; 1 unit had minor damage and 2 units had major damage. FEMA Housing payments in Okfuskee County were approximately \$276,000.

Forty-four percent (43.9%) of owners were uninsured; indicating the total estimated unmet need for owner-occupied rehabilitation in Okfuskee County is \$492,000.

Okfuskee County's total population in 2012 was 12,191. Approximately 25 percent (24.7%) of Okfuskee County's population is minority. The largest minority populations are American Indian and African American with 14.6% and 10.0% of the population, respectively. Twenty-nine percent (28.8%) of the population is elderly.

Okfuskee County's estimated median household income in 2012 was \$34,258, lower than the State's median household income of \$44,891. The estimated poverty rate for Okfuskee County was above twenty percent (20.4%) significantly higher than the State's poverty rate of 12.3%.

Okfuskee County’s homeownership rate in 2012 was 71%, higher than the State’s homeownership rate of 67.2%. The current estimated median house or condo value for the County is \$67,700. The median rent is \$490 a month for a three bedroom, two bath unit. Mobile homes constitute 22.1% of all housing units. There are two (2) census tracts within Okfuskee County that are designated low income.

Okmulgee County

The tornado struck on the evening of May 24th near Beggs. Okmulgee County’s FEMA housing damage assessment included 53 housing units, of which 43 were affected units; 6 units had minor damage; 3 units had major damage and 1 unit was destroyed. FEMA housing payments in Okmulgee County were approximately \$540,000.

Forty-two percent (42.2%) of owners were uninsured; indicating the total estimated unmet need for owner-occupied rehabilitation in Okmulgee County is \$934,000.

Okmulgee County’s total population in 2012 was 40,069. Approximately 34 percent (34.0%) of Okmulgee County’s population is minority. The largest minority populations are American Indian and African American with 18.9% and 13.4% of the population, respectively. Approximately twenty-nine percent (28.5%) of the population is elderly.

Okmulgee County’s estimated median household income in 2012 was \$39,142, lower than the State’s median household income of \$44,891. The estimated poverty rate for Okmulgee County was above fifteen percent (15.3%) significantly higher than the State’s poverty rate of 12.3%.

Okmulgee County’s homeownership rate in 2012 was 70.4%, higher than the State’s homeownership rate of 67.2%. The current estimated median house or condo value for the County is \$79,000. The median rent is \$593 a month for a three bedroom, two bath unit. Mobile homes constitute 15.3% of all housing units. There are two (2) census tracts within Okmulgee County that are designated low income.

Table 9 provides a summary of demographic data for the counties affected.

TABLE 9: SUMMARY OF COUNTIES AFFECTED: CLEVELAND (OUTSIDE OF OKC); LE FLORE; LINCOLN; MCCLAIN; OKFUSKEE; OKMULGEE; AND POTTAWATOMIE												
			Top Two Minority Population Segments									
County	Total Pop	Percent Minority	African-American	American Indian	Asian	Other	Two Or More Races	Percent Elderly	Income	Household Median in Poverty	Percent of Families	Rate Homeownership

Cleveland	256,550	20%	4.1%	4.1%	--	--	--	21.2%	\$54,883	7.9%	67.2%
Le Flore	50,056	24.9%	2.8%	17.2%	--	--	--	28.2%	\$36,084	6.6%	67.2%
Lincoln	34,273	8.5%	2.4%	10.5%	--	--	--	28.7%	\$42,953	12.4%	77.8%
McClain	34,506	8.2%	--	10.6%	--	2.0%	--	25.5%	\$54,544	8.2%	81.5%
Okfuskee	12,191	24.7%	10.0%	14.6%	--	--	--	28.8%	\$34,258	20.4%	71%
Okmulgee	40,069	34.0%	13.4%	18.9%	--	--	--	28.5%	\$39,142	15.3%	70.4%
Pottawatomie	69,442	24.1%	2.7%	11.7%	--	--	--	26.1%	\$42,467	14.1%	72.2%

III. Unmet Needs Assessment

Unmet need exists in the areas of housing, economic revitalization; infrastructure, mitigation/resiliency and planning. Data for the unmet need was compiled from information provided by an ODOC unmet need survey, HUD’s Oklahoma City Field Office, FEMA, and the American Red Cross.

Housing Needs Assessment

Owner-Occupied Unmet Need

The highest unmet need in the area of Owner Occupied Housing (Rehabilitation, Reconstruction and New Construction) is rehabilitation resulting from wind and associated storm damage. A total of 1,086 housing units in Oklahoma City were identified by FEMA and confirmed by HUD to have sustained some level of damage in the May 20th tornado event. Over 1,000 housing units sustained wind, hail, and flood damage in the May 31st tornado and flooding event identified by FEMA and confirmed by HUD.

The experience following Gulf Coast and Northeastern storms suggests the level of owner occupied housing rehabilitation need:

- Increases in cost as supplemental damage is incurred post storm;
- Increases in cost as local and state building codes are reset;
- Is undercounted initially due to evacuation, program misunderstanding by potential applicants, undocumented families’ reluctance to request benefits; and voluntary household relocation

In addition, the State requires that any housing subsidized with federal dollars meet the applicable State or local code. The base unmet need as identified by FEMA and the municipalities was increased by 10% to account for the factors noted.

FEMA data for the affected areas of the State indicate approximately 19% of owners were uninsured statewide with widely divergent results on a County by County basis.

TABLE 10: PERCENT UNINSURED OWNERS					
County	Total Apps	Owners	Insured Owners	Uninsured Owners	Percent Uninsured Owners
Canadian	1,112	879	665	214	24.3%
Cleveland	8,689	6,167	5,489	678	11.0%
Le Flore	40	36	14	22	61.1%
Lincoln	186	165	99	66	40.0%
McClain	101	92	79	13	14.1%
Okfuskee	48	41	23	18	43.9%
Oklahoma	4,529	2,259	1,519	740	32.8%
Okmulgee	81	64	37	27	42.2%
Pottawatomie	596	498	336	162	32.5%
Total	15,382	10,201	8,261	1,940	1,940
Percent	---	66.3%	81.0%	19.0%	23.5%

Multifamily Unmet Need

A total of four (4) unmet needs survey responses were received by the deadline from eligible municipalities and public housing authorities and additional submissions and supplementary information has continued to be submitted and reviewed. All survey responses were located within Oklahoma City for a total of \$170,000 in unmet need.

Homelessness, Transitional and Supportive Facilities, Units and Populations

To date, the State has received information identifying a subsidiary of the Oklahoma City Public Housing Authority has having an unmet need for physical or structural repairs. No other entity has identified a need for financial assistance to address an increase in homeless individuals or families or physical damage to homeless or transitional housing facilities for any of the events covered by the Federal Register Notice.

As the State continues to work on recovery efforts, and continues planning activities for future disasters, it will continue to reach out to public housing authorities, owners/operators of HUD-assisted housing, homeless

service and shelter providers, as well as the owners and managers of both transitional and permanent housing for the homeless in order address any newly identified unmet needs that may arise.

Should information relative to unmet need associated with alleviating the pressures of homelessness associated with the devastation caused by the storm become apparent, the State is committed to allocating any necessary resources from the next allocation of funding, consistent with all federal requirements and obligations. (The State of Oklahoma receives Emergency Shelter Grant Funding and Special Needs Grant funding to support homeless and transitional housing needs in the Oklahoma City area. Details regarding planned support for these populations will be provided separately).

Economic Revitalization Needs Assessment (Impact to the State's Economy)

The tornadoes impacted the State's economy by temporarily or permanently specific economic activity, including, for example, cancelled tourist visits, forgone business revenue due to shuttered offices, and wages not paid to workers who could not work during the storm and in its aftermath. In addition, the physical damage to residential housing, commercial buildings, public facilities, infrastructure and business equipment and inventory required new unplanned expenditures that diverted funds that could otherwise be reasonably expected to have been directed towards savings and investment. This could be viewed as a reduction in the State's wealth and stock of productive resources.

Separately, damages to public infrastructure such as roads, drainage as well as compromised water and electrical utility systems have caused significant interruption on the State's economy and have had a corresponding negative impact on businesses trying to recover after the storm.

Unmet Economic Development Needs

According to the ODOC unmet needs survey and data gathered through direct public input, there are unmet small business needs in the amount of approximately \$1.5 million in agribusiness centered south of El Reno in Canadian County. These unmet needs include structural repairs (approximately \$1.2 million), and the repair or replacement of equipment (approximately \$300,000).

TABLE 11: NAICS CODED STRUCTURAL BUSINESS DAMAGES				
Number of Businesses	NAICS Classification	NAICS Code	Total Estimated Damages	Total Unmet Need
1	Livestock Wholesalers	42452	\$2,400,000	\$700,000
9	Beef Cattle Ranching and Farming, including Feedlots	11211	\$1,386,000	\$508,000
	TOTALS	--	\$3,786,000	\$1,208,000

All of the impacted businesses were either in the direct path of the tornado or received damages due to flying debris. The unmet needs reflected in the above do not reflect potential mitigation or resiliency costs.

TABLE 12: NAICS CODED EQUIPMENT BUSINESS DAMAGES				
Number of Businesses	NAICS Classification	NAICS Code	Total Estimated Damages	Total Unmet Need
1	Livestock Wholesalers	42452	\$20,000	\$20,000
9	Beef Cattle Ranching and Farming, including Feedlots	11211	\$395,117	\$274,176
	TOTALS		\$415,117	\$294,176

The noted losses are structures and equipment only and do not include losses of personal vehicles; crops, animal stock, fences and other items not eligible for CDBG DR.

Infrastructure Needs Assessment

Based on the State’s needs assessment survey, public outreach and FEMA reports, it is clear that Oklahoma and particularly Oklahoma City, sustained significant damage to infrastructure as a result of the tornadoes. It should be noted that infrastructure stands as the single largest category in terms of unmet needs among all eligible CDBG DR categories as defined by this Action Plan.

Infrastructure unmet needs are, for the purpose of this Action Plan, limited to the repair and replacement of existing infrastructure. The construction of new infrastructure or ‘hardening’ of existing infrastructure not damaged by the 2013 tornadoes is included in mitigation, and is discussed elsewhere in this Action Plan.

The largest unmet need identified to date in the area of infrastructure is the repair or replacement of roads and drainage systems. These two areas constitute over seventy-six percent (76%) of the total infrastructure repair and replacement activities identified. In total, nearly 97% of the activities identified as having unmet needs are located in Oklahoma and Cleveland counties.

TABLE 13: INFRASTRUCTURE UNMET NEED					
Activity	Percent of Total Infrastructure	Total Unmet Need	OKC	Cleveland County / Norman	Lincoln Co. / Carney
Drainage	34%	\$2,920,000	\$2,920,000	\$0	\$0
Roads	51%	\$4,368,235	\$3,400,000	\$700,000	\$268,235
Water & Sewer	0%	\$0	\$0	\$0	\$0
Sidewalks	3%	\$300,000	\$300,000	\$0	\$0
Other	12%	\$1,000,000	\$0	\$1,000,000	\$0
TOTALS	100%	\$8,588,235	\$6,620,000	\$1,700,000	\$268,235

Infrastructure projects represent a wide range of unmet need encompassing numerous types of infrastructure repair, including, for example, repairing or replacing roads damaged during the tornadoes and in the subsequent clean-up.

Infrastructure activities will include the construction or reconstruction of drainage systems. The State’s needs assessment indicates a large unmet need for infrastructure repairs related to damaged drainage systems. Their repair is second only to roads. Anticipated uses of funds in this activity area are expected to include a focus on road and drainage improvements.

Moreover, the calculation of unmet needs in the infrastructure and public facilities areas is not intended to be comprehensive as much of the necessary data is not yet available. The State will continue to collect and analyze data in connection with future allocations of funding under the CDBG DR Program.

Public Facilities Needs Assessment

Based on the State’s needs assessment survey, public outreach and FEMA reports, Oklahoma sustained some direct damage to public facilities as a result of the tornadoes and flooding. The State has identified several public

building projects with unmet needs totaling approximately \$192,000. These projects relate to public building repairs (e.g. community rooms, schools) that sustained direct storm related damage. Overall, public facilities represent a small portion of the overall demonstrated unmet need.

It should be noted that the public facilities unmet need relates to a single college which sustained direct tornado damage. This same college has sustained damage to two student dormitories which are categorized as housing under this Action Plan. It should be noted that this funding would only be eligible for funding under the National Objective of “Urgent Need.”

Mitigation & Resiliency Needs Assessment

Based on the State’s needs assessment survey and public outreach, demand exists for Mitigation / Resiliency investments. One aspect of this category is the establishing safe rooms or shelters in private residences and public facilities. Since the tornado, there has been a large public demand to create safe rooms or install storm shelters in owner occupied units. The State expects to respond to this demand by including safe rooms or residential shelters in rehabilitation and reconstruction efforts in Oklahoma City and Cleveland County and by determining both the need and cost of shelters statewide through a planning activity.

As previously mentioned, the statewide housing/disaster resiliency study utilizing CDBG DR “Planning” funds will be used to accomplish this goal. The survey will serve a twofold purpose in that it will not only primarily address disaster related resiliency issues but seek to address housing issues across all seventy-seven (77) Oklahoma counties. The resiliency component of the survey is reflected below.

1. County Level Threat and Hazard Identification/Risk Assessment – Example: Identify areas subject to natural disasters and potential manmade hazards. Provide historical overview of continuous threats such as tornadoes/wind storms, floods, ice storms, fire, and drought.
2. Disaster Risk Sustainability – Example: What storm shelters are available to include Location (both Public & Private)? Provide Capacity. Any there any structures in place designed to provide any type of disaster mitigation? If so, provide type and location.
3. Public Policy and Governance to Build Disaster Resiliency – Example: Examine local building codes, Examine hazard mitigation regulations. Provide regulatory recommendations.
4. Post Disaster Resource Network – Example: Local Emergency Response Agency Structure.
5. Threat & Hazard Warning Systems – Example: Identify any areas that lack sufficient disaster warning systems such as sirens.

6. The market penetration of safe rooms and residential shelters by County and/or entitlement – Examples: What percentage of homeowners have safe rooms? What is the estimated cost of achieving 100% penetration by County and entitlement?
7. The market penetration of residential shelters in multifamily developments by County and/or entitlement – Examples: What percentage of multifamily have shelters? What is the estimated cost of achieving 100% penetration by County and entitlement?
8. The market penetration of residential shelters in HUD assisted and LIHTC multifamily developments by County and/or entitlement – Examples: What percentage of multifamily have shelters? What is the estimated cost of achieving 100% penetration by County and entitlement?
9. Calculate number and locate community based shelters in residential communities.

Proposed Allocation of the Funding

The funding allocation as evidenced in the table below was created as a result of several limiting factors and considerations. Some of these factors included Federal Register Notice CDBG DR guidelines, damage analysis, surveys, US Census data, and of course the Action Plan submission deadline to HUD. Considerations involving public input and especially the amount of available funding also restricted the overall scope of the program at this time.

As demonstrated earlier by this Action Plan, the total amount of unmet need far exceeds the current \$10,600,000 allocated CDBG DR funding as identified in the Federal Register Notice. It is hoped that this demonstration of unmet need may inspire an additional round of CDBG DR funding. Clearly, given these figures there is still a sufficient amount of unmet disaster need to be addressed within the state. Should a second round of funding result, the State will consider these additional unmet needs that couldn't be funded under the first funding allocation.

A summary of the unmet needs and proposed allocations by activity category is set forth in the table below. These needs are representative of the information provided via real-time feedback from surveys and direct public inquiry (email, telephone, public hearing) to ODOC at the time of CDBG DR Action Plan submission to HUD.

TABLE 14: SUMMARY OF UNMET NEEDS & PROPOSED ALLOCATIONS		
Activity	Total Unmet Need	Proposed Allocation
Housing (Owner-Occupied and Multi-family Housing)	\$1,726,201	\$1,871,770
Infrastructure	\$8,588,235	\$5,438,230
Public Facilities	----	----
Economic Revitalization	\$2,000,000	\$300,000

Mitigation & Resiliency	\$1,020,000	\$1,020,000
Administration	\$530,000	\$530,000
Planning	\$1,590,000	\$1,440,000
TOTAL	\$15,284,436	\$10,600,000

Consistent with the Federal Register Notice, the primary purpose of the Funding is to address the immediate unmet housing and economic revitalization needs of our most impacted counties. The State’s allocation of the Funding by activity (as set forth in the table above) is guided by several critical federal requirements set forth in the Federal Register Notice. All of the programs to be administered in the activity categories identified in the table above, with the exception of Administration and Planning, will achieve one or more of the National Objectives:

- First, the Federal Register Notice requires that not less than 30.4% of the Funding must be used to provide assistance in Cleveland County. HUD has explained that this requirement was largely based on where registrants who sought assistance from FEMA and SBA were geographically concentrated. The remaining funds may be expended in Canadian, Le Flore, Lincoln, McClain, Okfuskee, Oklahoma, Okmulgee, and Pottawatomie Counties.
- Second, all activities, with the exception of Administration and Planning, must meet at least one of the National Objectives.
- Third, at least 50% of the Funding (together with all related future allocations of CDBG DR Program funds) must meet the Low/Moderate Income Benefit National Objective. As a result, the State must be able to demonstrate that the Funding is being expended to assist LMI persons.
- Fourth, while homeownership assistance may be provided to households up to 120% of AMI, however, only those funds used to serve households with up to 80% of AMI may qualify as meeting the low- and moderate-income person benefit national objective.
- Finally, the Funding cannot be used to assist second homes (as defined in IRS Publication 936) or private utilities.

The State’s first priority with the Funding is to get funding to as many affected residents as possible in order to assist them in repairing their homes and small businesses so they can get their lives back in order and get the local economy back in business. With this priority in mind, the State has developed additional factors to determine allocations of the Funding down to the level of specificity required by HUD.

The following additional factors will guide the allocation of Funding:

- The State’s estimate of the unmet needs in the activity areas for which the Funding can be used.

The State’s estimates are based on its review of Census data, data from FEMA, SBA, and the Oklahoma Insurance Commission (OIC), and the results of the surveys designed by the State and submitted to the State by municipalities, public housing authorities and other local stakeholders in the eligible areas. (Additional information regarding the State’s estimate of unmet needs is provided in greater detail in the Damage Assessment Report included as Appendix A.)

The unmet needs estimate is necessarily preliminary. The State recognizes that the actual needs of the State’s communities in the aftermath of the tornadoes will change as recovery and rebuilding programs are implemented. As such, the State continues to receive and evaluate new or revised data pertaining to unmet needs and the availability of funding from private insurance, FEMA, SBA and other sources. The State’s estimate of the both the number of homes and businesses affected by the tornadoes as well as the magnitude of unmet needs will continue to be refined.

The focus of this Action Plan is on single family and multifamily homes, small businesses, planning, and funding urgent public facilities and infrastructure needs. Since much of the necessary data is still being gathered and analyzed by the State, regional planning organizations and units of local government, and since future allocations of CDBG DR Program funding is anticipated to focus on unmet infrastructure and public facility’s needs, a description of the allocation of such future funds will be set forth in the future plan required in connection with such funds.

- The prioritization of (a) housing and economic development activities and other activities that directly addresses an urgent unmet need and can be commenced with minimal delay and thereafter completed promptly and (b) in the case of more complicated projects, necessary planning and predevelopment work that will facilitate the speedy commencement and completion of such projects when additional funds are allocated to the State.
- The availability of sufficient funds to efficiently and effectively administer the Funding in compliance with all applicable law.

Housing (Rehabilitation, Reconstruction & New Construction)

Allocation \$1,871,770

Single Family

All housing related activities will be accomplished by Oklahoma City. The estimate Single-Family Housing Rehabilitation and Reconstruction (Eligible Rehabilitation and Preservation Activities 24 CFR 570.202 LMH/LMI) is \$1,556,201.

Over 1,086 housing units in Oklahoma City were identified by FEMA and confirmed by HUD to have sustained some level of damage in the May 20 tornado event. A comparable number of housing units sustained wind, hail and flood damage in the May 31 tornado and flooding event (FEMA confirms over 1,000 structures with verified loss.) To address the unmet need, the City will provide housing rehabilitation and reconstruction assistance. Approximately 50 housing units will be assisted.

Multi-family Housing

The estimate for Multi-Family Rental Housing Rehabilitation (Eligible Rehabilitation and Preservation Activities 24 CFR 570.202 LMH/LMI) is \$170,000.

All known HUD assisted and Low Income Housing Tax Credit affordable housing developments were surveyed by the City to identify damage associated with the May 20 and May 31 storm events. Four survey responses were received that identified \$170,000 unmet need in multi-family housing rehabilitation assistance. Approximately 357 multifamily units and 269 non-multifamily rental units were directly affected by the tornado.

The State is addressing the unmet need in Public Housing in the multifamily proposed allocation.

HUD-assisted Housing, McKinney-Vento funded shelters, other HUD Properties

The State conducted extensive outreach to Low Income Housing Tax Credit (LIHTC) affordable housing, HUD Assisted housing, and McKinney-Vento funded shelters. All known HUD Assisted and Low Income Housing Tax Credit affordable housing developments were surveyed to identify damage associated with the May 19th, 20th and May 31st storm events. Four survey responses were received that identified \$170,000 unmet need in multi-family housing rehabilitation assistance. All responses were located within the Oklahoma City. (The State will provide further detail regarding the type of units, PHA; HUD Assisted; etc.) and the type of damage (wind; flood, etc.) separately).

There were no transitional, supportive housing or other Continuum of Care or McKinney-Vento sponsored housing reporting any storm related damage at this time. Consequently, the State has not reserved any of CDBG DR funding specifically to address the rehabilitation, reconstruction or replacement of any McKinney-Vento funded

shelters and housing for the homeless – including emergency shelters and transitional and permanent housing for the homeless.

As noted previously, the State will continue to collect data in regard to these fore-mentioned housing programs and consider any unmet need request should it be reported and consider the unmet should a second round of disaster funding emerge.

Housing Goals

The State’s housing recovery programs are designed to meet the unmet housing needs of the communities most impacted by the tornadoes (i.e. the costs of repairs, reconstruction and new construction that insurance, FEMA and any other sources of funding does not cover). The objectives of the housing programs include helping people directly affected by tornadoes within the City limits of Oklahoma City by:

1. Replacing and rehabilitating homes, including identifying opportunities for mitigation enhancement measures;
2. Improving the resilience of their homes while restoring their buildings/residences;
3. Assisting homeowners, multifamily property owners and public housing authorities in completing applications for funding; and
4. Directing homeowners, multifamily property owners and public housing authorities to additional potential sources of funding.

To pursue these objectives, the State has developed a program that incorporates best practices from past disasters; builds upon stakeholder input from agencies and relevant organizations across the affected counties to ensure the diverse needs of residents and communities are appropriately addressed.

The State's strategy will balance speedy response with proper planning, and support while considering and incorporating the distinct needs and resources of different communities the members of those communities. The State will manage all program operations and ensure that all appropriate accountability and oversight mechanisms in place.

Owner-occupied Housing Program

Based on lessons learned from past disasters, and the particular needs of the State’s most impacted communities, the State will have a single owner-occupied housing program limited to Oklahoma City to

provide funding both to property owners that need only rehabilitation assistance and those that need substantial rehabilitation or reconstruction assistance as well as mitigation.

ODOC staff, the staff of Oklahoma City and third-party contractors will provide assistance to potential applicants at the application stage and then will work closely with homeowners eligible for assistance under this program to evaluate the extent of the damage, and to engage a contractor to perform the appropriate scope of construction work.

Eligibility Threshold Requirements

- Unmet Needs – Funding is available solely to address unmet needs;
- Eligible/Fundable – each property must be determined to be an eligible and fundable activity under the Housing and Community Development Act as modified by the Federal Register Notice and all other applicable regulations and guidance, including, without limitation, the following activities:
 - Acquisition of real property; buyouts; code enforcement; relocation assistance; new construction, reconstruction and rehabilitation of residential and nonresidential properties; new construction, reconstruction and rehabilitation of public housing; American Disability Act improvements; fair housing counseling; homeownership counseling and assistance; and actions to meet the State’s certification to affirmatively further fair housing.
- Impacted and Distressed Area – each property must be located within Oklahoma City;
- Readiness to Proceed – each property must be capable of being undertaken immediately to provide outcomes to intended beneficiaries affected by the disaster;
- Feasibility – each property must be found to be financially feasible, sustainable and likely to contribute to the long-term recovery of disaster impacted communities; and
- Consistency with Consolidated Plan/Action Plan – each property must be reflective of the goals, priorities and requirements of the State of Oklahoma’s 2014-2018 Consolidated Plan.
- No portion of the Funding may be used to reimburse the applicant for costs incurred prior to their application.

Funding Priorities

- Projects that benefit LMI persons and/or are located in LMI Areas (i.e. an area with household incomes at or below 80% of the area median income);

- Projects that enable the State to satisfy the federal requirement that at least 30.4% of the Funding be spent in Cleveland County;
- Projects that include deep income targeted units (i.e. units for extremely low income persons or families, the homeless or persons at risk of becoming homeless);
- Projects that address conditions that threaten the health and safety of either the occupants or the public;
- Projects that contribute significantly to the long-term recovery and economic revitalization of the affected area;
- Projects undertaken on behalf of a beneficiary or sponsor that commits to contribute financially in the repair, construction or mitigation of the project (this can be through private insurance, NFIP, FEMA, SBA, and/or other sources); and
- Mitigation – cost effective resiliency and other activities designed to harden the property in order to minimize reoccurrence of storm damage whenever possible or to protect households from future disasters by providing safe rooms or storm shelters.

Multifamily Rehabilitation Program

The Multifamily Rehabilitation program will provide financial assistance to rehabilitate LMI units in eligible multifamily properties with unmet need, including public housing, HUD-assisted housing, McKinney-Vento funded shelters and housing for the homeless, which were damaged by the tornadoes and are located outside the 100-year flood plain in any community in Oklahoma City. The general requirements of this program are as follows:

1. Eligible applicants include owners of existing low moderate income (LMI) multifamily properties outside of the 100 flood plain in Oklahoma City (for-profit and non-profit owners as well as public housing authorities);
2. An eligible applicant's property must have been damaged by a tornado or flooding during the period May 18th through June 2nd, 2013;
3. Each property to be assisted must have been insured at the time of the storm;
4. Each property to be assisted must be current on property taxes, if applicable ("current on property taxes" includes being in compliance with a payment plan or stipulated agreement with the taxing entity);

5. Each property must have a minimum of five units (applicants may aggregate existing units to meet the threshold of five units);
6. Properties to be assisted must meet applicable local codes or rehabilitation standards at completion;
7. The owner/developer must submit a relocation plan that conforms to the Uniform Relocation Act (the “URA”), if applicable;
8. The owner must propose the financial structure, which, at a minimum shall meet all of the following criteria:
 - a. CDBG DR Program funds are used as gap financing in the form of a subordinate debt, which may be secured by a mortgage;
 - b. CDBG DR Program funds are limited to the hard and soft costs of rehabilitation;
 - c. The application accounts for the expenditure of all benefits received prior to application, including:
 - i. insurance payments;
 - ii. FEMA or SBA payments
 - iii. Cash or other benefits provided by any charitable organization in connection with the project;
 - iv. Other federal, State or local financial assistance provided in connection with the project
9. All properties assisted with CDBG DR Program funds shall be encumbered with a lien for a period to be determined by ODOC or its assigns based standard underwriting of the project;
10. The property and the applicant meet all of the federal, State and local requirements of eligibility and underwriting for the Funding and all other applicable federal requirements;

Infrastructure

Allocation \$5,438,230

The State has identified several units of local governments that have proposed infrastructure projects with unmet needs due mostly in part to flooding and road deterioration brought about from tornadoes and the debris clean-up following tornadoes.

There are a number of infrastructure projects that have the potential to affect the health, safety and welfare of the local community and are therefore urgent priorities. The State's allocation for infrastructure projects will focus on unmet needs that are urgent in nature and can be immediately addressed, including, but not limited to drainage repairs and critical road repairs.

Infrastructure Goals

The primary goal of Oklahoma's CDBG DR disaster recovery program with regard to infrastructure is to restore a suitable living environment in disaster impacted areas by rehabilitating or reconstructing infrastructure, particularly though exclusively where such infrastructure primarily serves LMI persons. The State also intends to make infrastructure repairs in a manner that supports energy conservation/efficiency objectives and responsible growth as well as transit-oriented development.

Infrastructure projects will be selected on a basis modeled after the Small Cities CDBG Program.

As previously noted, it is not expected that this amount is sufficient to address a large portion of the State's unmet infrastructure needs. HUD has indicated that future CDBG DR funding will be intended primarily for unmet infrastructure, public facility and mitigation "only" needs. Oklahoma will more fully address its infrastructure needs when such future funds are allocated.

Infrastructure Program

The proposed allocation from the CDBG DR funding specifically for infrastructure activities will be the largest allocation. As previously noted, it is not expected that this amount is sufficient to address a large portion of the State's unmet infrastructure needs. HUD has indicated that future CDBG DR funding will be intended primarily for unmet infrastructure, public facility and mitigation "only" needs. The State will more fully address its infrastructure needs when such future funds are allocated.

Eligibility Threshold Requirements

- Unmet Needs – Funding is available solely to address unmet needs;
- Eligible/Fundable – each project must be determined to be an eligible and fundable activity under the Housing and Community Development Act as modified by the Federal Register Notice and all other applicable regulations and related guidance;
- Impacted and Distressed Area – each project must be located in an area directly impacted by a tornado or flood;

- Readiness to Proceed – each project must be capable of being undertaken (design or construction) immediately to provide outcomes to intended beneficiaries effected by the disaster;
- Feasibility – each project must be found to be financially feasible, sustainable and likely to contribute to the long-term recovery of disaster impacted communities; and
- Consistency with Consolidated Plan/Action Plan – each project must be reflective of the goals, priorities and requirements of the State’s 2014-2018 Consolidated Plan.

Funding Priorities

- Projects that primarily benefit LMI persons and/or are located in LMI Areas (i.e. an area with household incomes at or below 80% of the area median income);
- Projects that enable the State to satisfy the federal requirement that at least 30.4% of the Funding be spent in Cleveland County;
- Projects that address conditions that threaten the health and safety of either the occupants or the public;
- Projects that contribute significantly to the long-term recovery and economic revitalization of the affected area;
- Projects undertaken on behalf of a beneficiary or sponsor that commits to contribute financially in the repair, construction or mitigation of the project (this can be through private insurance, NFIP, FEMA, SBA, and/or other sources); and
- Mitigation – includes only a minimum of rehabilitation beyond the correction of conditions caused by the disaster.

Infrastructure activities will include the construction or reconstruction of streets/roads and drainage systems. The States needs assessment indicates a large unmet need for infrastructure repairs related to damaged streets/road and drainage systems.

A majority of the infrastructure funds will be utilized to make drainage and infrastructure improvements to the areas within Oklahoma City. Most of the street/road improvements are required due to the heavy volume of trucks used for hauling away large amounts of debris resulting from the storm damage.

Public Facilities

Allocation: \$0

The State has vigorously pursued public input regarding determination of disaster related unmet needs within the identified disaster areas. At this time, the State has not received any Disaster Recovery funding requests for Public Facilities projects with unmet needs that exhibit a priority of need. It should be noted that the public facilities unmet need relates to a single college which sustained direct tornado damage. This same college has sustained damage to two student dormitories which are categorized as housing under this Action Plan. It should be noted that this funding would only be eligible for funding under the National Objective of “Urgent Need”. Unmet need in Public Facilities is not an identified funding priority. Given funding constraints, the State will not be funding Public Facilities at this time.

Economic Revitalization

Allocation: \$300,000

The State has vigorously pursued public input regarding determination of disaster related unmet needs within the identified disaster areas. While overall, many businesses were affected by the storm(s); the vast majority had insurance and are being rebuilt. Given the amount of the CDBG DR allocation and the high level of insured commercial losses and lack of sufficient disaster funding at this time, the State cannot make this category the highest priority.

1. Due to limited funds, a preference will be given to businesses located in LMA’s or operated by Section 3 eligible applicants.
2. Due to Federal Register Notice requirements, the state will give preference to business equipment or business structural repairs to Cleveland County, the county most impacted.

Eligibility Threshold Requirements

- Projects that benefit LMI persons and/or are located in LMI Areas (i.e. an area with household incomes at or below 80% of the area median income);
- Projects that enable the State to satisfy the federal requirement that at least 30.4% of the Funding be spent in Cleveland County;
- Projects that address conditions that threaten the health and safety of either the occupants or the public;

- Projects that contribute significantly to the long-term recovery and economic revitalization of the affected area;
- Projects undertaken on behalf of a beneficiary or sponsor that commits to contribute financially in the repair, construction or mitigation of the project (this can be through private insurance, NFIP, FEMA, SBA, and/or other sources); and
- Mitigation – includes only a minimum of rehabilitation beyond the correction of conditions caused by the disaster.

Funding Priorities

- Due to limited funds, a preference will be given to businesses located in LMA's or operated by Section 3 eligible applicants.
- Due to Federal Register Notice requirements, the state must preference business equipment or business structural repairs to Cleveland County, the county most impacted;
- Projects that primarily benefit LMI persons and/or are located in LMI Areas (i.e. an area with household incomes at or below 80% of the area median income);
- Projects that enable the State to satisfy the federal requirement that at least 30.4% of the Funding be spent in Cleveland County;
- Projects that address conditions that threaten the health and safety of either the occupants or the public;
- Projects that contribute significantly to the long-term recovery and economic revitalization of the affected area;
- Projects undertaken on behalf of a beneficiary or sponsor that commits to contribute financially in the repair, construction or mitigation of the project (this can be through private insurance, NFIP, FEMA, SBA, and/or other sources); and
- Mitigation – includes only a minimum of rehabilitation beyond the correction of conditions caused by the disaster.

If during implementation of the CDBG DR program the State determines a need for a specific economic revitalization strategy, the State may amend this Action Plan should a second round of disaster funding emerge.

Mitigation & Resiliency

Allocation: \$1,020,000

Resilience Goals

The State's primary goal through resiliency programs and projects is to reduce the potential for loss of life in a future tornado or storm. The State recognizes that future tornadoes or flooding may severely damage homes, businesses, infrastructure, and public facilities in municipalities throughout Oklahoma. A portion of the Planning funds (\$500,000) will be used to assist the State, regional planning agencies, and/or local governments to plan resiliency or mitigation investments in housing. A statewide housing / resiliency study will be undertaken to assess the current housing stock and to define the resiliency needs of housing stock statewide. The overall purpose the housing study is to assist the State and localities in designing cost effective long-term resiliency and mitigation investments that may need to be addressed with future allocations of funds.

Additionally, The City of Oklahoma City will facilitate a Storm Shelter/Safe Room Rebate/Installation Program (Eligible Rehabilitation and Preservation Activities 24 CFR 570.202 LMH/LMI). Approximately 200 storm shelters or safe rooms will be installed in owner occupied affordable single family homes. The assistance will be provided in the form of a rebate on the total installation price.

Eligibility Threshold Requirements

- Projects that benefit LMI persons and/or are located in LMI Areas (i.e. an area with household incomes at or below 80% of the area median income);
- Projects that enable the State to satisfy the federal requirement that at least 30.4% of the Funding be spent in Cleveland County;
- Projects that address conditions that threaten the health and safety of either the occupants or the public;
- Projects that contribute significantly to the long-term recovery and economic revitalization of the affected area;
- Projects undertaken on behalf of a beneficiary or sponsor that commits to contribute financially in the repair, construction or mitigation of the project (this can be through private insurance, NFIP, FEMA, SBA, and/or other sources); and
- Mitigation – includes only a minimum of rehabilitation beyond the correction of conditions caused by the disaster.

- Fundable – (Stormshelter / Safe Room -There must be funds available to provide the rebate;
- Eligible –(Stormshelter / Safe Room - To be eligible, a person must be the homeowner and resident of a single-family residence
- Primary Residence - (Stormshelter / Safe Room -The residence where the storm shelter is installed must be the primary residence of the homeowner;
- Meets or Exceeds FEMA Standard – (Stormshelter / Safe Room -The storm shelter must meet or exceed the requirements established in FEMA Publication 361 as determined by a City inspector.

Funding Priorities

- Projects that primarily benefit LMI persons and/or are located in LMI Areas (i.e. an area with household incomes at or below 80% of the area median income);
- Projects that enable the State to satisfy the federal requirement that at least 30.4% of the Funding be spent in Cleveland County;
- Projects that address conditions that threaten the health and safety of either the occupants or the public;
- Projects that contribute significantly to the long-term recovery and economic revitalization of the affected area;
- Projects undertaken on behalf of a beneficiary or sponsor that commits to contribute financially in the repair, construction or mitigation of the project (this can be through private insurance, NFIP, FEMA, SBA, and/or other sources); and
- Mitigation – includes only a minimum of rehabilitation beyond the correction of conditions caused by the disaster.

Planning

Allocation: \$1,440,000

HUD guidelines allow the State to opt to expend up to 15% of its CDBG DR Program funding allocation on planning activities. The State intends to expend its planning activity allocation to assist in the planning processes associated with the redevelopment of storm impacted areas.

Planning Goals

ODOC intends to expend up to \$500,000 in Planning activities to assist in the long term planning processes associated with improving resiliency and mitigation of housing statewide and in defining the overall housing market. Specifically, the State intends to commission a statewide (seventy-seven county) resiliency / housing study.

The remaining Planning funded activities will be carried out by the City of Oklahoma City. The City anticipates using Planning funding for three (3) primary activities that include:

1. Preliminary planning and engineering on street and drainage projects that will be funded with the CDBG DR grant funding.
2. Draining Basin Master Plan. The City of Oklahoma City will phase the master planning effort with the initial study area being Downtown. The City will be identifying other viable sources of funding to complete the balance of the Drainage Basin Master Plan.
3. Pre-disaster housing and economic development resiliency plan. The City of Oklahoma City will initiate a pre-disaster resiliency plan to prepare for future disaster response and long term recovery for residents and businesses within the community.

HUD guidelines allow the State to opt to expend up to 15% of its CDBG DR Program funding allocation on planning activities. It is important for Oklahoma to be proactive in anticipation of future natural disasters. Accordingly, ODOC intends to expend up to \$500,000 in Planning activities to assist in the long term planning processes associated with improving resiliency and mitigation of housing statewide and in defining the overall housing market. Specifically, the State intends to commission a statewide seventy-seven county (77) housing / resiliency study with the following purposes:

1. To establish the housing baseline for long term planning efforts;
2. To identify high risk Counties and Entitlements based on historic records of natural disasters including tornadoes, storms, wildfires and earthquakes;
3. To establish the current level of housing resiliency and mitigation codes at the county and entitlement level;
4. To identify existing storm shelters that are publically accessible by County and/or entitlement;

5. To define the market penetration of safe rooms and residential shelters by County and/or entitlement (i.e., what percentage of homeowners have safe rooms) and to determine the estimated cost of achieving 100% penetration by County and entitlement.
6. To identify the market penetration of residential shelters in HUD assisted, LIHTC and all other multifamily developments by County and/or entitlement, and to determine the estimated cost of achieving 100% penetration of multifamily properties by County and entitlement.

Long-Term Recovery Planning

The State will continue to monitor long term recovery planning. As previously mentioned, the state-wide resiliency / housing survey will valuable information to the State regarding resiliency and housing related issues. This in turn will allow the State to more readily address these issues in the future.

Administration

Allocation: \$530,000

The State will act as the lead agency for the overall administration of the CDBG Disaster Recovery funding. The State will administer and utilize sub-grantees to disburse the CDBG Disaster Recovery funding directly to benefit homeowners, multifamily property owners, and other eligible beneficiaries of the funding. Administration of the CDBG Disaster Recovery funding by the State will ensure that program activities reach affected residents in a consistent and coordinated manner. The State will implement the programs and activities detailed in this Action Plan primarily through dedicated staff, consultants and third-party contractors.

SECTION TWO - \$83.1 MILLION ALLOCATION: (Released by HUD on June 3, 2014, Federal Register Notice Vol. 79, No. 106, Page 31964)

This \$83.1 million disaster recovery funding allocation marks the second of two disaster recovery allocations provided through HUD to the State of Oklahoma. The earlier \$10.6 million (December 16, 2013 in the Federal Register at Vol. 78, No. 241) disaster recovery funding has been allocated under a previous CDBG Disaster Recovery Action Plan.

In accordance with the Federal Register Notice, this Action Plan must also provide an assessment of the need for the Funding, the State's public outreach and citizen participation practices. The State is obligated to ensure that the processes, procedures, and fiscal and administrative controls it will use in the course of expending the CDBG DR funding are sufficient to safeguard the Funding from waste, fraud and abuse.

The Federal Register Notices also impose strict expenditure and compliance deadlines on the State. Accordingly, HUD is allowing Grantees to request less than the full funding amount in a Partial Action Plan. The State of Oklahoma, like other states to which CDBG DR Program funds were allocated by HUD, will pursue incremental obligation of the Funding to support its tornado relief and restoration programs and activities to ensure compliance with HUD's deadlines. Specifically, the State is requesting that HUD make \$16,661,243 available immediately upon approval of this Action Plan. HUD has assured the State that as it submits additional requests for additional portions of the Funding to be released, so long as everything is in order, they will approve the request promptly and without delay.

ODOC/CD is currently accepting CDBG DR applications through the State's online OKGrants' system. The State has reviewed and preliminarily approved several applications for disaster funding at this time. The State will continue to accept and evaluate CDBG DR applications for ELIGIBLE disaster recovery activities as long as funding and time restrictions permit. Any additional requested disaster activity funding will be subject to the same expenditure and compliance deadlines set forth in the Federal Register Notice and CDBG DR program selection priorities established by the State.

Because of such a large geographic scope of type and severity of eligible Presidentially Declared Disasters dating from 2011 through 2013, ODOC/CD will utilize the submitted Needs Assessment surveys as required to define need in the State's CDBG DR Plan and to conduct additional outreach beyond the earlier Citizen Participation CDBG DR hearings. ODOC/CD will review these surveys with a panel consisting of a CDBG Program Planner, CDBG Program Manager, and the CDBG Director of Programs. The panel will look at the type of project during this review that was provided with the submitted surveys. The purpose of the review will be to:

1. Allow ODOC/CD to expedite the CDBG DR program by allowing early identification of projects that may need further guidance by HUD as to their respective eligibility potential. This will potentially help to cut down on application review time should the application be OFFICIALLY submitted through the State's OKGrants' system.
2. Create an open channel of communication and address any questions or comments regarding the submitted CDBG DR survey related projects or the CDBG DR program via telephone or email. This will facilitate a better understanding of the CDBG DR program.
3. Provide ODOC/CD with better quality CDBG DR applications as well as the potential applicant by providing direct outreach which will in turn reduce possible delays and enhance the program's timeframe once the official CDBG DR applications are received through the state's online OKGrants' system.

No survey respondent will be either OFFICIALLY approved or disapproved as a result of the informal survey review. Rather, survey respondents will be presented with a preliminary assessment of their respective project's eligibility and be allowed to have any CDBG DR related questions addressed. It will be the survey respondent's choice to officially submit an application for CDBG DR funding through the OKGrants' website which stands as the only official means as CDBG DR application submittal and subsequent formal review. The CDBG DR program is subject to strict funding timelines. This preliminary review will provide the opportunity to identify questionable project eligibility requests early in the program and circumvent possible wasted time on part of the applicant and ODOC/CD staff.

The official CDBG DR application process will be facilitated via the state's electronic OKGrants' system. No CDBG DR projects will be considered for CDBG DR funding without the formal submission of the CDBG DR application through OKGrants. The OKGrants' application review will constitute the official review phase for the CDBG DR applications. The application review will involve evaluation of Federal Register specific program threshold and eligibility requirements. The application review also will allow program specific documentation such as the LMI and Duplication of Benefits forms to be examined. All funding eligible CDBG DR applications will be forwarded on for additional levels of review and approval through the OKGrants' system. It is important to mention that this OKGrants' approval process moves through a hierarchy of staff consisting of planners, management, finance, and contract administration members which make up the Community Development team.

Additionally, ODOC/CD anticipates that in some cases CDBG DR funding could potentially be available later in the program due to unforeseen events such as the cancellation of projects; projects completed under budget; or from funds designated but not allocated. ODOC/CD reserves the right to adjust any of the remaining CDBG DR funding to ensure maximum utilization of funds. Such CDBG DR "Reuse" funding adjustments shall be the minimum amount necessary to fund projects efficiently. The CDBG DR Reuse funding is also being made available to offset any

unforeseen project eligible cost increases such as in the case of construction. All CDBG DR Reuse funding will be subject to the same expenditure deadlines and compliance requirements set forth in the Federal Register Notice. Funding deemed Reuse will be evaluated and allocated according to the following considerations.

1. In addition to first meeting the core CDBG DR program eligibility requirements as outlined in this Action Plan, Reuse funding will be prioritized in order to allow the State to meet the minimum Federal Register specified objectives should these objectives still remain unfulfilled at the time of the Reuse funding availability.
2. Reuse funding will be first considered for current grantees whose infrastructure projects have been significantly impacted by unforeseen increased project completion costs and require additional funds to ensure timely completion of their eligible project.
3. Reuse funding consideration will depend on the amount required by the eligible CDBG DR project in relation to the amount of limited remaining CDBG DR funding available.
4. Reuse funding consideration will depend on the amount of time required for final project completion in relation to the amount of time remaining under the imposed Federal Register Notice deadlines.
5. Any remaining CDBG DR funding that cannot meet the expenditure deadlines and compliance requirements set forth in the Federal Register Notice will be will be returned to HUD as required under federal guidelines.

Initially, ODOC/CD has reviewed and approved applications for the following activity categories shown in the table below. The total allocation amount below reflects \$60,148,668 in CDBG DR funding or approximately 72% of the total \$83.1 million authorized CDBG DR (Second Allocation) funding for the State of Oklahoma. As stated previously, the State will continue to accept and evaluate CDBG DR applications for ELIGIBLE disaster recovery activities as long as funding and time restrictions permit.

TABLE 1: STATE OF OKLAHOMA: CDBG DR Second Round (\$83.1 Million) Proposed Allocations

Activity	Proposed Allocation	Request for Partial Allocation
Housing (Owner-Occupied and Multi-family Housing)	\$ 5,000,000	\$5,000,000
Infrastructure	\$47,970,917	\$6,278,227
Resiliency & Mitigation	\$4,500,000	\$4,500,000
Public Facilities	\$0.00	\$0.00
Economic Revitalization	\$0.00	\$0.00

Planning	\$0.00	\$0.00
Administration	\$2,677,751	\$883,016
TOTAL	\$60,148,668	\$16,661,243
FUTURE RESERVED DR FUNDING	\$22,951,332	-----
ALLOCATION TOTAL	\$83,100,000	-----

The Act provides that funding under the CDBG DR Program must be used “for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas resulting from a major disaster.”

In addition to specifying the amount of funds allocated to the State, the Federal Register Notice also sets forth, among other requirements, the areas within the State where the Funding can be expended, the programs or activities for which the Funding can be used, and the national objectives that each program or activity must meet.

Per the Federal Register Notice, the only areas in which the funding can be expended lie in Presidentially Declared Disaster areas of the state dating back from 2011 to 2013 occurring during the incident period as defined under the applicable Disaster Declaration. This requirement is consistent with the damage and impact assessments that were reported by the Federal Emergency Management Agency ("FEMA") the U.S. Small Business Administration ("SBA"), the Oklahoma Department of Emergency Management as well as municipalities within the impacted counties. Within these eligible areas, the Federal Register Notice requires that a minimum of \$41,228,000 of the total State CDBG DR funding must be expended in Cleveland and Creek Counties. The remaining funding will be available for remaining program eligible State disaster areas.

As outlined by the Federal Register Notice, the City of Moore will receive a separate CDBG DR Program funding allocation which will remain independent of the State's CDBG DR Program funding allocation. Given this, the City of Moore is charged with submitting an independent CDBG DR Action Plan to HUD on the City's behalf. The City of Moore expects to use its Community Development Block Grant Disaster Recovery allocation to render disaster aid within that respective jurisdiction. It is for this reason that the State's Community Development Block Grant - Disaster Recovery plan will NOT contain any direct disaster related information and will NOT provide any additional funding allocation to the City of Moore.

Broad categories for CDBG DR Program eligible activities include: Housing, Infrastructure, Public Facilities, Economic Revitalization, and Planning. A limited portion of the funds may be used for the cost of administering the CDBG DR Program.

Some of the specific CDBG DR Program eligible activities that HUD has identified include the following:

- Acquisition of real property;
- Acquisition, rehabilitation and construction of public works and facilities;
- Buyouts;
- Code enforcement;
- Relocation assistance;
- New construction, reconstruction and rehabilitation of residential and nonresidential properties;
- New construction, reconstruction and rehabilitation of public housing;
- Repair or rehabilitation of infrastructure;
- American Disability Act improvements;
- Rental assistance (limited); storm mitigation measures;
- Special economic development including: grants and loans to SBA-defined small businesses, job training, and the revitalization of business districts;
- Fair housing counseling;
- Homeownership counseling and assistance;
- Assistance to Community-Based Development Organizations for neighborhood revitalization, community economic development, energy conservation projects, homeownership assistance, fair housing, planning, and administrative costs, including actions to meet the grantee's certification to affirmatively further fair housing.

With respect to CDBG DR Program eligible activities, the State must also ensure that at least 50% of its CDBG DR grant funds are used for activities that benefit low- and moderate-income ("LMI") persons. LMI persons are defined for the purposes of the CDBG DR Program as persons and families whose income does not exceed 80% of the area median income ("AMI"), as determined by HUD. This 50% requirement applies to the State's expenditure of the entirety of the Funding, less administration and planning, and does not apply to each individual program or activity. For the purposes of this Action Plan, that would mean a minimum of \$41,228,000 of these funds must be obligated to the national objective of benefitting low- and moderate- income persons.

As set forth in the Federal Register Notice, the Funding cannot be used for any of the following purposes: to assist second homes (as defined in IRS Publication 936); and to assist private utility companies or organizations.

In addition, all expenditures of the Funding, other than Administration and Planning, must meet at least one of the three federally-mandated national objectives (each a "National Objective"): low- and moderate income benefit; elimination of slum and blight; and urgent need.

Any activity not listed in the Housing and Community Development Act, as modified by the Federal Register Notice, is not an activity for which any of the Funding can be used unless a specific waiver of such ineligibility has been granted by HUD and/or the federal Office of Management and Budget.

States may request additional waivers of program requirements by providing sufficient evidence that such waiver is necessary for the effective administration of the Funding. As of the date of this Action Plan, the State has not requested any such specific waivers. The State reserves the right to pursue such waivers under all broad program categories as may be appropriate and necessary as additional information relative to “unmet need” and other parameters are obtained.

Governor Mary Fallin has designated the Oklahoma Department of Commerce (“ODOC”) the principal state agency for the allocation and administration of Funding. ODOC will administer the Funding through application processes. The eligibility requirements identified by ODOC include the following (though not all requirements will apply to all types of projects):

- Applicants must be “Eligible Applicants” as defined by HUD program regulations, as modified by the Federal Register Notice:
- Each proposed activity must be an “Eligible Activity” as defined by HUD program regulations, as modified by the Federal Register Notice;
- Each project must meet at least one National Objective and such National Objective(s) must be fully supported within the application;
- Consistency with the goals and strategies of the Action Plan must be demonstrated;
- Fair Housing and Equal Opportunity compliance must be evidenced by a Fair Housing Action Plan that complies with ODOC’s guidelines/policies; and
- Each applicant must be in compliance with all existing assistance agreements with ODOC and cannot be in default under any OHFA or HUD-administered program.

In addition to meeting the federal obligations associated with the Funding, this Action Plan reflects the fact that the State’s first priority is to get financial assistance to as many affected residents as possible, assisting them in the repair or reconstruction of their homes to get their lives back in order, and to small businesses to get their business running and get our local economy back in business. The State, acting through ODOC, will use the Funding to provide financial assistance directly to assist eligible homeowners, multi-family property owners (possibly including public housing authorities), small businesses, municipalities and other eligible recipients to

ensure the State's recovery from the damage caused by the tornadoes in all areas for which the Funding can be used under applicable federal regulations.

This Action Plan describes the priorities that the State has used to allocate the Funding among the eligible activities. Again, it is important to note that this Action Plan requests immediate access to the first tranche of the CDBG DR funding but is in no way an indication that the State does not intend to expend all of the Funding as quickly and effectively as possible.

I. Introduction

In January 2013, in response to the extraordinary destruction caused by Hurricane Sandy, Congress passed, and the President signed into law, The Disaster Relief Appropriations Act, also known as Public Law 113-2 (the "Act"), which, among other things, appropriated approximately \$50 billion for recovery efforts related to Hurricane Sandy and other natural disasters specified in the Act (supplementing almost \$10 million that Congress had appropriated for the National Flood Insurance Program earlier that month). Of those funds, approximately \$16 billion was set aside for the Community Development Block Grant - Disaster Recovery Program (the "CDBG DR Program") to be administered by the United States Department of Housing and Urban Development ("HUD").

On June 3, 2014, HUD released its initial CDBG DR Program allocations and program requirements in the Federal Register at Vol. 79, No. 106, Page 31964 in a notice entitled: "Second Allocation, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013".

This \$83.1 million disaster recovery funding allocation marks the second of two disaster recovery allocations provided through HUD to the State of Oklahoma. The earlier \$10.6 million (December 16, 2013 in the Federal Register at Vol. 78, No. 241) disaster recovery funding has been allocated under a previous CDBG DR Action Plan. For the purposes of this plan, the earlier \$10.6 million will be also referred to as the CDBG DR "First Allocation".

HUD's allocation of CDBG DR Program funds was based on its estimate of critical unmet needs for repairing and rebuilding housing and infrastructure and economic revitalization in the most impacted areas, primarily using data provided by FEMA.

Per the Federal Register Notice, the only areas in which the funding can be expended lie in Presidentially Declared Disaster areas of the state dating back from 2011 to 2013 occurring during the incident period as defined under the applicable Disaster Declaration. This requirement is consistent with the damage and impact assessments that were reported by the Federal Emergency Management Agency ("FEMA"), the U.S. Small Business Administration ("SBA"), the Oklahoma Department of Emergency Management

as well as municipalities within the impacted counties. Within these eligible areas, the Federal Register Notice requires that a minimum of \$41.2 million of the total State CDBG DR funding must be expended in Cleveland and Creek Counties. The remaining funding will be available for remaining program eligible State disaster areas.

The following list includes the federal Disaster Declarations and eligible counties accounted for under the eligible declaration.

Oklahoma Severe Winter Storm (DR-4164)

Incident period: December 5, 2013 to December 6, 2013

Major Disaster Declaration declared on January 30, 2014

Counties Included: Choctaw, Le Flore, McCurtain, Pushmataha

Oklahoma Severe Storms and Tornadoes (DR-4117)

Incident period: May 18, 2013 to June 2, 2013

Major Disaster Declaration declared on May 20, 2013

Counties Included: Atoka, Canadian, Coal, Cleveland, Craig, Haskell, Hughes, Latimer, LeFlore, Lincoln, McClain, McIntosh, Nowata, Oklahoma, Okfuskee, Okmulgee, Ottawa, Pittsburg, Pottawatomie, Pushmataha, Seminole

Oklahoma Severe Winter Storm and Snowstorm (DR-4109)

Incident period: February 24, 2013 to February 26, 2013

Major Disaster Declaration declared on April 8, 2013

Counties Included: Alfalfa, Beaver, Beckham, Blaine, Custer, Dewey, Ellis, Garfield, Grant, Kay, Kingfisher, Major, Noble, Roger Mills, Washita, Woods, Woodward

Oklahoma Freedom and Noble Wildfires (DR-4078)

Incident period: August 3, 2012 to August 14, 2012

Major Disaster Declaration declared on August 22, 2012

Counties Included: Cleveland, Creek

Oklahoma Severe Storms, Tornadoes, Straight-line Winds, and Flooding (DR-4064)

Incident period: April 28, 2012 to May 1, 2012

Major Disaster Declaration declared on June 14, 2012

Counties Included: Alfalfa, Craig, Grant, Kay, Nowata

Oklahoma Severe Storms, Tornadoes, Straight-line Winds, and Flooding (DR-1989)

Incident period: May 22, 2011 to May 25, 2011

Major Disaster Declaration declared on June 6, 2011

Counties Included: Blaine, Caddo, Canadian, Craig, Delaware, Grady, Jefferson, Kingfisher, LeFlore, Logan, Major, McClain, Nowata, Osage, Ottawa

Oklahoma Severe Storms and Flooding (DR-1988)

Incident period: April 21, 2011 to April 28, 2011

Major Disaster Declaration declared on May 27, 2011

Counties Included: Adair, Cherokee, Delaware, Haskell, LeFlore, McIntosh, Muskogee, Okmulgee, Pittsburg, Sequoyah

Oklahoma Severe Winter Storm and Snowstorm (DR-1985)

Incident period: January 31, 2011 to February 5, 2011

Major Disaster Declaration declared on May 13, 2011

Counties Included: Creek, Craig, Jefferson, Logan, Mayes, Nowata, Okmulgee, Osage, Ottawa, Pawnee, Pottawatomie, Rogers, Stephens, Tulsa, Wagoner, Washington

Oklahoma Severe Storms, Tornadoes, and Straight-Line Winds (DR-1970)

Incident period: April 14, 2011

Major Disaster Declaration declared on April 22, 2011

Counties Included: Atoka, Pushmataha

The Federal Register Notice provides that funding under the CDBG DR Program must be used “for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas resulting from a major disaster.”

This Action Plan primarily focuses on the State’s proposed second allocation (\$83.1 Million) use of the Funding, specifically the immediate unmet needs of individuals and families for housing and business assistance affected by the multiple disasters as well as assisting local governments in repairing, rebuilding infrastructure as well providing for greater resiliency statewide. The State expects to use future allocations of CDBG DR Program funds by HUD to fund infrastructure and public facility rehabilitation and resilience efforts as well as to continue to address the unmet needs of homeowners, owners of multifamily dwellings.

Governor Fallin has designated the Department of Housing (“ODOC”) as the principal state agency for the administration of the Funding. ODOC will oversee the expenditure of the Funding to assist impacted residents, organizations and municipalities with their recovery and rebuilding efforts. ODOC will administer the Funding directly or through Units of Local Government (“ULG’s”) to benefit homeowners, property owners, business owners and other beneficiaries.

In accordance with the Federal Register Notice, the State is required to prepare and submit this Action Plan to describe the proposed use of the Funding, including:

- The proposed use of the Funding;
- The criteria for eligibility under any program or activity for which the Funding is to be used;
- How the use of the Funding will address the long-term recovery, restoration of housing, infrastructure and economic revitalization in most impacted and stressed areas;
- The process for Citizen Participation; and
- The standards for grant administration.

This Action Plan must be submitted to HUD within 120 days of the Effective Date of the Federal Register Notice (i.e. October 9th, 2014). The State must obtain HUD’s approval of the Action Plan before the State can access the Funding. The programs and activities set forth in this Action Plan and the policies, processes, and procedures in accordance with which ODOC will administer the Funding will comply with all applicable federal requirements, including all requirements specifically set forth in the Federal Register Notice. Without limitation, these requirements include the requirement that at least 44% of the Funding must be expended in the most affected areas in Cleveland and Creek Counties; that 50% must be expended to benefit low- and moderate-income (“LMI”) persons, and that all of the Funding must be used for eligible activities that achieve at least one of the three federally-mandated national objectives (each a “National Objective”): low- and moderate income benefit; elimination of slum and blight; and urgent need.

The Federal Register Notice also imposes strict expenditure and compliance deadlines on the State. Accordingly, HUD has strongly recommended that the State not request the entire Funding at the time of its submission of this Action Plan. Based on this advice, the State, like other states to which CDBG DR Program funds were allocated by HUD, will pursue the incremental obligation (tranches) of the Funding to support its tornado relief and restoration programs and activities (as applications are approved and projects become shovel ready) to ensure compliance with HUD's deadlines.

This Action Plan was developed after extensive public outreach, data collection, consultation and input from a host of stakeholders, constituents, organizations and other state agencies, as described in more detail in this Action Plan.

II. Disaster Impact and Response

Overview

As previously noted and as specified in the June 3, 2014 Federal Register Notice Vol. 79, No. 106, the State sustained multiple disasters occurring from 2011 to 2013. These disasters were far reaching throughout the fifty-seven (57) counties identified under the Presidential Disaster Declarations. Such disasters included; tornadoes, wildfires, flooding, straight-line winds, and winter snowstorms. Disaster related damage resulting from tornadoes (2013) and wildfires (2012) occurring in Cleveland and Creek counties respectively account for the majority of the disaster related damage. A Damage Assessment Report (August 6, 2013) covering the tornado disaster impact area appears as Appendix A in this Action Plan and contains a more detailed assessment of the Moore tornado event of 2013. This single disaster proved to be the most significant event of the Federal Register Notice time period.

Since the initial assessment of the storms' impact, inquiries have been made to the State of Oklahoma Department of Emergency Management to update disaster impacts. However, the Department reported that there is no additional State disaster information available. Because several years have passed and vigorous steps have been taken toward recovery, the State determined that a survey was needed to update recovery efforts and determine the unmet needs still existing. As mentioned previously, CDBG_DR funds must be used to cover "unmet" storm related disaster needs. Given these circumstances, the State prepared both mailed and emailed surveys to representatives of various units of general local governments (counties, cities, towns), HUD assisted housing, and LITHC housing located within the eligible disaster areas. US Census (American Community Survey) data was also examined as well to help better identify targeted groups which could possibly address the LMI requirement set forth in the Federal Register Notice.

The following list includes the Presidential Disaster Declarations and eligible counties accounted for under the eligible declaration. The listing also denotes the incident period in which the disaster occurred.

Oklahoma Severe Winter Storm (DR-4164)

Incident period: December 5, 2013 to December 6, 2013

Major Disaster Declaration declared on January 30, 2014

Counties Included: Choctaw, Le Flore, McCurtain, Pushmataha

Oklahoma Severe Storms and Tornadoes (DR-4117)

Incident period: May 18, 2013 to June 2, 2013

Major Disaster Declaration declared on May 20, 2013

Counties Included: Atoka, Canadian, Coal, Cleveland, Craig, Haskell, Hughes, Latimer, LeFlore, Lincoln, McClain, McIntosh, Nowata, Oklahoma, Okfuskee, Okmulgee, Ottawa, Pittsburg, Pottawatomie, Pushmataha, Seminole

Oklahoma Severe Winter Storm and Snowstorm (DR-4109)

Incident period: February 24, 2013 to February 26, 2013

Major Disaster Declaration declared on April 8, 2013

Counties Included: Alfalfa, Beaver, Beckham, Blaine, Custer, Dewey, Ellis, Garfield, Grant, Kay, Kingfisher, Major, Noble, Roger Mills, Washita, Woods, Woodward

Oklahoma Freedom and Noble Wildfires (DR-4078)

Incident period: August 3, 2012 to August 14, 2012

Major Disaster Declaration declared on August 22, 2012

Counties Included: Cleveland, Creek

Oklahoma Severe Storms, Tornadoes, Straight-line Winds, and Flooding (DR-4064)

Incident period: April 28, 2012 to May 1, 2012

Major Disaster Declaration declared on June 14, 2012

Counties Included: Alfalfa, Craig, Grant, Kay, Nowata

Oklahoma Severe Storms, Tornadoes, Straight-line Winds, and Flooding (DR-1989)

Incident period: May 22, 2011 to May 25, 2011

Major Disaster Declaration declared on June 6, 2011

Counties Included: Blaine, Caddo, Canadian, Craig, Delaware, Grady, Jefferson, Kingfisher, LeFlore, Logan, Major, McClain, Nowata, Osage, Ottawa

Oklahoma Severe Storms and Flooding (DR-1988)

Incident period: April 21, 2011 to April 28, 2011

Major Disaster Declaration declared on May 27, 2011

Counties Included: Adair, Cherokee, Delaware, Haskell, LeFlore, McIntosh, Muskogee, Okmulgee, Pittsburg, Sequoyah

Oklahoma Severe Winter Storm and Snowstorm (DR-1985)

Incident period: January 31, 2011 to February 5, 2011

Major Disaster Declaration declared on May 13, 2011

Counties Included: Creek, Craig, Jefferson, Logan, Mayes, Nowata, Okmulgee, Osage, Ottawa, Pawnee, Pottawatomie, Rogers, Stephens, Tulsa, Wagoner, Washington

Oklahoma Severe Storms, Tornadoes, and Straight-Line Winds (DR-1970)

Incident period: April 14, 2011

Major Disaster Declaration declared on April 22, 2011

Counties Included: Atoka, Pushmataha

III. Unmet Needs Assessment

Unmet need exists in the areas of housing, infrastructure, resiliency / mitigation and planning. Data to determine the unmet need was compiled from unmet need requests provided by an ODOC unmet needs survey conducted from June 26, 2014 through August 8, 2014. Disaster Recovery notification letters were individually mailed to each of the fifty-seven (57) disaster eligible counties across the State. Disaster Recovery notification letters were also mailed to each of the State's eleven (11) Substate Planning Districts. An email database of approximately three-thousand (3,000) from ODOC's *Community Developer* newsletter was also utilized in conjunction with the ODOC disaster recovery website. Additionally, supplemental data from HUD's Oklahoma City Field Office and FEMA was also used. The unmet needs survey was targeted at the fifty-seven (57) Oklahoma counties and their inclusive municipalities which qualified under the 2011, 2012, and 2013 Presidential Disaster Declarations as specified in

the Federal Register Notice. Below is a summary of the results from the survey contained in the ODOC disaster recovery notification letters. **Please note that these survey results are the initial response to the inquiry of the State’s unmet disaster needs. Because these unmet needs are based off simple requests and not substantiated by an official application, this listing DOES NOT reflect a final eligibility of such requested activities. The FINAL eligibility assessment will be conducted upon evaluation of an officially submitted Disaster Recovery application through the State’s OKGrants’ system.**

**CDBG DISASTER RECOVERY SECOND ALLOCATION (\$83.1 MILLION)
SURVEY SUMMARY – AS OF 8/8/2014 SUBMISSION DEADLINE**

- Total Submissions – 89 Units of General Local Government (UGLG’s)
- Total Disaster Funding Requested – **\$253,818,251.68**
- Total Individual Funding Activities Requested Among the 89 UGLG’s – 371
- Projects Directly DR Ineligible: 8 (\$3,542,289.75)
- Project Administration Directly Specified in Letter of Intent: 2 (\$2,222,869.98) Note: No Other UGLG’s Requested Administration Amounts as Part of the Letter of Intent.

- Cleveland County – (Cleveland / Norman) 67 Activities (\$49,221,000.00) Does NOT include OKC/Cleveland County Activities
- Creek County – 136 Activities (\$43,435,673.46)
- Oklahoma City – 22 Activities (\$87,501,550.00)
- Balance of State – 145 Activities (\$73,660,028.22)

- Activities Requested from 2011 Disaster Declarations: 125 (\$62,789,432.64)
- Activities Requested from 2012 Disaster Declarations: 181 (\$60,677,272.96)
- Activities Requested from 2013 Disaster Declarations: 62 (\$125,728,676.10)
- Activities Requested with Disaster Event Occurring Outside of Allowed Years (2011, 2012, & 2013): 1 Activity (\$2,400,000.00)

CDBG DR Categories (Total Request - \$253,818,251.68)

- **Housing** – 3 Activities (\$9,000,000.00) **3.5%**
- **Infrastructure** – 90 Activities (\$156,902,371.60) **61.8%**
- **Planning** – 10 Activities (\$15,403,444.00) **6.1%**
- **Public Facilities** – 14 Activities (\$1,748,582.64) **0.7%**
- **Resiliency** – 250 Activities (\$59,640,983.46) **23.5%** Includes: Emergency Equipment, Generators, Storm Sirens, Housing Clearance for Flood Plain Issues, Storm Shelters/Safe Rooms.
- **Economic Development** – 1 Activity (\$900,000 INELIGIBLE) **0.4%** Project DID NOT Relate To Disaster.

- **Administration** – 2 Activities (\$2,222,869.98) **0.9%** This amount will not reflect actual administration at the time of the final DR plan. This amount only shows what was included in the Letter of Intent listings. Federal guidance allows for up to 5% Administration.
- **UNKNOWN** – 1 (\$8,000,000.00) **3.2%** ****NOTE: Requested \$8 million in funding but did not provide any detailed list of requested DR activities.**

Housing Needs Assessment

Owner-Occupied Unmet Need

Unmet Housing needs comprised a relatively small 3.5% of the overall disaster unmet needs requests. Owner Occupied Housing (New Construction) resulting from wildfire destruction ranked behind Multifamily housing unmet need in terms of housing related monetary requests. Approximately 400 housing units in Creek County were identified by FEMA and confirmed by HUD to have sustained some level of damage in a 2012 wildfire event.

The experience following Gulf Coast and Northeastern storms suggests the level of owner occupied housing rehabilitation need:

- Increases in cost as supplemental damage is incurred post disaster;
- Increases in cost as local and state building codes are reset;
- Is undercounted initially due to evacuation, program misunderstanding by potential applicants, undocumented families' reluctance to request benefits; and voluntary household relocation

In addition, the State requires that any housing subsidized with federal dollars meet the applicable State or local code. The base unmet need as identified by FEMA and the municipalities was increased by 10% to account for the factors noted.

FEMA data for the affected areas of the State indicate approximately 19% of owners were uninsured statewide with widely divergent results on a county by county basis.

Multifamily Unmet Need

Multifamily housing unmet need ranked first in terms of overall housing related monetary requests. Only one unmet needs survey response was received by the deadline from eligible municipalities, public housing authorities. The survey response located within the City of Mannford for a forty (40) unit elderly housing complex for a total of \$5,000,000 in unmet need.

Homelessness, Transitional and Supportive Facilities, Units and Populations

To date, the State has received information identifying a subsidiary of the Oklahoma City Public Housing Authority has having an unmet need for physical or structural repairs. No other entity has identified a need for financial assistance to address an increase in homeless individuals or families or physical damage to homeless or transitional housing facilities for any of the events covered by the Federal Register Notice.

As the State continues to work on recovery efforts, and continues planning activities for future disasters, it will continue to reach out to public housing authorities, owners/operators of HUD-assisted housing, homeless service and shelter providers, as well as the owners and managers of both transitional and permanent housing for the homeless in order address any newly identified unmet needs that may arise.

Should information relative to unmet need associated with alleviating the pressures of homelessness associated with the devastation caused by the storm become apparent, the State is committed to allocating any necessary resources from the next allocation of funding, consistent with all federal requirements and obligations. (The State of Oklahoma receives Emergency Shelter Grant Funding and Special Needs Grant funding to support homeless and transitional housing needs in the Oklahoma City area.

Economic Revitalization Needs Assessment (Impact to the State's Economy)

No CDBG DR eligible Economic Revitalization unmet needs survey responses were received. The multiple disasters impacted the State's economy by temporarily or permanently specific economic activity, including, for example, cancelled tourist visits, forgone business revenue due to shuttered offices, and wages not paid to workers who could not work during the storm and in its aftermath. In addition, the physical damage to residential housing, commercial buildings, public facilities, infrastructure and business equipment and inventory required new unplanned expenditures that diverted funds that could otherwise be reasonably expected to have been directed towards savings and investment. This could be viewed as a reduction in the State's wealth and stock of productive resources.

Separately, damages to public infrastructure such as roads, drainage as well as compromised water and electrical utility systems have caused significant interruption on the State's economy and have had a corresponding negative impact on businesses trying to recover after the storm.

Infrastructure Needs Assessment

Based on the State's needs assessment survey, public outreach and FEMA reports, it is clear that unmet infrastructure needs rank number one due to sustained significant damage to infrastructure as a result of the

multiple disasters occurring over the past three years (2013, 2012, 2011). It should be noted that infrastructure stands as the single largest category in terms of unmet needs among all eligible CDBG DR categories as defined by this Action Plan. Unmet infrastructure needs comprised 61.8% of the overall disaster unmet needs requests.

Infrastructure unmet needs are, for the purpose of this Action Plan, limited to the repair and replacement of existing infrastructure. This includes the construction of new infrastructure or ‘hardening’ of existing infrastructure damaged due to the subsequent disasters occurring in 2011, 2012, and 2014.

The largest unmet need identified to date in the area of infrastructure is the repair or replacement of roads and drainage systems. These two categories combined constitute 57% of the total infrastructure repair and replacement activities identified. In total, nearly 51% of the activities identified as having unmet needs are located in Oklahoma and Cleveland counties.

TABLE 2: INFRASTRUCTURE UNMET NEED

Activity	Percent of Total	Total Unmet Need	Creek County	Cleveland County	Balance of State
Drainage	34%	\$52,615,888	\$0	\$0	\$52,615,888
Roads	23%	\$35,547,085	\$1,200,000	\$27,876,938	\$6,470,147
Water & Sewer	23%	\$36,470,337	\$7,298,000	\$24,055,000	\$5,117,337
Bridges	18%	\$28,497,547	\$0	\$16,627,000	\$11,870,547
Other	2%	\$771,514	\$0	\$0	\$771,514
TOTALS	100%	\$153,902,372	\$8,498,000	\$68,558,938	\$76,845,434

Infrastructure projects represent a wide range of unmet need encompassing numerous types of infrastructure repair, including, for example, repairing or replacing roads and bridges damaged during the multiple disasters and in their subsequent clean-up.

Infrastructure activities will include the construction or reconstruction of drainage systems. The State’s needs assessment indicates a large unmet need for infrastructure repairs related to damaged drainage systems. Road repairs can be noted as following as a close second in terms of unmet infrastructure needs. Anticipated uses of infrastructure funds are expected to include a focus on road and drainage improvements.

Moreover, the calculation of unmet needs in the infrastructure and public facilities areas is not intended to be comprehensive as much of the necessary data is not yet available. The State will continue to collect and analyze data in connection with future allocations of funding under the CDBG DR Program.

Public Facilities Needs Assessment

Unmet Public Facilities needs comprised a small 0.7% of the overall disaster unmet needs requests. The State has identified several public building projects as directly ineligible CDBG DR funding. This reduced the overall actual number of requests. These ineligible projects related to miscellaneous public building maintenance / repairs that could not be directly attributed to storm damage. Overall, public facilities projects represent a very small portion of the overall demonstrated unmet need.

Mitigation & Resiliency Needs Assessment

Based on the State’s needs assessment survey and public outreach, demand exists for resiliency / mitigation investments. One aspect of this category is the establishing safe rooms or shelters in private residences and public facilities. Since the multiple disasters occurring in 2011, 2012 and 2013, there has been a large public demand to create safe rooms or install storm shelters in owner occupied units. The State expects to respond to this demand by including safe rooms or residential shelters in rehabilitation and reconstruction efforts statewide by prioritizing both the need and cost of shelters statewide.

TABLE 3: RESILIENCY / MITIGATION UNMET NEED

Activity	Percent of Total	Total Unmet Need	Creek County	Cleveland County	Balance of State
Storm Shelter / Saferoom	8%	\$5,984,808	\$0	\$0	\$5,984,808
Clearance / Demolition	25%	\$18,675,000	\$300,000	\$0	\$18,375,000
Equipment (Misc)	67%	\$50,917,806	\$24,129,399	\$5,271,000	\$21,517,407
Other	0%	\$0	\$0	\$0	\$0
TOTALS	100%	\$75,577,614	\$24,429,399	\$5,271,000	\$45,877,215

Resiliency / Mitigation projects represent a wide range of unmet need encompassing numerous types of activities. Resiliency / Mitigation activities will include the clearance / demolition of houses in identified floodplain areas. The State’s needs assessment also indicates a large unmet need for infrastructure repairs related to damaged drainage systems. Anticipated uses of funds in this activity area are expected to include a focus on storm shelters / safe rooms and providing emergency equipment.

Moreover, the calculation of unmet needs in the resiliency / mitigation areas is not intended to be comprehensive as much of the necessary data is not yet available. The State will continue to collect and analyze data in connection with future allocations of funding under the CDBG DR Program. As indicated in the earlier first allocation of CDBG DR (\$10.6 million) Action Plan, a comprehensive statewide Disaster / Housing Needs survey has been funded to provide the following data.

1. County Level Threat and Hazard Identification/Risk Assessment – Example: Identify areas subject to natural disasters and potential manmade hazards. Provide historical overview of continuous threats such as tornadoes/wind storms, floods, ice storms, fire, and drought.
2. Disaster Risk Sustainability – Example: What storm shelters are available to include Location (both Public & Private)? Provide Capacity. Any there any structures in place designed to provide any type of disaster mitigation? If so, provide type and location.
3. Public Policy and Governance to Build Disaster Resiliency – Example: Examine local building codes, Examine hazard mitigation regulations. Provide regulatory recommendations.
4. Post Disaster Resource Network – Example: Local Emergency Response Agency Structure.
5. Threat & Hazard Warning Systems – Example: Identify any areas that lack sufficient disaster warning systems such as sirens.
6. The market penetration of safe rooms and residential shelters by County and/or entitlement – Examples: What percentage of homeowners have safe rooms? What is the estimated cost of achieving 100% penetration by County and entitlement?
7. The market penetration of residential shelters in multifamily developments by County and/or entitlement – Examples: What percentage of multifamily have shelters? What is the estimated cost of achieving 100% penetration by County and entitlement?
8. The market penetration of residential shelters in HUD assisted and LIHTC multifamily developments by County and/or entitlement – Examples: What percentage of multifamily have shelters? What is the estimated cost of achieving 100% penetration by County and entitlement?
9. Calculate number and locate community based shelters in residential communities.

IV. Proposed Allocation of the Funding

The funding allocation as evidenced in the table #4 was created as a result of several limiting factors and considerations. Some of these factors included Federal Register Notice CDBG DR guidelines, damage analysis, surveys, US Census data, and of course the Action Plan submission deadline to HUD. Considerations involving public input and especially the amount of available funding also restricted the overall scope of the program at this time.

As demonstrated earlier by this Action Plan, the total amount of nearly \$254 million, unmet need far exceeds the current \$83.1 million allocated CDBG DR funding as identified in the Federal Register Notice. It is hoped that this demonstration of unmet need may inspire an additional round of CDBG DR funding. Clearly, given these figures there is still a sufficient amount of unmet disaster need to be addressed within the state. Should any additional future rounds of funding result, the State will consider these additional unmet needs that couldn't be funded under the previous two funding allocations.

A summary of the proposed allocations by activity category is set forth in the table below. These needs are representative of the information provided via real-time feedback from surveys and direct public inquiry (email, telephone, public hearing) to ODOC at the time of CDBG DR Action Plan submission to HUD.

ODOC/CD is currently accepting CDBG DR applications through the State's online OKGrants' system. The State has reviewed and preliminarily approved several applications for disaster funding at this time. The State will continue to accept and evaluate CDBG DR applications for ELIGIBLE disaster recovery activities as long as funding and time restrictions permit. Any additional requested disaster activity funding will be subject to the same expenditure and compliance deadlines set forth in the Federal Register Notice and CDBG DR program selection priorities established by the State.

Additionally, ODOC/CD reserves the right to adjust any of the CDBG DR funding to ensure maximum utilization of funds. Such CDBG DR "Reuse" funding adjustments shall be the minimum amount necessary to fund projects efficiently. CDBG DR Reuse funds are defined as the funds available from the cancellation of projects; from projects completed under budget; or from funds designated but not allocated. The CDBG DR Reuse funding is also being made available to offset any unforeseen project eligible cost increases such as in the case of construction. All CDBG DR Reuse funding will be subject to the same expenditure and compliance deadlines set forth in the Federal Register Notice.

Currently, ODOC/CD has reviewed and approved applications for the following activity categories shown in the table below. The total allocation amount below reflects \$60,148,668 in CDBG DR funding or approximately 72% of the total \$83.1 million authorized CDBG DR (Second Allocation) funding for the State of Oklahoma. As stated previously, the State will continue to accept and evaluate CDBG DR applications for ELIGIBLE disaster recovery activities as long as funding and time restrictions permit.

TABLE 4: STATE OF OKLAHOMA: CDBG DR Second Round (\$83.1 Million) Proposed Allocations

Activity	Proposed Allocation	Request for Partial Allocation
Housing (Owner-Occupied and Multi-family Housing)	\$ 5,000,000	\$5,000,000

Infrastructure	\$47,970,917	\$6,278,227
Resiliency & Mitigation	\$4,500,000	\$4,500,000
Public Facilities	\$0.00	\$0.00
Economic Revitalization	\$0.00	\$0.00
Planning	\$0.00	\$0.00
Administration	\$2,677,751	\$883,016
TOTAL	\$60,148,668	\$16,661,243
FUTURE RESERVED DR FUNDING	\$22,951,332	-----
ALLOCATION TOTAL	\$83,100,000	-----

Consistent with the Federal Register Notice, the primary purpose of the Funding is to address the immediate unmet needs of our most impacted counties. The State’s allocation of the Funding by activity is guided by several critical federal requirements set forth in the Federal Register Notice. All of the programs to be administered in the activity categories identified in the table above, with the exception of Administration and Planning, will achieve one or more of the National Objectives:

- First, the Federal Register Notice requires that not less than 44% of the Funding must be used to provide assistance in Cleveland and Creek Counties. HUD has explained that this requirement was largely based on where registrants who sought assistance from FEMA and SBA were geographically concentrated. The remaining funds may be expended by eligible UGLG’s throughout the balance of state in counties identified by 2011, 2012, and 2013 Presidential Disaster Declarations.
- Second, all activities, with the exception of Administration and Planning, must meet at least one of the National Objectives.
- Third, at least 50% of the Funding (together with all related future allocations of CDBG DR Program funds) must meet the Low/Moderate Income Benefit National Objective. As a result, the State must be able to demonstrate that the Funding is being expended to assist LMI persons.
- Fourth, while homeownership assistance may be provided to households up to 120% of AMI, however, only those funds used to serve households with up to 80% of AMI may qualify as meeting the low- and moderate-income person benefit national objective.
- Finally, the Funding cannot be used to assist second homes (as defined in IRS Publication 936) or private utilities.

The State's first priority with the Funding is to get funding to as many affected residents as possible in order to assist them in repairing their homes and small businesses so they can get their lives back in order and get the local economy back in business. With this priority in mind, the State has developed additional factors to determine allocations of the Funding down to the level of specificity required by HUD.

The following additional factors (priorities) will guide the allocation of Funding:

- The State's estimate of the unmet needs in the activity areas for which the Funding can be used.

The State's estimates are based on its review of Census data, data from FEMA, SBA, and the Oklahoma Insurance Commission (OIC), and the results of the surveys designed by the State and submitted to the State by municipalities, public housing authorities and other local stakeholders in the eligible areas.

The unmet needs estimate is necessarily preliminary. The State recognizes that the actual needs of the State's communities in the aftermath of the disasters will change as recovery and rebuilding programs are implemented. As such, the State continues to receive and evaluate new or revised data pertaining to unmet needs and the availability of funding from private insurance, FEMA, SBA and other sources. The State's estimate of the both the number of homes and businesses affected by the disasters as well as the magnitude of unmet needs will continue to be refined.

The focus of this Action Plan is on infrastructure, resiliency and Housing needs. Since much of the necessary data is still being gathered and analyzed by the State, regional planning organizations and units of local government, and since future allocations (*Subject to Federal Funding*) of CDBG DR Program funding will focus on unmet infrastructure and public facility's needs, a description of the allocation of such future funds will be set forth in any future plan required in connection with such funds.

- The prioritization of (a) infrastructure, resiliency, and housing activities and other activities that directly addresses an urgent unmet need and can be commenced with minimal delay and thereafter completed promptly and (b) in the case of more complicated projects, necessary planning and predevelopment work that will facilitate the speedy commencement and completion of such projects when additional funds are allocated to the State.
- The availability of sufficient funds to efficiently and effectively administer the Funding in compliance with all applicable law.
- Direct Relationship-Disaster Area. All projects must show a direct relationship to the 2011, 2012, and 2013 Disaster Declarations and must be located in the impact area. Projects must show the damage that still

needs to be addressed (unmet need) or the mitigation/resiliency measures to be taken to prevent or lessen the impacts of a future related disaster.

- Readiness to Proceed. Each project must be capable of being undertaken (design and construction) immediately to provide outcomes to intended beneficiaries affected by the disaster. All projects must include a project timeline that allows ODOC to meet the Federal Expenditure deadline of September 30, 2019.
- Feasibility. Each project must be found to be financially feasible, sustainable and likely to contribute to the long-term recovery of the disaster impacted community.
- Disaster Declaration Priority. Projects addressing 2013 damage will be provided priority followed by 2012 and then 2011. It is noted that damage has been already been addressed with each older disaster declaration.

Housing (Rehabilitation, Reconstruction & New Construction)

Allocation \$7,137,075.38

Single Family

Single family housing was addressed earlier under the previous CDBG DR first round allocation (10.6 Million). Due to CDBG DR second round (83.1 Million) funding priorities and limited funding, there are no planned single family activities.

Multi-family Housing

The estimate for Multi-Family Rental Housing Rehabilitation (Eligible Rehabilitation and Preservation Activities 24 CFR 570.202 LMH/LMI) is \$5,000,000. The State is addressing the unmet need in Public Housing in the multifamily proposed allocation. Over 400 housing units in Creek were identified by FEMA and confirmed by HUD to have sustained some level of damage in the 2012 wildfire event. All housing related activities will be accomplished within Creek County based on needs assessment and public outreach.

HUD-assisted Housing, McKinney-Vento funded shelters, other HUD Properties

The State conducted extensive outreach to Low Income Housing Tax Credit (LIHTC) affordable housing, HUD Assisted housing, and McKinney-Vento funded shelters. As previously mentioned, statewide (seventy-seven county) resiliency / housing study conducted under the earlier \$10.6 million CDBG DR (First Allocation) funding will provide valuable information to the State regarding resiliency and housing related issues. This in turn will

allow the State to more readily address these issues in the future. All known HUD Assisted and Low Income Housing Tax Credit affordable housing developments were surveyed to identify damage associated with the storm events. Four survey responses were received that identified \$170,000 unmet need in multi-family housing rehabilitation assistance. All responses were located within the Oklahoma City metro area.

There were no transitional, supportive housing or other Continuum of Care or McKinney-Vento sponsored housing reporting any storm related damage at this time. Consequently, the State has not reserved any of CDBG DR funding specifically to address the rehabilitation, reconstruction or replacement of any McKinney-Vento funded shelters and housing for the homeless – including emergency shelters and transitional and permanent housing for the homeless.

As noted previously, the State will continue to collect data in regard to these fore-mentioned housing programs and consider any unmet need request should it be reported and consider the unmet should a second round of disaster funding emerge.

Housing Goals

The State's housing recovery programs are designed to meet the unmet housing needs of the communities most impacted by disaster (i.e. the costs of repairs, reconstruction and new construction that insurance, FEMA and any other sources of funding does not cover). The objectives of the housing programs include helping people directly affected by disaster related to wildfire damage by:

1. Replacing and rehabilitating homes, including identifying opportunities for mitigation enhancement measures;
2. Improving the resilience of their homes while restoring their buildings/residences;
3. Assisting homeowners, multifamily property owners and public housing authorities in completing applications for funding; and
4. Directing homeowners, multifamily property owners and public housing authorities to additional potential sources of funding.

To pursue these objectives, the State has developed a program that incorporates best practices from past disasters; builds upon stakeholder input from agencies and relevant organizations across the affected counties to ensure the diverse needs of residents and communities are appropriately addressed.

The State's strategy will balance speedy response with proper planning, and support while considering and incorporating the distinct needs and resources of different communities the members of those communities.

The State will manage all program operations and ensure that all appropriate accountability and oversight mechanisms in place.

Eligibility Threshold Requirements

- Unmet Needs – Funding is available solely to address unmet needs;
- Eligible/Fundable – each property must be determined to be an eligible and fundable activity under the Housing and Community Development Act as modified by the Federal Register Notice and all other applicable regulations and guidance, including, without limitation, the following activities:
 - Acquisition of real property; buyouts; code enforcement; relocation assistance; new construction, reconstruction and rehabilitation of residential and nonresidential properties; new construction, reconstruction and rehabilitation of public housing; American Disability Act improvements; fair housing counseling; homeownership counseling and assistance; and actions to meet the State’s certification to affirmatively further fair housing.
- Impacted and Distressed Area – each property must be located within a disaster eligible area;
- Readiness to Proceed – each property must be capable of being undertaken immediately to provide outcomes to intended beneficiaries affected by the disaster;
- Feasibility – each property must be found to be financially feasible, sustainable and likely to contribute to the long-term recovery of disaster impacted communities; and
- Consistency with Consolidated Plan/Action Plan – each property must be reflective of the goals, priorities and requirements of the State of Oklahoma’s 2014-2018 Consolidated Plan.
- No portion of the Funding may be used to reimburse the applicant for costs incurred prior to their application.

Funding Priorities

- Projects that benefit LMI persons and/or are located in LMI Areas (i.e. an area with household incomes at or below 80% of the area median income);
- Projects that enable the State to satisfy the federal requirement that at least 44% of the Funding be spent in Cleveland and Creek Counties;

- Projects that include deep income targeted units (i.e. units for extremely low income persons or families, the homeless or persons at risk of becoming homeless);
- Projects that address conditions that threaten the health and safety of either the occupants or the public;
- Projects that contribute significantly to the long-term recovery and economic revitalization of the affected area;
- Projects undertaken on behalf of a beneficiary or sponsor that commits to contribute financially in the repair, construction or mitigation of the project (this can be through private insurance, NFIP, FEMA, SBA, and/or other sources); and
- Mitigation – cost effective resiliency and other activities designed to harden the property in order to minimize reoccurrence of storm damage whenever possible or to protect households from future disasters by providing safe rooms or storm shelters.
- Readiness to Proceed. Each project must be capable of being undertaken (design and construction) immediately to provide outcomes to intended beneficiaries affected by the disaster. All projects must include a project timeline that allows ODOC to meet the Federal Expenditure deadline of September 30, 2019.
- Direct Relationship-Disaster Area. All projects must show a direct relationship to the 2011, 2012, and 2013 Disaster Declarations and must be located in the impact area. Projects must show the damage that still needs to be addressed (unmet need) or the mitigation/resiliency measures to be taken to prevent or lessen the impacts of a future related disaster.

Multifamily Rehabilitation Program

The Multifamily Rehabilitation program will provide financial assistance to rehabilitate LMI units in eligible multifamily properties with unmet need, including public housing, HUD-assisted housing, McKinney-Vento funded shelters and housing for the homeless, which were damaged by the wildfires in Creek County.

The general requirements of this program are as follows:

1. Eligible applicants include owners of existing low moderate income (LMI) multifamily properties (for-profit and non-profit owners as well as public housing authorities);
2. An eligible applicant's property must have been directly affected by an eligible disaster;

3. Each property to be assisted must have been insured at the time of the storm;
4. Each property to be assisted must be current on property taxes, if applicable (“current on property taxes” includes being in compliance with a payment plan or stipulated agreement with the taxing entity);
5. Each property must have a minimum of five units (applicants may aggregate existing units to meet the threshold of five units);
6. Properties to be assisted must meet applicable local codes or rehabilitation standards at completion;
7. The owner/developer must submit a relocation plan that conforms to the Uniform Relocation Act (the “URA”), if applicable;
8. The owner must propose the financial structure, which, at a minimum shall meet all of the following criteria:
 - a. CDBG DR Program funds are used as gap financing in the form of a subordinate debt, which may be secured by a mortgage;
 - b. CDBG DR Program funds are limited to the hard and soft costs of rehabilitation;
 - c. The application accounts for the expenditure of all benefits received prior to application, including:
 - i. insurance payments;
 - ii. FEMA or SBA payments
 - iii. Cash or other benefits provided by any charitable organization in connection with the project;
 - iv. Other federal, State or local financial assistance provided in connection with the project
9. All properties assisted with CDBG DR Program funds shall be encumbered with a lien for a period to be determined by ODOC or its assigns based standard underwriting of the project;
10. The property and the applicant meet all of the federal, State and local requirements of eligibility and underwriting for the Funding and all other applicable federal requirements;

Infrastructure

Allocation \$59,102,671.87

The State has identified several units of local governments that have proposed infrastructure projects with unmet needs due mostly in part to flooding and road deterioration brought about from various disasters and the debris clean-up following the disasters.

There are a number of infrastructure projects that have the potential to affect the health, safety and welfare of the local community and are therefore urgent priorities. The State's allocation for infrastructure projects will focus on unmet needs that are urgent in nature and can be immediately addressed, including, but not limited to drainage repairs and critical road repairs.

Infrastructure Goals

The primary goal of Oklahoma's CDBG DR disaster recovery program with regard to infrastructure is to restore a suitable living environment in disaster impacted areas by rehabilitating or reconstructing infrastructure, particularly though exclusively where such infrastructure primarily serves LMI persons. The State also intends to make infrastructure repairs in a manner that supports energy conservation/efficiency objectives and responsible growth as well as transit-oriented development.

Infrastructure projects will be selected on a basis modeled after the Small Cities CDBG Program.

As previously noted, it is not expected that this amount is sufficient to address a large portion of the State's unmet infrastructure needs. HUD has indicated that future CDBG DR funding will be intended primarily for unmet infrastructure, public facility and mitigation "only" needs.

Infrastructure Program

The proposed allocation from the CDBG DR funding specifically for infrastructure activities will be the largest allocation. As previously noted, it is not expected that this amount is sufficient to address a large portion of the State's unmet infrastructure needs. HUD has indicated that future CDBG DR funding will be intended primarily for unmet infrastructure, public facility and mitigation "only" needs. The State will more fully address its infrastructure needs when such future funds are allocated.

Eligibility Threshold Requirements

- Pursuant to the Federal Register Notice, the requested activity must relate to direct physical damage inflicted to the infrastructure as a result of the qualifying disaster;
- Unmet Needs – Funding is available solely to address unmet needs;

- Eligible/Fundable – each project must be determined to be an eligible and fundable activity under the Housing and Community Development Act as modified by the Federal Register Notice and all other applicable regulations and related guidance;
- Impacted and Distressed Area – each project must be located in an area directly impacted by a Presidentially Declared Disaster;
- Readiness to Proceed – each project must be capable of being undertaken (design or construction) immediately to provide outcomes to intended beneficiaries effected by the disaster;
- Feasibility – each project must be found to be financially feasible, sustainable and likely to contribute to the long-term recovery of disaster impacted communities; and
- Consistency with Consolidated Plan/Action Plan – each project must be reflective of the goals, priorities and requirements of the State’s 2014-2018 Consolidated Plan.

Funding Priorities

- Projects that primarily benefit LMI persons and/or are located in LMI Areas (i.e. an area with household incomes at or below 80% of the area median income);
- Projects that enable the State to satisfy the federal requirement that at least 44% of the Funding be spent in Cleveland and Creek counties;
- Projects that address conditions that threaten the health and safety of either the occupants or the public;
- Projects that contribute significantly to the long-term recovery and economic revitalization of the affected area;
- Projects undertaken on behalf of a beneficiary or sponsor that commits to contribute financially in the repair, construction or mitigation of the project (this can be through private insurance, NFIP, FEMA, SBA, and/or other sources); and
- Mitigation – includes only a minimum of rehabilitation beyond the correction of conditions caused by the disaster.
- Readiness to Proceed. Each project must be capable of being undertaken (design and construction) immediately to provide outcomes to intended beneficiaries affected by the disaster. All projects must

include a project timeline that allows ODOC to meet the Federal Expenditure deadline of September 30, 2019.

- **Direct Relationship-Disaster Area.** All projects must show a direct relationship to the 2011, 2012, and 2013 Disaster Declarations and must be located in the impact area. Projects must show the damage that still needs to be addressed (unmet need) or the mitigation/resiliency measures to be taken to prevent or lessen the impacts of a future related disaster.
- **Feasibility.** Each project must be found to be financially feasible, sustainable and likely to contribute to the long-term recovery of the disaster impacted community.
- **Disaster Declaration Priority.** Projects addressing 2013 damage will be provided priority followed by 2012 and then 2011. It is noted that damage has been already been addressed with each older disaster declaration.
- **Unmet Needs.** Projects which address damage by the declared disaster and has not been yet addressed.
- **Direct Health and Safety.** Projects that specifically address the health and safety of either individual households or the community as a whole.

Infrastructure activities will include the construction or reconstruction of streets/roads and drainage systems. The States needs assessment indicates a large unmet need for infrastructure repairs related to damaged streets/road and drainage systems.

A majority of the infrastructure funds will be utilized to make drainage and infrastructure improvements to the areas within the States most impacted areas such as Cleveland County, Creek County, and Oklahoma City. Most of the street/road improvements are required due to the heavy volume of trucks used for hauling away large amounts of debris resulting from the storm damage.

Public Facilities

Allocation: \$0

The State has vigorously pursued public input regarding determination of disaster related unmet needs within the identified disaster areas. At this time, the State has not received any Disaster Recovery funding requests for Public Facilities projects with unmet needs that exhibit a priority of need Unmet need. Public Facilities is not an identified funding priority. Given funding constraints, the State will not be funding Public Facilities at this time.

Economic Revitalization

Allocation: \$0

The State has vigorously pursued public input regarding determination of disaster related unmet needs within the identified disaster areas. While overall, many businesses were affected by the storm(s); the vast majority had insurance and are or have been rebuilt. Given the amount of the CDBG DR allocation and the high level of insured commercial losses and lack of sufficient disaster funding at this time, the State cannot make this category the highest priority.

3. Due to limited funds, a preference will be given to businesses located in LMA's or operated by Section 3 eligible applicants.
4. Due to Federal Register Notice requirements, the state will give preference to business equipment or business structural repairs to Cleveland or Creek County, the counties most impacted and specifically addressed in the Federal Register Notice as funding priorities.

Mitigation & Resiliency

Allocation: \$20,200,983.22

Resilience Goals

The State's primary goal through resiliency programs and projects is to reduce the potential for loss of life and economic loss in a future storm. The State recognizes that future disasters may severely damage homes, businesses, infrastructure, and public facilities in municipalities throughout Oklahoma.

One such activity under the Mitigation and Resiliency category could include Storm Shelter/Safe Room Installation Programs (Eligible Rehabilitation and Preservation Activities 24 CFR 570.202 LMH/LMI).

Eligibility Threshold Requirements

- Pursuant to the Federal Register Notice, the requested activity must relate to direct physical damage inflicted to the public facility or infrastructure as a result of the qualifying disaster;
- Projects that benefit LMI persons and/or are located in LMI Areas (i.e. an area with household incomes at or below 80% of the area median income);
- Projects that enable the State to satisfy the federal requirement that at least 44% of the Funding be spent in Cleveland and Creek counties;

- Projects that address conditions that threaten the health and safety of either the occupants or the public;
- Projects that contribute significantly to the long-term recovery and economic revitalization of the affected area;
- Projects undertaken on behalf of a beneficiary or sponsor that commits to contribute financially in the repair, construction or mitigation of the project (this can be through private insurance, NFIP, FEMA, SBA, and/or other sources); and
- Mitigation – includes only a minimum of rehabilitation beyond the correction of conditions caused by the disaster;
- Fundable – (Stormshelter / Safe Room -There must be funds available to provide the rebate;
- Eligible – (Stormshelter / Safe Room - To be eligible, a person must be the homeowner and resident of a single-family residence. Public Schools will also be eligible under this resiliency category;
- Primary Residence - (Stormshelter / Safe Room -The residence where the storm shelter is installed must be the primary residence of the homeowner;
- Meets or Exceeds FEMA Standard – (Stormshelter / Safe Room -The storm shelter must meet or exceed the requirements established in FEMA Publication 361 as determined by a City inspector.

Funding Priorities

- Projects that primarily benefit LMI persons and/or are located in LMI Areas (i.e. an area with household incomes at or below 80% of the area median income);
- Projects that enable the State to satisfy the federal requirement that at least 44% of the Funding be spent in Cleveland and Creek counties;
- Projects that address conditions that threaten the health and safety of either the occupants or the public;
- Projects that contribute significantly to the long-term recovery and economic revitalization of the affected area;
- Projects undertaken on behalf of a beneficiary or sponsor that commits to contribute financially in the repair, construction or mitigation of the project (this can be through private insurance, NFIP, FEMA, SBA, and/or other sources); and

- Mitigation – includes only a minimum of rehabilitation beyond the correction of conditions caused by the disaster.
- Readiness to Proceed. Each project must be capable of being undertaken (design and construction) immediately to provide outcomes to intended beneficiaries affected by the disaster. All projects must include a project timeline that allows ODOC to meet the Federal Expenditure deadline of September 30, 2019.
- Direct Relationship-Disaster Area. All projects must show a direct relationship to the 2011, 2012, and 2013 Disaster Declarations and must be located in the impact area. Projects must show the damage that still needs to be addressed (unmet need) or the mitigation/resiliency measures to be taken to prevent or lessen the impacts of a future related disaster.
- Feasibility. Each project must be found to be financially feasible, sustainable and likely to contribute to the long-term recovery of the disaster impacted community.
- Disaster Declaration Priority. Projects addressing 2013 damage will be provided priority followed by 2012 and then 2011. It is noted that damage has been already been addressed with each older disaster declaration.
- Unmet Needs. Projects which address damage by the declared disaster and has not been yet addressed.
- Direct Health and Safety. Projects that specifically address the health and safety of either individual households or the community as a whole.

Planning

Allocation: \$0.00

HUD guidelines allow the State to opt to expend up to 15% of its CDBG DR Program funding allocation on planning activities. The State does not intend to expend its planning activity allocation to assist in the planning processes associated with the redevelopment of storm impacted areas during this second allocation of disaster recovery funding. The State has already commissioned a statewide (seventy-seven county) resiliency / housing study under the first round CDBG DR (\$10.6 million) Action Plan and will be spending up to \$500,000 in Planning activities to assist in the long term planning statewide.

Planning Goals

As mentioned previously, the State commissioned a statewide (seventy-seven county) resiliency / housing study and will be spending up to \$500,000 under the first round CDBG DR (\$10.6 million) Action Plan in Planning activities

to assist in the long term planning processes associated with improving resiliency and mitigation of housing statewide and in defining the overall housing market.

It is important for Oklahoma to be proactive in anticipation of future natural disasters. Accordingly, study will assist in the long term planning processes associated with improving resiliency and mitigation of housing statewide and in defining the overall housing market. Specifically, the statewide seventy-seven county (77) housing / resiliency study with the following purposes:

7. To establish the housing baseline for long term planning efforts;
8. To identify high risk Counties and Entitlements based on historic records of natural disasters including tornadoes, storms, wildfires and earthquakes;
9. To establish the current level of housing resiliency and mitigation codes at the county and entitlement level;
10. To identify existing storm shelters that are publically accessible by County and/or entitlement;
11. To define the market penetration of safe rooms and residential shelters by County and/or entitlement (i.e., what percentage of homeowners have safe rooms) and to determine the estimated cost of achieving 100% penetration by County and entitlement.
12. To identify the market penetration of residential shelters in HUD assisted, LIHTC and all other multifamily developments by County and/or entitlement, and to determine the estimated cost of achieving 100% penetration of multifamily properties by County and entitlement.

Long-Term Recovery Planning

The State will continue to monitor long term recovery planning. As previously mentioned, the state-wide resiliency / housing survey will valuable information to the State regarding resiliency and housing related issues. This in turn will allow the State to more readily address these issues in the future.

Administration

Allocation: \$1,632,567.41

The State will act as the lead agency for the overall administration of the CDBG Disaster Recovery funding. The State will administer and utilize sub-grantees to disburse the CDBG Disaster Recovery funding directly to benefit homeowners, multifamily property owners, and other eligible beneficiaries of the funding. Administration of the CDBG Disaster Recovery funding by the State will ensure that program activities reach affected residents in

a consistent and coordinated manner. The State will implement the programs and activities detailed in this Action Plan primarily through dedicated staff, consultants and third-party contractors.

The third-party contractors to be retained by ODOC and/or the ULG's will vary by activity category (i.e. Homeowner Rehabilitation, Multifamily Rehabilitation/Mitigation, Infrastructure, Economic Revitalization, Public Facilities, and Planning) and will include, but not be limited to:

- Application Intake and Evaluation (specifically for Homeowner programs);
- Architectural and Engineering services;
- Environmental Review services (including historic preservation review);
- Legal services;
- Construction Management services; and
- General Contracting (including subcontracting).

The ODOC staff dedicated to the administration of the Funding will be responsible for complying with the significant federal requirements related to financial management and control, programmatic compliance and monitoring, affirmative fair housing, the prevention of fraud, waste and abuse. These staff members will be responsible for administering all aspects of the State's CDBG DR Program, including oversight of all contractors, working with individual applicants, processing the necessary payments, tracking projects and program activities, reporting in the federal Disaster Recovery Grants Administration (DRGR) system, as well as coordinating the activities of other state agencies in relation to d i s a s t e r recovery.

The ODOC staff dedicated to the administration of the Funding will be responsible for complying with the significant federal requirements related to financial management and control, programmatic compliance and monitoring, affirmative fair housing, the prevention of fraud, waste and abuse. These staff members will be responsible for administering all aspects of the State's CDBG DR Program, including oversight of all contractors, working with individual applicants, processing the necessary payments, tracking projects and program activities, reporting in the federal Disaster Recovery Grants Administration (DRGR) system, as well as coordinating the activities of other state agencies in relation to the Tornado recovery.

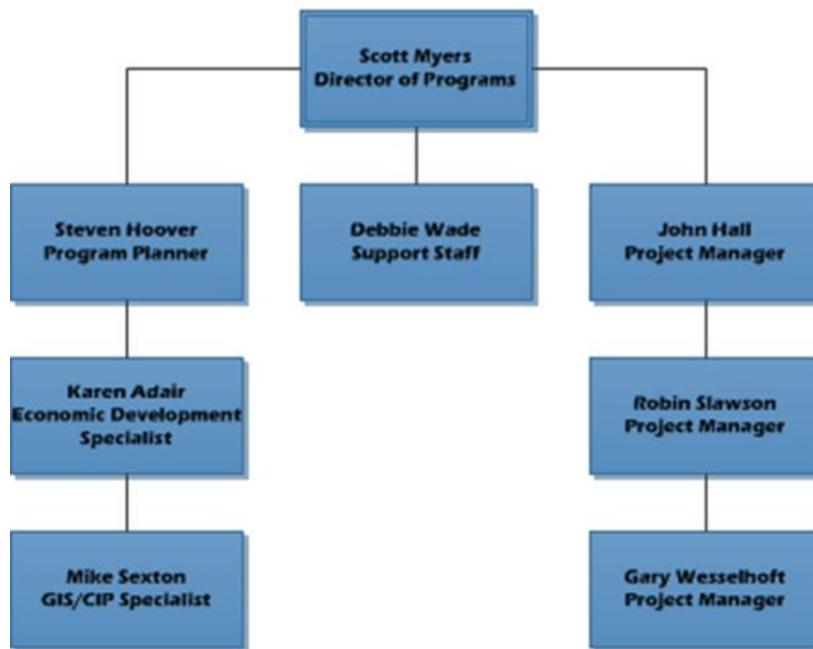
ODOC staff will also oversee the extensive federal requirements associated with programmatic compliance and monitoring. These staff members will be responsible for ensuring the overall administration of the Funding complies with all applicable federal requirements. They will monitor other ODOC staff to ensure the proper implementation of consistent processes and procedures, particularly as they relate to the identification and prevention of the duplication of benefits. This compliance team will also be responsible for monitoring all ODOC contractors and service providers as detailed in the CDBG DR Compliance and Monitoring Manual, attached as

Appendix B to this Action Plan. As previously noted, there will also be long term compliance requirements associated with some of these program activities (i.e. liens on homeowner and multifamily properties for extended periods.

In order to effectively administer the CDBG Disaster Recovery funding, consistent with these federal requirements, and to ensure that the necessary safe guards are provided, and monitoring processes and procedures are established and followed, the State intends to utilize the full allotment of administrative funds allowed under the Federal Register Notice. By regulation, the CDBG Disaster Recovery administration for this allocation is subject to 5% of the total funding amount.

The Organizational Chart for the ODOC/Community Development team is as follows:

**Community Development Services
Community Infrastructure Team**



V. Federal, State, Local, Non-profit, and Individual Sources of Funding to be Leveraged

The State has identified the following preliminary list of sources of leverage for the Funding:

Multifamily Housing		
Program	Explanation	Amount

LIHTC – 4%	Non-competitive open application period with award based on viability of the project	TBD
LIHTC – 9%	Competitive allocation of credits	TBD
OHFA – HOME	May be available in conjunction with 4% or 9% tax credit financing	TBD
FEMA	Hazard Mitigation Grant Program	TBD

Single Family Housing		
Program	Explanation	Amount
FEMA	Hazard Mitigation Grant Program	TBD
Local Area Recovery Committee	Single Family Housing	\$300,000

Infrastructure		
Program	Explanation	Amount
FEMA	Hazard Mitigation Grant Program	TBD
Local Funds	Although not required, subgrantees are encouraged to make contributions to infrastructure projects through the expenditure of local general funds.	TBD

Public Facilities (Not Funded)		
Program	Explanation	Amount
FEMA	Hazard Mitigation Grant Program	TBD
Local Funds	Although not required, subgrantees are encouraged to make contributions to infrastructure projects through the expenditure of local general funds.	TBD

Economic Development (Not Funded)		
Program	Explanation	Amount

SBA	Small Business Administration	TBD
USDA	US Department of Agriculture (Agribusiness)	TBD

Resiliency and Mitigation		
Program	Explanation	Amount
FEMA	Hazard Mitigation Grant Program	TBD
American Red Cross Fund	Safe Rooms/Shelters	\$3.7 million

In all, the State has identified several forms of leverage to increase the impact of the Funding. Of the potential sources of leverage, Infrastructure (road & drainage) will have the highest leverage requirement due to the nature and scope of work required. Under the infrastructure category, although not required, it will be anticipated that the local funds be utilized given the limited amount of overall funding already provided. Leverage in the owner occupied rehabilitation program will vary greatly by the applicant and will be dependent on a number of factors which cannot reasonably be quantified at this time, such as the availability of private insurance and National Flood Insurance Program paid claims payments, and foundation and/or other philanthropic awards.

VI. USE OF IMPACT AND UNMET NEEDS ASSESSMENT AND THE COMPREHENSIVE RISK ANALYSIS

As specified in the June 3, 2014 Federal Register Notice Vol. 79, No. 106, Page 31968, the State is required for each major infrastructure project with such projects having a total cost of \$50 million or more (including at least \$10 million of CDBG DR funds) or physically located in more than one county. Per the Federal Register Notice, projects (activities) falling under this description are formally known as “Covered Projects”.

Additionally, under this guidance, the State is required to implement a comprehensive risk based analysis that it will employ to select, prioritize, implement, and maintain infrastructure activities in its CDBG DR program. In keeping with this requirement, the State has examined predictive and historical climate data and a performed risk based analysis of various types of storm damage. This information and related data can be found in Section VIII “Other Program Requirements” of this CDBG DR Second Allocation Action Plan.

The State's CDBG DR program has only one qualifying "Covered Project" and consists of The City of Oklahoma City making improvements to the Draper Water Treatment Plant. The Draper Treatment Plant improvements align with the State of Oklahoma's Hazard Mitigation Plan by addressing specific priorities that include:

1. Protect Life – The primary objective of the Oklahoma State Hazard Mitigation Plan is to protect life. Potable water is critical to public health. The Draper Treatment Plant improvements will ensure uninterrupted potable water will be provided to the City's water distribution network.
2. Protect Property – Redundancy in electrical services will protect property by ensuring adequate water is available for fire protection and public health.
3. Increase Public Preparedness for Disasters – Physical improvements that will prevent repetitive power loss to the water treatment plant due to severe weather events that include flooding, tornados, lightning and other natural hazards.

The State's Hazard Mitigation Plan was updated in 2014. State Mitigation Goal #1 is to Protect Life. Protecting people from harm is one of the primary responsibilities of state government. Many state laws contain a declaration of purpose that includes protecting public health and safety. For example, the Oklahoma Emergency Management Act [Oklahoma Statutes, Title 63], the legislature declares that emergency management is a necessary function of state government "to protect the public peace, health and safety, and to preserve the lives and property of the people of the state" from the increasing possibility of the occurrence of disasters of unprecedented size and destructiveness.

Installing a permanent emergency generation system at Draper Water Treatment Plant (WTP) reduces the risk to public health and safety from lack of potable water service under pressure caused by the Draper WTP being inoperative due to a power outage caused by a hazard impact. The water treatment plant is considered a critical facility as it is critical to the public health and safety. The proposed generator system will ensure continuous potable water service under pressure in the Oklahoma City area. In addition to reducing the risk to public health and safety, the proposed generation system at the Draper WTP will reduce the overall costs and economic disruptions to the businesses that depend on the water supply.

In addition to ensuring public health and safety through the treatment of potable water for the service area, Oklahoma State Statute 252:631-3-20 requires that water service providers maintain minimum pressures throughout the distribution system of 25 pounds per square inch (PSI). The following table was developed during recent power outages at the Draper Water Treatment Plant. The table demonstrates how the loss of power at the plant affects water pressures and flows at the surrounding locations where SCADA instrumentation is placed.

The table demonstrates how such power outages translate into drastic pressure effects throughout the distribution system.

Note: Normal pressure was taken from 1030 am to 130 pm on February 22, 2014 and the outage data was taken from 1030 am to 130 pm on March 1, 2014.							
	Moore - SW 164th and Telephone (PSI)	Moore - NE 12th and Eastern (PSI)	Moore - 104th and Santa Fe (PSI)	Booster Station 23 (PSI)	Quad Graphics (PSI)	Booster Station 22 (PSI)	Booster Station 21 (PSI)
Normal Average Pressure	83.922	59.595	65.429	59.821	80.401	129.037	56.166
Average Pressure During Outage	46.148	22.568	11.696	0.0	8.825	29.419	17.906
Difference in Average Pressure	-37.774	-37.027	-53.733	-59.821	-71.576	-99.618	-38.26
Minimum Pressure During the Outage	43.625	19.875	11.063	0.0	7.188	26.9	17.738

Another example of hazards that will be mitigated through the installation of a generation system at the Draper Water Treatment Plant is through an examination of how these power outages affect critical facilities such as area hospitals. Hospital data from one regional service provider has been attached as Exhibit A stating the number of patients served in a year and the nearest hospitals in the event that loss of water would cause hospitals to reroute patients to other facilities.

Community Development Block Grant Eligibility

The Draper Water Treatment Plant electrical system improvements are eligible under 24 CFR 570.201(c) Public Facilities and Improvements. The CDBG national objective will benefit low and moderate income persons as provided under 24 CFR 570.208(a)(1) Area Benefit Activities. A complete listing of all census block groups and associated low and moderate income data provided by HUD is provided in the Beneficiary Income Survey included as an attachment to this submission.

BACKGROUND

The Oklahoma City water distribution service area includes the corporate limits of Oklahoma City, and most other communities within its metropolitan statistical area. According to 2010 Census data (U.S. Census Bureau, Population Division, 2014), the Metropolitan Statistical Area has a population of 1,252,987 people. Water is provided through three water treatment plants (WTP): Hefner Water Treatment Plant, Overholser Water Treatment Plant, and Draper Water Treatment Plant, delivering up to 39 billion gallons of potable water on an annual basis. Draper Water Treatment Plant over the last three years has treated an average of 57% of the total water produced. The City of Oklahoma City Utilities Department strives to provide water to its customers at all

times. During prolonged power outages at the Draper WTP the treatment and delivery capabilities are limited, as evidenced by the severe weather events in May 2010 and May 2013.

The current reliability that the electrical service provider offers to Draper WTP is subject to failure. The main overhead power lines originate from two different substations and approach the plant from two different directions to tie into a common feed point on the west side of the WTP (Figure 1). On May 10, 2010, a tornado took out both power feeds from the electrical service provider to the Draper WTP, thereby limiting the plant's ability to provide water to the distribution system for approximately three days. Violent storms on May 19, 2013, and a tornado on May 20, 2013, also adversely affected the electrical service provider's service to the Draper WTP for approximately 24 hours before power was restored. During these outages limited water service from the plant was provided via portable generators and transformers.

Draper WTP Electrical System

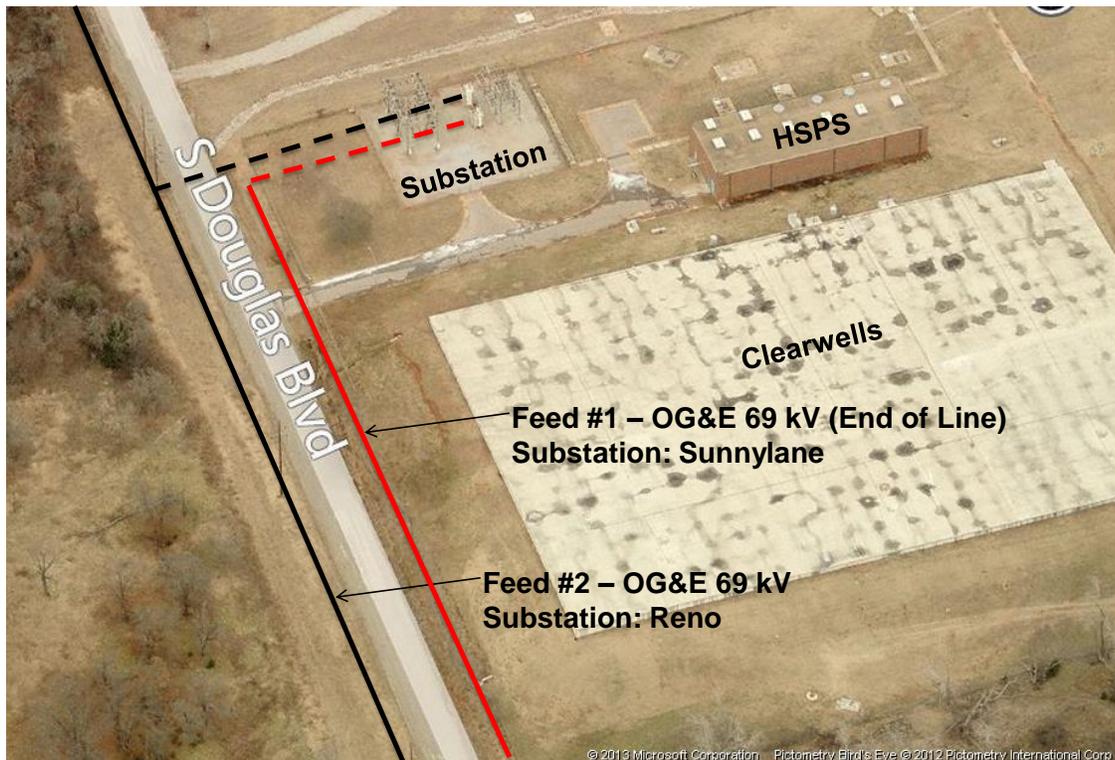


Figure 1 - Electric Power Feeds to Draper WTP

The existing electrical system within the Draper Water Treatment Plant is "radially" fed from the existing electric switchgear in the Headquarters Building, which in turn, draws its power from an electrical feed emanating through the existing high service pump station (HSPS) (Figure 2).

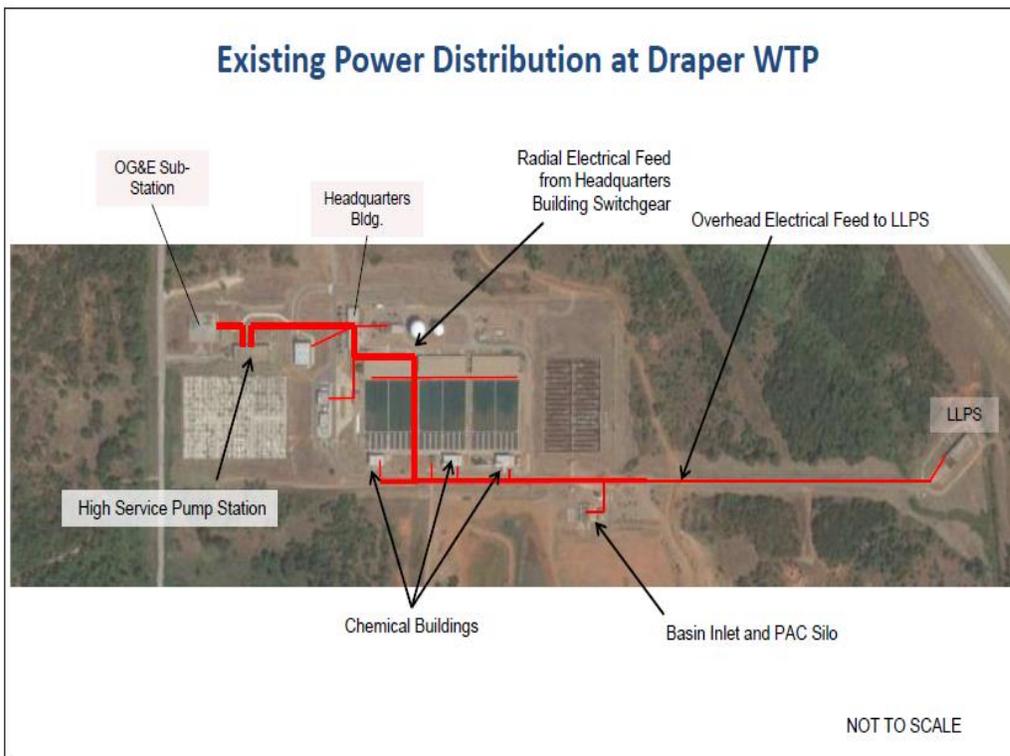


Figure 2 - Existing Onsite Power Distribution

As can be seen from the above figure, there is no redundancy in the current power system on the plant site. Several key plant facilities would be inoperable if an electrical failure were to happen anywhere on the plant site. This was experienced this past February when the electrical feed to one of the chemical buildings failed. This resulted in a power loss to the HSPS and at least half of the plant treatment processes for several hours until temporary repairs were completed. Permanent repairs were completed by an on-call contractor with the City over a several month period.

Figure 3 shows the conceptual layout of the recommendations.

1. Phase I will loop around the main features of the plant. The Hefner WTP has a similar electrical loop distribution system and City staff is familiar with its operation and maintenance. Portable, trailer-mounted generators will be able to connect to transformers at some of the proposed electrical loop distribution points.
2. Phase II will extend a looped electrical feed from the main plant loop to the low lift pump station (LLPS) and improve the electrical systems at the LLPS.

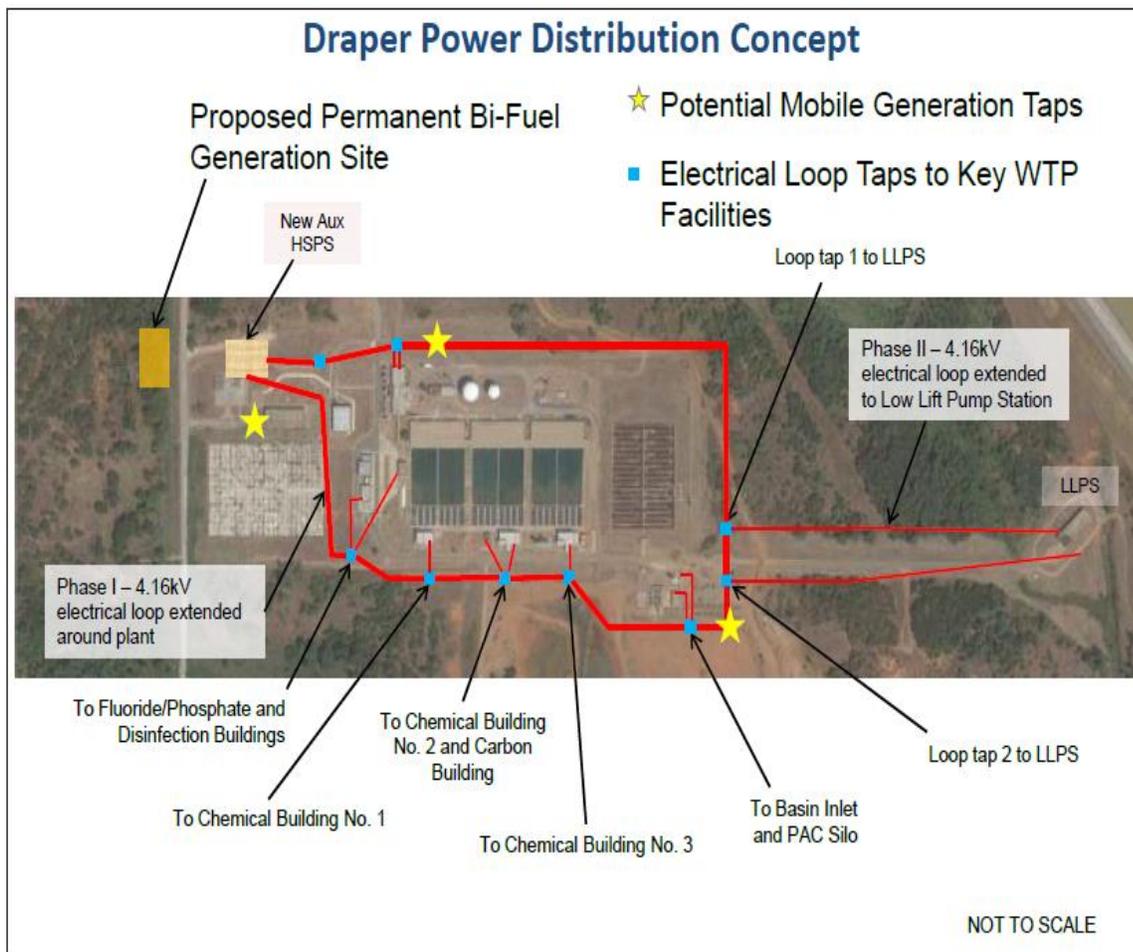


Figure 3- Recommended Onsite Power Distribution

3. The third project consists of a bi-fuel emergency generator system as a permanent facility to serve the plant during power outages. The proposed generation system will consist of three 2.5 mega-watt units capable of running two of three treatment trains and pumping approximately 100 MGD into the distribution system.

Long-Term Efficacy and Fiscal Sustainability: FRN / Vol. 79, No. 106 / Tuesday, June 3, 2014 Page 31968 – 4.

Green building rating and certification systems require an integrated design process to create projects that are environmentally responsible and resource-efficient throughout a given life-cycle: from siting to design, construction, operation, maintenance, renovation, and demolition.

Oklahoma City's project is rooted in resiliency by providing sustained power for continued water service without interruption.

1. Phase I will loop around the main features of the plant. The Hefner WTP has a similar electrical loop distribution system and City staff is familiar with its operation and maintenance. Portable, trailer-mounted generators will be able to connect to transformers at some of the proposed electrical loop distribution points.

2. Phase II will extend a looped electrical feed from the main plant loop to the low lift pump station (LLPS) and improve the electrical systems at the LLPS.

Oklahoma City's sustainable, dependable water supply plays a large role in business development and economic growth. At Oklahoma City's three water treatment plants – **Draper**, Hefner and Overholser – crews test streams of water. In fact, they exceed the regulatory requirement of testing water every four hours. The water is tested every two hours on the raw water, treated water and water leaving the plant. Next, quality assurance and quality control processes are conducted to ensure the accuracy of their tests. In addition, chemists in the Water Quality Laboratory conduct weekly testing on the source lake water and on the tap water throughout the entire distribution system. Additionally, Oklahoma City actively promotes water conservation as evidenced by their Water Conservation Program "Squeeze Every Drop" campaign (<https://www.okc.gov/departments/utilities/squeeze-every-drop>).

Environmentally Sustainable & Innovative Investments: FRN / Vol. 79, No. 106 / Tuesday, June 3, 2014 Page 31968 - 5.

Oklahoma City's project consists of a bi-fuel emergency generator system as a permanent facility to serve the plant during power outages. The proposed generation system will consist of three 2.5 mega-watt units capable of running two of three treatment trains and pumping approximately 100 MGD into the distribution system.

VII. Other Requirements

Climate Assessment

As specified in the June 3, 2014 Federal Register Notice Vol. 79, No. 106, Page 31967, the State is required to implement a comprehensive risk based analysis that it will employ to select, prioritize, implement, and maintain infrastructure activities in its Disaster Recovery program. In keeping with this requirement, the State has examined predictive and historical climate data and performed a risk based analysis of various types of storm damage. The data and information for this climate assessment narrative was taken from elements of the State of Oklahoma Standard Hazard Mitigation Plan Update Feb. 10, 2014 and the US Global Change Research Program website (<http://nca2014.globalchange.gov/report/regions/great-plains>).

Climate of the Great Plains

Oklahoma is located in the Southern Great Plains. Daily, monthly, and annual changes in the weather can be dramatic and challenging for communities and their commerce. The region experiences multiple climate and weather hazards, including floods, droughts, severe storms, tornadoes, hurricanes, and winter storms. In much of the Great Plains, too little precipitation falls to replace that needed by humans, plants, and animals. These variable conditions in the Great Plains already stress communities and cause billions of dollars in damage; climate change will add to both stress and costs.

Climate projections suggest more frequent and more intense droughts, severe rainfall events, and heat waves, communities and individuals can reduce vulnerabilities through the use of new technologies, community-driven policies, and the judicious use of resources. Adaptation (means of coping with changed conditions) and mitigation (reducing emissions of heat-trapping gases to reduce the speed and amount of climate change) choices can be locally driven, cost effective, and beneficial for local economies and ecosystem services.

1. ENERGY, WATER, & LAND USE: Rising temperatures are leading to increased demand for water and energy. In parts of the region, this will constrain development, stress natural resources, and increase competition for water among communities, agriculture, energy production, and ecological needs.
2. SUSTAINING AGRICULTURE: Changes to crop growth cycles due to warming winters and alterations in the timing and magnitude of rainfall events have already been observed; as these trends continue, they will require new agriculture and livestock management practices.
3. CONSERVATION & ADAPTATION: Landscape fragmentation is increasing, for example, in the context of energy development activities in the northern Great Plains. A highly fragmented landscape will hinder adaptation of species when climate change alters habitat composition and timing of plant development cycles.
4. VULNERABLE COMMUNITIES: Communities that are already the most vulnerable to weather and climate extremes will be stressed even further by more frequent extreme events occurring within an already highly variable climate system.
5. OPPORTUNITIES TO BUILD RESILIENCE: The magnitude of expected changes will exceed those experienced in the last century. Existing adaptation and planning efforts are inadequate to respond to these projected impacts.

State Climate Overview

As mentioned previously, Oklahoma is located in the Southern Great Plains. Of the 50 states, it ranks 20th in size, with an area of 69,903 square miles, about 1,224 of which are covered by water. The terrain is mostly plains, varying from nearly flat in the west to rolling in the central and near east. The plains are broken by scattered hilly areas that include the Wichita Mountains in the southwest and the Arbuckle Mountains in the south central part of the state. The Ouachita Mountains dominate much of the southeast, with peaks that rise as much as 2,000 feet above their base. Extreme northeastern counties are part of the Ozark Plateau, which is marked by steep, Rocky River valleys between large areas of hills and rolling plains. The western tip of the panhandle features part of the Black Mesa complex, a fractured terrain featuring large mesas overlooking seasonal creek and riverbeds. Elevations range from 287 feet above sea level where the Little River exits in southeastern Oklahoma to 4,973 feet on Black Mesa near the New Mexico border.

Oklahoma lies entirely within the drainage basin of the Mississippi River. The two main rivers in the state are the Arkansas, which drains the northern two-thirds of the state, and the Red, which drains the southern third and serves as the state's southern border. Principal tributaries of the Arkansas are the Verdigris, Grand (Neosho), Illinois, Cimarron, Canadian and North Canadian. The Washita and Kiamichi serve as the Red's principal tributaries in Oklahoma, with the Little River flowing into the Red River.

Temperature

The mean annual temperature over the state ranges from 62° F along the Red River to about 58° F along the northern border. Temperatures of 90° F or greater occur, on average, about 60-65 days per year in the western panhandle and the northeast corner of the state. Temperatures of 100° F or higher occur, frequently during some years, from May through September, and very rarely in April and October. The western half of the state, excluding most of the Panhandle, averages 15+ days of triple-digit temperatures, ranging from about 35 in the southwest corner to 25 in the northwest area. Years without 100° F temperatures are rare, ranging from about one of every seven years in the eastern half of the state to somewhat rarer in the west. The highest temperature ever recorded in the Oklahoma was 120° F. Temperatures of 32° F or less occur, on average, about 60 days per year in the southeast. The lowest temperature on record is -27° F, set originally at Vinita on February 13, 1905, and tied at Watts on January 18, 1930.

Frozen soil is not a major problem, nor much of a deterrent to seasonal activities. Its occurrence is rather infrequent, of very limited depth, and of brief duration. The average maximum depth that frost penetrates the soil ranges from less than three inches in the southeastern corner of the state to more than 10 inches in the

northwestern reaches. Extreme frost penetration ranges from about 10 inches in the southeast to almost 30 inches in the western panhandle.

Precipitation

Although precipitation is quite variable on a year-to-year basis, average annual precipitation ranges from about 17 inches in the far western panhandle to about 56 inches in the far southeast. The greatest annual precipitation recorded at an official reporting station was 84.47 inches at Kiamichi Tower in the southeast in 1957. The least annual rainfall occurred during 1956, when Regnier, in the extreme northwestern panhandle, observed 6.53 inches.

Excessive rainfall occurs at times. Amounts of ten inches or more in 24 hours, while rare, have been recorded. The greatest official rainfall in a 24-hour period is 15.68 inches at Enid on October 11, 1973. Amounts up to 20 inches in a day have also been reported from nonstandard sources.

Snowfall remaining on the ground more than a few days is an uncommon occurrence in northwestern Oklahoma, quite rare in central Oklahoma, and almost unheard of in the southeast. The greatest seasonal snowfall ever recorded in the state was 87.3 inches at Beaver during the winter of 1911-1912.

Freezing rain is a distinct wintertime hazard in Oklahoma. The resulting ice cover can down power lines and limbs, causing millions of dollars in damages and widespread power outages. These events make automobile travel very treacherous, especially on secondary roads, where the hazard can last several days. Significant icing events occur with nearly the same frequency as heavy snow events, especially in the southeastern half or so of the state. While ice accumulation is usually less than an inch, storms that deposit several inches can occur once or more per decade. The consecutive winters of 2000-01 and 2001-02 each featured a major ice storm that deposited more than three inches of ice in 24 hours across much of southeast and central Oklahoma. Two damaging ice storms affected Oklahoma in 2007. The first, in January, affected primarily southern and eastern Oklahoma. The latter, in December, was most severe in central and northeastern Oklahoma. Although ice accumulation in the latter event was generally one inch or less, it caused extensive damage to trees that subsequently took down power lines to more than 600,000 customers.

Floods

Floods of major rivers and tributaries may occur during any season, but they occur with greatest frequency during those spring and autumn months associated with greatest rainfall. Such floods cost many lives and property damage in the first 50 years of statehood, but flood prevention programs have reduced the frequency and severity of such events. Flash flooding of creeks and minor streams remains a serious threat, especially in urban and

suburban areas, where development and removal of vegetation have increased runoff. See the following map depicting lakes and waterways throughout the State of Oklahoma.

Drought

Drought is a recurring part of Oklahoma's climate cycle, as it is in all the plains states. Almost all of Oklahoma's usable surface water comes from precipitation that falls within the state's borders. Therefore, drought in Oklahoma is tied almost entirely to local rainfall patterns (i.e., the influence of upstream events on drought is very small). Western Oklahoma tends to be slightly more susceptible to drought because precipitation there tends to be more variable (percentage-wise) and marginal for dry land farm applications.

Drought episodes can last from a few months to several years. Those that last a few months can elevate wildfire danger and impact municipal water use. Seasonal droughts can occur at any time of the year, and those that resonate with crop production cycles can cause billions of dollars of damage to the farm economy. Multi-season and multi-year episodes can severely impact large reservoirs, stream-flow and groundwater.

Since modern Climatological record-keeping began in the late nineteenth century, the state has seen five major multi-year and multi-regional drought events. These occurred in the late 1890s, from 1909-18, 1930-40, 1952-58 and, to a lesser extent, 1962-72. Each of these episodes contained at least one year of above-normal rainfall. The drought of the 1930's is associated with the Dust Bowl of the Great Plains, when socio-economic conditions, agricultural practices and drought forced the largest emigration of Oklahomans in state history. It is yet to be determined if the drought of 2005-2006, while at times more severe than any on record, will be as extensive as these other events.

The agricultural impact of drought is increasingly mitigated on a farm-by-farm and year-by-year basis through irrigation of crops, mostly with fossil water. This practice dominates much of the panhandle and some of the rest of western Oklahoma.

Development of water supplies has aided community resiliency, helped in large measure by the Oklahoma Water Resources Board's Financial Assistance Program. Upgrades to municipal and rural water district water/wastewater systems over the previous two decades allowed communities, which previously may have run dry under such circumstances, to more effectively manage their water supplies during the most recent drought.

Severe Weather

Thunderstorms occur, on average, about 55 days per year in the east, decreasing to about 45 days per year in the southwest. Late spring and early summer are the peak seasons for thunder, averaging about eight thunderstorms per month per location during these seasons. For the southeastern two-thirds of the state, thunder occurs most

often in May. June is the peak month for much of the remainder of the state, while the western panhandle observes the most thunder in July. General thunderstorms are quite common in the summer, but tend to be less organized storms of relatively short duration. These storms can produce locally heavy rain and some hail. Severe weather can occur at any time of day, but the maximum frequency for severe weather is from mid-afternoon to sunset.

Tornadoes

Tornados are a particular hazard, in that the frequency of occurrence per unit area is among the greatest in the world. Since 1950, an average of 54 tornados has been observed annually within the state's borders.

Tornadoes can occur at any time of year, but are the most frequent during springtime. April, May and June represent the months of peak occurrence with these three months accounting for about three-fourths of the observations. May's average of 20 tornado observations per month is the greatest. The winter months each average less than one tornado per month. About 80 percent of tornados are observed between noon and midnight Central Standard Time, with the peak hours being between 4 pm and 8 pm. Most of Oklahoma's tornados travel from the southwest to the north and east.

Although the annual number of tornados striking Oklahoma is increasing, the proportion of those ranking among the most severe has actually been declining. Improved technology and recording practices have improved counts and documentation of those at the weaker end of the spectrum, thus accounting for the increase in overall number. However, the number of significant tornados (those rating as F2 intensity or greater) has declined, particularly since 1982. In fact, the years with the greatest numbers of significant tornados were 1960 and 1961, with 49 and 41, respectively. Declining death tolls and declining numbers of significant tornados does not necessarily mean Oklahoma is becoming less at risk. As the May 3, 1999 tornado showed, one event could forever impact the lives of many Oklahomans.

Earthquakes

The earliest documented earthquake in Oklahoma occurred on October 22, 1882, and while it cannot be precisely located, the strongest shaking, Modified Mercalli Intensity of VIII, was reported at Fort Gibson, Indian Territory. For a more complete list of significant earthquakes in Oklahoma please visit the United States Geological Survey www.usgs.gov. Earthquakes occur in response to forces, which build up over long time periods, and occur when two bodies of rock slide past each other. This slip can be large for big earthquakes (10's of meters) or as small as a millimeter. Earthquakes generally occur on pre-existing weaknesses in the rocks called faults. By far, the majority of the world's earthquakes occur on or near the boundaries of tectonic plates. Large earthquakes tend to be concentrated at plate tectonic boundaries where forces and faults are much larger. Generally, away from plate

boundary settings, such as Oklahoma, earthquakes will be smaller with magnitudes generally less than 6.5. Small earthquakes (magnitudes 5 or less) occur nearly everywhere in the world. These types of earthquakes can cause damage and loss of life, but damage is usually moderate and closely concentrated around the epicenter, where the earthquake occurred. Oklahoma earthquakes generally occur at shallow depths ranging from about 5 to 15 kilometers (3-10 miles) depth. Earthquake hazard is the unavoidable risk that an earthquake will disrupt daily activities or cause loss of property or life. Most damage associated with earthquakes is caused by waves generated during the earthquake. Estimates can be made for the chances of how much shaking will occur due to all possible earthquake sources. These estimates use recorded earthquakes and mapped faults to define possible sources and how often these earthquakes occur.

Other Climatic Features

The climate of Oklahoma is continental, as is all of the Great Plains. Summers are long and usually quite hot. Winters are shorter and less rigorous than those of the more northern plains states. Periods of extreme cold are infrequent, and those lasting more than a few days are rare.

Annual average relative humidity ranges from about 60 percent in the panhandle to just over 70 percent in the east and southeast. Average annual lake evaporation varies from 48 inches in the extreme east to 65 inches in the southwest, numbers that far exceed the average yearly rainfall in those areas. Evaporation and percolation preclude use of about 80 percent of Oklahoma's precipitation.

Prevailing winds are southerly to southeasterly throughout most of the state during the spring through autumn months. These prevailing winds veer to south-to-southwest in far western Oklahoma, including the panhandle. March and April are the windiest months, while July August and September are the calmest.

Climate – State Perspective

Since 1950, Oklahoma's population has gradually increased, and by 2008 it had reached 3,642,361. This figure represents an increase of 5.6 percent over 2000. Population densities generally decline from east to west across the state, and the highest densities are found in the metropolitan areas. The population in metropolitan counties increased by 2.0 percent from the year 2000 to 2006. Non-classified counties saw their populations decline by -0.6 percent. Oklahoma is the 20th largest state and the 28th most populous state in the United States.

The State of Oklahoma does not have adopted ordinances regulating areas of population growth or future development per se. Oklahoma agencies representing the state under authority granted to them by the legislation adopt rules/regulations regarding Storm Water Management or Stream Water Management. Storm Water Management is addressed under the Federal National Pollution Discharge Elimination System (NPDES) program.

The Oklahoma Department of Environmental Quality (DEQ) has received delegation of that Federal program. They have adopted rules and established general and individual permits to require storm water management. Two basic types of storm water management are addressed. One is primarily aimed at sediment control and requires anyone disturbing one acre of ground or more to obtain a general permit and to use Best Management Practices. The other addresses storm water runoff from certain industrial areas. As part of the program, communities with a population of 10,000 or more must have a storm water management program in place (usually includes ordinances) that meets the conditions of the DEQ general permit or an individual permit issued by DEQ.

The water quality of streams in Oklahoma is described in terms of beneficial uses as defined by narrative descriptions and specific constituent numbers by the Oklahoma Water Quality Standards promulgated by the Oklahoma Water Resources Board. DEQ and the other state environmental agencies are required to protect the water quality of Oklahoma streams and lakes by implementing the Water Quality Standard (WQS) in administering their various regulatory responsibilities. For instance, when DEQ issues a wastewater discharge permit, the limits placed on that discharge are based on the WQS for the body of water that will receive the discharge. The beneficial uses of that body of water cannot be adversely impacted by the discharge.

Areas of future growth and development as they relate to known hazard areas are managed at the local level. Of the 77 counties in Oklahoma, over half of the counties have adopted rules/regulations for zoning management, subdivision management, land use plans, or Floodplain Boards in place.

Additionally, a large percentage of the cities/towns over 1,000 in population have and enforce building and zoning requirements and have procedures in place for enforcing these requirements.

Risk Based Analysis

As specified in the June 3, 2014 Federal Register Notice Vol. 79, No. 106, Page 31967, as part of the Disaster Recovery Action Plan, the State is required to implement a comprehensive risk based analysis that it will employ to select, prioritize, implement, and maintain infrastructure activities in its Disaster Recovery program. The following analysis uses elements of informational resources taken from Oklahoma Climatological data, Oklahoma Geological data, and the *State Standard Hazard Mitigation Plan* (Update-Feb. 10, 2014) as developed by the Oklahoma Emergency Management.

The current Oklahoma *State Standard Hazard Mitigation Plan* was approved by the Federal Emergency Management Agency Region 6 office on February 10, 2014. This State Plan addresses all natural hazards that have been identified as a threat to the State of Oklahoma, per the requirement of the federal regulations cited above. This plan meets requirements for a Standard State Plan under Rule 44 CFR 13.11(c), published in the Federal Register by the Federal Emergency Management Agency (FEMA).

The Oklahoma State Standard Hazard Mitigation Plan provides policy guidance for hazard mitigation in the state of Oklahoma. It identifies hazard mitigation goals, objectives, actions and initiatives for state government that will reduce injury and damage from natural hazards. The Plan specifically identifies six categories of possible mitigation priorities and strategies. These priorities and strategies are as follows:

1. Public Education & Awareness – Outreach projects and technical assistance
2. Preventive Measures – Zoning, building codes, storm water management
3. Natural Resource Protection – Wetlands protection, forest/vegetation management
4. Property Protection – Acquisition, retrofitting, relocation, elevation
5. Emergency Services – Warning, sandbagging, evacuation
6. Structural Projects – Dams, reservoirs, retaining walls, safe rooms

The Oklahoma State Standard Hazard Mitigation Plan lists natural hazards that could affect the State of Oklahoma through the Critical Priority Risk Index (CPRI). Each identified hazard was weighted according to the following criteria of probability, magnitude/severity, warning time and duration. The CPRI categories are needed based upon data provided by Oklahoma Climatological, Oklahoma Geological, and Oklahoma Emergency Management. The CPRI factors the elements of risk—Probability (P), Magnitude/Severity (M), Warning Time (WT) and Duration (D) -- to create an index that allows for the prioritization of mitigation activities based on the level of risk. Each hazard is evaluated based on potential or probability using the elements of the index, and a weighting factor to determine the impact, in the following manner:

Weighing Factors				
.45 Probability of Occurrence		.30 Magnitude/Severity Expected of Hazard	.15 Warning Time Possible to Event	.10 Duration Of Event
4	Highly Likely	4 Catastrophic	4 < than 6 hours	4 > 1 week
3	Likely	3 Critical	3 6 – 12 hours	3 ≤ 1 week
2	Possible	2 Limited	2 12 – 24 hours	2 ≤ 24 hours
1	Unlikely	1 Negligible	1 24 + hours	1 ≤ 6 hours

Probability of Occurrence	Definition
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4 - Highly Likely	Event is probable within the calendar year. Event has a 1 in 1 year chance of occurring.
3 -Likely	Event is probable within the next three years. Event has up to 1 in 3 year's chance of occurring.
2 - Possible	Event is probable within the next 5 years. Event has up to 1 in 5 year's chance of occurring.
1 - Unlikely	Event is possible within the next 10 years. Event has up to 1 to 10 years chance of occurring.

Magnitude / Severity Level	Characteristics
Catastrophic	<ul style="list-style-type: none"> < Multiple deaths. < Complete shutdown of facilities for 30 or more days. < More than 50% of property is severely damaged.
Critical	<ul style="list-style-type: none"> < Injuries and/or illnesses result in permanent disability. < Complete shutdown of critical facilities for at least two weeks. < More than 25% of property is severely damaged.
Limited	<ul style="list-style-type: none"> < Injuries and/or illnesses do not result in permanent disability. < Complete shutdown of critical facilities for more than one week. < More than 10% of property is severely damaged.
Negligible	<ul style="list-style-type: none"> < Injuries and/or illnesses are treatable with first aid. < Minor quality of life lost. < Shutdown of critical facilities and services for 24 hours or less. < Less than 10% of property is severely damaged.

The following set of tables list the Critical Priority Risk Index for each hazard that could affect the State of Oklahoma. The hazards are listed in the order of their Priority Risk. Because there is no way to estimate the probability, severity, warning time or duration of a man-made or special event (because by definition the event is usually unknown) that hazard ranking is a best guess estimate using the CPRI and is less than exact. For that reason, the special event hazard is listed last.

Calculated Priority Risk Index (CPRI)

1. FLOODING

Probability	4 Highly Likely
Magnitude / Severity	4 Catastrophic
Warning Time	3 6 - 12 hours
Duration	3 Less than one week

Flooding Hazard CPRI (State of Oklahoma)				
Probability	Magnitude	Warning Time	Duration	= CPRI
(4 x .45)	+(4 x .30)	+(3 x .15)	3 x .10)	= 3.75

Source: State of Oklahoma Standard Hazard Mitigation Plan Update Feb. 10, 2014

2. TORNADO

Probability	4 Highly Likely			
Magnitude / Severity	4 Catastrophic			
Warning Time	4 Less than 6 hours			
Duration	1 Less than 6 hours			
Tornado Hazard CPRI (State of Oklahoma)				
Probability	Magnitude	Warning Time	Duration	= CPRI
(4 x .45)	+(4 x .30)	+(4 x .15)	1 x .10)	= 3.7

Source: State of Oklahoma Standard Hazard Mitigation Plan Update Feb. 10, 2014

3. WINTER STORMS / ICE / FREEZING RAIN

Probability	3 Likely			
Magnitude / Severity	4 Catastrophic			
Warning Time	2 12-24 hours			
Duration	3 Less than one week			
Winter Storm Hazard CPRI (State of Oklahoma)				
Probability	Magnitude	Warning Time	Duration	= CPRI
(3x .45)	+(4 x .30)	+(2 x .15)	3 x .10)	= 3.15

Source: State of Oklahoma Standard Hazard Mitigation Plan Update Feb. 10, 2014

4. DROUGHT

Probability	3 Likely			
Magnitude / Severity	4 Catastrophic			
Warning Time	1 24+ hours			
Duration	4 More than one week			
Drought Hazard CPRI (State of Oklahoma)				
Probability	Magnitude	Warning Time	Duration	= CPRI
(3x .45)	+(4 x .30)	+(1 x .15)	4 x .10)	= 3.1

Source: State of Oklahoma Standard Hazard Mitigation Plan Update Feb. 10, 2014

5. HAIL

Probability	4 Highly Likely			
Magnitude / Severity	2 Limited			
Warning Time	4 Less than 6 hours			
Duration	1 Less than 6 hours			
Hail Hazard CPRI (State of Oklahoma)				
Probability	Magnitude	Warning Time	Duration	= CPRI
(4x .45)	+(2 x .30)	+(4x .15)	1 x .10)	= 3.1

Source: State of Oklahoma Standard Hazard Mitigation Plan Update Feb. 10, 2014

6. HIGH WINDS

Probability	4 Highly Likely			
Magnitude / Severity	2 Limited			
Warning Time	4 Less than 6 hours			
Duration	1 Less than 6 hours			
High Wind Hazard CPRI (State of Oklahoma)				
Probability	Magnitude	Warning Time	Duration	= CPRI
(4x .45)	+(2 x .30)	+(4x .15)	1 x .10)	= 3.1

Source: State of Oklahoma Standard Hazard Mitigation Plan Update Feb. 10, 2014

7. LIGHTNING

Probability	4 Highly Likely			
Magnitude / Severity	1 Negligible			
Warning Time	4 Less than 6 hours			
Duration	1 Less than 6 hours			
Lightning Hazard CPRI (State of Oklahoma)				
Probability	Magnitude	Warning Time	Duration	= CPRI
(4x .45)	+(1 x .30)	+(4x .15)	1 x .10)	= 2.8

Source: State of Oklahoma Standard Hazard Mitigation Plan Update Feb. 10, 2014

8. WILDFIRES

Probability	3 Likely			
Magnitude / Severity	2 Limited			
Warning Time	4 Less than 6 hours			
Duration	2 Less than one day			

Wildfire Hazard CPRI (State of Oklahoma)				
Probability	Magnitude	Warning Time	Duration	= CPRI
(3x .45)	+(2 x .30)	+(4x .15)	2 x .10)	= 2.75

Source: State of Oklahoma Standard Hazard Mitigation Plan Update Feb. 10, 2014

9. DAM FAILURE

Probability	1 Unlikely			
Magnitude / Severity	4 Catastrophic			
Warning Time	4 Less than 6 hours			
Duration	4 More than one week			
Dam Failure Hazard CPRI (State of Oklahoma)				
Probability	Magnitude	Warning Time	Duration	= CPRI
(1x .45)	+(4x .30)	+(4x .15)	4 x .10)	= 2.65

Source: State of Oklahoma Standard Hazard Mitigation Plan Update Feb. 10, 2014

10. EXTREME HEAT

Probability	3 Likely			
Magnitude / Severity	2 Limited			
Warning Time	1 24+ hours			
Duration	3 Less than one week			
Extreme Heat Hazard CPRI (State of Oklahoma)				
Probability	Magnitude	Warning Time	Duration	= CPRI
(3x .45)	+(2x .30)	+(1x .15)	3 x .10)	= 2.4

Source: State of Oklahoma Standard Hazard Mitigation Plan Update Feb. 10, 2014

11. EXPANSIVE SOILS

Probability	3 Likely			
Magnitude / Severity	1 Negligible			
Warning Time	1 24+ hours			
Duration	4 More than one week			
Expansive Soils Hazard CPRI (State of Oklahoma)				
Probability	Magnitude	Warning Time	Duration	= CPRI
(3x .45)	+(1x .30)	+(1x .15)	4 x .10)	= 2.2

Source: State of Oklahoma Standard Hazard Mitigation Plan Update Feb. 10, 2014

12. SPECIAL EVENTS (TAR CREEK PROJECT)

Probability	2 Possible			
Magnitude / Severity	2 Limited			
Warning Time	1 24+ hours			
Duration	4 More than one week			
Special Events Hazard CPRI (State of Oklahoma)				
Probability	Magnitude	Warning Time	Duration	= CPRI
(2x .45)	+(2x .30)	+(1x .15)	4 x .10)	= 2.05

Source: State of Oklahoma Standard Hazard Mitigation Plan Update Feb. 10, 2014

13 EARTHQUAKE

Probability	2 Possible			
Magnitude / Severity	1 Negligible			
Warning Time	4 Less than 6 hours			
Duration	1 Less than 6 hours			
Earthquake Hazard CPRI (State of Oklahoma)				
Probability	Magnitude	Warning Time	Duration	= CPRI
(2x .45)	+(1x .30)	+(4x .15)	1 x .10)	= 1.9

Source: State of Oklahoma Standard Hazard Mitigation Plan Update Feb. 10, 2014

14. SUBSIDENCE

Probability	1 Unlikely			
Magnitude / Severity	2 Limited			
Warning Time	4 Less than 6 hours			
Duration	1 Less than 6 hours			
Subsidence Hazard CPRI (State of Oklahoma)				
Probability	Magnitude	Warning Time	Duration	= CPRI
(1x .45)	+(2x .30)	+(4x .15)	1 x .10)	= 1.75

Source: State of Oklahoma Standard Hazard Mitigation Plan Update Feb. 10, 2014

15. LANDSLIDE

Probability	1 Unlikely			
Magnitude / Severity	1 Negligible			
Warning Time	4 Less than 6 hours			
Duration	1 Less than 6 hours			

Landslide Hazard CPRI (State of Oklahoma)				
Probability	Magnitude	Warning Time	Duration	= CPRI
(1x .45)	+(1x .30)	+(4x .15)	1 x .10)	= 1.45

Source: State of Oklahoma Standard Hazard Mitigation Plan Update Feb. 10, 2014

SECTION THREE – OTHER PROGRAM REQUIREMENTS

Green Building Standards

Resilience Performance Standards: Reference Federal Register / Vol. 79, No. 106 / Tuesday, June 3, 2014 Page 31968 - e. All projects (as applicable) will incorporate resilience in such a way to reduce overall impact on environment and human health by as it specifically relates to the type and scope the of requested CDBG DR project:

- Reduce trash, pollution and degradation of environment.
- Efficiently use energy, water and other resources.
- Protect health and improve productivity.

In addition, all applicable projects must be sustainable as it specifically relates to the type and scope the of requested CDBG DR project. Sustainable infrastructure refers to the designing, building, and operating of these structural elements in ways that do not diminish the social, economic and ecological processes required to maintain human equity, diversity, and the functionality of natural systems.

The State has adopted the HUD CPD Green Retrofit Checklist for rehabilitation and the International Energy Conservation Code 2006 ("IECC") and the Enterprise Green Communities Criteria for reconstruction and/or new construction.

Additionally, the State will use the City of Oklahoma City's Office of Housing Rehabilitation's Green Initiative standard as included in their Housing Rehab Proposal Checklist.

Green Initiative: Projects (as applicable) designed to meet the Green Communities Initiative Criteria created by the Enterprise Community Partners. Contractors are encouraged to follow the "Green Communities Initiative" listed:

- All particleboard components shall meet ANSI A208.1 for formaldehyde emission limits or all exposed particleboard edges shall be sealed with a low Volatile Organic Compounds (VOC) sealant or have a factory applied low VOC sealant prior to installation. All MDF edges shall meet ANSI A208.2 for formaldehyde emission limits or all exposed particleboard edges shall be sealed with a low VOC sealant or have a factory applied low VOC sealant prior to installation.

- Recycle all cardboard generated by construction to the local recycling plant. Recycle all removed metals (copper, iron, tin, aluminum, etc.) to a local recycling plant.

In terms of complying with the Green Building Standard established in the Federal Register Notice, the State will require that replacement of residential properties, including reconstruction and new construction of substantially damaged properties meet and be certified under the Enterprise Green Communities Criteria. (Because replacement of residential properties expected to occur within OKC, the City will ensure that these criteria are met).

For those buildings that are non-substantially damaged, the State will require that they be rehabilitated following the HUD CPD Green Buildings Retrofit Checklist. The requirement for rehabilitation means that the developer and/or construction team will strive to meet the checklist standard to the extent that there are Energy Star, Water Sense and Federal Energy Management Program-designated products available. The State recognizes that most energy- and water-consuming appliances and products now are available with these designations, and therefore, acknowledges that in a rehabilitation situation most products will be available with conservation designations.

While the standards noted above are for the bricks and mortar aspects of replacing damaged residential properties, the State will also encourage the use of green infrastructure techniques to mitigate against storm water run-off and flooding when repairing or replacing damaged infrastructure.

Green Infrastructure: Reference Federal Register / Vol. 79, No. 106 / Tuesday, June 3, 2014 Page 31968 - f. All projects (as applicable) will incorporate green infrastructure in such a way to reduce overall impact on environment and human health by as it specifically relates to the type and scope the of requested CDBG DR project:

Green Building, also known as green construction or sustainable building, is the practice of creating structures and using processes that are environmentally responsible and resource-efficient throughout a building's life-cycle: from siting to design, construction, operation, maintenance, renovation, and deconstruction.

Green Streets: Green streets can incorporate a wide variety of design elements including street trees, permeable pavements, bioretention, and swales. Although the design and appearance of green streets will vary, the functional goals are the same: provide source control of stormwater, limit its transport and pollutant conveyance to the collection system, restore predevelopment hydrology to the extent possible, and provide environmentally enhanced roads. Successful application of green techniques will encourage soil and vegetation contact and infiltration and retention of stormwater.

Compliance and Monitoring

As part of the State's ongoing responsibilities for the administration of HUD's federally funded programs, ODOC will conduct comprehensive monitoring reviews for all programs and activities that fall under Title H.R. 152, titled: Division A: The Disaster Relief Appropriations Act; also known as Public Law 113-2. The State of Oklahoma is a recipient of funding for the purpose of assisting in the development and redevelopment of homes, facilities and infrastructure lost or devastated by during the tornadoes under the Community Development Block Grant Program - Disaster Recovery (CDBG DR) administered by HUD.

The Funding is targeted to areas with the greatest needs based on disaster related data and as requested by Units of General Local Governments. The Funding must be used in accordance with the Federal Register Notice, which provides the regulatory framework established by HUD for the CDBG DR Program and the Funding.

The Oklahoma Department of Commerce is not required by the State of Oklahoma to employ a full-time internal auditor. ODOC utilizes its own system of internal controls to identify issues with transactions. Should our internal controls identify an area of concern, we would discuss the transaction with any parties involved to obtain additional information or clarification. If the additional information did not resolve the issue, the matter would be sent to the ODOC Chief of Staff and/or the Secretary of Commerce for resolution. ODOC retains an independent accounting firm to perform our annual and single audits. At times, ODOC consults with our external auditors when issues arise.

The Oklahoma Department of Commerce (ODOC) working through the Oklahoma Office of Management & Enterprise Services (OMES) invited the submission of a RFP to provide disaster recovery monitoring and compliance services. ODOC will be requiring the selected vendor to conduct 100% monitoring of the program. Services will consist of on-site monitoring to ensure the proper expenditure and management of funds. Monitoring will consist of an in-depth review of their financial and programmatic compliance of the Community Development Block Grant-Disaster Recovery program to ensure full CDBG compliance with Federal Register Notice (FRN) Vol. 78, No. 241 Dec 16, 2013 and FRN Vol. 79, No. 106 June 3, 2014.

Program monitoring will follow the procedures described in the CDBG DR Compliance and Monitoring Manual (see Appendix C of this Action Plan), with a particular emphasis on the accuracy of information provided by applicants, identification of the duplication of benefits, compliance with all applicable state and federal requirements associated with the CDBG DR funding. Specifically, ODOC will conduct a risk analysis on all recipients of any portion of the Funding (each, a "Funding Recipient") in order to identify those programs that are most susceptible to fraud, abuse, or mismanagement. ODOC staff and/or qualified procured vendor

will monitor those programs that are identified as high risk as well as sample those deemed to be low risk programs.

Risk analysis, conducted by the staff of the ODOC and/or qualified procured vendor, will pay special attention to Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 USC 5155 by guaranteeing that there will not be a “duplication of benefits.”

The goal of this attention is to ensure that the State does not engage in any activity that provides federal financial assistance to persons, business concerns, or other entities suffering losses as a result of a major disaster or emergency, where such person, business concern, or other entity will receive such assistance with respect to any part of such loss as to which he or she has received financial assistance under any other program or from insurance or any other source.

Duplication of Benefits

HUD has instituted specific reporting, written procedures, monitoring, and internal audit requirements for each grantee to ensure compliance with program rules for CDBG disaster recovery awards, including rules related to prevention of fraud, abuse, and duplication of benefits. Two authorities form the foundation of duplication of benefit inquiries—the Stafford Act and applicable “necessary and reasonable cost principles in 24 CFR part 570 and in OMB Cost Circulars (codified in title 2 of the Code of Federal Regulations). Supplemental appropriations statutes often reinforce and supplement these authorities.

The Stafford Act directs administrators of Federal assistance to ensure that no “person, business concern or other entity” will receive duplicative assistance and imposes liability “to the extent such assistance duplicates the benefits available to the person for the same purpose from another source.” 42 U.S.C. 5155(a). Specifically, section 312 of the Stafford Act prohibits any person, business concern, or other entity from receiving “any part of such loss as to which he has received financial assistance under any other program or from insurance or any other source.” 42 U.S.C. 5155(a). Duplication occurs when a beneficiary receives assistance from multiple sources for a cumulative amount that exceeds the total need for a particular recovery purpose. The amount of the duplication is the amount of assistance provided in excess of need. The Stafford Act requires a fact specific inquiry into assistance received by each person, household, or entity. A grantee may not make a blanket determination that a duplication of benefits does not exist for all beneficiaries or recipients under a disaster recovery program. As a result, all disaster recovery funds must be governed by policies and procedures to prevent duplication of benefits.

In order to prevent DOB, the State will procure a competitively qualified vendor to implement CDBG DR DOB procedures. The competitively awarded vendor will perform a basic calculation known as the Housing Assistance

Award Calculation which is completed by: (1) Determining each applicant's remaining recovery need; and then (2) Reducing that remaining recovery need by previously received funding for housing recovery, if any (less amounts expended on Allowable Activities). This activity will be monitored for accuracy and completeness by ODOC/CD. The competitively qualified vendor will establish a database for the collection of data on each resident/client receiving any portion of the Funding and will implement the following framework for determining and preventing Duplication of Benefits in its CDBG DR Program:

1. Assessment of need prior to assistance. The State will first determine the applicant's total post disaster need in the absence of any duplicative benefits or program caps. For housing and infrastructure programs, the State will require an applicant to obtain professional construction cost estimates on all projects seeking assistance. For recovery programs not involved with physical rebuilding, such as economic development to provide an affected business with working capital, the total need may not necessarily be based on construction cost estimates. In such scenarios, the potential award will be determined by the program and be guided by standard DECD underwriting principles in determining cost reasonableness.
2. Total assistance available to the person or entity. Assistance includes all benefits available to a funding recipient; including cash and other resources such as insurance proceeds, grants, and SBA loans (private loans not guaranteed by SBA are exceptions and will not be included in accordance with guidance from HUD). ODOC through its Grants Administration staff will identify all assistance received by each person, business concern, or other entity, via insurance, FEMA, SBA, other local, state, or federal programs, and private or nonprofit charity organizations. The homeowner, business and/or Unit of Local Government (ULG) will be required to sign a "Consent and Release Form". This form will allow ODOC to share all of the owner information and all owner non-public personal information with agencies and companies in order to process the application of CDBG DR funds. Each form only allows the sharing of information required for completing the duplication of benefits check. In addition, each applicant for CDBG DR funds will be required to complete an "Insurance and Other Fund Sources Affidavit". This form will be used to collect information on assistance received by the homeowner and/or entity for the same purpose.
3. The State's competitively qualified vendor will identify reasonably anticipated assistance, such as future insurance claims or approved SBA loan proceeds. Reasonably anticipated funds include assistance that has been awarded, but has not yet been received. This information will be entered in the database for calculation of the CDBG DR unmet need. To address any potential duplication, beneficiaries will be required to sign a "Subrogation and Assignment Agreement" to repay any assistance later received for

the same purpose as the CDBG –DR funds. The signing of this document ensures that if the applicant receives additional funds, the applicant pays ODOC back enough to prevent any duplication of benefit. This also ensures that CDBG DR funds are not being used to cover losses already covered by “any other source”. (Ref. Sec. 312. Duplication of Benefits (42 U.S.C. 5155) The State will identify a method in its administrative manual for the CDBG DR Program to monitor compliance with the agreement for a reasonable period subsequent to close out of the project.

Once it has been determined, the potential award and the total assistance received or to be received, the following assistance will be excluded for duplication of benefit purposes: (1) assistance provided for a different purpose; (2) used for a different, eligible purpose; (3) not available to the applicant; (4) private loan not guaranteed by SBA; or (5) any other asset or line of credit available to the applicant. However, the State will take into consideration that funding for the repair, replacement, rehabilitation, or new construction of public facilities or improvements could potentially involve a duplication of benefits. The owner of these facilities must be able to address whether other sources of funds are available for that same purpose and for that specific project because funds used directly by State and other government entities for public facilities or other purposes are also subject to the duplication of benefits prohibitions under the Stafford Act.

The Oklahoma Department of Commerce (ODOC) working through the Oklahoma Office of Management & Enterprise Services (OMES) invited the submission of a Statement of Qualifications to provide Duplication of Benefits analysis and verification services including the execution of Subrogation Agreements for the Community Development Block Grant-Disaster Recovery program (CDBG DR). Duplication of Benefit requirements are prescribed by Section 312 of the Robert T. Stafford Disaster Assistance and Emergency Relief Act (42 U.S.C 5155). The bid was issued on August 9, 2016 and responses were due September 16, 2016. A copy of the Amendment of Solicitation can be found in Appendix F of this Plan. The State’s full Duplication of Benefits policy can be found in greater detail within Appendix F of this Plan. The Procurement policy by which the vendor will be selected is contained in Appendix G of this Plan.

Program Income

Program Income is the amount of revenue received in a single program year which is greater than or equal to \$25,000. The State will provide grants within several components of the CDBG DR program. As applicable to housing and public facilities, liens will be filed on each property to ensure compliance requirements, with recapture of all or a portion of the grant in the event of any noncompliance during that period. The State does not intend to fund revenue generating activities as part of its administration of the funding. In the event that any program income is generated in connection with a sub-grantee’s administration of the CDBG DR funding, such funds will remain with the sub-grantee and expended under the method of distribution annotated within the

Action Plan. If the sub-grantee cannot successfully fulfill this program income obligation, the State will assume the program income and reallocate the funds based on its then current method of distribution as described in the applicable Action Plan. Additionally, the State will withhold 2% percent of a n y program income to offset that State's administrative cost and any other eligible administrative expenses.

Program Income that has been derived from the CDBG DR activities may be used only for eligible CDBG Program activities and in accordance with the provisions of Title I of the Housing and Community Development Act of 1974, as amended, 24 CFR Part 570.489(e), and the program income guidelines of the State CDBG Program Management Manual. Program Income is defined as gross income received by a recipient (or sub recipient) that has been directly generated from the use of Small Cities Program funds, and includes the following:

- Payments of principal and interest (including late fees) on loans made using CDBG DR funds. For any loan that was partially funded with CDBG DR Program funds, program income is only the prorated portion of the income that reflects the actual percentage of CDBG DR participation. For example, if a loan was made with 50% local funds and 50% CDBG DR funds and a \$100 payment is received, \$50 would be CDBG DR program income;
- Interest earned on program income pending disposition of same, but excluding interest earned on funds held in a revolving fund account;
- Net proceeds from the disposition by sale or long-term lease of real property purchased or improved with CDBG DR Program funds;
- Proceeds from the disposition of equipment purchased with CDBG DR Program funds;
- Gross income from the use or rental of real or personal property acquired by a State, a unit of general local government; a tribe or sub recipient of a State or a sub recipient of a unit of general local government or tribe with CDBG DR Program funds; less the costs incidental to the generation of the income (i.e. net income);
- Net income from the use or rental of real property owned by a State, a unit of general local government, or tribe or a sub recipient of a unit of general local government or State or tribe, that was constructed or improved with CDBG DR Program funds; less the costs incidental to the generation of the income;
- Proceeds from the sale of liens made with CDBG DR Program funds;
- Proceeds from the sale of obligations secured by liens made with CDBG DR Program funds;

- Funds collected through special assessments made against properties owned and occupied by households not low-and moderate-income, where the special assessments are used to recover all or part of the CDBG DR Program portion of a public improvement; and
- Gross income paid to a State, LG, tribe, or paid to a sub recipient thereof from the ownership interest in a for-profit entity in which the income is returned for the provision of CDBG DR assistance

Capacity Building

The State recognizes the need to establish program and staff capacity to undertake the CDBG Disaster Recovery Grant Program. To build capacity, the State will obtain training either through HUD or through consulting services to enhance the capabilities of existing staff and sub-grantees.

Additionally, the State will seek to increase the capacity of ULG's and to effectively plan for and define resiliency and mitigation investments by conducting the fore-mentioned statewide resiliency / housing survey targeted at the needs of the affected communities along with that of all seventy-seven (77) counties.

Minority Owned, Women Owned and Sections 3 (Disadvantaged) Business

The State's affirmative outreach and marketing efforts are governed by the following initiatives, efforts or programs.

Policy: Contracting with Small and Minority Businesses, Women Business Enterprise and Labor Surplus Firms

It is national policy to award a fair share of contracts to small, women and minority business firms. Accordingly, affirmative steps must be taken to assure that small and minority/women businesses are utilized when possible as sources of supplies, equipment, construction and services. Affirmative steps shall include the following:

1. Including qualified small and minority/women businesses on solicitation lists.
2. Assuring that small and minority/women businesses are solicited whenever they are potential sources.
3. When economically feasible, dividing total requirements into smaller tasks or quantities so as to permit maximum small and minority/women business participation.
4. Using the services and assistance of the Small Business Administration, the Office of Minority Business Enterprise of the Department of Commerce and the Community Services Administration as required.
5. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority business, and women's business enterprises.

6. If any subcontracts are to be let, requiring the prime contractor to take affirmative steps in 1 through 5 above.
7. Grantees shall take similar appropriate affirmative action in support of women's business enterprises.
8. Grantees are encouraged to procure goods and services from labor surplus areas.
9. Grantor agencies may impose additional regulations and requirements in the foregoing areas only to the extent specifically mandated by statute or presidential direction.

Definitions

Minority Business Enterprise – A Minority Business Enterprise is a business in which minority group members own 51 percent or more of the company; or, in the case of a publicly-owned business, one in which minority group members own at least 51% of its voting stock and control management and daily business operations. For this purpose, minority group members are those groups of U.S. citizens found to be disadvantaged by the Small Business Administration pursuant to Section 8(d) of the Small Business Act. Such groups include, but are not limited to, Black Americans, Hispanic Americans, Native Americans, Indian tribes, Asian Pacific Americans, Native Hawaiian Organizations, and other minorities.

Women Business Enterprise - A Women Business Enterprise is a small business that is at least 51% owned by one or more women. In the case of publicly owned businesses, at least 51% of the stock is owned by one or more women and the management and daily operations of the business are controlled by one or more women.

Small Business - A business that is independently owned and operated and which is not dominant in its field of operation and in conformity with specific industry criteria defined by the Small Business Administration (SBA)

Small Disadvantaged Business - A Small Disadvantaged Business is a small business that is at least 51% owned and controlled by a socially and economically disadvantaged individual or individuals. Small Disadvantaged Businesses are often referred to as Section 3 businesses.

Racial and Ethnic Groups - The following are HUD defined recognized and ethnic categories:

- *White, Not Hispanic Origin* - A person having origins in any of the original peoples of Europe, North Africa, or the Middle East, but not of Hispanic origin.
- *Black, Not Hispanic Origin* - A person having origins in any of the black racial groups of Africa, but not of Hispanic origin.

- *Hispanic* - A person of Mexican, Puerto Rican, Cuban, Central or South American or other Spanish culture or origin, regardless of race.
- *Asian and Pacific Islander* - A person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands.
- *American Indian or Alaskan Native Origin* - A person having origins in any of the original peoples of North America, and who maintains cultural identification through tribal.

Citizen Participation

The Oklahoma Department of Commerce (ODOC/CD) has developed a Citizen Participation Plan in compliance with 24 C.F.R. § 91.115 and applicable U.S. Department of Housing and Urban Development (HUD) requirements such as those outlined in Federal Register Notice, Vol. 78, No. 43 / Tuesday, March 5, 2013 which set forth policies and procedures applicable to citizen participation.

Per 24 C.F.R. § 91.115, the citizen participation plan must encourage citizen participation in the development of a plan, any substantial amendments to the Plan and performance reports. This Plan contains rules and procedures to be followed for citizen participation in activities financed with funding from a CDBG DR grant, administered by ODOC/CD, including activities carried out by a local government in accordance with 24 C.F.R. §91.115(e). The Plan is meant to provide opportunity for participation of all citizens, including those with disabilities or limited English proficiency. The Plan conforms to the requirements outlined in Federal Register Notice, Vol. 78, No. 43 / Tuesday, March 5, 2013.

This Plan is intended to maximize the opportunity for citizen involvement in the planning and development of the ODOC/CD Community Development Block Grant Disaster Recovery (CDBG DR) program, including but not limited to:

- The amount of assistance expected to be received by impacted communities;
- The range of eligible activities to be undertaken;
- Performance reports;
- Other Action Plan and program activities.

The goal of the Citizen Participation Plan is to provide Oklahoma residents with an opportunity to participate in the planning and assessment of the ODOC/CD's CDBG DR Program. This Citizen Participation Plan as part of the CDBG DR Action Plan will continue to be updated as programs progress.

The State welcomes public comments and encourages citizens to submit both oral and written comments regarding the CDBG DR Program throughout the duration of this grant. Under the State's CDBG DR Citizen Participation Plan, each comment will be considered and personally addressed and attached in the Appendix of the CDBG Disaster Recovery Action Plan. A summary of these comments or views, and the grantee's response(s), will be submitted to HUD with the Action Plan or Substantial Amendment. To date, one written comment was received and is attached as Appendix 'C' of the CDBG DR Action Plan. ODOC/CD may be contacted using the following methods:

- Via telephone: (405) 815-6552 Toll Free: (800)-879-6552
- Via email: Robin.Slawson@okcommerce.gov
- Online at: <https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery/>
- In writing at:

Oklahoma Department of Commerce
Attn: Community Development: CDBG Disaster Recovery
900 N. Stiles Ave.
Oklahoma City, OK 73104-3234

ODOC/CD will maintain a public website that provides information accounting for how all grant funds are used and managed/administered, including: links to all action plans; action plan amendments; CDBG DR Program policies and procedures; performance reports; citizen participation requirements; and activity/program information for activities described in its action plan, including details of all contracts and ongoing procurement policies. The website will be updated in a timely manner to reflect the most up-to-date information about the use of these funds and any changes in policies and procedures, as necessary. ODOC/CD will make the following items available on the State's CDBG DR website: <https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery/>

- (a) The action plan (including all amendments);
- (b) Each Quarterly Performance Report (QPR) as created using the Disaster Recovery Grant Reporting System (DRGR) system;
- (c) Updated procurement, policies, and procedures;
- (d) Executed CDBG DR contracts;
- (e) Status of services or goods currently being procured by ODOC/CD (e.g., phase of the procurement, requirements for proposals, etc.)
- (f) Internal Audit Reports

In addition to the public website, ODOC/CD maintains several types of social media accounts such as Instagram, Facebook, Twitter, and Youtube, which are used for informative public outreach. The ODOC/CD CDBG DR website also allows the public to subscribe to an ODOC mailing list, which provides additional public outreach regarding upcoming and current event notifications. The ODOC/CD CDBG DR website also allows for questions and comments to be electronically submitted by the public.

The screenshot shows the Oklahoma Department of Commerce website interface. On the left, the logo features the state of Oklahoma with the text "OKLAHOMA STATE of SUCCESS". Below the logo, the address is listed: "Oklahoma Department of Commerce, 900 N. Stiles Ave., Oklahoma City, OK 73104". Contact information includes "Phone: 405-815-6552", "Toll-Free: 800-879-6552", and "8:00 AM – 5:00 PM CST". Social media icons for LinkedIn, Facebook, Twitter, and YouTube are displayed under the heading "Connect with us".

The main content area is titled "Questions? Contact us today." and contains a contact form with the following fields: "First Name", "Last Name", "Email Address", "Phone Number", "Company", and "City, State, Country". A text area for "How can we help you?" is also present. A reCAPTCHA "I'm not a robot" checkbox is included. A "Submit" button is located below the form. To the right of the form are two blue buttons: an envelope icon for email and a speech bubble icon for chat.

Below the contact form is a "Join our mailing list." section with an "Email Address" input field and a "Subscribe" button.

At the bottom, there are two columns of links: "> [Rx for Oklahoma](#)", "> [Weatherization Assistance Program](#)", "> [Privacy Policy + Legal Notices](#)", "> [Reporting + Compliance](#)", "> [Consolidated Plan](#)", and "> [CDBG Disaster Recovery](#)".

Action Plan Amendments

Substantial Amendments to the Action Plan

A Substantial Amendment to the Action Plan shall be defined as:

1. a change in program benefit or eligibility criteria;
2. the addition or deletion of an activity; or
3. the allocation or reallocation of more than \$1 million between activities.

Only those amendments that meet the definition of a Substantial Amendment are subject to the public notification and public comment procedures. Specifically, a public notice will be published online at the ODOC/CD

CDBG Disaster Recovery webpage (<https://okcommerce.gov/about/reports-planning-documents/cdbg-disaster-recovery/>) and comment will be sought when assistance programs are further defined (i.e. change in program benefit or eligibility criteria) or when funding allocations are further refined by type of activity and location, if applicable. Per the Federal Register Notice guidelines, all amendments (Non-Substantial and Substantial) to the Action Plan will be posted online at the ODOC/CD CDBG Disaster Recovery webpage. Additionally, the CDBG Disaster Recovery Action Plan will be revised to reflect the amendments (Non-Substantial and Substantial) to the Action Plan. As with the amendments, the CDBG Disaster Recovery Action Plan is posted online at the ODOC/CD CDBG Disaster Recovery webpage. Hard copies will also be made available upon request. Citizens, units of local government, and community partners will be provided notice and the opportunity to comment on proposed Substantial Amendments to the Action Plan. No less than seven (7) days will be provided for review and comment on the Substantial Amendment. Comments will be accepted electronically or in writing and will be posted online at the ODOC/CD CDBG Disaster Recovery webpage. A summary of all comments received and responses will be included in the Substantial Amendment that is submitted to HUD for approval. Each amendment submitted to HUD for approval will be numbered sequentially and is meant to supersede the earlier amendments in the published Action Plan.

Non-Substantial Amendments to the Action Plan

Non-Substantial Amendments to the Action Plan are defined as minor, one that does not materially change the activities or eligible beneficiaries. This provision should not be construed as allowing the general administrative budget to exceed the allowable limit. Additionally, a Substantial Amendment is not required in the case where the State is simply requesting additional funding from HUD. HUD must be notified in advance of a Non-Substantial Amendment becoming effective. Non-Substantial Amendments are NOT subject to the public notification and public comment procedures such as a seven (7) day review and comment period. Per the Federal Register Notice guidelines, all amendments (Non-Substantial and Substantial) to the Action Plan will be posted online at the ODOC/CD CDBG Disaster Recovery webpage (<https://okcommerce.gov/about/reports-planning-documents/cdbg-disaster-recovery/>). Additionally, the CDBG Disaster Recovery Action Plan will be revised to reflect the amendments (Non-Substantial and Substantial) to the Action Plan. As with the amendments, the CDBG Disaster Recovery Action Plan is posted online at the ODOC/CD CDBG Disaster Recovery webpage. Hard copies will also be made available upon request. Each amendment submitted to HUD for approval will be numbered sequentially and is meant to supersede the earlier amendments in the published Action Plan.

ODOC/CD may be contacted using the following methods in regard to any additional questions relating to the amendments or amendment process:

- Via telephone: (405) 815-6552 Toll Free: (800)-879-6552

- Via email: steven.hoover@okcommerce.gov
- Online at: <https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery/>
- In writing at:

Oklahoma Department of Commerce
 Attn: Community Development: CDBG Disaster Recovery
 900 N. Stiles Ave.
 Oklahoma City, OK 73104-3234

Individuals with Disabilities or Language Impairments

The State values the public’s opinion by accepting citizen and other interested parties’ comments throughout development and implementation of its CDBG Disaster Recovery program. Every effort will be made to reach minorities, non-English speaking residents, as well as persons with disabilities. For all meetings, to facilitate comments, questions, and other information; a Spanish-speaking translator and/or Hearing Impaired Sign Language interpreter is made available upon request. Program information posted to the website will be accessible and available in accessible formats, including those readable by screen readers. ODOC/CD works to publish all public documentation in formats supportive of screen reader technology. ODOC/CD will make information available in alternate formats as needed and upon request to ensure effective communication to persons with disabilities and language related impairments.

Requests for this Plan or related documents in alternate formats consistent with the provisions of federal requirements related to persons with disabilities can be directed to ODOC/CD using the following methods:

- Via telephone: (405) 815-6552 Toll Free: (800)-879-6552
- Via email: steven.hoover@okcommerce.gov
- Online at: <https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery/>
- In writing at:

Oklahoma Department of Commerce
 Attn: Community Development: CDBG Disaster Recovery
 900 N. Stiles Ave.
 Oklahoma City, OK 73104-3234

Requests for this Plan or related documents in alternate formats consistent with the provisions of federal requirements related to limited English proficiency can be directed to ODOC/CD using the following methods:

- Via telephone: (405) 815-6552 Toll Free: (800)-879-6552

- Via email: Jessica.Izquierdo@okcommerce.gov
- Online at: <https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery/>
- In writing at:

Oklahoma Department of Commerce
 Attn: Community Development: CDBG Disaster Recovery
 900 N. Stiles Ave.
 Oklahoma City, OK 73104-3234

Individuos con Discapacidades o Impedimentos de Lenguaje

El Estado valora la opinión del público al aceptar los comentarios de los ciudadanos y otras partes interesadas durante el desarrollo y la implementación de su programa de Ayuda Local de Desarrollo Comunitario Recuperación de Desastres (CDBG-DR). Se hará todo lo posible para llegar a las minorías, los residentes que no hablan inglés, así como a las personas con discapacidades. Para todas las reuniones, para facilitar comentarios, preguntas y otra información; Un traductor de habla hispana y / o un intérprete de lenguaje de señas para discapacidad auditiva está disponible si es solicitado. La información del programa publicada en el sitio web será accesible y estará disponible en formatos accesibles, incluidos los que puedan leer los lectores de pantalla. El Departamento de Comercio de Oklahoma/ Desarrollo Comunitario (ODOC/CD) trabaja para publicar toda la documentación pública en formatos compatibles con la tecnología de lector de pantalla. ODOC/CD pondrá a disposición información en formatos alternativos según sea necesario y a pedido para garantizar una comunicación efectiva a las personas con discapacidades y discapacidades relacionadas con el lenguaje.

Las solicitudes de este Plan o documentos relacionados en formatos alternativos consistentes con las disposiciones de los requisitos federales relacionados con el dominio limitado del inglés pueden dirigirse a ODOC/CD utilizando los siguientes métodos:

- Por el telefono: (405) 534-6814
- Por el correo electrónico: Jessica.Izquierdo@okcommerce.gov
- En línea a: <https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery/>
- Por escrito en

Oklahoma Department of Commerce
 Attn: Community Development: CDBG Disaster Recovery
 900 N. Stiles Ave.

Technical Assistance

ODOC/CD will provide technical assistance in order to facilitate public participation, upon request. Technical assistance provided will be determined based on the needs of the community or individual requesting assistance.

ODOC/CD may be contacted using the following methods:

- Via telephone: (405) 815-6552 Toll Free: (800)-879-6552
- Via email: Robin.Slawson@okcommerce.gov
- Online at: <https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery/>
- In writing at:

Oklahoma Department of Commerce
 Attn: Community Development: CDBG Disaster Recovery
 900 N. Stiles Ave.
 Oklahoma City, OK 73104-3234

Citizen Complaint Procedures

ODOC/CD will accept written citizen complaints from citizens related to the CDBG DR Program. The State will make every effort to provide a timely written response to every citizen complaint within fifteen (15) working days of the receipt of the complaint, where practical. Citizens who wish to voice a complaint related to the published CDBG DR Action Plan, any substantial amendments to the CDBG DR Action Plan, performance reports, or other issues related to CDBG DR funded activities may do so through any of the following methods:

- Via telephone: (405) 815-6552 Toll Free: (800)-879-6552
- Via email: Robin.Slawson@okcommerce.gov
- Online at: <https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery/>
- In writing at:

Oklahoma Department of Commerce
 Attn: Community Development: CDBG Disaster Recovery
 900 N. Stiles Ave.
 Oklahoma City, OK 73104-3234

Complaints regarding fraud, waste, or abuse of government funds should be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov).

The State encourages all Fair Housing / Equal Opportunity complaints be filed as applicable with the Metropolitan Fair Housing Council of Oklahoma, Inc. for Fair Housing Administration. All citizen complaints relative to Fair Housing / Equal Opportunity violations involving discrimination will be forwarded to the following address for disposition:

Metropolitan Fair Housing Council of Oklahoma, Inc.
 1500 Northeast 4th Street, Suite 204, Oklahoma City, OK 73117

Additionally, the State encourages all Fair Housing / Equal Opportunity complaints be filed as applicable with the State Human Rights Commission now operating under the State Office of the Attorney General.

Oklahoma Office of the Attorney General
313 NE 21st Street, Oklahoma City, OK 73105

Performance Reports

The State must submit a Quarterly Performance Report (“QPR”) through HUD’s Disaster Recovery Grant Reporting (DRGR) system no later than thirty days following the end of each calendar quarter. Within three (3) days of submission to HUD, the QPR must be posted on the State’s CDBG Disaster webpage located on the ODOC website for public review and comment. The State’s first QPR is due after the first full calendar quarter after the grant award. QPR’s will be posted on a quarterly basis until all funds have been expended and all expenditures have been reported. Each QPR will include information about the uses of funds in activities identified in the Action Plan as entered in the DRGR reporting system. This includes, but is not limited to: project name, activity, location, and national objective; funds budgeted, obligated, drawn down, and expended; the funding source and total amount of any non-CDBG Disaster Recovery program funds to be expended on each activity; beginning and actual completion dates of completed activities; achieved performance outcomes such as number of housing units complete or number of low and moderate income persons benefiting; and the race and ethnicity of persons assisted under direct-benefit activities. The State must also record the amount of funding expended for each contractor identified in the Action Plan. Efforts made by the State to affirmatively further fair housing will also be included in the QPR.

During the term of the grant, the grantee will provide citizens, affected local governments, and other interested parties with reasonable and timely access to information and records relating to the approved program and to the grantee’s use of grant funds as well as contracts procured with CDBG Disaster Recovery funding. This information shall be posted on the State’s CDBG Disaster Recovery webpage located on the ODOC/CD website.

Public Outreach History

10.6 Million Allocation - Federal Register Notice Vol. 78, No. 43, Page 14329, March 5, 2013

On February 26, 2014, the Draft CDBG DR Action Plan (\$10.6 Million) was published and made available for public comment. By regulation, a minimum of seven (7) days is required to allow for public review of the proposed Action Plan. The comment period ended on March 19, 2014.

A chronology of citizen participation related events were conducted as part of the State's CDBG Disaster Recovery Action Plan is as follows.

- **CDBG DR Needs Assessment Surveys: Mailed out January 21, 2014**

Additionally, a program narrative and downloadable documentation were made available on the webpage.

- **Public Input Session #1 (Informal): February 6, 2014, Needs Assessment / CDBG DR Survey Discussion**
STATE GOVERNMENT WEATHER CANCEL!

Notification posted on State's CDBG Disaster Recovery webpage located on ODOC's Website. Program narrative and downloadable documentation were made available on the webpage. The input session was also listed in the CDBG DR Needs Assessment which was mailed out to units of local government (Counties, Cities, Towns), HUD Assisted, and LITHC entities within the areas impacted by the storm damage. Direct email and telephone contact was also made with parties who had contacted ODOC before the Federal Register Notice was released.

- **Public Input Session #2 (Informal): January 13, 2014, Needs Assessment / CDBG DR Survey Discussion**

Notification posted on State's CDBG Disaster Recovery webpage located on ODOC's Website. Program narrative and downloadable documentation were made available on the webpage. The input session was also listed in the CDBG DR Needs Assessment which was mailed out to units of local government (Counties, Cities, Towns), HUD Assisted, and LITHC entities within the areas impacted by the storm damage. Direct email and telephone contact was also made with parties who had contacted ODOC before the Federal Register Notice was released.

- **Public Hearing (Formal): February 26, 2014, Proposed CDBG DR Action Plan Overview / Comments**

Notification posted on State's CDBG Disaster Recovery webpage located on ODOC's dedicated CDBG DR Website. A meeting notification and program narrative was also posted on the ODOC website's *EVENTS* webpage as well. The Public Hearing was also listed in the ODOC *Community Developer* Newsletter.

83.1 Million Allocation - Federal Register Notice, Vol. 79, No. 106, Page 31964, June 3, 2014

On September 3, 2014, the Draft CDBG DR (\$83.1 Million) Action Plan was published and made available for public comment. Per the Federal Register Notice, a minimum of thirty (30) days is required to allow for public review of the proposed Action Plan. The comment period ended on October 3, 2014.

A chronology of citizen participation related events were conducted as part of the State's CDBG Disaster Recovery Action Plan is as follows.

- **CDBG DR Needs Assessment (\$83.1 Million Second Allocation) Surveys: Mailed and Emailed out June 26, 2014**

Additionally, a program narrative and downloadable documentation were made available on the webpage.

- **Public Input Session (Informal): July 23, 2014, Needs Assessment / CDBG DR Survey Discussion**

Notification posted on State's CDBG Disaster Recovery webpage located on ODOC/CD's website. Program narrative and downloadable documentation were made available on the webpage. The input session was also listed in the CDBG DR Needs Assessment which was mailed out to units of local government (Counties, Cities, Towns), HUD Assisted, and LITHC entities within the areas impacted by the storm damage. Direct email and telephone contact was also made with parties who had contacted ODOC/CD before the Federal Register Notice was released.

- **Public Hearing (Formal): September 3, 2014, Proposed CDBG DR Action Plan Overview / Comments**

Notification posted on State's CDBG Disaster Recovery webpage located on ODOC/CD's dedicated CDBG DR Website. A meeting notification and program narrative was also posted on the ODOC/CD'S website's *EVENTS* webpage as well.

APPENDICES

CDBG DISASTER RECOVERY

ACTION PLAN

APPENDIX A

DAMAGE ASSESSMENT REPORT

Oklahoma Tornado Disaster & Related Events

Final Report

August 6th, 2013



Overview

The following is a report to HUD's Office of Block Grant Assistance resulting from technical assistance provided by TDA, Inc. in regard to the Oklahoma Tornadoes.

On May 20, 2013 a massive, mile-wide tornado with winds up to 200 mph killed at least 51 people during 40 terrifying minutes of destruction across southern Oklahoma City and its suburbs. The catastrophic storm, commonly referred to as the Moore, OK tornado, was actually part of a series of 30 tornadoes and related events (flooding and straight-line winds) that struck central Oklahoma this spring damaging or destroying over 4,000 homes, a hospital, two elementary schools, commercial strips, a major park – and causing an estimated \$670 million in damages.

In response to the Moore and Oklahoma City tornadoes, the primary events of the natural disaster, HUD directed TDA, Inc. to provide a two-phase delivery of technical assistance designed to assist those entitlement grantees: first, to determine interim assistance that can respond to the events; and second to plan for disaster recovery in their communities. (The technical assistance is authorized under a OneCPD Work Plan: Oklahoma CDBG TA-#TDA-O-11-008-04.)

A team of consultants began delivering the assistance on June 18th -- less than a month after the May tornadoes -- at a kick-off meeting convened by the Oklahoma HUD Field Office. Over the past five weeks, this early intervention offered representatives of the City of Moore, the City of Oklahoma City and the State of Oklahoma timely guidance on strategies to gather complete information on the disaster's impacts (both direct and indirect), to address the disaster with upfront planning and engagement of all stakeholders as well as to prepare for implementing recovery activities.

Because FEMA could not completely assess the storm's damage and turned to the Oklahoma HUD Field Office for help, the team also assisted HUD in presenting this full picture of the conditions resulting from the disaster.

The report first offers a description of the natural disaster, listing the tornadoes and related events. It maps the tornadoes' paths, relates the disaster impacts to the Oklahoma's CDBG entitlement communities (as well as the rest of the state), and provides damage assessments from local and state Emergency Management reports. The damage assessment identifies numbers of structures impacted by the events – housing as well as commercial, infrastructure, public facilities, public utilities, equipment, parks and recreational and public buildings. Included in the housing damage assessment are figures verified by a damage verification team from the Oklahoma HUD Field Office. After the report characterizes the damages, it estimates the damage's cost by category and by entitlement community. Lastly, the report, describes consideration of plans for Oklahoma communities to build back better and stronger with robust mitigation and resiliency initiatives.

Description of Events/Damage

The Oklahoma tornadoes and related events include not only the Moore, OK tornado, but a total of 14 impacting events that occurred during a 45-day period (from April 14-May 31, 2013). Causing the most death and destruction, the tornado that first struck Moore on May 20th, was sandwiched between two sets of storms – one set the preceding day and another 11 days later. These three sets of events include:

1. Tornadoes on May 19th, 2013

- Arcadia (EF 0; 0 fatalities; .3 miles in length)
- Carney, Luther and Prague (EF 3, 0 fatalities, 20 miles in length)
- Edmond and OKC (EF 1, 0 fatalities, 7 miles in length)
- Little Axe, OKC and Shawnee (EF 4, 2 fatalities, 20 miles in length)

2. Tornado on May 20th, 2013

- New Castle, Moore, and OKC (EF 5, 23 fatalities, 17.5 miles in length & 1.3 miles wide)

3. Tornadoes & Flashfloods on May 31st, 2013

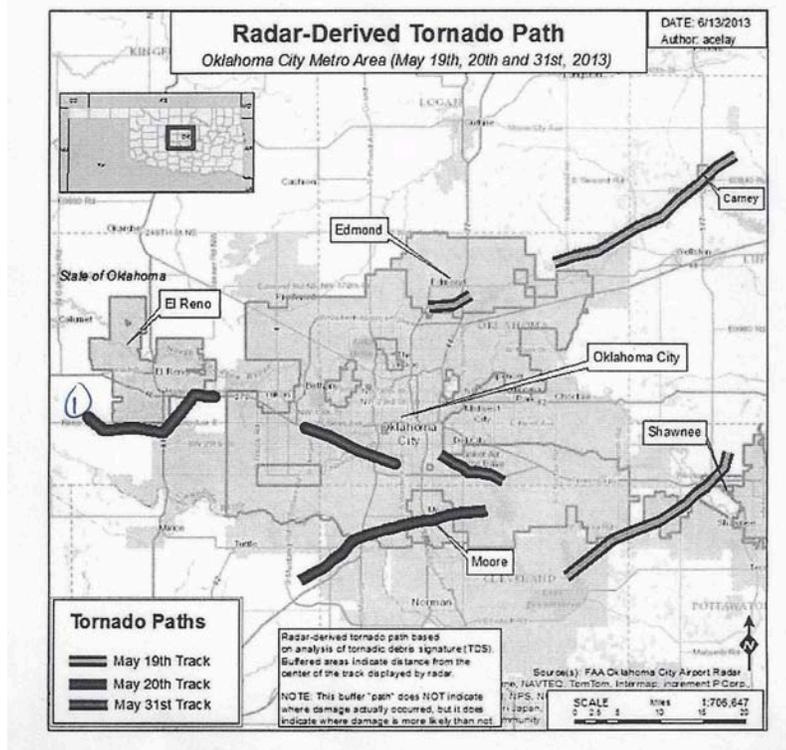
- El Reno, Southwest OKC and Southeast OKC tornadoes (EF 5/1, 9 fatalities); OKC flash floods

These storms' impacts resulted in an initial Presidential Disaster Declaration and amendments covering a large set of effected communities in Oklahoma -- specifically these 4 cities and 6 counties:

- Moore, Oklahoma City, Edmond, and Shawnee
- Canadian, Cleveland, Lincoln, McClain, Oklahoma, Pottawatomie.

Appendix A presents a comparison of all 14 events with affected areas, noting whether they are CDBG entitlement communities or non-entitlement communities.

Appearing below is a map of the tornadoes' paths for the three sets of events listed on the preceding page.



In addition to these events, tornadoes caused 2 fatalities and extensive damage on April 14th in mostly rural sections of Central Oklahoma. These events are identified in [Appendix B](#). They were either covered in the initial Disaster Declaration or the most recent amendment and added the following counties: Atoka, Coal, Hughes, Latimer, Nowata, and Pittsburg, Pushmataha, and Seminole Counties.

Damage assessments completed by local and state Emergency Management

Services report significant damage in Moore, OK and nearby sections of southwestern Oklahoma City resulting from the May 20th tornado. Widespread damage is also reported from the related events and activities.

Taken together, the set of natural disasters have caused major impacts to the affected communities. A detailed account by jurisdiction appears on the following pages.

City of Moore

Having been struck by the May 20th tornado, the central event in the set of three severe storms, Moore suffered by far the most damage in a large area characterized by extensive destruction.



A recap of the event and the City's damage assessment report follow:

Event:

May 20th New Castle, Moore, OKC Tornado (EF 5; 23 fatalities; Length 17.5 miles; Width 1.3 miles);

Initial declaration; <http://www.srh.weather.gov/oun/?n=tornadodata-ok-2013>

Damage:

A report provided by Moore on July 7th indicates 2,091 homes destroyed; 265 homes with major damage; 445 homes with minor damage; and an additional 369 homes affected.



Two schools (including the Plaza Towers elementary school shown here); a school administration building; a hospital; and two commercial strips were destroyed or severely damaged. A total of 90 businesses were also damaged or destroyed.

A major park containing a memorial was also destroyed.

As noted above, Moore suffered the loss of a 24-hour operating hospital managed by the Norman Regional Health System.



(The hospital is a total loss as shown here.)

Plans for rebuilding the hospital are under consideration.

The two commercial strips in Moore included a bowling alley that was completely destroyed.

(A photograph of the bowling alley appears here.)

While initial damage assessments properly focused on housing units, subsequent investigation has revealed substantial damages to commercial structures.



Damage to public facilities was not significant, but did include the above mentioned park which features a Veterans Memorial. Plans are underway to rebuild that park.

The number of structures damaged by the tornado appears in the table below:

Moore

TYPE	AFFECTED	MINOR	MAJOR	DESTROYED	TOTALS
SINGLE FAMILY	369	445	265	1,012	2,091
MOBILE HOME	0	0	0	0	0
APARTMENT	0	0	0	0	0
BUSINESS	12	39	2	37	90
PUBLIC FACILITIES	0	0	1	3	4
Total	381	484	268	1,052	2,185

City of Oklahoma City

Oklahoma City was impacted by all three of the major storm-related events: two tornadoes and a flash flood. The May 20th tornado caused significant damage, but the other events were destructive as well. A recap of the events and the City's Office of Emergency Management damage assessment report follows separately for each event:

Event #1:

May 19th Arcadia Tornado (EF 0; 0 fatalities; Length .3 miles; Width 200 yards); Arcadia part of OKC; Initial declaration; <http://www.srh.weather.gov/oun/?n=tornadodata-ok-2013>

May 19th Carney, Luther, Prague Tornado (EF 1; 0 fatalities; Length 7 miles; Width Unknown); Portion within OKC's City limits; Initial declaration; <http://www.srh.weather.gov/oun/?n=tornadodata-ok-2013>

May 19th Little Axe Tornado (EF 4; 0 fatalities; Length 20 miles; Width Unknown); Portion within OKC's City limits. Initial declaration; <http://www.srh.weather.gov/oun/?n=tornadodata-ok-2013>

Damage:

A report provided by Oklahoma City July 11th indicates the following:

OKC 1

TYPE	AFFECTED	MINOR	MAJOR	DESTROYED	TOTALS
Single Family	12	2	1	1	16
Mobile Home	8	2	2	2	14
Apartment	0	0	0	0	0
Business	0	0	0	0	0
Public Facilities	1	0	0	0	1
Total	21	4	3	3	31

Event #2:

May 20th New Castle, Moore, OKC Tornado (EF 5; 23 fatalities; Length 17.5 miles; Width 1.3 miles). Portion within OKC's City limits; Initial declaration;

<http://www.srh.weather.gov/oun/?n=tornadodata-ok-2013>

Damage:

A report provided by Oklahoma City July 11th indicates the following:

OKC 2

TYPE	AFFECTED	MINOR	MAJOR	DESTROYED	TOTALS
Single Family	267	114	198	447	1026
Mobile Home	0	0	1	1	2
Apartment	0	0	0	0	0
Business	3	0	1	5	9
Public Facilities	0	0	0	1	1
Total	270	114	200	454	1038

Event #3:

May 31st SW OKC Tornado (EF 1; 0 fatalities; Length .4 miles; Width: 250 yards); Included in Amendment 5; <http://www.srh.weather.gov/oun/?n=tornadodata-ok-2013>

May 31st SE OKC Tornado (EF 1; 0 fatalities; Length 10 miles; Width: 250 yards); Included in Amendment 5; <http://www.srh.weather.gov/oun/?n=tornadodata-ok-2013>

May 31st Flash Floods (2 fatalities); Damage within OKC including public housing development flooded; public buildings flooded; infrastructure damaged; Included in Amendment 5

Damage:

A report provided by Oklahoma City July 11th indicates the following:

OKC 3

TYPE	AFFECTED	MINOR	MAJOR	DESTROYED	TOTALS
Single Family	424	10	1	0	435
Mobile Home	120	12	4	0	136
Apartment	83	3	6	0	92
Business	60	23	11	0	94
Public Facilities	7	0	0	0	7
Total	694	48	22	0	764

For Oklahoma City, the three events -- Event #1, Event #2 and Event #3 -- caused significant damages to housing. A total of 1,833 structures were damaged within the city limits.

Housing damages from the New Castle, Moore, OKC Tornado (Event #2) occurred along a path spanning the eastern border of Moore.

(The destruction of a house pictured here is typical of the damage.)



Note: Figures reporting damages to OKC from Event # 2 were incorrectly listed in the table on page 9 in the August 6, 2013 report. They appear correctly here and in the CDBG-DR Action Plans submitted to HUD. (3/19/14)

City of Edmond

Edmond was impacted by a tornado in the first event that struck the area touching ground in the northern suburb of Oklahoma City and causing minor damage.

Event:

May 19th Edmond, OKC Tornado (EF 1; 0 fatalities; Length 7 miles; Width: Unknown); Location adjacent to OKC's City limits; Initial declaration;

<http://www.srh.weather.gov/oun/?n=tornadodata-ok-2013>

Damage:

A report provided by Edmond on July 3rd indicates the following:

Edmond

TYPE	AFFECTED	MINOR	MAJOR	DESTROYED	TOTALS
Single Family	45	85	5	0	135
Mobile Home	0	0	0	0	0
Apartment	0	0	0	0	0
Business	0	0	0	0	0
Public Facilities	0	0	0	0	0
Total	45	85	5	0	135

City of Shawnee

Shawnee was impacted by a tornado in the first event that struck the area touching ground in the nearby community of Oklahoma City and causing considerable damage, particularly to a rural section within the city limits.

Event:

May 19th Little Axe, OKC and Shawnee Edmond, OKC Tornado (EF 4; 2 fatalities; Length 20 miles; Width Unknown; Location adjacent to OKC's City limits; Initial declaration;

<http://www.srh.weather.gov/oun/?n=tornadodata-ok-2013>

Damage:

A report provided by Shawnee on July 9th indicates the following:

Shawnee

TYPE	AFFECTED	MINOR	MAJOR	DESTROYED	TOTALS
Single Family	2	22	12	18	54
Mobile Home	0	0	0	0	0
Apartment	0	0	0	0	0
Business	0	0	0	0	0
Public Facilities	0	0	0	1	1
Total	2	22	12	18	55

City of Norman

In addition, Norman was impacted by a tornado in the first event that struck the area touching ground in the nearby community of Oklahoma City and causing limited damage.

Event:

May 19th Little Axe, OKC and Shawnee Edmond, OKC Tornado (EF 4; 2 fatalities; Length 20 miles; Width Unknown; Location adjacent to OKC's City limits; Initial declaration;

<http://www.srh.weather.gov/oun/?n=tornadodata-ok-2013>

Damage:

A report provided by Norman on July 26th indicates the following:

Norman

TYPE	AFFECTED	MINOR	MAJOR	DESTROYED	TOTALS
Single Family	97	43	16	13	170
Mobile Home	0	0	0	0	0
Apartment	0	0	0	0	0
Business	0	0	0	0	0
Public Facilities	0	0	0	0	0
Total	97	43	16	13	170

Balance of State

A large number of structures were damaged in the state of Oklahoma outside the above-named local jurisdictions. This “balance of the state” damage includes Pottawatomie County near Shawnee; Cleveland County near Norman; Okmulgee; as well as Okfuskee and Le Flore counties. Emergency management officials did not report the balance of state damage by type of structure. Damaged structures were assumed to be single family or mobile homes and have been categorized as single family housing. (Damages to the housing units were verified by the Oklahoma HUD Field Office.) A total of 391 housing units were included in the reports. Most notable is a 90-unit mobile home park near Shawnee.

As of this writing, official damage reports have not been received from rural Atoka, Coal, Hughes, Latimer, Nowata, Pittsburg, Pushmataha, and Seminole Counties. Of these, Atoka County press reports indicate 100 homes or commercial structures were damaged or destroyed. See [Appendix B](#) for details on those damages.

Balance of State

TYPE	AFFECTED	MINOR	MAJOR	DESTROYED	TOTALS
Single Family	40	163	70	117	391
Mobile Home	0	0	0	0	0
Apartment	0	0	0	0	0
Business	0	0	0	0	0
Public Facilities	0	0	0	0	0
Total	0	0	0	0	391

Damage to the rural areas outside the local jurisdictions is represented by the photograph that appears here depicting the tornado's impact to mobile homes.



Based on the numbers of structures damaged or destroyed, the Oklahoma tornadoes and related events represent a catastrophe of major proportions. The following summary table presents damages to structures caused by all events throughout the Presidential declared disaster areas.

DAMAGE SUMMARY					
Type	Affected	Minor	Major	Destroyed	Totals
Single Family	859	879	579	1,607	3,924
Mobile Home	128	14	7	3	152
Apartment	83	3	6	0	92
Business	75	62	14	42	193
Public Facilities	8	0	1	5	14
Total	1,153	958	607	1,657	4,375

Estimated Cost of Damages

In response to the Oklahoma tornado disaster and related events, the team compiled estimates of the storm damage in cooperation with the affected jurisdictions. Community Development staff in those jurisdiction conferred with their Offices of Emergency Management and other local government offices. They provided estimates for the cost of the damages to structures identified in the previous section of this report.

The resulting estimates are limited to direct damages resulting from the three set of events. Because rural counties of Oklahoma have simply not reported damages at a level of detail sufficient to permit a detailed cost estimate by category, the table below reflect damages reported by the local jurisdictions and only the portion of the balance of state captured by those jurisdictions. The cost estimates do not cover the rural counties.

DAMAGE COST ESTIMATE BY CATEGORY (Millions of Dollars)							
Category	Edmond	Moore	OKC	Norman	Shawnee	Balance of State	Totals
Housing	\$2.2	\$159.7	\$83.6	\$3.8	\$3.4	\$22.2	\$274.9
Commercial	0	\$84.8	\$16.0	0	0	0	\$100.9
Infrastructure	\$.1	\$110.3	\$68.8		.5	0	\$179.7
Public Utility	\$.1	\$15.0	0	0	0	0	\$15.1
Public Facilities							
- Equipment	0	0.7	1.5	0	0	0	2.2
- Parks & Rec	0	12.8	0.1	0	0	0	12.8
- Public Bldgs	0	70.3	7.5	0	.2	0	78.0
Subtotal		\$83.8	\$9.10		\$.2		\$93.0
Totals	\$2.4	\$453.5	\$177.6	\$3.8	\$4.1	\$22.2	\$663.7

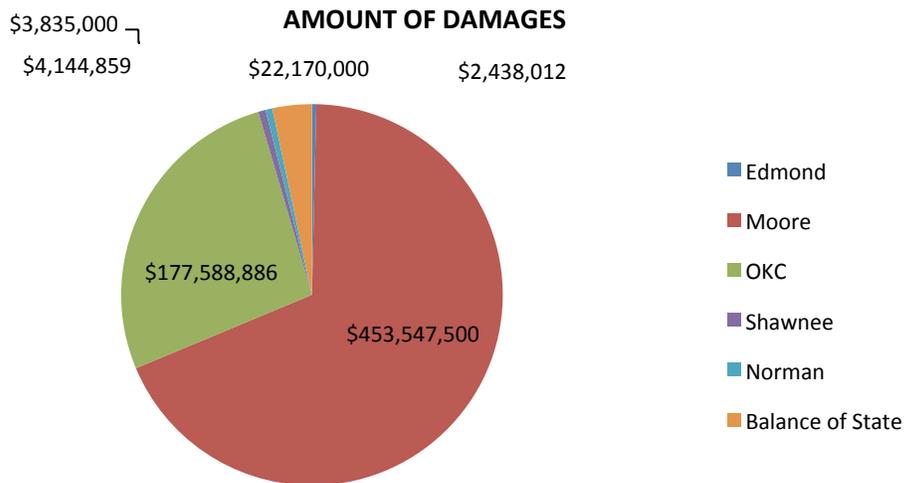
As noted above, the damage estimate by category does not include the complete balance of the state. However, the team can provide a single estimate for the additional cost of the damages reported, but not verified, by assuming 1% of the all damages have not been reported. The cost estimate for unreported damages in the balance of state is an additional \$6.6 million.

Adding the \$6.6 million cost estimate of unreported damages in the balance of state to the estimate of all reported damages presented in the above table, this report can summarize a gross total of estimated damages for the entire disaster area:

Overall, the affected entitlement communities and counties comprising the balance of state report approximately \$670 million in direct damages from the Oklahoma tornadoes and related events.

Ninety-five percent (95%) of the damages currently reported are concentrated in Moore and Oklahoma City. Because the local jurisdictions of Shawnee, Edmond and Norman report relatively small

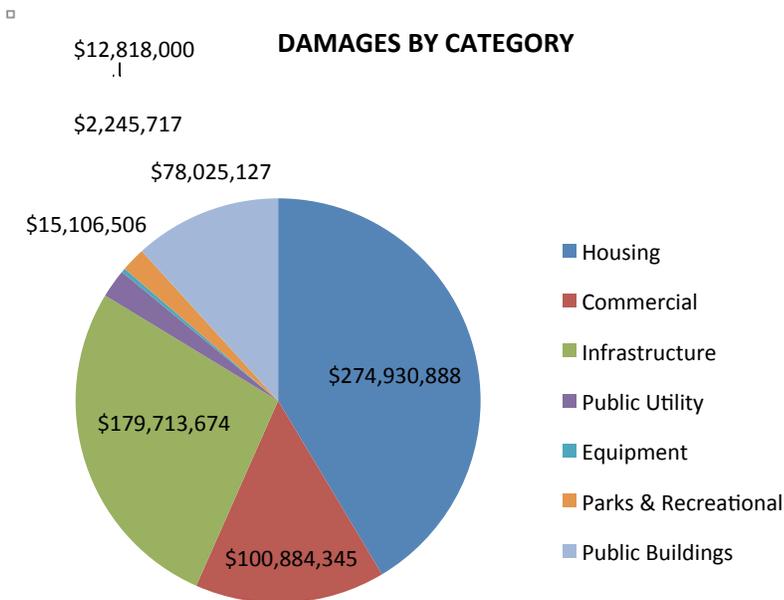
percentages of the total damages, the balance of state portion is the third largest percentage of the damages.



As damages from currently unreported rural counties are added to the totals,

the balance of state portion of the damages is likely to rise.

The chart here provides a breakdown of units by FEMA category of damage type. Total estimated housing damages exceed \$274 million. With the addition housing damages from unreported counties and in the balance of the state, the numbers are expected to increase.



The housing damages represent forty-one percent (41.4%) of the damages reported.

Twenty-seven percent (27%) were to infrastructure damages and fifteen percent (15.2%) were damages to commercial property.

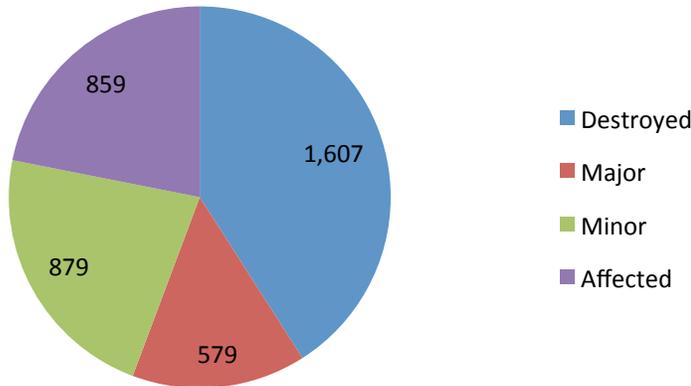
A breakdown of public facilities appears here including: equipment; parks & recreational facilities; and public buildings.

As noted previously, the damaged public buildings were two schools (including the Plaza Towers elementary school and a school administration building in Moore).

As indicated earlier, damage cost estimates include housing damages reported to FEMA by the local jurisdiction's Offices of Emergency Management and verified by the Oklahoma HUD Field Office.

□ This report concludes that over 4,375 homes were damaged or destroyed by the tornadoes and related events, including at least 3,928 units of housing that were reported to the Field Office.

**HOUSING UNIT DAMAGES
(By FEMA Category)**



A majority of the units are in Moore (58.3%) followed by Oklahoma City (30.2%).

The largest portion of damaged housing units were destroyed and they are mostly located in Moore.

Mitigation and Resiliency

The totality of events occurring in Oklahoma has led to a robust local discussion of the need for mitigation and resiliency at the State and local level. During the technical assistance engagement, both Moore and Oklahoma City have embraced the need for mitigation and resiliency measures. The primary problem for all entities is the expected cost of mitigation and resiliency. A detailed account of this discussion appears on the following pages.

Public Schools

The Moore Public School System includes three (3) high schools, five (5) junior high schools (grades 7-8), twenty-three (23) elementary schools, and an alternative school, for a total of thirty-one (31) schools. In total, the Moore school system serves 22,500 students and employs 1,400 teachers and at least 750 support staff¹.

The Oklahoma City Public School system includes twenty-one (21) high schools, seventeen (17) middle schools (grades 7-8), ninety-eight (98) elementary schools, and five (5) other schools, for a total of 141 schools. The Oklahoma City school system contains at least four unified school districts, some of which serve the City and adjacent areas².

The cost of placing a safe room in a public school which will hold both students and staff ranges from \$400,000 to \$600,000 a school³. If a safe room were constructed for every school in Moore and Oklahoma City, the range of costs would be between \$69 million and \$105 million. Statewide (including both Moore and Oklahoma City) there are approximately 2,225 schools⁴. The range of costs to provide a safe room in every school statewide would be between \$890 million and \$1.35 billion.

The Governor has initiated a public private partnership with the intent of raising an undetermined amount of funds toward addressing the need for public school based safe rooms. The Governor has publically stated she will veto any attempt to mandate storm rooms/shelters; however, the Governor is looking to a public/private partnership for safe rooms/shelters for schools. The partnership is being led by the Council on Foundations (COF). Conceptually, the Governor wants to combine 50% state and federal funds with 50% private sector funds brought in by the school systems or the COF to make the partnership work. COF reports \$1.3 million in donations as of June 30th.

¹ City of Moore: Schools and Education: <http://www.cityofmoore.com/education>

² City-Data: <http://www.city-data.com/school/Oklahoma-City-Oklahoma.html>

³ Local estimates provided by Moore & Oklahoma City

⁴ Oklahoma Department of Education:

http://www.ok.gov/sde/about/swsd?field_county_name_tid=All&field_district_name_tid=All&field_site_level_tid=All&page=88



Residential Safe Rooms

The State operates a safe room/shelter lottery which provides a tax rebate for participation. The tax rebate is approximately 25% of the cost. The program is oversubscribed by 20,000. The average lottery quota is 300 units a year. Even with this limitation the Safe Room/Shelter installation backlog is now nine months.

A safe room that survived the Moore Tornado is shown here clearly demonstrating the effectiveness of safe rooms.

The F5 Moore tornado came through the area pictured and this \$4,200 safe room saved the family who lived there. Both Moore and Oklahoma



City have embraced the concept of building safe rooms as part of a mitigation/resiliency effort. However, the local political situation does not support a mandate requiring safe rooms due to cost considerations.

As noted earlier, the Governor has gone as far as to promise a veto of any legislative initiative at the State level to mandate safe rooms for newly constructed homes. Moore City Council also expressed skepticism and tabled a proposal by the Moore Mayor to require safe rooms in new construction or reconstruction. Moore and Oklahoma City; however, have expressed interest in a program associated with disaster recovery activities that might defray the cost of safe rooms in reconstructed homes. Also, Moore is considering changes to its building codes that would address resiliency to weather situations and increased safety. They have hired an architect to assist with the research and the writing of the code changes that would tie down roofs and fasten studs.

Moore has approximately 20,000 households, of which approximately 2,250 are households residing in multifamily properties⁵, leaving a net of approximately 17,750 single family households. FEMA approved safe rooms that hold six (6) persons cost between \$3,200 and \$4,200, indicating an effort to build safe rooms for every single family home would cost between \$67 million and \$72 million.

The multifamily properties are largely low rise town home type developments which suggest 24 person shelters at a cost of \$25,000 each. The net need would be at least 94 safe rooms at a rough cost of \$2.3 million.

Oklahoma City has approximately 225,000 households, of which approximately 58,500 are households residing in multifamily properties⁶, leaving a net of approximately 166,500 single family households. FEMA approved safe rooms that hold six (6) persons cost between \$3,200 and \$4,200, indicating an effort to build safe rooms for every single family home would cost between \$632 million and \$699 million. The multifamily properties are largely low rise town home type developments which suggest 24 person shelters at a cost of \$25,000 each. The net need would be at least 2,438 safe rooms at a rough cost of \$61 million.

Building Codes

The City of Moore has created an advisory group made up of various key stakeholders (architects, builders, council members) who are tasked with recommending building code updates to the City's building code ordinance. These additional building codes will add to the resiliency of houses built in Moore to support potential for surviving as a minimum an F3 tornado.

⁵ US Census Bureau Quick Facts; Moore, OK

⁶ US Census Bureau Quick Facts; Oklahoma City, OK

Other

Both Moore and Oklahoma City are interested in creating or building safe rooms in existing public facilities and other areas and have made very preliminary estimates of cost. Both cities recognize infrastructure improvement and resiliency measures are important to the long term mitigation of tornado damages. Oklahoma City also has concerns regarding the impact of flash floods and resiliency measures which might mitigate the impacts of flooding.

For Further Information

The City of Moore and other jurisdictions all contributed useful information for this report. Not all facts and figures were included in order to keep the report as brief as possible. For further information, the team suggests that anyone who is interested in additional details contact those jurisdictions directly for written reports that they have completed with regard to their respective needs.

Appendix A

The tables below are based on NOAA data. Explanations are placed in context by responsible party in the next section. Explanation data is partially NOAA, partially press reports.

Entitlements

Date/Event	OKC	Edmond	Moore	Shawnee
May 19 th Edmond Tornado		X		
May 19 th Little Axe-OKC-Shawnee Tornado	X			X
May 20 th New Castle – Moore – OKC Tornado	X		X	
May 20 th SW OKC Tornado (SW 79th /Western)	X			
May 31 st SE OKC Tornado (0.5 Miles ENE SW 59th/Penn; 4 Miles SSW Downtown OKC)	X			
May 31 st OKC Flash Floods	X			

Non-Entitlements

Date/Events	Atoka	Canadian	Cleveland	Coal	Latimer	Le Flore	Lincoln	McClain	Nowata	Okfuskee	Oklahoma	Okmulgee	Pittsburg	Pottawatomie	Pushmataha
April 14 th Atoka (7)	X														
April 14 th Talihina					X	X									
April 14 th Poteau						X									
April 14 th Howe						X									
April 14 th Delaware									X						
April 14 th Welty – Nuyaka										X		X			
April 14 th Weathers													X		
April 14 th Bache													X		
April 14 th Jumbo															X
April 14 th Clayton 1															X
April 14 th Clayton 2															X
May 19 th Little Axe-OKC-Shawnee			X								X			X	
May 19 th Carney-Luther							X				X				



Non-Entitlements (Continued)

Date/Events	Atoka	Canadian	Cleveland	Coal	Le Flore	Latimer	Lincoln	McClain	Nowata	Okfuskee	Oklahoma	Okmulgee	Pittsburg	Pottawatomie	Pushmataha
May 19 th Prague Tornado							X			X		X		X	
May 19 th Cameron Tornado					X										
May 20 th New Castle – Moore – OKC Tornado			X					X			X				
May 20 th SW OKC Tornado (SW 79th /Western) *											X				
May 20 th Coal Tornado				X											
May 31 st Talala Tornado									X						
May 31 st Watova Tornado									X						
May 31 st SE OKC Tornado (0.5 Miles ENE SW 59th/Penn; 4 Miles SSW Downtown OKC)											X				
May 31 st El Reno Tornado		X													
May 31 st Yukon Tornado		X													
May 31 st Flash Floods **											X				

* Portions of Oklahoma County are outside of OKC.

** Flash Flood impacts are not clear outside of OKC.

Appendix B

Atoka County

Atoka County was hit by a total of seven (7) tornadoes on April 14th. Press reports indicate as many as 100 homes and businesses and one school were destroyed in and near Tushka; Included in Amendment 7 to the Disaster Declaration.

Event Date	County	Designation	Fatalities	Length in Miles	Width in Yards	Path
April 14 th	Atoka	EF 3	2	17 m	1,320 y	3 E Boggy Depot (5 WSW Tushka) - Tushka - 3 SE Atoka - curving to ~2 E Stringtown
April 14 th	Atoka Pushmataha Pittsburg	EF 1	0	14 m	1,100 y	0.8 S Daisy - 4.5 SE Weathers
April 14 th	Atoka	EF 1	0	.5 m	125 y	1.8 SE - 2 SE Daisy
April 14 th	Atoka	EF 1	0	4 m	100 y	3 WNW - 2 NNE Tushka
April 14 th	Atoka	EF 1	0	2 m	400 y	4 SE - 4 ESE Atoka
April 14 th	Atoka	EF 1	0	4 m	500 y	1.5 NE Redden - 1.3 WSW Daisy
April 14 th	Atoka	EF 1	0	14 m	1,100 y	0.8 S Daisy - 4.5 SE Weathers

Latimer County

No damage reports available; Included in Amendment 7

Event Date	Counties	Designation	Fatalities	Length in Miles	Width in Yards	Path
April 14 th	Latimer Le Flore	EF 1	0	5 m	600 y	4.6 WSW - 0.5 NNW Talihina

Le Flore County

Three events; No damage estimates available; Included as part of Amendment 6.

Event Date	Counties	Designation	Fatalities	Length in Miles	Width in Yards	Path
April 14th	Latimer Le Flore	EF 1	0	5 m	600 y	4.6 WSW - 0.5 NNW Talihina
April 14th	Le Flore	EF 1	0	7	440 y	2.9 SSE Wister - 3.2 S Poteau
April 14th	Le Flore	EF 1	0	1.5 m	300 y	2.1 WSW - 1.7 NW Howe

Nowata County

Includes one tornado; No damage reports available; Included in Amendment 7; News reports indicate another tornado went through the area on April 30th destroying a mobile home and damaging a number of homes. No NOAA data available on April 30th event

Event Date	Counties	Designation	Fatalities	Length in Miles	Width in Yards	Path
April 14 th	Nowata Washington	EF 1	0	1.6 m	200 y	7.2 ESE - 8.5 W Delaware

Okfuskee County

One tornado; Included in initial declaration;

Event Date	Counties	Designation	Fatalities	Length in Miles	Width in Yards	Path
April 14 th	Okfuskee Okmulgee	EF 1	0	11 m	100 y	0.5 S Haydenville - 4 N Nuyaka

Okmulgee County

No damage reports available; Included in Amendment 7

Event Date	Counties	Designation	Fatalities	Length in Miles	Width in Yards	Path
April 14 th	Okfuskee Okmulgee	EF 1	0	11 m	100 y	0.5 S Haydenville - 4 N Nuyaka

Pittsburg County

Two events; No damage reports available; Included in Amendment 7

Event Date	Counties	Designation	Fatalities	Length in Miles	Width in Yards	Path
April 14 th	Atoka Pushmataha Pittsburg	EF 1	0	14 m	1,100 y	0.8 S Daisy - 4.5 SE Weathers
April 14 th	Pittsburg	EF 1	0	5.5 m	300 y	5.9 S - 2.2 SE Bache

Pushmataha County

A total of four events on April 14th; Areas identified as Oleta, Corinne & Sobol; No damage information; Included in Amendment 7;

Event Date	Counties	Designation	Fatalities	Length in Miles	Width in Yards	Path
April 14 th	Atoka Pushmataha Pittsburg	EF 1	0	14 m	1,100 y	0.8 S Daisy - 4.5 SE Weathers
April 14 th	Pushmataha	EF 1	0	3 m	400 y	0.5 WSW - 2.6 ENE Jumbo
April 14 th	Pushmataha	EF 2	0	7 m	1,000 y	10.5 SW - 3.7 WSW Clayton
April 14 th	Pushmataha	EF 1	0	14 m	1,100 y	7.5 NW - 7.1 NW Clayton



Appendix C

The table below is based on a FEMA report that has compiled information on applications received for individual assistance through July 2013.

County	Total Apps	Owners		Renters		Insured		Uninsured	
		Count	%	Count	%	Count	%	Count	%
Canadian (County)	1,054	833	79.0%	216	20.5%	631	59.9%	423	40.1%
Cleveland (County)	8,485	6,005	70.8%	2,437	28.7%	5,382	63.4%	3,103	36.6%
Le Flore (County)	35	31	88.6%	4	11.4%	14	40.0%	21	60.0%
Lincoln (County)	183	163	89.1%	20	10.9%	98	53.6%	85	46.4%
McClain (County)	94	87	92.6%	7	7.4%	75	79.8%	19	20.2%
Okfuskee (County)	46	39	84.8%	7	15.2%	23	50.0%	23	50.0%
Oklahoma (County)	4,305	2,096	48.7%	2,185	50.8%	1,415	32.9%	2,890	67.1%
Okmulgee (County)	79	62	78.5%	17	21.5%	37	46.8%	42	53.2%
Pottawatomie (County)	575	482	83.8%	90	15.7%	331	57.6%	244	42.4%
Totals	14,856	9,798	66.0%	4,983	33.5%	8,006	53.9%	6,850	46.1%

CDBG DISASTER RECOVERY

ACTION PLAN

APPENDIX B

CITIZEN PARTICIPATION PUBLIC COMMENT

CDBG-DR Citizen Participation / Public Comment

The State has an adopted Citizen Participation Plan as required by HUD in its Five Year Consolidated Plan / Annual Action Plan. The plan(s) provide citizens with information on how they can participate in HUD's formula funded CDBG program as well as the HOME, ESG, and HOPWA Programs. Upon notification that the State would receive a CDBG-DR grant allocation, the State has adopted this Citizen Participation Plan and modified it for this CDBG-DR Action Plan in accordance with the guidance set forth in the Federal Register Notice(s).

On February 26, 2014, the proposed CDBG-DR Action Plan was made available for public comment. By regulation, a minimum of seven (7) days is required to allow for public review of the proposed Action Plan.

A chronology of citizen participation related events were conducted as part of the State's CDBG Disaster Recovery Action Plan is as follows.

CDBG-DR Needs Assessment Surveys: Mailed out January 21, 2014

- Additionally, a program narrative and downloadable documentation were made available on the webpage.

Public Input Session #1 (Informal): February 6, 2014, Needs Assessment / CDBG DR Survey Discussion

STATE GOVERNMENT WEATHER CANCEL!

-Notification posted on State's CDBG Disaster Recovery webpage located on ODOC's Website. Program narrative and downloadable documentation were made available on the webpage. The input session was also listed in the CDBG-DR Needs Assessment which was mailed out to units of local government (Counties, Cities, Towns), HUD Assisted, and LITHC entities within the areas impacted by the storm damage. Direct email and telephone contact was also made with parties who had contacted ODOC before the Federal Register Notice was released.

Public Input Session #2 (Informal): January 13, 2014, Needs Assessment / CDBG DR Survey Discussion

-Notification posted on State's CDBG Disaster Recovery webpage located on ODOC's Website. Program narrative and downloadable documentation were made available on the webpage. The input session was also listed in the CDBG-DR Needs Assessment which was mailed out to units of local government (Counties, Cities, Towns), HUD Assisted, and LITHC entities within the areas impacted by the storm damage. Direct email and telephone contact was also made with parties who had contacted ODOC before the Federal Register Notice was released.

Public Hearing (Formal): February 26, 2014, Proposed CDBG DR Action Plan Overview / Comments

-Notification posted on State's CDBG Disaster Recovery webpage located on ODOC's dedicated CDBG-DR Website. A meeting notification and program narrative was also posted on the ODOC website's *EVENTS* webpage as well. The Public Hearing was also listed in the ODOC *Community Developer* Newsletter.

The State welcomes public comments and encourages citizens to submit written comments. All postal delivered written comments are submitted to:

Oklahoma Department of Commerce
Attn: Scott Myers, Community Development / Community Infrastructure
900 N. Stiles Ave.
Oklahoma City, OK 73104-3234

Under the State's Citizen Participation Plan, each comment will be considered and personally addressed and attached in the Appendix of the CDBG Disaster Recovery Action Plan. One written comment was received and is attached to the Appendix of this Action Plan

SUMMARY OF PUBLIC COMMENTS AND RESPONSES

The following is a compilation of all comments received as a result of the Public Hearing and the public comment period. Pursuant to the State of Oklahoma Consolidated Plan Public Comment format, the comments received and their respective responses are grouped by topic and are followed by the response of the agency. All comments are required to be submitted in written form either by postal mail or electronically via email.

CDBG-DR – General Comments

Topic – Agribusiness Funding Request

Comment: Jack Stewart, Canadian County Commissioner District 3 (See Appendix Section C-2)

Canadian County appreciates your consideration regarding inclusion in the CDBG-DR Action Plan and your support.

In regard to the above referenced request this letter is to introduce Levi Clifton, Field of Teams Leader. Debra "Levi" Clifton is a 3rd generation farmer with a 116-year-old farm located 15 miles south of where the El Reno Tornado hit. In the aftermath, she decided it was time to help the affected community of farmers so she started Field of T.E.A.M.S., a group dedicated to clearing the fields of tornado generated debris. She is most knowledgeable about the scope and extent of the damage to Agribusiness in the path of the Tornado from this Event.

Levi and I have been working with FEMA to prepare a survey of affected Agribusinesses. Initial results of this survey indicate that this sector has sustained approximately two million (\$2,000,000.00 U.S.D.) in damage. Levi has spent considerable time and effort in conducting this survey and is still collecting information.

Upon review of this information and subsequent meetings and discussion we are seeking support of CDBG-DR funds to assist us in rectifying some of this damage. Please contact me at your earliest convenience with any questions, comments and direction you may provide.

Response: (Scott Myers, ODOC)

We appreciate your comment. Given CDBG-DR requirements listed in the Federal Register Notice(s) as indicated in the CDBG-DR Action Plan and the current amount of CDBG-DR funding, the State is limited to a maximum allocation of \$300,000 as identified under the CDBG-DR Action Plan. The State must establish the following eligibility threshold requirements and funding priorities for the program.

Eligibility Threshold Requirements

- Projects that benefit LMI persons and/or are located in LMI Areas (i.e. an area with household incomes at or below 80% of the area median income);
- Projects that enable the State to satisfy the federal requirement that at least 30.4% of the Funding be spent in Cleveland County;
- Projects that address conditions that threaten the health and safety of either the occupants or the public;
- Projects that contribute significantly to the long-term recovery and economic revitalization of the affected area;
- Projects undertaken on behalf of a beneficiary or sponsor that commits to contribute financially in the repair, construction or mitigation of the project (this can be through private insurance, NFIP, FEMA, SBA, and/or other sources); and
- Mitigation – includes only a minimum of rehabilitation beyond the correction of conditions caused by the disaster.

Funding Priorities

- Due to limited funds, a preference will be given to businesses located in LMA's or operated by Section 3 eligible applicants.
-

- Due to Federal Register Notice requirements, the state must preference business equipment or business structural repairs to Cleveland County, the county most impacted;
 - Projects that primarily benefit LMI persons and/or are located in LMI Areas (i.e. an area with household incomes at or below 80% of the area median income);
 - Projects that enable the State to satisfy the federal requirement that at least 30.4% of the Funding be spent in Cleveland County;
 - Projects that address conditions that threaten the health and safety of either the occupants or the public;
 - Projects that contribute significantly to the long-term recovery and economic revitalization of the affected area;
 - Projects undertaken on behalf of a beneficiary or sponsor that commits to contribute financially in the repair, construction or mitigation of the project (this can be through private insurance, NFIP, FEMA, SBA, and/or other sources); and
 - Mitigation – includes only a minimum of rehabilitation beyond the correction of conditions caused by the disaster.
-

CDBG-DR Second Allocation Citizen Participation / Public Comment

The State has an adopted Citizen Participation Plan as required by HUD in its Five Year Consolidated Plan/Annual Action Plan. The plan(s) provide citizens with information on how they can participate in HUD's formula funded CDBG program as well as the HOME, ESG, and HOPWA Programs. Upon notification that the State would receive a CDBG-DR grant allocation, the State has adopted this Citizen Participation Plan and modified it for this CDBG-DR Action Plan in accordance with the guidance set forth in the Federal Register Notice(s).

On September 3, 2014, the Draft CDBG-DR Action Plan was published and made available for public comment. Per the Federal Register Notice, a minimum of thirty (30) days is required to allow for public review of the proposed Action Plan. The comment period ended on October 3, 2014.

A chronology of citizen participation related events were conducted as part of the State's CDBG Disaster Recovery Action Plan is as follows.

- **CDBG-DR Needs Assessment (Second Allocation) Surveys: Mailed and Emailed out June 26, 2014**

Additionally, a program narrative and downloadable documentation were made available on the webpage.

- **Public Input Session (Informal): July 23, 2014, Needs Assessment / CDBG-DR Survey Discussion**

Notification posted on State's CDBG Disaster Recovery webpage located on ODOC's Website. Program narrative and downloadable documentation were made available on the webpage. The input session was also listed in the CDBG-DR Needs Assessment which was mailed out to units of local government (Counties, Cities, Towns), HUD Assisted, and LITHC entities within the areas impacted by the storm damage. Direct email and telephone contact was also made with parties who had contacted ODOC before the Federal Register Notice was released.

- **Public Hearing (Formal): September 3, 2014, Proposed CDBG-DR Action Plan Overview / Comments**

Notification posted on State's CDBG Disaster Recovery webpage located on ODOC's dedicated CDBG-DR Website. A meeting notification and program narrative was also posted on the ODOC website's *EVENTS* webpage as well.

The State welcomes public comments and encourages citizens to submit written comments. All postal delivered written comments are submitted to:

Oklahoma Department of Commerce

Attn: Scott Myers, Community Development / Community Infrastructure

900 N. Stiles Ave.

Oklahoma City, OK 73104-3234

Under the State's Citizen Participation Plan, each comment is considered and personally addressed. In all, only one written comment was received.

The State values the public's opinion by accepting citizen and other interested parties' comments throughout development and implementation of its CDBG Disaster Recovery program. Every effort is made to reach minorities, non-English speaking residents, as well as persons with disabilities. For all meetings, to facilitate comments, questions, and other information; a Spanish-speaking translator / Hearing Impaired Sign Language interpreter is made available upon request. As identified in the State's Consolidated Plan under the Citizen Participation component, special needs and translation services were available, as requested. No requests were made for Spanish-speaking translators or other special needs.

SUMMARY OF PUBLIC COMMENTS AND RESPONSES

The following denotes the comments received as a result of the Public Hearing and public comment period. Pursuant to the State of Oklahoma Consolidated Plan public comment format, the comments received and their respective responses are grouped by topic and are followed by the response of the agency. All comments are required to be submitted in written form either by postal or electronically via email. As of the end of the public comment period (Oct. 3, 2014) ODOC/CD had received only one formal public comment.

CDBG-DR COMMENT(S)

TOPIC – Disaster Recovery State Plan Housing Section

(Claudia Brierre, INCOG): I know these are busy days for you all as you wade through the CDBG-DR applications and issues, but I wanted to touch base with you regarding the Housing sections of the State

Disaster Recovery Plan (2nd Allocation) to make sure I am proceeding on the same page as you. As you know, I administer the Tulsa County HOME Consortium and the Tulsa County CDBG Urban County programs. The HOME Consortium is anticipating partnering with the Town of Mannford to create affordable elderly apartments, funded through \$932,000.00 in HOME funds and \$5,000,000.00 in CDBG-DR funds. Tulsa County has issued a Request For Proposals to eligible CHDOs for the HOME portion of the project, to be opened by the Board of County Commissioners on October 13th. We will not enter into a contract with the CHDO (Vintage Housing) until the environmental review has been completed and all project funding sources (CDBG-DR) have been committed. I would anticipate the HOME contract in the December 1- January 1 timeframe, depending on ODOC's contract timeframe. Construction could begin in early Winter and generally takes 10-12 months.

Although I wasn't able to attend your State Plan input session, Rich and Barbara filled me in that the draft plan Housing portions contained language copied from the first Disaster Recovery Plan, and Rich asked me to send you an email discussing the unmet housing needs to be funded through the 2nd allocation. So, here goes.

Page 16 Multifamily Unmet Need identifies the City of Mannford 40 unit elderly housing for \$5,000.000 in unmet need, so that language is correct. Page 24 Multifamily Housing references Rental Housing Rehabilitation and Public Housing. The elderly housing in Mannford will be totally new construction created through a non-profit CHDO and is not Public Housing. As you know, New Construction of Multifamily housing is not customarily an eligible activity under CDBG. I have read the Federal Register Notices for the CDBG Disaster program, and don't see a specific waiver to this ineligibility. I could definitely be wrong- there is a lot of tiny print to scan. If there is a specific waiver, you can stop reading my message right now. There are a few provisions in the CDBG regs that would permit the use of CDBG funds for new construction, though, and I wanted to confirm these provisions were what you are using to qualify the funds:

I am using a handy Policy Memorandum entitled "Using CDBG Funds in Support of Housing" for the following points, and Chapter 4 of Basically CDBG Manual (November 2007):

Grantees may use CDBG funds in four ways for new housing construction, provided a national objective is met:

- 1. Construction by eligible subrecipients. The regulations at section 570.204(a) allow for certain "eligible subrecipients" to receive CDBG funds for constructing housing. The eligible subrecipients are*

described in section 570.204(c) as neighborhood-based nonprofit organizations (NBOs), section 301(d) Small Business Investment Companies (SBICs), local development corporations (LDCs), and Community Housing Development Organizations (CHDOs).

2. *Two further requirements are imposed by section 570.204(a). To receive funding, eligible subrecipients must be undertaking a neighborhood revitalization, community economic development, or energy conservation project with the CDBG funds. And, the grantee must determine that the project is necessary or appropriate to achieve its community development objectives. (Will you require the Town of Mannford to develop a Neighborhood Revitalization Plan, or does the DR Plan serve as that?)*

3. *Eligible subrecipients must carry out the project in name and in deed. Although inexperienced eligible subrecipients may need technical assistance from the grantee, the eligible subrecipient must actually be implementing the activity.*

4. *(This last way doesn't apply here) Last resort housing. Under 24 CFR Part 42, Subpart I, grantees may construct housing of last resort. Grantees are limited to constructing housing for displacees of a CDBG project, subject to the Uniform Act, when the project is prevented from proceeding because comparable replacement housing is not available otherwise. [section 570.207(b)(3)(i)]*

It should be noted that, except as provided for above, grantees are prohibited under section 570.207(b)(3) from constructing new housing using Block Grant funds. These regulations prevent grantees from acting as developers, themselves, with CDBG financing and from directly financing new housing.

I am interpreting all this to mean that in order for CDBG-DR funds to be used for new construction of affordable elderly housing, the Town of Mannford must undertake the activity using an eligible subrecipient, in this case a CHDO. The CHDO must carry out the activity themselves and the Town cannot be the developer or have ownership interest.

We are looking forward to creating affordable elderly housing in disaster-impacted Creek County through this unique funding partnership.

RESPONSE –

(ODOC/CD) “New Construction” is allowed under Disaster Recovery as evidenced in FRN Vol 78 No. 43 March 5, 2013 Page 14335. The FRN specifically says that:

(1) Housing. Typical housing activities include new construction and rehabilitation of single family or multifamily units (including garden apartments, condominiums, and units that participate in a housing cooperative). Most often, grantees use CDBG–DR funds to rehabilitate damaged homes and rental units; rehabilitation activities may include the costs associated with mold remediation. However, grantees may also fund new construction or rehabilitate units not damaged by the disaster if the activity clearly addresses a disaster-related impact and is located in a disaster affected area. This impact can be demonstrated by the disaster’s overall effect on the quality, quantity, and affordability of the housing stock and the resulting inability of the existing stock to meet post-disaster needs and population demands.

CDBG DISASTER RECOVERY

ACTION PLAN

APPENDIX C

IMPEDIMENTS TO FAIR HOUSING

IMPEDIMENTS TO FAIR HOUSING CHOICE (State Jurisdictional Review)

The Housing Priorities and Strategies component in the State's Consolidated Plan identifies the need to minimize barriers to affordable housing from the state perspective. Before there is further discussion regarding the impediments of fair housing choice, one must first understand that the availability of and the ability to obtain affordable housing has a direct impact on those classified as 'protected classes' under the Fair Housing Act. Demographic, employment, and income data show that minorities, families with children (including single parent families), and persons with disabilities are proportionally overrepresented in low-income data and constitute those who are most often in need of affordable housing. It is this connection that one should understand that many barriers to affordable housing can in turn be understood to be an impediment to fair housing choice.

Conclusions drawn from the survey, demographic, economic, and housing related information reveal that these areas share some common themes which also qualify as impediments to fair housing. A discussion of these impediments (deterrents) follows. Each discussion concludes with an action plan outlining what steps the State of Oklahoma will take to try to diminish or eliminate these impediments.

A. Impediment – Lack of Affordable of Housing for Rent

The recent recession caused many homeowners to lose their homes through foreclosure, changing those individuals for homeowners to renters. In addition, the resulting slump in the housing market and the increased risk to real estate lenders has made home loans more difficult to obtain. This comes at a time when more people are out of work or simply working at any job they can find. Household incomes are down and the costs of rents and utilities are rising. During the real estate boom, builders moved away from the construction of rental properties and into the construction of housing for sale.

In recent years, Affordable Housing Tax Credit rental projects have been delayed due to a lack of demand for the Tax Credits. There has been a resulting increase in the demand for rental housing at a time when there is a shortage of decent, safe and sanitary housing units for rent. These factors have created a severe shortage of affordable rental housing. This shortage of affordable rental housing has had a disproportionate impact on minorities, families with children, and individuals with disabilities.

Action - (Lack of Affordable of Housing for Rent)

Stimulus funds from the Tax Credit Assistance Program (TCAP) and the Section 1602 Exchange Program (Exchange Program) have been invaluable in reviving stalled Affordable Housing Tax Credit (AHTC) projects, which are all rental projects. Thirty-eight (38) projects received funding through one or both of these programs. Some have recently been completed, and the rest should be in service by the end of 2011. This will help ease the shortage of affordable rental housing.

In addition, OHFA is considering using a greater percentage of its HOME Investment Partnerships Program (HOME Program) funds for rental activities than in previous years. This is in response to public comment and the results of both surveys. OHFA will put forward this idea in the public input sessions and hearings for the 2012 HOME Program Action Plan. Unfortunately, the funds available through the

HOME Program have never been sufficient to meet the needs of the State of Oklahoma, and these funds have been reduced significantly in recent years. OHFA is not aware of the amount of funding that will be available for the 2012 Program Year. Nonetheless, OHFA will do everything it can, with the limited funds available, to provide the State of Oklahoma with as many affordable rental housing units as possible.

OHFA will also make every effort to encourage builders and developers to use Oklahoma Housing Trust Fund (HTF) monies as part of their development funding for rental properties. The HTF provides very low interest construction financing for both rental and homeownership projects, especially in the rural areas of the State. Once again, the amount of these funds is extremely limited, and the State legislature is no longer providing ongoing funding for the program. OHFA has only the existing funds, less than \$5 million, to assist these projects. OHFA is further limited by the HTF Rules regarding rental projects. Under the HTF Rules, OHFA may only fund up to 25% of the total development costs of a rental project with monies from the HTF. Also, this is only a construction loan program, and builders and developers must repay the funds by obtaining permanent financing once the project is complete.

B. Impediment – Financial Cost Burden of Low incomes or High Rents

This impediment is another one that was heavily emphasized in both surveys. Financial cost burden has been identified in prior analyses as a major impediment to fair housing choice. The problem has only been exacerbated by the recent economic downturn. Unemployment is up, many others are underemployed, and incomes are not rising at the same rate as the cost of rent and utilities.

Financial cost burden can pose a substantial impediment to the protected classes. Affordable units are generally defined as housing available to households at a cost that is no more than 30% of the total household income. Paying more than 30% of monthly income, sometimes substantially more, for rent/mortgage payments and utilities severely handicaps the members of the protected classes, who predominantly tend to have only lower income opportunities.

Local property tax has been identified as increasing the cost of housing for many Oklahomans across the state. Local governments are placing an increasing portion of the total tax burden on property taxes. This tax shift is occurring because the property tax is the only tax most local governments and school districts have flexibility to modify. High property taxes affect the cost of housing for both renters and homeowners.

Rental assistance and utility assistance payments represent the only viable way to alleviate the situation. However, all of the public housing authorities (PHAs) in the State of Oklahoma are oversubscribed in the area of rental and utility assistance. Most if not all of the PHAs have very long waiting lists for this assistance, and have closed their waiting lists due to the length of time it would take any new applicant to receive assistance. In light of the current economic slump and the political situation at the federal level, it is not anticipated that there will be any increase in the Section 8 Housing Choice Voucher Program, or any of the other federal and/or State sources of rental and utility assistance.

Action – (Financial Cost Burden of Low incomes or High Rents)

OHFA is considering increasing the amount of HOME funds set aside for Tenant-Based Rental Assistance (TBRA), in response to the results of the two surveys previously mentioned. It is anticipated that this will be one of the recommendations of the Affordable Housing Committee. Unfortunately, OHFA's funds are limited in this regard. The available HOME funds have been cut by 12% for 2011, and may be cut even further for 2012. Since a substantial part of the 2011 HOME funds have already been committed, and the rest are set-aside for other activities, there are no 2011 funds available for TBRA. Any increase for 2012 would have to be approved through the Consolidated Planning Process.

C. Impediment - Unemployment or Underemployment

This impediment ties directly to Impediment 'B' listed above. Unemployment and underemployment contribute to the financial cost burden of rent, mortgage payments and/or utilities facing individuals or households in the protected classes. If the able-bodied adult members of these households are unable to find employment at a salary equivalent to their skills and abilities, or are unable to find employment of any kind, the problem of financial cost burden becomes much worse. Larger amounts of assistance are required to help these families.

Absent an economic recovery affecting both the State of Oklahoma and the nation as a whole, rental and utility payment assistance will be required for more of the households in the protected classes, and in greater amounts. However, all of the public housing authorities (PHAs) in the State of Oklahoma are oversubscribed in the area of rental and utility assistance. Most if not all of the PHAs have very long waiting lists for this assistance, and have closed their waiting lists due to the length of time it would take any new applicant to receive assistance. In light of the current economic slump and the political situation at the federal level, it is not anticipated that there will be any increase in the Section 8 Housing Choice Voucher Program, or any of the other federal and/or State sources of rental and utility assistance.

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OHFA is considering increasing the amount of HOME funds set aside for Tenant-Based Rental Assistance (TBRA), in response to the results of the two surveys previously mentioned. It is anticipated that this will be one of the recommendations of the Affordable Housing Committee. Unfortunately, OHFA's funds are limited in this regard. The available HOME funds have been cut by 12% for 2011, and may be cut even further for 2012. Since a substantial part of the 2011 HOME funds have already been committed, and the rest are set-aside for other activities, there are no 2011 funds available for TBRA. Any increase for 2012 would have to be approved through the Consolidated Planning Process.

D. Impediment – Lack of Accessible Housing for the Disabled

Affordable, accessible housing is not readily available for many people with developmental disabilities. People who need accessible housing often have trouble finding it or obtaining the funds to modify existing housing. The lack of affordable housing in general only makes this situation worse. Many Oklahomans with developmental disabilities have Supplemental Security Income (SSI) as their only source of income. SSI payments are inadequate to pay market rents, and there are long waiting lists for

housing subsidies. Many individuals with developmental disabilities require some support services to enable them to live independently. For a number of reasons, it is frequently difficult to fund appropriate levels of flexible services to provide this support.

Oklahomans with developmental disabilities who need accessible housing have a difficult time finding appropriate units. Many developers, including developers of public housing, are only willing to develop accessible units if there is specific demand at the time the units are built. Furthermore, landlords often are not willing to leave accessible units open for those who need them, and will rent those units to people who do not need accessible housing. These actions contribute to a shortage of accessible housing.

Even low-income housing is frequently too expensive for people with developmental disabilities who live on SSI. Section 8 Housing vouchers have provided the primary subsidy for very low-income individuals living in community housing. Unfortunately, decreasing support for low income housing programs at the local, state, and federal level have made the problem of finding affordable housing for people with developmental disabilities even worse.

Action - (Lack of Accessible Housing for the Disabled)

Developers of AHTC properties are not required to provide any accessible units, as the AHTC Program does not mandate compliance with Section 504 of the Rehabilitation Act, which requires a certain minimum number of accessible units. However, many recent AHTC properties received assistance through the TCAP Program in order to complete stalled projects. All of the AHTC developments assisted with TCAP funds are required to meet the cross-cutting federal requirements, including Section 504. This means that many new rental developments that will place in service over the next year will have accessible units for disabled individuals or households.

The availability of units is only part of the problem, however. Disabled households must be able to pay the cost of rent and utilities for those units. As previously mentioned, OHFA is considering using more of its 2012 HOME Program allocation for TBRA. OHFA will look at requiring any TBRA activity to give preference to disabled individuals and households, similar to the preference given to such individuals and households by the Section 8 Housing Choice Voucher Program currently administered by OHFA.

E. Impediment - General Lack of Affordable Housing

This impediment is closely tied to Impediment 'A', a lack of affordable rental housing. It is evident from the survey responses and from the demographic, economic and housing data that all types of affordable housing are in short supply. Although rental housing appears to be the greatest need, affordable housing units for homeownership are also greatly needed.

Construction costs are rising, forcing the cost of homes for sale to increase. The average cost of homes for sale has risen at a greater rate than incomes have increased. To make matters worse, stricter lending practices resulting from the collapse of the housing market bubble have made it much more difficult for households with small down-payments and less than stellar credit to be approved for the purchase of a

home. The protected classes are disproportionately represented in the lower income strata, and are more likely to face great difficulties in becoming homeowners due to the conditions mentioned.

Action – (General Lack of Affordable Housing)

Due to the limited amount of HOME Program funds available, and the changes that will be proposed to the HOME Program set-asides in order to address other impediments to fair housing choice, it will not be possible to use HOME funds to address the lack of affordable housing for homeownership. As previously mentioned, OHFA will propose using HOME funds to help alleviate the shortage of other forms of affordable housing, such as housing units for rent.

To address the shortage of affordable housing for homeownership, OHFA will make every effort to educate the public regarding its Single Family Mortgage Revenue Bond Program (SFRMB). OHFA Advantage is a program offered through the SFRMB Program. OHFA Advantage offers 30 year, fixed rate, low interest home loans with 3.5% down payment assistance to homebuyers, statewide. Three products are available for eligible homebuyers to purchase any new or existing home: 1st Gold (most homebuyers), OHFA Shield (Police Officers & Fire Fighters) and OHFA 4Teachers (Educators). To qualify for OHFA Advantage (state bond money), households need only contact a participating lender. Homebuyers must meet income, purchase price and credit score guidelines. The maximum purchase price is \$189,607 and a minimum credit score of 620.

OHFA will also make every effort to encourage builders and developers to make use of the previously mentioned Oklahoma Housing Trust Fund. The HTF provides low-interest construction loan financing for both affordable housing for sale and affordable housing for rent. The HTF is an especially good source of funding for affordable housing for sale, since it can finance 100% of the construction costs of homes for sale.

F. Impediment - Racial bias, Prejudice or Stereotyping

Racial bias, prejudice or stereotyping impediments can be most difficult to address and can originate by various means. The lack of knowledge or education regarding fair housing laws and protections can sometimes serve as an impediment source for protected class members. This can include both those persons offering housing and persons seeking housing. Typically, a landlord's only sources of information regarding fair housing issues are general media reports, or possibly occasional housing presentations. Although many housing groups provide education to their members, not all of the landlords belong to these groups. This is especially true in the rural areas served by the State. Additionally, a vast majority of fair housing claims emanate from the two largest cities, thus indicating that residents in more remote communities (1) are less familiar with fair housing laws and complaint procedures; (2) are unwilling to travel the distances required to pursue action; and (3) perceive that the laws apply only to the metropolitan areas.

There have been many changes to fair housing law since 1968 and the information that many have been using may simply be out of date. The problem of outdated information affects not only private parties, but also has impacted some local government agencies charged with enforcing fair housing laws.

Outdated information may result persons seeking housing to become victims of misinformation or result in a lack of information about their housing rights. It is difficult to combat housing discrimination if people who are discriminated against are not aware that the practice is illegal.

Action – (Racial bias, Prejudice or Stereotyping)

☑ Action: As stated before, while unlawful, prejudice and stereotyping can be the most pervasive and are difficult to correct. Bigotry is not hereditary but a learned behavior stemming from early childhood or through negative life experiences. Educational awareness as mentioned previously is the best available tool but it ultimately remains up to the individual to act upon the new behavior. The State will continue to train funding recipients to recognize housing discrimination or direct clients who encounter housing problems and then to refer them to agencies that can help them remedy the issue or file a complaint with HUD or the OHRC.

☑ Action: Community Action Agencies and/or other community-based non-profit organizations are encouraged to remain proactive in regard to fair housing. These agencies are more readily accessible at the local level and are key players in rural housing advocacy. These local resources are encouraged to develop media campaigns which recognize the most opportune methods of reaching rural citizens, such as weekly or bi-weekly newspapers, county extension programs, or posters at the county fairgrounds, for example. Such public relations efforts might emphasize the concept that fair housing is indeed an issue on a statewide basis and not just limited to the most highly populated areas.

☑ Action: The State is now using online survey technology. This allows for a more direct method to reach rural Oklahoma in order to identify existing impediments. The initial results of using online survey methodology have been very promising. This online survey method provides many benefits over older postal mailing methods. First, emailing surveys or links to online survey questionnaires is very cost effective in an era of diminishing federal funding. Second, it is anticipated that the ease of use and accessibility to the survey will generate more responses than through previous postal mailing formats. The State sees this as a continually evolving process. As technology changes, survey delivery will adapt and change accordingly. Additionally, the questions themselves will change and be refined based off of previous survey response. Simply put, there is a continuous learning curve built in which will allow improved targeting and provide for getting the most accurate fair housing related data possible.

☑ Action: Programs which are administered by ODOC all require that grantees certify their compliance with fair housing laws, regulations, and standards. Implementation manuals which accompany the programs include the following requirements in regard to fair housing provisions for state-funded jurisdictions. By contractual requirement; contractors shall administer the program to affirmatively further fair housing in compliance with Public Law 88-352, Public Law 90-284, and 24 CFR Part 570.601 and 570.904(c). Fair housing requirements apply to all communities irrespective of size, with or without minority residents. For each fiscal year the contractor has received a contract from ODOC, the contractor must provide documentation of the steps taken to affirmatively further fair housing.

The following excerpt below is incorporated into the CDBG monitoring checklists. It verifies that grantees have met the following conditions in regards to fair housing.

a. Does Grant Recipient have an Ordinance? _____ or Resolution? Date: _____

How Enforced? _____

b. Have Complaints been received? _____

Is there documentation describing process to handle discrimination complaints (i.e. complaint form)?

c. Identify steps taken to further fair Housing (there must be one (1) step for each FY CDBG's have been received).

Year ____ Step Year Step

Year ____ Step Year Step

d. Were CDBG funds expended to further fair housing? _____

Findings/Comments:

CDBG DISASTER RECOVERY

ACTION PLAN

APPENDIX D

CDBG-DR ACTION PLAN AMENDMENTS (FUNDING REQUESTS / REVISIONS)



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
 Oklahoma City Field Office, Region VI
 Office of Community Planning and Development
 301 NW 6th, Suite 200
 Oklahoma City, OK 73102-2807
 Phone (405) 609-8509 Fax (405) 609-8982

June 10, 2015

Mr. Vaughn Clark
 Director, Community Development Services
 Oklahoma Department of Commerce
 State of Oklahoma
 900 North Stiles Ave.
 Oklahoma City, OK 73104-3234

Subj: Approved Budget Changes to Round 1 and Round 3 CDBG-DR Grant Agreements for B-13-DS-40-0001

Dear Mr. Clark:

These revised terms and conditions constitute the Department's approval of the State's request to reallocate a cumulative total for rounds 1 and 3 of \$3,346,339.30 from its Housing, Mitigation and Resiliency, and Economic Recovery programs to its Administration, Planning and Infrastructure programs. See tables below:

Project/Program Category	Previous Obligations #1	Reallocated Amount	Revised Obligation #1
Admin	\$316,217.00	\$4,264.30	\$320,481.30
Planning	\$780,000.00	\$150,000.00	\$930,000.00
Housing	\$445,569.00	-\$4,264.30	\$441,304.70
Infrastructure	\$2,204,230.00	\$150,000.00	\$2,354,230.00
Mitigation/Resiliency	\$200,000.00	\$0.00	\$200,000.00
Economic Revitalization	\$300,000.00	-\$300,000.00	\$0.00
TOTAL ROUND 1:	\$4,246,016.00		\$4,246,016.00

Project/Program Category	Previous Obligations #3	Reallocated Amount	Revised Obligation #3
Admin	\$883,016.00	\$359,052.00	\$1,242,068.00
Planning	\$0.00	\$660,000.00	\$660,000.00
Housing	\$5,000,000.00	\$0.00	\$5,000,000.00
Infrastructure	\$6,278,227.00	\$2,023,023.00	\$8,301,250.00
Mitigation/Resiliency	\$4,500,000.00	-\$3,042,075.00	\$1,457,925.00
Economic Revitalization	\$0.00	\$0.00	\$0.00
TOTAL ROUND 3:	\$16,661,243.00		\$16,661,243.00

The State of Oklahoma is seeking to make this change in order to bring its budget more in line with actual progress being made in implementing its programs. The enclosed terms and conditions supersede the previous grant agreements in Rounds 1, 2, and 3. Please update your files accordingly.

The Department remains committed to assisting the recovery of the State Oklahoma from the impacts of major disasters in 2011, 2012 or 2013. If you or any members of your staff have any questions, please contact Mr. Clark M. Williams, CDBG-Disaster Grant Specialist at: (405) 609-8455 direct, (202) 695-0432 mobile and/or email: clark.m.williams@hud.gov .

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Bright". The signature is fluid and cursive, with a large initial "B" and "B".

Bill Bright, Director
Community Planning and Development

Encl:

Oklahoma Department of Commerce, (ODOC), Revised Grant Conditions with Table.

CC:

Scott Myers
Steve Hoover
Robin Slawson

**Revised Grant Conditions for
CDBG Disaster Recovery Assistance
State of Oklahoma
(Disaster Recovery Appropriations Act, 2013 P.L. 113-2)**

1. The grantee must use these Community Development Block Grant (CDBG) funds as provided by Public Law 113-2, Disaster Relief Appropriations Act, 2013 (approved January 29, 2013). This Grant Agreement governs the use of all funds made available to the grantee under grant number B-13-DS-40-0001. The provisions of this Grant Agreement replace any provisions previously provided for in a Grant Agreement executed by the grantee and the Department for grant number B-13-DS-40-0001.
2. The grantee is required to expend the funds obligated in the grant agreement within two years of the date of the obligation. If the grantee's two year expenditure deadline occurs prior to September 30, 2017, unexpended funds will be returned to the Department and may be reallocated. After September 30, 2017, any unexpended funds will be returned to the U.S. Treasury. Funds previously obligated under this Grant Agreement and additional funds now obligated under this Grant Agreement must be expended by two- years from the date on which the Department signed the agreement to obligate the respective funds.
3. The grantee must comply with all Notice requirements, waivers and alternative requirements previously and subsequently issued by the U.S. Department of Housing and Urban Development with respect to this grant. At minimum, these include the December 16, 2013 Federal Register Notice "Allocations, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013" (Docket FR-5696-N-07), the June 3, 2014 Federal Register Notice, "Second Allocation, Waivers, and Alternative Requirements for Grantees Receiving community Development Block Grant (CDBG) Disaster Recovery Funds in Response to Disasters Occurring in 2013," (Docket FR-5696-N-09), and any other applicable Federal Register Notices.
4. The grantee must comply with all applicable requirements of the Housing and Community Development Act of 1974, as amended, and the Cranston-Gonzalez National Affordable Housing Act, as amended, and other statutes, regulations, notices, and Office of Management and Budget (OMB) circulars, except as provided for in terms 1 and 3, above. The grantee is advised to pay particular attention to: regulations at 24 CFR part 58 pertaining to environmental review requirements; labor standards requirements of 42 U.S.C. 5310, and to act in conformance with OMB Circular A-87 (2 CFR part 225) pertaining to cost principles.
5. The grantee's submissions, the Notices identified in term 3 (above), the Funding approval/Agreement (form HUD-7082) are incorporated by reference and constitute part of this Grant Agreement. Submissions include the CDBG-DR action plans and amendments, including the certifications and assurances and any information or documentation required to meet any grant award conditions.

6. The grantee shall comply with requirements established by the Office of Management and Budget (OMB) concerning the Dunn and Bradstreet Data Universal Numbering System (DUNS), the System or Award Management (SAM) Central Contractor Registration database, and the Federal Funding Accountability and Transparency Act, including Appendix A to Part 25 of the *Financial Assistance Use of Universal Identifier and Central Contractor Registration*, 75 Fed. Reg. 55671 (Sept. 14, 2010) (to be codified at 2 CFR part 25) and Appendix A to Part 170 of the *Requirements for Federal Funding Accountability and Transparency Act Implementation*, 75 Fed. Reg. 55663 (Sept. 14, 2010) (codified at 2 CFR part 170).
7. Pursuant to the Notices identified in term 3 (above), the grantee is required to develop a needs assessment and amend its Action Plan as conditions change and additional needs are identified. In its action plan, grantees must also describe the connection between identified unmet needs and the allocation of CDBG-DR resources.
8. This grant agreement covers a total amount of **\$22,887,259.00**. The funds may be used in the amounts listed and activities described in the attached table and as provided in the Action Plan, as amended. The grant terms and conditions have been amended to adjust funding levels and activities described in the table below. The grantee may request that the Department amend the grant terms and conditions to adjust funding levels and activities described in the table below and may not adjust those levels or activities until receiving amended grant terms and conditions. Substantial amendments are subject to the additional requirements of the applicable CDBG-DR Notices. Subsequent amendments to this grant agreement will obligate additional funds towards the State's full grant amount of **\$93,700,000**. The grantee may request additional funds by submitting its amended action plan to the Department.

State of Oklahoma B-13-DS-40-0001

PROGRAM CATEGORY	PREVIOUSLY OBLIGATED AMOUNTS	REALLOCATED AMOUNTS	REVISED OBLIGATIONS
Admin	\$1,199,233.00	\$363,316.30	\$1,562,549.30
Planning	\$780,000.00	\$810,000.00	\$1,590,000.00
Housing	\$5,445,569.00	(\$4,264.30)	\$5,441,304.70
Infrastructure	\$10,462,457.00	\$2,173,023.00	\$12,635,480.00
Mitigation & Resiliency	\$4,700,000.00	(\$3,042,075.00)	\$1,657,925.00
Economic Revitalization	\$300,000.00	(\$300,000.00)	\$0.00
TOTALS:	\$22,887,259.00	\$0.00	\$22,887,259.00

Application for Federal Assistance SF-424		Version 02
*1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		*2. Type of Application * If Revision, select appropriate letter(s) <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision *Other (Specify) _____
3. Date Received:		4. Applicant Identifier:
5a. Federal Entity Identifier:		*5b. Federal Award Identifier:
State Use Only:		
6. Date Received by State:		7. State Application Identifier:
8. APPLICANT INFORMATION:		
*a. Legal Name: State of Oklahoma		
*b. Employer/Taxpayer Identification Number (EIN/TIN): 73-6017987		*c. Organizational DUNS: 824700058
d. Address:		
*Street 1: <u>900 N. Stiles</u>		
Street 2: _____		
*City: <u>Oklahoma City</u>		
County: <u>Oklahoma</u>		
*State: <u>OK</u>		
Province: _____		
*Country: <u>USA</u>		
*Zip / Postal Code <u>73104-3234</u>		
e. Organizational Unit:		
Department Name: Oklahoma Department of Commerce		Division Name: Community Development
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <u>Mr</u>		*First Name: <u>W.</u>
Middle Name: <u>Vaughn</u>		
*Last Name: <u>Clark</u>		
Suffix: _____		
Title: <u>Community Development Director</u>		
Organizational Affiliation:		
*Telephone Number: 405-815-5370		Fax Number: 405-815-5344
*Email: <u>vaughn_clark@okcommerce.gov</u>		

Application for Federal Assistance SF-424

Version 02

***9. Type of Applicant 1: Select Applicant Type:**

A.State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

*Other (Specify)

***10 Name of Federal Agency:**

U.S. Department of Housing and Urban Development (HUD)

11. Catalog of Federal Domestic Assistance Number:

14.269 _____

CFDA Title:

Sandy _____

***12 Funding Opportunity Number:**

*Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

State

***15. Descriptive Title of Applicant's Project:**

Community Development Block Grant / Disaster Recovery (93.7 Million Allocation) State's Program

Application for Federal Assistance SF-424

Version 02

***Applicant Federal Debt Delinquency Explanation**

The following should contain an explanation if the Applicant organization is delinquent of any Federal Debt.

STATE OF OKLAHOMA

CDBG-DISASTER RECOVERY ALLOCATION (\$93.7 MILLION)

AMENDED ACTION PLAN – ROUND / REVISION #4 – 6/1/2015

The State is required to submit an Action Plan Amendment and obtain approval by the US Department of Housing and Urban Development (HUD) before it can receive any portion of the requested disaster funding. This Action Plan Amendment describes the programs and activities for which the State intends to expend the disaster funding in compliance with the federal requirements set forth in the Federal Register.

To date, the Oklahoma Department of Commerce / Community Development (ODOC/CD) has officially received two allocations (\$10.6 & \$83.1 Million) of CDBG Disaster Recovery funding (CDBG-DR). Collectively, these two allocations total \$93.7 million in disaster related funding being provided to the State of Oklahoma from HUD.

The first allocation (\$10.6 Million) was released by HUD on March 5, 2013, in the Federal Register at Vol. 78, No. 43, Page 14329 entitled: “Allocations, Common Application, Waivers and Alternative Requirements for Grantees Receiving Community Development Block Grant (CDBG) Disaster Recovery Funds in Response to Hurricane Sandy” (FR-5696-N-01); April 19, 2013 in the Federal Register at Vol. 78, No. 76, page 23578 entitled: “Clarifying Guidance, Waivers and Alternative Requirements for Hurricane Sandy Grantees in Receipt of Community Development Block Grant Disaster Recovery Funds” (FR-5710-N-01); and December 16, 2013 in the Federal Register at Vol. 78, No. 241 page 76154 “Allocations, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013” (FR-5696-N-07) (collectively, the “Federal Register Notice”).

The second allocation (\$83.1 Million) was released by HUD on June 3, 2014, in the Federal Register at Vol. 79, No. 106, Page 31964 in a notice entitled: “Second Allocation, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013”.

Pursuant to these aforementioned Federal Register Notices and as outlined in the State’s original CDBG-DR Action Plans (1st Allocation, \$10.6 Million & 2nd Allocation \$83.1 Million) submitted to HUD, the State

has reserved the right to “tranche” or segment the CDBG-DR allocation in order to enable the completion of large infrastructure projects under taken by the disaster recovery funding. Based on this ‘tranche’ methodology, the State now must update the requested tranche amounts indicated in the State’s original CDBG-DR Action Plans submitted to HUD.

Although this Action Plan Amendment identifies the State’s revised tranche request for the expenditure of disaster recovery funding, the plan fully complies with the Federal Register Notices and describes the State’s intended use of all of the disaster funding. It is important to note that the amount of the disaster funding is subject to increase, reduction or other modification by Congress, including, without limitation, an act making permanent the impact of sequestration. All amounts based on the amount of the disaster funding set forth in the Federal Register Notice are subject to change consistent with any change in the amount of the disaster funding.

ODOC/CD reserves the right to adjust any of the CDBG-DR funding to ensure the maximum utilization of funds. Such adjustments would be in conjunction with unforeseen events such as the cancellation of projects; projects completed under budget; or from funds designated but not allocated. These adjustments may be used to offset any unforeseen eligible project cost increases such as in the case of construction. Such adjustments, if made available by ODOC/CD, shall be the minimum amount necessary to fund projects efficiently. ODOC/CD will make adjustments as necessary using funding priorities outlined under the earlier published Action Plans.

In accordance with the Federal Register Notice, Action Plans must provide an assessment of the need for the disaster funding. As part of this compliance directive, each Action Plan contains a table of disaster related categories along with the requested funding amounts. It should be noted that these numbers are based solely off of COST ESTIMATES at the time of Action Plan submission and HUD approval. Final project cost estimates can fluctuate and are subject to a variety of factors. No formal contract awards are made by ODOC/CD before HUD has formally approved the requested round’s funding. It is not until the actual contract is awarded and the project has completed the regulatory steps such as procurement that the ACTUAL activity cost will be known.

The following table illustrates the State’s requested funding revision at this time. Please note that the following tables account for the collective \$93.7 million in State CDBG-DR funding. It should be understood that the requested funds for this round of funding as illustrated in the table below are based solely off of preliminary COST ESTIMATES at the time of submission to HUD. The table below reflects the most current

CDBG DR category funding amounts. The table is updated each time a request for an additional round of funding is submitted. Each numbered revision submitted to HUD for approval is meant to supersede the earlier category totals in the earlier published Action Plan.

STATE OF OKLAHOMA: CDBG-DR Allocations (\$93.7 Million)		
ROUND / REVISION #4 AS OF JUNE 1, 2015		
Activity	Round / Revision #4 Request	Total Allocation (Rev 1 – 4)
Housing (Owner-Occupied and Multi-family Housing)	\$0.00	\$5,445,569.00
Infrastructure	\$0.00	\$12,635,480.00
Resiliency & Mitigation	\$16,395,416.70	\$18,099,019.70
Public Facilities	\$0.00	\$0.00
Economic Revitalization	\$0.00	\$0.00
Planning	\$0.00	\$1,590,000.00
Administration	\$442,959.25	\$1,955,566.25
TOTAL:	\$16,838,375.95	\$39,725,634.95

STATE OF OKLAHOMA: CDBG-DR Tranche Allocation History		
(\$10.6 & \$83.1 Million = \$93.7 Million)		
Round / Funding Request #	Allocation	HUD Approval Date
Round #1 (Initial Plan)	\$4,246,016.00	4/29/2014
Round #2	\$1,980,000.00	12/11/2014
Round #3	\$16,661,243.00	12/15/2014
TOTAL:	\$22,887,259.00	

The following is a list of Disaster Recovery specific projects that will be funded under this newest allocation request. The respective administration costs are not included in the table.

Unit of General Local Gov't	Funding Description	Qty	Unit Price	Total
Cleveland County (SP) Cedar Country	Fire Truck - Type 6 engine (brush truck)	1	\$ 74,400.00	\$ 74,400.00
Cleveland County (SP) Lexington	Fire Truck - Type 6 engine (brush truck)	1	\$ 74,400.00	\$ 74,400.00
Cleveland County (SP) Lexington	Fire Truck - Type 2 engine	1	\$ 216,000.00	\$ 216,000.00
Cleveland County (SP) Little Axe	Fire Truck - Type 2 engine	1	\$ 288,000.00	\$ 288,000.00
Cleveland County (SP) Little Axe	Fire Truck - Type 6 engine (brush truck)	1	\$ 74,400.00	\$ 74,400.00
Cleveland County (SP) Little Axe	Fire Truck - 2500 gallon water tender	1	\$ 216,000.00	\$ 216,000.00
Cleveland County (SP) Noble	Fire Truck - Type 6 engine (brush truck)	1	\$ 74,400.00	\$ 74,400.00
Cleveland County (SP) Noble	Fire Truck - 2500 gallon water tender	1	\$ 216,000.00	\$ 216,000.00
Cleveland County (SP) Noble	Fire Truck - Type 2 engine	1	\$ 288,000.00	\$ 288,000.00
Cleveland County (SP) Slaughterville	Fire Truck - Type 6 engine (brush truck)	1	\$ 74,400.00	\$ 74,400.00
Cleveland County (SP) Slaughterville	Fire Truck - Type 2 engine	1	\$ 288,000.00	\$ 288,000.00
Creek County (BOCC)	Emergency Communications - New Site Turner Toll Gate	1	\$ 1,415,000.00	\$ 1,415,000.00
Creek County (BOCC)	Emergency Communications - New Site Carl Cole Arena	1	\$ 1,415,000.00	\$ 1,415,000.00
Creek County (BOCC)	Emergency Communications - New Site at GDRA	1	\$ 1,051,000.00	\$ 1,051,000.00
Creek County (BOCC)	Emergency Communications - APX Mobiles	351	\$ 4,500.00	\$ 1,579,500.00
Creek County (BOCC)	Emergency Communications - APX Portables	423	\$ 4,000.00	\$ 1,692,000.00
Creek County (BOCC)	Emergency Communications - Additional Southeast Site	1	\$ 600,000.00	\$ 600,000.00

Creek County (BOCC)	Emergency Communications - Control Stations	11	\$	6,600.00	\$	72,600.00
Creek County (Sheriff Dept.)	Emergency Communications - Bristow Site Upgrade	1	\$	600,000.00	\$	600,000.00
Creek County (Sheriff Dept.)	Emergency Communications - Kellyville Site Upgrade	1	\$	600,000.00	\$	600,000.00
Creek County (Sheriff Dept.)	Emergency Communications - New Kellyville Tower 400'	1	\$	313,000.00	\$	313,000.00
Creek County (Sheriff Dept.)	Emergency Communications - APX Mobiles	54	\$	4,500.00	\$	243,000.00
Creek County (Sheriff Dept.)	Emergency Communications - APX Portables	61	\$	4,000.00	\$	244,000.00
Creek County (SP) Drumright	Fire Truck - Rescue Truck	1	\$	107,900.00	\$	107,900.00
Creek County (SP) Drumright	Fire Truck - Pumper/Tanker	1	\$	233,275.00	\$	233,275.00
Creek County (SP) Freedom Hill	Fire Truck - Pumper	1	\$	336,104.00	\$	336,104.00
Creek County (SP) Freedom Hill	Emergency Bunker Gear: Super Deluxe Bunker Coats	20	\$	1,040.00	\$	20,800.00
Creek County (SP) Freedom Hill	Emergency Bunker Gear: Lettering "Coat"	20	\$	25.00	\$	500.00
Creek County (SP) Freedom Hill	Emergency Bunker Gear: Super Pants	20	\$	670.50	\$	13,410.00
Creek County (SP) Freedom Hill	Emergency Bunker Gear: Padded H-Back Suspenders	20	\$	28.00	\$	560.00
Creek County (SP) Freedom Hill	Emergency Bunker Gear: Traditional Helmets - Faceshield	20	\$	335.00	\$	6,700.00
Creek County (SP) Freedom Hill	Emergency Bunker Gear: Standard 2 Panel, 6" Leather Helmet Front	20	\$	40.00	\$	800.00
Creek County (SP) Freedom Hill	Emergency Bunker Gear: Fire Hunter Extreme Leather Boots	20	\$	293.00	\$	5,860.00
Creek County (SP) Freedom Hill	Emergency Bunker Gear: Black/Gold Commander Leather Gloves	20	\$	71.00	\$	1,420.00

Creek County (SP) Freedom Hill	Emergency Bunker Gear: Nomex Blend Flashover Hoods	20	\$	19.25	\$	385.00
Creek County (SP) Kellyville	Fire Truck (Grass Rig) Wildlands Apparatus	1	\$	124,220.00	\$	124,220.00
Creek County (SP) Kellyville	Emergency Bunker Gear - American Classic Fire Helmet	25	\$	263.25	\$	6,581.25
Creek County (SP) Kellyville	Emergency Bunker Gear - Super Commando Fire Coat	25	\$	1,093.50	\$	27,337.50
Creek County (SP) Kellyville	Emergency Bunker Gear - Super Commando Fire Pant	25	\$	700.50	\$	17,512.50
Creek County (SP) Kellyville	Emergency Bunker Gear - Leather Fire Boots	25	\$	333.50	\$	8,337.50
Creek County (SP) Kellyville	Emergency Bunker Gear - Shelby Fire Glove High Visibility	25	\$	46.50	\$	1,162.50
Creek County (SP) Kellyville	Emergency Bunker Gear - Shelby Pigskin Glove Gauntlet	25	\$	74.25	\$	1,856.25
Creek County (SP) Kellyville	Emergency Bunker Gear - Carbon Hood	25	\$	29.50	\$	737.50
Creek County (SP) Kellyville	Emergency Bunker Gear - Structural /Wildland Leather Boots	25	\$	293.50	\$	7,337.50
Creek County (SP) Milfay	Fire Truck - Tanker Truck	1	\$	239,150.00	\$	239,150.00
Creek County (SP) Milfay	Fire Truck - Grass Fire Truck	1	\$	77,742.00	\$	77,742.00
Creek County (SP) Olive	Fire Truck - Pumper/Tanker	1	\$	348,800.00	\$	348,800.00
Creek County (SP) Olive	Emergency Bunker Gear - Gloves	18	\$	60.00	\$	1,080.00
Creek County (SP) Olive	Emergency Bunker Gear - Nomex Hood	18	\$	23.00	\$	414.00
Creek County (SP) Olive	Emergency Bunker Gear - Fire Helmet	18	\$	178.00	\$	3,204.00
Creek County (SP) Olive	Emergency Bunker Gear - Fire Boots	18	\$	122.00	\$	2,196.00
Creek County (SP) Olive	Emergency Bunker Gear - Fire Coat	18	\$	596.00	\$	10,728.00
Creek County (SP) Olive	Emergency Bunker Gear - Nomex Fire Pants	18	\$	400.00	\$	7,200.00

Creek County (SP) Olive	Emergency Bunker Gear - Scotchlite Letters (Sewn On)	90	\$	4.50	\$	405.00
Creek County (SP) Shamrock RFD	Fire Truck - Wildlands Fire Truck	2	\$	118,088.00	\$	236,176.00
Creek County (SP) Shamrock RFD	Emergency Bunker Gear - Nomex Wildland Jacket	12	\$	150.00	\$	1,800.00
Creek County (SP) Shamrock RFD	Emergency Bunker Gear - Nomex Wildland Pant	12	\$	160.00	\$	1,920.00
Creek County (SP) Shamrock RFD	Emergency Bunker Gear - Wildland Helmet	12	\$	69.00	\$	828.00
Creek County (SP) Shamrock RFD	Emergency Bunker Gear - Hot Shield Wildland Mask with Filters	12	\$	75.00	\$	900.00
Creek County (SP) Shamrock RFD	Emergency Bunker Gear - Wildland Goggles	12	\$	42.00	\$	504.00
Creek County (SP) Shamrock RFD	Emergency Bunker Gear - Nomex Hood	12	\$	29.00	\$	348.00
Creek County (SP) Shamrock RFD	Emergency Bunker Gear - Tactical Light with Bracket	12	\$	65.00	\$	780.00
Creek County (SP) Shamrock RFD	Emergency Bunker Gear - Wildland Pant Suspenders	12	\$	30.00	\$	360.00
Creek County (SP) Silver City	Fire Truck - Brush Truck	1	\$	77,741.00	\$	77,741.00
Depew , Town of	Fire Truck - Rescue Pumper	1	\$	245,649.00	\$	245,649.00
Depew, Town of	Wildlands 150 Gallon Skid Unit	1	\$	10,160.00	\$	10,160.00
Mounds, Town of	Fire Truck - Brush Truck	1	\$	77,741.20	\$	77,741.20
Mounds, Town of	Emergency Bunker Gear: Super Deluxe Bunker Coats	20	\$	1,040.00	\$	20,800.00
Mounds, Town of	Emergency Bunker Gear: Lettering "Coat"	20	\$	25.00	\$	500.00
Mounds, Town of	Emergency Bunker Gear: Super Pants	20	\$	670.50	\$	13,410.00
Mounds, Town of	Emergency Bunker Gear: Padded H-Back Suspenders	20	\$	28.00	\$	560.00
Mounds, Town of	Emergency Bunker Gear: Traditional Helmets - Faceshield	20	\$	335.00	\$	6,700.00

Mounds, Town of	Emergency Bunker Gear: Standard 2 Panel, 6" Leather Helmet Front	20	\$	40.00	\$	800.00
Mounds, Town of	Emergency Bunker Gear: Fire Hunter Extreme Leather Boots	20	\$	293.00	\$	5,860.00
Mounds, Town of	Emergency Bunker Gear: Black/Gold Commander Leather Gloves	20	\$	71.00	\$	1,420.00
Mounds, Town of	Emergency Bunker Gear: Nomex Blend Flashover Hoods	20	\$	19.25	\$	385.00
Sapulpa, City of	Fire Truck - Custom Quint Pumper	1	\$	1,025,000.00	\$	1,025,000.00
Sapulpa, City of	Fire Truck - Pierce Pumper	1	\$	750,000.00	\$	750,000.00
Sapulpa, City of	Fire Truck - Tanker Truck	1	\$	300,000.00	\$	300,000.00
Sapulpa, City of	Fire Truck - Skeeter Brush Truck	2	\$	185,000.00	\$	370,000.00
Total					\$	16,395,416.70

STATE OF OKLAHOMA

CDBG-DISASTER RECOVERY ALLOCATION (\$93.7 MILLION)

AMENDED ACTION PLAN – ROUND / REVISION #5 – 7/7/2015

The State is required to submit an Action Plan Amendment and obtain approval by the US Department of Housing and Urban Development (HUD) before it can receive any portion of the requested disaster funding. This Action Plan Amendment describes the programs and activities for which the State intends to expend the disaster funding in compliance with the federal requirements set forth in the Federal Register.

To date, the Oklahoma Department of Commerce / Community Development (ODOC/CD) has officially received two allocations (\$10.6 & \$83.1 Million) of CDBG Disaster Recovery funding (CDBG-DR). Collectively, these two allocations total \$93.7 million in disaster related funding being provided to the State of Oklahoma from HUD.

The first allocation (\$10.6 Million) was released by HUD on March 5, 2013, in the Federal Register at Vol. 78, No. 43, Page 14329 entitled: “Allocations, Common Application, Waivers and Alternative Requirements for Grantees Receiving Community Development Block Grant (CDBG) Disaster Recovery Funds in Response to Hurricane Sandy” (FR-5696-N-01); April 19, 2013 in the Federal Register at Vol. 78, No. 76, page 23578 entitled: “Clarifying Guidance, Waivers and Alternative Requirements for Hurricane Sandy Grantees in Receipt of Community Development Block Grant Disaster Recovery Funds” (FR-5710-N-01); and December 16, 2013 in the Federal Register at Vol. 78, No. 241 page 76154 “Allocations, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013” (FR-5696-N-07) (collectively, the “Federal Register Notice”).

The second allocation (\$83.1 Million) was released by HUD on June 3, 2014, in the Federal Register at Vol. 79, No. 106, Page 31964 in a notice entitled: “Second Allocation, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013”.

Pursuant to these aforementioned Federal Register Notices and as outlined in the State’s original CDBG-DR Action Plans (1st Allocation, \$10.6 Million & 2nd Allocation \$83.1 Million) submitted to HUD, the State

has reserved the right to “tranche” or segment the CDBG-DR allocation in order to enable the completion of large infrastructure projects under taken by the disaster recovery funding. Based on this ‘tranche’ methodology, the State now must update the requested tranche amounts indicated in the State’s original CDBG-DR Action Plans submitted to HUD.

Although this Action Plan Amendment identifies the State’s revised tranche request for the expenditure of disaster recovery funding, the plan fully complies with the Federal Register Notices and describes the State’s intended use of all of the disaster funding. It is important to note that the amount of the disaster funding is subject to increase, reduction or other modification by Congress, including, without limitation, an act making permanent the impact of sequestration. All amounts based on the amount of the disaster funding set forth in the Federal Register Notice are subject to change consistent with any change in the amount of the disaster funding.

ODOC/CD reserves the right to adjust any of the CDBG-DR funding to ensure the maximum utilization of funds. Such adjustments would be in conjunction with unforeseen events such as the cancellation of projects; projects completed under budget; or from funds designated but not allocated. These adjustments may be used to offset any unforeseen eligible project cost increases such as in the case of construction. Such adjustments, if made available by ODOC/CD, shall be the minimum amount necessary to fund projects efficiently. ODOC/CD will make adjustments as necessary using funding priorities outlined under the earlier published Action Plans.

In accordance with the Federal Register Notice, Action Plans must provide an assessment of the need for the disaster funding. As part of this compliance directive, each Action Plan contains a table of disaster related categories along with the requested funding amounts. It should be noted that these numbers are based solely off of COST ESTIMATES at the time of Action Plan submission and HUD approval. Final project cost estimates can fluctuate and are subject to a variety of factors. No formal contract awards are made by ODOC/CD before HUD has formally approved the requested round’s funding. It is not until the actual contract is awarded and the project has completed the regulatory steps such as procurement that the ACTUAL activity cost will be known.

The following table illustrates the State’s requested funding revision at this time. Please note that the following tables account for the collective \$93.7 million in State CDBG-DR funding. It should be understood that the requested funds for this round of funding as illustrated in the table below are based solely off of preliminary COST ESTIMATES at the time of submission to HUD. The table below reflects the most current

CDBG DR category funding amounts. The table is updated each time a request for an additional round of funding is submitted. Each numbered revision submitted to HUD for approval is meant to supersede the earlier category totals in the earlier published Action Plan.

STATE OF OKLAHOMA: CDBG-DR Allocations (\$93.7 Million)		
ROUND / REVISION #5 AS OF JULY 7, 2015		
Activity	Round / Revision #5 Request	Total Allocation (Rev 1 – 5)
Housing (Owner-Occupied and Multi-family Housing)	\$750,000.00	\$6,191,304.70
Infrastructure	\$0.00	\$12,635,480.00
Resiliency & Mitigation	\$537,500.00	\$18,590,841.70
Public Facilities	\$0.00	\$0.00
Economic Revitalization	\$0.00	\$0.00
Planning	\$0.00	\$1,590,000.00
Administration	\$68,000.00	\$2,073,508.55
TOTAL:	\$1,355,500.00	\$41,081,134.95

STATE OF OKLAHOMA: CDBG-DR Tranche Allocation History		
(\$10.6 & \$83.1 Million = \$93.7 Million)		
Round / Funding Request #	Allocation	HUD Approval Date
Round #1 (Initial Plan)	\$4,246,016.00	4/29/2014
Round #2	\$1,980,000.00	12/11/2014
Round #3	\$16,661,243.00	12/15/2014
Round #4	\$16,838,375.95	6/11/2015
TOTAL:	\$39,725,634.95	

The following is a list of CDBG Disaster Recovery specific funding requests that are included under this newest allocation.

Unit of General Local Gov't	DR Activity	Funding Description	Total
Oklahoma City, City of	Housing	Single Family Housing	\$750,000.00
Oklahoma City, City of	Resiliency & Mitigation	Storm Shelter Program	\$537,500.00
Oklahoma City, City of	Administration	Administration	\$68,000.00
Total			\$1,355,500.00

STATE OF OKLAHOMA

CDBG-DISASTER RECOVERY ALLOCATION (\$93.7 MILLION)

AMENDED ACTION PLAN – ROUND / REVISION #6 – 10/8/2015

The State is required to submit an Action Plan Amendment and obtain approval by the US Department of Housing and Urban Development (HUD) before it can receive any portion of the requested disaster funding. This Action Plan Amendment describes the programs and activities for which the State intends to expend the disaster funding in compliance with the federal requirements set forth in the Federal Register.

To date, the Oklahoma Department of Commerce / Community Development (ODOC/CD) has officially received two allocations (\$10.6 & \$83.1 Million) of CDBG Disaster Recovery funding (CDBG-DR). Collectively, these two allocations total \$93.7 million in disaster related funding being provided to the State of Oklahoma from HUD.

The first allocation (\$10.6 Million) was released by HUD on March 5, 2013, in the Federal Register at Vol. 78, No. 43, Page 14329 entitled: “Allocations, Common Application, Waivers and Alternative Requirements for Grantees Receiving Community Development Block Grant (CDBG) Disaster Recovery Funds in Response to Hurricane Sandy” (FR-5696-N-01); April 19, 2013 in the Federal Register at Vol. 78, No. 76, page 23578 entitled: “Clarifying Guidance, Waivers and Alternative Requirements for Hurricane Sandy Grantees in Receipt of Community Development Block Grant Disaster Recovery Funds” (FR-5710-N-01); and December 16, 2013 in the Federal Register at Vol. 78, No. 241 page 76154 “Allocations, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013” (FR-5696-N-07) (collectively, the “Federal Register Notice”).

The second allocation (\$83.1 Million) was released by HUD on June 3, 2014, in the Federal Register at Vol. 79, No. 106, Page 31964 in a notice entitled: “Second Allocation, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013”.

Pursuant to these aforementioned Federal Register Notices and as outlined in the State’s original CDBG-DR Action Plans (1st Allocation, \$10.6 Million & 2nd Allocation \$83.1 Million) submitted to HUD, the State

has reserved the right to “tranche” or segment the CDBG-DR allocation in order to enable the completion of large infrastructure projects under taken by the disaster recovery funding. Based on this ‘tranche’ methodology, the State now must update the requested tranche amounts indicated in the State’s original CDBG-DR Action Plans submitted to HUD.

Although this Action Plan Amendment identifies the State’s revised tranche request for the expenditure of disaster recovery funding, the plan fully complies with the Federal Register Notices and describes the State’s intended use of all of the disaster funding. It is important to note that the amount of the disaster funding is subject to increase, reduction or other modification by Congress, including, without limitation, an act making permanent the impact of sequestration. All amounts based on the amount of the disaster funding set forth in the Federal Register Notice are subject to change consistent with any change in the amount of the disaster funding.

ODOC/CD reserves the right to adjust any of the CDBG-DR funding to ensure the maximum utilization of funds. Such adjustments would be in conjunction with unforeseen events such as the cancellation of projects; projects completed under budget; or from funds designated but not allocated. These adjustments may be used to offset any unforeseen eligible project cost increases such as in the case of construction. Such adjustments, if made available by ODOC/CD, shall be the minimum amount necessary to fund projects efficiently. ODOC/CD will make adjustments as necessary using funding priorities outlined under the earlier published Action Plans.

In accordance with the Federal Register Notice, Action Plans must provide an assessment of the need for the disaster funding. As part of this compliance directive, each Action Plan contains a table of disaster related categories along with the requested funding amounts. It should be noted that these numbers are based solely off of COST ESTIMATES at the time of Action Plan submission and HUD approval. Final project cost estimates can fluctuate and are subject to a variety of factors. No formal contract awards are made by ODOC/CD before HUD has formally approved the requested round’s funding. It is not until the actual contract is awarded and the project has completed the regulatory steps such as procurement that the ACTUAL activity cost will be known.

The following table illustrates the State’s requested funding revision at this time. Please note that the following tables account for the collective \$93.7 million in State CDBG-DR funding. It should be understood that the requested funds for this round of funding as illustrated in the table below are based solely off of preliminary COST ESTIMATES at the time of submission to HUD. The table below reflects the most current

CDBG DR category funding amounts. The table is updated each time a request for an additional round of funding is submitted. Each numbered revision submitted to HUD for approval is meant to supersede the earlier category totals in the earlier published Action Plan.

STATE OF OKLAHOMA: CDBG-DR Allocations (\$93.7 Million)		
ROUND / REVISION #6 AS OF OCTOBER 8, 2015		
Activity	Round / Revision #6 Request	Total Allocation (Rev 1 – 6)
Housing (Owner-Occupied and Multi-family Housing)	\$0.00	\$6,191,304.70
Infrastructure	\$7,840,829.05	\$20,476,309.05
Resiliency & Mitigation	\$300,000.00	\$18,890,841.70
Public Facilities	\$0.00	\$0.00
Economic Revitalization	\$0.00	\$0.00
Planning	\$0.00	\$1,590,000.00
Administration	\$3,723.00	\$2,077,231.55
TOTAL:	\$8,144,552.05	\$49,225,687.00

STATE OF OKLAHOMA: CDBG-DR Tranche Allocation History		
(\$10.6 & \$83.1 Million = \$93.7 Million)		
Round / Funding Request #	Allocation	HUD Approval Date
Round #1 (Initial Plan)	\$4,246,016.00	4/29/2014
Round #2	\$1,980,000.00	12/11/2014
Round #3	\$16,661,243.00	12/15/2014
Round #4	\$16,838,375.95	6/11/2015
Round #5	\$1,355,500.00	7/21/2015
TOTAL:	\$41,081,134.95	

The following is a list of CDBG Disaster Recovery specific funding requests that are included under this newest allocation.

Unit of General Local Gov't	DR Activity	Funding Description	Total
Hughes County	Administration	Administration	\$ 3,723.00
Hughes County	Infrastructure	Bridges (4)	\$ 124,130.05
Oklahoma City, City of	Infrastructure	Draper Water Treatment Plant	\$ 7,716,699.00
Oklahoma County	Resiliency & Mitigation	Acquisition / Buyout Floodplain Homes	\$ 300,000.00
Total			\$ 8,144,552.05

STATE OF OKLAHOMA

CDBG-DISASTER RECOVERY ALLOCATION (\$93.7 MILLION)

AMENDED ACTION PLAN – ROUND / REVISION #7 – 12/2/2015

The State is required to submit an Action Plan Amendment and obtain approval by the US Department of Housing and Urban Development (HUD) before it can receive any portion of the requested disaster funding. This Action Plan Amendment describes the programs and activities for which the State intends to expend the disaster funding in compliance with the federal requirements set forth in the Federal Register.

To date, the Oklahoma Department of Commerce / Community Development (ODOC/CD) has officially received two allocations (\$10.6 & \$83.1 Million) of CDBG Disaster Recovery funding (CDBG-DR). Collectively, these two allocations total \$93.7 million in disaster related funding being provided to the State of Oklahoma from HUD.

The first allocation (\$10.6 Million) was released by HUD on March 5, 2013, in the Federal Register at Vol. 78, No. 43, Page 14329 entitled: “Allocations, Common Application, Waivers and Alternative Requirements for Grantees Receiving Community Development Block Grant (CDBG) Disaster Recovery Funds in Response to Hurricane Sandy” (FR-5696-N-01); April 19, 2013 in the Federal Register at Vol. 78, No. 76, page 23578 entitled: “Clarifying Guidance, Waivers and Alternative Requirements for Hurricane Sandy Grantees in Receipt of Community Development Block Grant Disaster Recovery Funds” (FR-5710-N-01); and December 16, 2013 in the Federal Register at Vol. 78, No. 241 page 76154 “Allocations, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013” (FR-5696-N-07) (collectively, the “Federal Register Notice”).

The second allocation (\$83.1 Million) was released by HUD on June 3, 2014, in the Federal Register at Vol. 79, No. 106, Page 31964 in a notice entitled: “Second Allocation, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013”.

Pursuant to these aforementioned Federal Register Notices and as outlined in the State’s original CDBG-DR Action Plans (1st Allocation, \$10.6 Million & 2nd Allocation \$83.1 Million) submitted to HUD, the State

has reserved the right to “tranche” or segment the CDBG-DR allocation in order to enable the completion of large infrastructure projects under taken by the disaster recovery funding. Based on this ‘tranche’ methodology, the State now must update the requested tranche amounts indicated in the State’s original CDBG-DR Action Plans submitted to HUD.

Although this Action Plan Amendment identifies the State’s revised tranche request for the expenditure of disaster recovery funding, the plan fully complies with the Federal Register Notices and describes the State’s intended use of all of the disaster funding. It is important to note that the amount of the disaster funding is subject to increase, reduction or other modification by Congress, including, without limitation, an act making permanent the impact of sequestration. All amounts based on the amount of the disaster funding set forth in the Federal Register Notice are subject to change consistent with any change in the amount of the disaster funding.

ODOC/CD reserves the right to adjust any of the CDBG-DR funding to ensure the maximum utilization of funds. Such adjustments would be in conjunction with unforeseen events such as the cancellation of projects; projects completed under budget; or from funds designated but not allocated. These adjustments may be used to offset any unforeseen eligible project cost increases such as in the case of construction. Such adjustments, if made available by ODOC/CD, shall be the minimum amount necessary to fund projects efficiently. ODOC/CD will make adjustments as necessary using funding priorities outlined under the earlier published Action Plans.

In accordance with the Federal Register Notice, Action Plans must provide an assessment of the need for the disaster funding. As part of this compliance directive, each Action Plan contains a table of disaster related categories along with the requested funding amounts. It should be noted that these numbers are based solely off of COST ESTIMATES at the time of Action Plan submission and HUD approval. Final project cost estimates can fluctuate and are subject to a variety of factors. No formal contract awards are made by ODOC/CD before HUD has formally approved the requested round’s funding. It is not until the actual contract is awarded and the project has completed the regulatory steps such as procurement that the ACTUAL activity cost will be known.

The following table illustrates the State’s requested funding revision at this time. Please note that the following tables account for the collective \$93.7 million in State CDBG-DR funding. It should be understood that the requested funds for this round of funding as illustrated in the table below are based solely off of preliminary COST ESTIMATES at the time of submission to HUD. The table below reflects the most current

CDBG DR category funding amounts. The table is updated each time a request for an additional round of funding is submitted. Each numbered revision submitted to HUD for approval is meant to supersede the earlier category totals in the earlier published Action Plan.

STATE OF OKLAHOMA: CDBG-DR Allocations (\$93.7 Million)		
ROUND / REVISION #7 AS OF DECEMBER 2, 2015		
Activity	Round / Revision #7 Request	Total Allocation (Rev 1 – 7)
Housing (Owner-Occupied and Multi-family Housing)	\$0.00	\$6,191,304.70
Infrastructure	\$8,599,314.00	\$29,075,623.05
Resiliency & Mitigation	\$924,221.00	\$19,815,062.70
Public Facilities	\$0.00	\$0.00
Economic Revitalization	\$0.00	\$0.00
Planning	\$0.00	\$1,590,000.00
Administration	\$480,168.50	\$2,557,400.05
TOTAL:	\$10,003,703.50	\$59,229,390.50

STATE OF OKLAHOMA: CDBG-DR Tranche Allocation History		
(\$10.6 & \$83.1 Million = \$93.7 Million)		
Round / Funding Request #	Allocation	HUD Approval Date
Round #1 (Initial Plan)	\$4,246,016.00	4/29/2014
Round #2	\$1,980,000.00	12/11/2014
Round #3	\$16,661,243.00	12/15/2014
Round #4	\$16,838,375.95	6/11/2015
Round #5	\$1,355,500.00	7/21/2015
Round #6	\$8,144,552.05	10/16/2015
TOTAL:	\$49,225,687.00	

The following is a list of CDBG Disaster Recovery specific funding requests that are included under this newest allocation.

Unit of General Local Gov't	DR Activity	Funding Description	Total
Bristow, City of	ADMINISTRATION	Administration	\$ 7,489.50
Bristow, City of	MITIGATION / RESILIENCY	Fire Truck (1 Fire Tanker)	\$ 249,650.00
Bristow, City of	ADMINISTRATION	Administration	\$ 5,880.00
Bristow, City of	INFRASTRUCTURE	Streets	\$ 196,000.00
Cleveland County	INFRASTRUCTURE	Streets	\$ 1,012,964.00
Cleveland County	ADMINISTRATION	Administration	\$ 30,389.00
Cleveland County	INFRASTRUCTURE	Streets	\$ 2,531,300.00
Cleveland County	ADMINISTRATION	Administration	\$ 75,939.00
Creek Co (SP) Olive	MITIGATION / RESILIENCY	Fire Truck (1 Brush Truck)	\$ 135,291.00
Creek Co (SP) Olive	ADMINISTRATION	Administration	\$ 4,059.00
Drumright, City of	MITIGATION / RESILIENCY	Fire Truck (1 Brush Truck)	\$ 110,000.00
Drumright, City of	ADMINISTRATION	Administration	\$ 3,300.00
Kiefer, Town of	ADMINISTRATION	Administration	\$ 4,080.00
Kiefer, Town of	MITIGATION / RESILIENCY	Fire Truck (1 Tanker/Pumper)	\$ 192,280.00
Norman, City of	ADMINISTRATION	Administration	\$ 145,771.00
Norman, City of	INFRASTRUCTURE	Streets	\$ 4,859,050.00
ODOC (State)	ADMINISTRATION	Administration	\$ 196,151.00
Oilton, City of	ADMINISTRATION	Administration	\$ 7,110.00
Oilton, City of	MITIGATION / RESILIENCY	Fire Truck (1 Pumper Truck)	\$ 237,000.00
Total			\$ 10,003,703.50

STATE OF OKLAHOMA

CDBG-DISASTER RECOVERY ALLOCATION (\$93.7 MILLION)

AMENDED ACTION PLAN – ROUND / REVISION #8 – 1/21/16

The State is required to submit an Action Plan Amendment and obtain approval by the US Department of Housing and Urban Development (HUD) before it can receive any portion of the requested disaster funding. This Action Plan Amendment describes the programs and activities for which the State intends to expend the disaster funding in compliance with the federal requirements set forth in the Federal Register.

To date, the Oklahoma Department of Commerce / Community Development (ODOC/CD) has officially received two allocations (\$10.6 & \$83.1 Million) of CDBG Disaster Recovery funding (CDBG-DR). Collectively, these two allocations total \$93.7 million in disaster related funding being provided to the State of Oklahoma from HUD.

The first allocation (\$10.6 Million) was released by HUD on March 5, 2013, in the Federal Register at Vol. 78, No. 43, Page 14329 entitled: “Allocations, Common Application, Waivers and Alternative Requirements for Grantees Receiving Community Development Block Grant (CDBG) Disaster Recovery Funds in Response to Hurricane Sandy” (FR-5696-N-01); April 19, 2013 in the Federal Register at Vol. 78, No. 76, page 23578 entitled: “Clarifying Guidance, Waivers and Alternative Requirements for Hurricane Sandy Grantees in Receipt of Community Development Block Grant Disaster Recovery Funds” (FR-5710-N-01); and December 16, 2013 in the Federal Register at Vol. 78, No. 241 page 76154 “Allocations, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013” (FR-5696-N-07) (collectively, the “Federal Register Notice”).

The second allocation (\$83.1 Million) was released by HUD on June 3, 2014, in the Federal Register at Vol. 79, No. 106, Page 31964 in a notice entitled: “Second Allocation, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013”.

Pursuant to these aforementioned Federal Register Notices and as outlined in the State’s original CDBG-DR Action Plans (1st Allocation, \$10.6 Million & 2nd Allocation \$83.1 Million) submitted to HUD, the State

has reserved the right to “tranche” or segment the CDBG-DR allocation in order to enable the completion of large infrastructure projects under taken by the disaster recovery funding. Based on this ‘tranche’ methodology, the State now must update the requested tranche amounts indicated in the State’s original CDBG-DR Action Plans submitted to HUD.

Although this Action Plan Amendment identifies the State’s revised tranche request for the expenditure of disaster recovery funding, the plan fully complies with the Federal Register Notices and describes the State’s intended use of all of the disaster funding. It is important to note that the amount of the disaster funding is subject to increase, reduction or other modification by Congress, including, without limitation, an act making permanent the impact of sequestration. All amounts based on the amount of the disaster funding set forth in the Federal Register Notice are subject to change consistent with any change in the amount of the disaster funding.

ODOC/CD reserves the right to adjust any of the CDBG-DR funding to ensure the maximum utilization of funds. Such adjustments would be in conjunction with unforeseen events such as the cancellation of projects; projects completed under budget; or from funds designated but not allocated. These adjustments may be used to offset any unforeseen eligible project cost increases such as in the case of construction. Such adjustments, if made available by ODOC/CD, shall be the minimum amount necessary to fund projects efficiently. ODOC/CD will make adjustments as necessary using funding priorities outlined under the earlier published Action Plans.

In accordance with the Federal Register Notice, Action Plans must provide an assessment of the need for the disaster funding. As part of this compliance directive, each Action Plan contains a table of disaster related categories along with the requested funding amounts. It should be noted that these numbers are based solely off of COST ESTIMATES at the time of Action Plan submission and HUD approval. Final project cost estimates can fluctuate and are subject to a variety of factors. No formal contract awards are made by ODOC/CD before HUD has formally approved the requested round’s funding. It is not until the actual contract is awarded and the project has completed the regulatory steps such as procurement that the ACTUAL activity cost will be known.

The following table illustrates the State’s requested funding revision at this time. Please note that the following tables account for the collective \$93.7 million in State CDBG-DR funding. It should be understood that the requested funds for this round of funding as illustrated in the table below are based solely off of preliminary COST ESTIMATES at the time of submission to HUD. The table below reflects the most current

CDBG DR category funding amounts. The table is updated each time a request for an additional round of funding is submitted. Each numbered revision submitted to HUD for approval is meant to supersede the earlier category totals in the earlier published Action Plan.

STATE OF OKLAHOMA: CDBG-DR Allocations (\$93.7 Million)		
ROUND / REVISION #8 AS OF JANUARY 21, 2016		
Activity	Round / Revision #8 Request	Total Allocation (Rev 1 – 8)
Housing (Owner-Occupied and Multi-family Housing)	\$0.00	\$6,184,334.89
Infrastructure	\$9,500,000.00	\$38,558,727.15
Resiliency & Mitigation	\$0.00	\$19,822,032.51
Public Facilities	\$0.00	\$0.00
Economic Revitalization	\$0.00	\$0.00
Planning	\$0.00	\$1,590,000.00
Administration	\$0.00	\$2,574,295.95
TOTAL:	\$9,500,000.00	\$68,729,390.50

STATE OF OKLAHOMA: CDBG-DR Tranche Allocation History		
(\$10.6 & \$83.1 Million = \$93.7 Million)		
Round / Funding Request #	Allocation	HUD Approval Date
Round #1 (Initial Plan)	\$4,246,016.00	4/29/2014
Round #2	\$1,980,000.00	12/11/2014
Round #3	\$16,661,243.00	12/15/2014
Round #4	\$16,838,375.95	6/11/2015
Round #5	\$1,355,500.00	7/21/2015
Round #6	\$8,144,552.05	10/16/2015
Round #7	\$10,003,703.50	12/11/2015
TOTAL:	\$59,229,390.50	

The following is a list of CDBG Disaster Recovery specific funding requests that are included under this newest allocation.

Unit of General Local Gov't	DR Activity	Funding Description	Total
Oklahoma City, City of	INFRASTRUCTURE	Draper Water Treatment Plant	\$ 9,500,000.00
Total			\$ 9,500,000.00

Request Narrative:

The City of Oklahoma City is requesting another tranche allocation to their Community Development Block Grant – Disaster Recovery grant associated with the Draper Water Treatment Plant improvements funded under the Oklahoma Department of Commerce’s \$83.1 million CDBG-DR allocation. Specifically, the City is requesting \$9,500,000 for funding construction activities necessary to complete the approved electrical loop and emergency power generation facility improvements to the Draper Water Treatment Plant.

STATE OF OKLAHOMA

CDBG-DISASTER RECOVERY ALLOCATION (\$93.7 MILLION)

AMENDED ACTION PLAN – ROUND / REVISION #9 – 2/23/16

The State is required to submit an Action Plan Amendment and obtain approval by the US Department of Housing and Urban Development (HUD) before it can receive any portion of the requested disaster funding. This Action Plan Amendment describes the programs and activities for which the State intends to expend the disaster funding in compliance with the federal requirements set forth in the Federal Register.

To date, the Oklahoma Department of Commerce / Community Development (ODOC/CD) has officially received two allocations (\$10.6 & \$83.1 Million) of CDBG Disaster Recovery funding (CDBG-DR). Collectively, these two allocations total \$93.7 million in disaster related funding being provided to the State of Oklahoma from HUD.

The first allocation (\$10.6 Million) was released by HUD on March 5, 2013, in the Federal Register at Vol. 78, No. 43, Page 14329 entitled: “Allocations, Common Application, Waivers and Alternative Requirements for Grantees Receiving Community Development Block Grant (CDBG) Disaster Recovery Funds in Response to Hurricane Sandy” (FR-5696-N-01); April 19, 2013 in the Federal Register at Vol. 78, No. 76, page 23578 entitled: “Clarifying Guidance, Waivers and Alternative Requirements for Hurricane Sandy Grantees in Receipt of Community Development Block Grant Disaster Recovery Funds” (FR-5710-N-01); and December 16, 2013 in the Federal Register at Vol. 78, No. 241 page 76154 “Allocations, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013” (FR-5696-N-07) (collectively, the “Federal Register Notice”).

The second allocation (\$83.1 Million) was released by HUD on June 3, 2014, in the Federal Register at Vol. 79, No. 106, Page 31964 in a notice entitled: “Second Allocation, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013”.

Pursuant to these aforementioned Federal Register Notices and as outlined in the State’s original CDBG-DR Action Plans (1st Allocation, \$10.6 Million & 2nd Allocation \$83.1 Million) submitted to HUD, the State

has reserved the right to “tranche” or segment the CDBG-DR allocation in order to enable the completion of large infrastructure projects under taken by the disaster recovery funding. Based on this ‘tranche’ methodology, the State now must update the requested tranche amounts indicated in the State’s original CDBG-DR Action Plans submitted to HUD.

Although this Action Plan Amendment identifies the State’s revised tranche request for the expenditure of disaster recovery funding, the plan fully complies with the Federal Register Notices and describes the State’s intended use of all of the disaster funding. It is important to note that the amount of the disaster funding is subject to increase, reduction or other modification by Congress, including, without limitation, an act making permanent the impact of sequestration. All amounts based on the amount of the disaster funding set forth in the Federal Register Notice are subject to change consistent with any change in the amount of the disaster funding.

ODOC/CD reserves the right to adjust any of the CDBG-DR funding to ensure the maximum utilization of funds. Such adjustments would be in conjunction with unforeseen events such as the cancellation of projects; projects completed under budget; or from funds designated but not allocated. These adjustments may be used to offset any unforeseen eligible project cost increases such as in the case of construction. Such adjustments, if made available by ODOC/CD, shall be the minimum amount necessary to fund projects efficiently. ODOC/CD will make adjustments as necessary using funding priorities outlined under the earlier published Action Plans.

In accordance with the Federal Register Notice, Action Plans must provide an assessment of the need for the disaster funding. As part of this compliance directive, each Action Plan contains a table of disaster related categories along with the requested funding amounts. It should be noted that these numbers are based solely off of COST ESTIMATES at the time of Action Plan submission and HUD approval. Final project cost estimates can fluctuate and are subject to a variety of factors. No formal contract awards are made by ODOC/CD before HUD has formally approved the requested round’s funding. It is not until the actual contract is awarded and the project has completed the regulatory steps such as procurement that the ACTUAL activity cost will be known.

The following table illustrates the State’s requested funding revision at this time. Please note that the following tables account for the collective \$93.7 million in State CDBG-DR funding. It should be understood that the requested funds for this round of funding as illustrated in the table below are based solely off of preliminary COST ESTIMATES at the time of submission to HUD. The table below reflects the most current

CDBG DR category funding amounts. The table is updated each time a request for an additional round of funding is submitted. Each numbered revision submitted to HUD for approval is meant to supersede the earlier category totals in the earlier published Action Plan.

STATE OF OKLAHOMA: CDBG-DR Allocations (\$93.7 Million)		
ROUND / REVISION #9 AS OF FEBRUARY 23, 2016		
Activity	Round / Revision #9 Request	Total Allocation: <i>NOTE - Reflects Tranche Requests & Budget Modifications to Date.</i>
Housing (Owner-Occupied and Multi-family Housing)	\$0.00	\$6,294,334.89
Infrastructure	\$10,293,600.00	\$48,815,395.57
Resiliency & Mitigation	\$0.00	\$19,829,522.01
Public Facilities	\$0.00	\$0.00
Economic Revitalization	\$0.00	\$0.00
Planning	\$0.00	\$1,632,811.58
Administration	\$408,808.00	\$2,859,734.45
TOTAL:	\$10,702,408.00	\$79,431,798.50

STATE OF OKLAHOMA: CDBG-DR Tranche Allocation History		
(\$10.6 & \$83.1 Million = \$93.7 Million)		
Round / Funding Request #	Allocation	HUD Approval Date
Round #1 (Initial Plan)	\$4,246,016.00	4/29/2014
Round #2	\$1,980,000.00	12/11/2014
Round #3	\$16,661,243.00	12/15/2014
Round #4	\$16,838,375.95	6/11/2015
Round #5	\$1,355,500.00	7/21/2015
Round #6	\$8,144,552.05	10/16/2015

Round #7	\$10,003,703.50	12/11/2015
Round #8	\$9,500,000.00	1/21/2016
TOTAL:	\$68,729,390.50	

The following is a list of CDBG Disaster Recovery specific funding requests that are included under this newest allocation.

BUDGET ADJUSTMENT:

1. ROUND #3 - *The City of Mannford (OKGrants 00021) is requesting approval of a budget modification moving \$110,000.00 from the Administration category to the Housing category for their current CDBG DR senior housing project. The total housing allocation will then be \$5,110,000.00 and the remaining administration allocation will be \$40,000.00.*

2. ROUND #2 & #3 – *The City of Oklahoma City (OKGrants 00005) submitted a budget amendment to reduce Street Reconstruction (Round 2) by \$178,307.37; reduce Deep Fork Creek Drainage Study (Round 3) by \$4,424.21; reduce Drainage Improvements (Round 3) \$42,811.58. Additionally, Oklahoma City submitted budget amendment to increase funding for Downtown Drainage Study (Round 3) by \$47,235.79 and Drainage Improvement Project (Round 2) by \$178,307.37.*

3. ROUND #7 – *The City of Bristow (OKGrants 00098) is requesting approval of a budget modification moving \$7,489.50 from the Administration category to Equipment with a new total of \$257,139.50. There will be no Administration for the project after this move.*

4. ROUND #7 - *The City of Bristow (OKGrants 00103) is requesting approval of a budget modification moving \$5,880.00 from the Administration category to infrastructure (Streets) with a new total of \$201,880.00. There will be no Administration for the project after this move.*

TRANCHE ALLOCATION:

1. ROUND #9 – *Tranche Request: The State is requesting \$100,000.00 in Administration of CDBG DR Round #9 funding.*

2. ROUND #9 – *Tranche Request: The City of Norman (OKGrants 00064) is requesting a total of \$10,602,408 of funding (Infrastructure and Administration) to be submitted in coordination with*

Oklahoma Department of Commerce Round #9. These funds are for the construction costs to be incurred for five of the seven projects that have been approved under application DR-2014-NORMAN-CI-00064. Funding for all seven projects (\$721,312) allowed for survey, design, environmental, etc. in preparation for the bidding of the projects. Tranche Two includes construction, construction management, etc. for each of the projects.

The seven projects were aligned into three work groups determined by their proximity in location to each other and will be bid by individual projects but awarded as the lowest and best bid total of the group. Provision of funding from Round #9 to the Tranche Two for these five projects (Group One \$5,976,060 and Group Two \$4,626,348) will allow for bidding and construction of these projects. It is anticipated that the remaining two projects (Group Three) will be ready to access additional Tranche funding in late summer 2016.

The environmental process was included in the earlier allocation is complete for all seven projects. Check Plans for 60% design (Groups One and Two) were submitted and reviewed by the City of Norman in early January. Revisions were made and the projects now are at the 80% complete stage for these five projects with expectation that these two groups will be ready to bid at the same time as the Round #9 funding is approved.

STATE OF OKLAHOMA

CDBG-DISASTER RECOVERY ALLOCATION (\$93.7 MILLION)

AMENDED ACTION PLAN – ROUND / REVISION #10 – 5/16/16

The State is required to submit an Action Plan Amendment and obtain approval by the US Department of Housing and Urban Development (HUD) before it can receive any portion of the requested disaster funding. This Action Plan Amendment describes the programs and activities for which the State intends to expend the disaster funding in compliance with the federal requirements set forth in the Federal Register.

To date, the Oklahoma Department of Commerce / Community Development (ODOC/CD) has officially received two allocations (\$10.6 & \$83.1 Million) of CDBG Disaster Recovery funding (CDBG-DR). Collectively, these two allocations total \$93.7 million in disaster related funding being provided to the State of Oklahoma from HUD.

The first allocation (\$10.6 Million) was released by HUD on March 5, 2013, in the Federal Register at Vol. 78, No. 43, Page 14329 entitled: “Allocations, Common Application, Waivers and Alternative Requirements for Grantees Receiving Community Development Block Grant (CDBG) Disaster Recovery Funds in Response to Hurricane Sandy” (FR-5696-N-01); April 19, 2013 in the Federal Register at Vol. 78, No. 76, page 23578 entitled: “Clarifying Guidance, Waivers and Alternative Requirements for Hurricane Sandy Grantees in Receipt of Community Development Block Grant Disaster Recovery Funds” (FR-5710-N-01); and December 16, 2013 in the Federal Register at Vol. 78, No. 241 page 76154 “Allocations, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013” (FR-5696-N-07) (collectively, the “Federal Register Notice”).

The second allocation (\$83.1 Million) was released by HUD on June 3, 2014, in the Federal Register at Vol. 79, No. 106, Page 31964 in a notice entitled: “Second Allocation, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013”.

Pursuant to these aforementioned Federal Register Notices and as outlined in the State’s original CDBG-DR Action Plans (1st Allocation, \$10.6 Million & 2nd Allocation \$83.1 Million) submitted to HUD, the State

has reserved the right to “tranche” or segment the CDBG-DR allocation in order to enable the completion of large infrastructure projects under taken by the disaster recovery funding. Based on this ‘tranche’ methodology, the State now must update the requested tranche amounts indicated in the State’s original CDBG-DR Action Plans submitted to HUD.

Although this Action Plan Amendment identifies the State’s revised tranche request for the expenditure of disaster recovery funding, the plan fully complies with the Federal Register Notices and describes the State’s intended use of all of the disaster funding. It is important to note that the amount of the disaster funding is subject to increase, reduction or other modification by Congress, including, without limitation, an act making permanent the impact of sequestration. All amounts based on the amount of the disaster funding set forth in the Federal Register Notice are subject to change consistent with any change in the amount of the disaster funding.

ODOC/CD reserves the right to adjust any of the CDBG-DR funding to ensure the maximum utilization of funds. Such adjustments would be in conjunction with unforeseen events such as the cancellation of projects; projects completed under budget; or from funds designated but not allocated. These adjustments may be used to offset any unforeseen eligible project cost increases such as in the case of construction. Such adjustments, if made available by ODOC/CD, shall be the minimum amount necessary to fund projects efficiently. ODOC/CD will make adjustments as necessary using funding priorities outlined under the earlier published Action Plans.

In accordance with the Federal Register Notice, Action Plans must provide an assessment of the need for the disaster funding. As part of this compliance directive, each Action Plan contains a table of disaster related categories along with the requested funding amounts. It should be noted that these numbers are based solely off of COST ESTIMATES at the time of Action Plan submission and HUD approval. Final project cost estimates can fluctuate and are subject to a variety of factors. No formal contract awards are made by ODOC/CD before HUD has formally approved the requested round’s funding. It is not until the actual contract is awarded and the project has completed the regulatory steps such as procurement that the ACTUAL activity cost will be known.

The following table illustrates the State’s requested funding revision at this time. Please note that the following tables account for the collective \$93.7 million in State CDBG-DR funding. It should be understood that the requested funds for this round of funding as illustrated in the table below are based solely off of preliminary COST ESTIMATES at the time of submission to HUD. The table below reflects the most current

CDBG DR category funding amounts. The table is updated each time a request for an additional round of funding is submitted. Each numbered revision submitted to HUD for approval is meant to supersede the earlier category totals in the earlier published Action Plan.

STATE OF OKLAHOMA: CDBG-DR Allocations (\$93.7 Million)		
ROUND / REVISION #10 AS OF MAY 16, 2016		
Activity	Round / Revision #10 Request	Total Allocation: <i>NOTE - Reflects Tranche Requests & Budget Modifications to Date.</i>
Housing (Owner-Occupied and Multi-family Housing)	\$0.00	\$6,294,334.89
Infrastructure	\$4,353,851.00	\$53,169,246.57
Resiliency & Mitigation	\$0.00	\$19,829,522.01
Public Facilities	\$0.00	\$0.00
Economic Revitalization	\$0.00	\$0.00
Planning	\$0.00	\$1,632,811.58
Administration	\$150,000.00	\$3,009,734.45
TOTAL:	\$4,503,851.00	\$83,935,649.50

STATE OF OKLAHOMA: CDBG-DR Tranche Allocation History		
(\$10.6 & \$83.1 Million = \$93.7 Million)		
Round / Funding Request #	Allocation	HUD Approval Date
Round #1 (Initial Plan)	\$4,246,016.00	4/29/2014
Round #2	\$1,980,000.00	12/11/2014
Round #3	\$16,661,243.00	12/15/2014
Round #4	\$16,838,375.95	6/11/2015
Round #5	\$1,355,500.00	7/21/2015
Round #6	\$8,144,552.05	10/16/2015

Round #7	\$10,003,703.50	12/11/2015
Round #8	\$9,500,000.00	1/21/2016
Round #9	\$10,702,408.00	3/11/2016
TOTAL:	\$79,431,798.50	

The following is a list of CDBG Disaster Recovery specific funding requests that are included under this newest allocation.

TRANCHE ALLOCATION:

1. ROUND #10 – *Tranche Request: The City of Oklahoma City is requesting another allocation to their Community Development Block Grant Disaster Recovery grant associated with the Draper Water Treatment Plant project. The City is requesting the remaining \$4,353,851 funding for construction activities necessary to complete the approved electrical loop and emergency power generation facility improvements and \$150,000 for General Program Administration. The total request amounts to \$4,503,851.*

The status on prior contracts associated with ODOC's \$83.1 million allocation for improvements at the Draper Water Treatment Plant are as follows:

- *The City of Oklahoma City has contracted with Carollo for engineering and project management on all proposed improvements at the Draper Water Treatment Plant.*
- *The City has contracted with Lippert Brothers and Caterpillar for the purchase and delivery of three emergency power generators under WT-0148. The contract was awarded in October 2015.*
- *The City has contracted with Wynn Construction to provide the ductbank system for installing the electrical loop under WT-0147. The contract was awarded December 2015.*
- *The City has awarded WT-0138 to Wynn Construction for the construction of the generator building and ancillary facilities for emergency power generator project.*
- *The City has bid WT-0137 for electrical loop and ductbank system for improved power management at the plant.*

STATE OF OKLAHOMA

CDBG-DISASTER RECOVERY ALLOCATION (\$93.7 MILLION)

AMENDED ACTION PLAN – ROUND / REVISION #11 – 11/15/16

The State is required to submit an Action Plan Amendment and obtain approval by the US Department of Housing and Urban Development (HUD) before it can receive any portion of the requested disaster funding. This Action Plan Amendment describes the programs and activities for which the State intends to expend the disaster funding in compliance with the federal requirements set forth in the Federal Register.

To date, the Oklahoma Department of Commerce / Community Development (ODOC/CD) has officially received two allocations (\$10.6 & \$83.1 Million) of CDBG Disaster Recovery funding (CDBG-DR). Collectively, these two allocations total \$93.7 million in disaster related funding being provided to the State of Oklahoma from HUD.

The first allocation (\$10.6 Million) was released by HUD on March 5, 2013, in the Federal Register at Vol. 78, No. 43, Page 14329 entitled: “Allocations, Common Application, Waivers and Alternative Requirements for Grantees Receiving Community Development Block Grant (CDBG) Disaster Recovery Funds in Response to Hurricane Sandy” (FR-5696-N-01); April 19, 2013 in the Federal Register at Vol. 78, No. 76, page 23578 entitled: “Clarifying Guidance, Waivers and Alternative Requirements for Hurricane Sandy Grantees in Receipt of Community Development Block Grant Disaster Recovery Funds” (FR-5710-N-01); and December 16, 2013 in the Federal Register at Vol. 78, No. 241 page 76154 “Allocations, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013” (FR-5696-N-07) (collectively, the “Federal Register Notice”).

The second allocation (\$83.1 Million) was released by HUD on June 3, 2014, in the Federal Register at Vol. 79, No. 106, Page 31964 in a notice entitled: “Second Allocation, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013”.

Pursuant to these aforementioned Federal Register Notices and as outlined in the State’s original CDBG-DR Action Plans (1st Allocation, \$10.6 Million & 2nd Allocation \$83.1 Million) submitted to HUD, the State

has reserved the right to “tranche” or segment the CDBG-DR allocation in order to enable the completion of large infrastructure projects under taken by the disaster recovery funding. Based on this ‘tranche’ methodology, the State now must update the requested tranche amounts indicated in the State’s original CDBG-DR Action Plans submitted to HUD.

Although this Action Plan Amendment identifies the State’s revised tranche request for the expenditure of disaster recovery funding, the plan fully complies with the Federal Register Notices and describes the State’s intended use of all of the disaster funding. It is important to note that the amount of the disaster funding is subject to increase, reduction or other modification by Congress, including, without limitation, an act making permanent the impact of sequestration. All amounts based on the amount of the disaster funding set forth in the Federal Register Notice are subject to change consistent with any change in the amount of the disaster funding.

ODOC/CD reserves the right to adjust any of the CDBG-DR funding to ensure the maximum utilization of funds. Such adjustments would be in conjunction with unforeseen events such as the cancellation of projects; projects completed under budget; or from funds designated but not allocated. These adjustments may be used to offset any unforeseen eligible project cost increases such as in the case of construction. Such adjustments, if made available by ODOC/CD, shall be the minimum amount necessary to fund projects efficiently. ODOC/CD will make adjustments as necessary using funding priorities outlined under the earlier published Action Plans.

In accordance with the Federal Register Notice, Action Plans must provide an assessment of the need for the disaster funding. As part of this compliance directive, each Action Plan contains a table of disaster related categories along with the requested funding amounts. It should be noted that these numbers are based solely off of COST ESTIMATES at the time of Action Plan submission and HUD approval. Final project cost estimates can fluctuate and are subject to a variety of factors. No formal contract awards are made by ODOC/CD before HUD has formally approved the requested round’s funding. It is not until the actual contract is awarded and the project has completed the regulatory steps such as procurement that the ACTUAL activity cost will be known.

The following table illustrates the State’s requested funding revision at this time. Please note that the following tables account for the collective \$93.7 million in State CDBG-DR funding. It should be understood that the requested funds for this round of funding as illustrated in the table below are based solely off of preliminary COST ESTIMATES at the time of submission to HUD. The table below reflects the most current

CDBG DR category funding amounts. The table is updated each time a request for an additional round of funding is submitted. Each numbered revision submitted to HUD for approval is meant to supersede the earlier category totals in the earlier published Action Plan.

STATE OF OKLAHOMA: CDBG-DR Allocations (\$93.7 Million)		
ROUND / REVISION #11 AS OF NOVEMBER 14, 2016		
Activity	Round / Revision #11 Request	Total Allocation: <i>NOTE - Reflects Tranche Requests & Budget Modifications to Date.</i>
Housing (Owner-Occupied and Multi-family Housing)	\$676,201.00	\$6,970,535.89
Infrastructure	\$0.00	\$53,169,246.57
Resiliency & Mitigation	\$282,500.00	\$20,112,622.01
Public Facilities	\$0.00	\$0.00
Economic Revitalization	\$0.00	\$0.00
Planning	\$0.00	\$1,632,811.58
Administration	\$300,000.00	\$3,309,134.45
TOTAL:	\$1,258,701.00	\$85,194,350.50

STATE OF OKLAHOMA: CDBG-DR Tranche Allocation History		
(\$10.6 & \$83.1 Million = \$93.7 Million)		
Round / Funding Request #	Allocation	HUD Approval Date
Round #1 (Initial Plan)	\$4,246,016.00	4/29/2014
Round #2	\$1,980,000.00	12/11/2014
Round #3	\$16,661,243.00	12/15/2014
Round #4	\$16,838,375.95	6/11/2015
Round #5	\$1,355,500.00	7/21/2015
Round #6	\$8,144,552.05	10/16/2015

Round #7	\$10,003,703.50	12/11/2015
Round #8	\$9,500,000.00	1/21/2016
Round #9	\$10,702,408.00	3/11/2016
Round #10	\$4,503,851.00	5/20/2016
TOTAL:	\$83,935,649.50	

The following is a list of CDBG Disaster Recovery specific funding requests that are included under this newest allocation.

TRANCHE ALLOCATION:

1. City of Oklahoma City “DR-2014-OKLAHOMA CITY CI-00005” – Tranche 11 Request: *The City of Oklahoma City is requesting another allocation to their Community Development Block Grant Disaster Recovery grant associated with the Single Family Housing Rehabilitation and Storm Shelter projects initially funded under the Oklahoma Department of Commerce’s \$10.6 million CDBG-DR allocation. The City is requesting the remaining \$676,201.00 funding for Single Family Housing Rehabilitation and \$282,500.00 Storm Shelter activities. The total request amounts to \$958,701.00.*

2. State (ODOC/CD) – Tranche 11 Request: *The State (ODOC/CD) requests \$300,000.00 in Administration.*

BUDGET REVISION / MODIFICATION:

1. Creek County (Kellyville) “DR-2014-CREEK CO-(SP)-00053” - *Creek County (Kellyville) requests a budget adjustment of \$600.00 of the original \$5,850.00 in Admin be moved to Mitigation/Resiliency. The original Mitigation/Resiliency amount of \$195,082.50 will be increased \$600 to total a new total of \$195,682.50. Admin will be decreased by \$600.00 to a new total of \$5,250.00. This request is being made in order to cover additional fire equipment shipping costs per contract bids and invoice.*

STATE OF OKLAHOMA

CDBG-DISASTER RECOVERY ALLOCATION (\$93.7 MILLION)

AMENDED ACTION PLAN – ROUND / REVISION #12 – 4/10/2017

The State is required to submit an Action Plan Amendment and obtain approval by the US Department of Housing and Urban Development (HUD) before it can receive any portion of the requested disaster funding. This Action Plan Amendment describes the programs and activities for which the State intends to expend the disaster funding in compliance with the federal requirements set forth in the Federal Register.

To date, the Oklahoma Department of Commerce / Community Development (ODOC/CD) has officially received two allocations (\$10.6 & \$83.1 Million) of CDBG Disaster Recovery funding (CDBG-DR). Collectively, these two allocations total \$93.7 million in disaster related funding being provided to the State of Oklahoma from HUD.

The first allocation (\$10.6 Million) was released by HUD on March 5, 2013, in the Federal Register at Vol. 78, No. 43, Page 14329 entitled: “Allocations, Common Application, Waivers and Alternative Requirements for Grantees Receiving Community Development Block Grant (CDBG) Disaster Recovery Funds in Response to Hurricane Sandy” (FR-5696-N-01); April 19, 2013 in the Federal Register at Vol. 78, No. 76, page 23578 entitled: “Clarifying Guidance, Waivers and Alternative Requirements for Hurricane Sandy Grantees in Receipt of Community Development Block Grant Disaster Recovery Funds” (FR-5710-N-01); and December 16, 2013 in the Federal Register at Vol. 78, No. 241 page 76154 “Allocations, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013” (FR-5696-N-07) (collectively, the “Federal Register Notice”).

The second allocation (\$83.1 Million) was released by HUD on June 3, 2014, in the Federal Register at Vol. 79, No. 106, Page 31964 in a notice entitled: “Second Allocation, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013”.

Pursuant to these aforementioned Federal Register Notices and as outlined in the State’s original CDBG-DR Action Plans (1st Allocation, \$10.6 Million & 2nd Allocation \$83.1 Million) submitted to HUD, the State

has reserved the right to “tranche” or segment the CDBG-DR allocation in order to enable the completion of large infrastructure projects under taken by the disaster recovery funding. Based on this ‘tranche’ methodology, the State now must update the requested tranche amounts indicated in the State’s original CDBG-DR Action Plans submitted to HUD.

Although this Action Plan Amendment identifies the State’s revised tranche request for the expenditure of disaster recovery funding, the plan fully complies with the Federal Register Notices and describes the State’s intended use of all of the disaster funding. It is important to note that the amount of the disaster funding is subject to increase, reduction or other modification by Congress, including, without limitation, an act making permanent the impact of sequestration. All amounts based on the amount of the disaster funding set forth in the Federal Register Notice are subject to change consistent with any change in the amount of the disaster funding.

ODOC/CD reserves the right to adjust any of the CDBG-DR funding to ensure the maximum utilization of funds. Such adjustments would be in conjunction with unforeseen events such as the cancellation of projects; projects completed under budget; or from funds designated but not allocated. These adjustments may be used to offset any unforeseen eligible project cost increases such as in the case of construction. Such adjustments, if made available by ODOC/CD, shall be the minimum amount necessary to fund projects efficiently. ODOC/CD will make adjustments as necessary using funding priorities outlined under the earlier published Action Plans.

In accordance with the Federal Register Notice, Action Plans must provide an assessment of the need for the disaster funding. As part of this compliance directive, each Action Plan contains a table of disaster related categories along with the requested funding amounts. It should be noted that these numbers are based solely off of COST ESTIMATES at the time of Action Plan submission and HUD approval. Final project cost estimates can fluctuate and are subject to a variety of factors. No formal contract awards are made by ODOC/CD before HUD has formally approved the requested round’s funding. It is not until the actual contract is awarded and the project has completed the regulatory steps such as procurement that the ACTUAL activity cost will be known.

The following table illustrates the State’s requested funding revision at this time. Please note that the following tables account for the collective \$93.7 million in State CDBG-DR funding. It should be understood that the requested funds for this round of funding as illustrated in the table below are based solely off of preliminary COST ESTIMATES at the time of submission to HUD. The table below reflects the most current

CDBG DR category funding amounts. The table is updated each time a request for an additional round of funding is submitted. Each numbered revision submitted to HUD for approval is meant to supersede the earlier category totals in the earlier published Action Plan.

STATE OF OKLAHOMA: CDBG-DR Allocations (\$93.7 Million)		
ROUND / REVISION #12 AS OF January 10, 2017		
Activity	Round / Revision #12 Request	Total Allocation: <i>NOTE - Reflects Tranche Requests & Budget Modifications to Date.</i>
Housing (Owner-Occupied and Multi-family Housing)	\$0.00	\$6,970,535.89
Infrastructure	\$7,550,956.00	\$60,720,202.57
Resiliency & Mitigation	\$0.00	\$20,112,622.01
Public Facilities	\$0.00	\$0.00
Economic Revitalization	\$0.00	\$0.00
Planning	\$0.00	\$1,632,811.58
Administration	\$954,693.50	\$4,263,827.95
TOTAL:	\$8,505,649.50	\$93,700,000.00

STATE OF OKLAHOMA: CDBG-DR Tranche Allocation History		
(\$10.6 & \$83.1 Million = \$93.7 Million)		
Round / Funding Request #	Allocation	HUD Approval Date
Round #1 (Initial Plan)	\$4,246,016.00	4/29/2014
Round #2	\$1,980,000.00	12/11/2014
Round #3	\$16,661,243.00	12/15/2014
Round #4	\$16,838,375.95	6/11/2015
Round #5	\$1,355,500.00	7/21/2015
Round #6	\$8,144,552.05	10/16/2015

Round #7	\$10,003,703.50	12/11/2015
Round #8	\$9,500,000.00	1/21/2016
Round #9	\$10,702,408.00	3/11/2016
Round #10	\$4,503,851.00	5/20/2016
Round # 11	\$1,258,701.00	1/05/2017
TOTAL:	\$85,194,350.50	

The following is a list of CDBG Disaster Recovery specific funding requests that are included under this newest allocation. ***It should be noted that this is the FINAL allocation of CDBG DR funding that will be made. All available CDBG DR funding will have been requested for the State of Oklahoma \$93.7 Million CDBG DR program upon HUD approval and funding release of this final allocation.***

TRANCHE ALLOCATION:

- 1. City of Oklahoma City “DR-2014-OKLAHOMA CITY CI-00005”** – Tranche 12 Request: *The City of Oklahoma City is requesting a final allocation of “Administration” under this grant (DR-2014-Oklahoma City CI-00005) for a total of \$64,500.00.*

- 2. City of Oklahoma City “DR-2014-OKLAHOMA CITY CI-00023”** – Tranche 12 Request: *The City of Oklahoma City is requesting a final allocation of “Administration” under this grant (DR-2014-Oklahoma City CI-00023) for a total of \$210,825.00.*

- 3. State (ODOC/CD)** – Tranche 12 Request: *The State (ODOC/CD) request is requesting a final allocation of \$474,439.50 in “Administration”.*

- 4. City of Norman “DR-2014-Norman CI-00064”** – Tranche 12 Request: *The City of Norman is requesting the final allocation of \$719,970 for funds awarded under the DR-2014-Norman CI-00064) Application to be programmed in the Round Twelve Request. These funds will be utilized for the construction activities. The City of Norman is requesting that the remaining \$719,970 in CDBG DR funds (\$699,000.00 Infrastructure & \$20,970.00 Admin) be allocated in Round 12. In addition, the City of Norman requests that the remaining \$20,970 in Admin be moved to Infrastructure for a combined Round 12 total of \$719,970.00 in Infrastructure.*

5. Cleveland County “DR-2014-CLEVELAND CO-(SP)-00080” – Tranche 12 Request: *Cleveland County is requesting the remaining balance of \$7,035,915.00. This final allocation is comprised of \$204,929.00 for “Administration” and \$6,830,986.00 for “Infrastructure” from CDBG-DR funds grant #00080 to be obligated for immediate use. This request includes funds needed for the remainder of the work that is currently underway.*

STATE OF OKLAHOMA

CDBG-DISASTER RECOVERY

NON-SUBSTANTIAL AMENDMENT #13 – 12/2/2019

The State is required to submit an Action Plan Amendment and obtain approval by the US Department of Housing and Urban Development (HUD) before it can receive any portion of the requested disaster funding. This Action Plan Amendment describes the programs and activities for which the State intends to expend the disaster funding in compliance with the federal requirements set forth in the Federal Register.

To date, the Oklahoma Department of Commerce / Community Development (ODOC/CD) has officially received two allocations (\$10.6 & \$83.1 Million) of CDBG Disaster Recovery funding (CDBG-DR). Collectively, these two allocations total \$93.7 million in disaster related funding being provided to the State of Oklahoma from HUD.

The first allocation (\$10.6 Million) was released by HUD on March 5, 2013, in the Federal Register at Vol. 78, No. 43, Page 14329 entitled: "Allocations, Common Application, Waivers and Alternative Requirements for Grantees Receiving Community Development Block Grant (CDBG) Disaster Recovery Funds in Response to Hurricane Sandy" (FR-5696-N-01); April 19, 2013 in the Federal Register at Vol. 78, No. 76, page 23578 entitled: "Clarifying Guidance, Waivers and Alternative Requirements for Hurricane Sandy Grantees in Receipt of Community Development Block Grant Disaster Recovery Funds" (FR-5710-N-01); and December 16, 2013 in the Federal Register at Vol. 78, No. 241 page 76154 "Allocations, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013" (FR-5696-N-07) (collectively, the "Federal Register Notice").

The second allocation (\$83.1 Million) was released by HUD on June 3, 2014, in the Federal Register at Vol. 79, No. 106, Page 31964 in a notice entitled: "Second Allocation, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013".

Pursuant to these aforementioned Federal Register Notices and as outlined in the State's original CDBG-DR Action Plans (1st Allocation, \$10.6 Million & 2nd Allocation \$83.1 Million) submitted to HUD, the State

has reserved the right to “tranche” or segment the CDBG-DR allocation in order to enable the completion of large infrastructure projects under taken by the disaster recovery funding.

Action Plan Amendments

Non-Substantial: This CDBG DR Action Plan modification is classified as a Non-Substantial Amendment as referenced on page 114 of the CDBG DR Action Plan. Non-Substantial Amendments to the Action Plan are defined as minor, one that does not materially change the activities or eligible beneficiaries. This provision should not be construed as allowing the general administrative budget to exceed the allowable limit. Additionally, a Substantial Amendment is not required in the case where the State is simply requesting additional funding from HUD. HUD must be notified in advance of a Non-Substantial Amendment becoming effective. Non-Substantial Amendments are NOT subject to the public notification and public comment procedures such as a seven (7) day review and comment period. Per the Federal Register Notice guidelines, all amendments (Non-Substantial and Substantial) to the Action Plan will be posted online at the ODOC/CD CDBG Disaster Recovery webpage (<https://okcommerce.gov/about/reports-planning-documents/cdbg-disaster-recovery/>). Additionally, the CDBG Disaster Recovery Action Plan will be revised to reflect the amendments (Non-Substantial and Substantial) to the Action Plan. As with the amendments, the CDBG Disaster Recovery Action Plan is posted online at the ODOC/CD CDBG Disaster Recovery webpage. Hard copies will also be made available upon request. Each amendment submitted to HUD for approval will be numbered sequentially and is meant to supersede the earlier amendments in the published Action Plan.

Substantial: A Substantial Amendment to the Action Plan is defined as:

1. a change in program benefit or eligibility criteria;
2. the addition or deletion of an activity; or
3. the allocation or reallocation of more than \$1 million between activities.

Only those amendments that meet the definition of a Substantial Amendment are subject to the public notification and public comment procedures. Specifically, a public notice will be published online at the ODOC/CD CDBG Disaster Recovery webpage (<https://okcommerce.gov/about/reports-planning-documents/cdbg-disaster-recovery/>) and comment will be sought when assistance programs are further defined (i.e. change in program benefit or eligibility criteria) or when funding allocations are further

refined by type of activity and location, if applicable. Per the Federal Register Notice guidelines, all amendments (Non-Substantial and Substantial) to the Action Plan will be posted online at the ODOC/CD CDBG Disaster Recovery webpage. Additionally, the CDBG Disaster Recovery Action Plan will be revised to reflect the amendments (Non-Substantial and Substantial) to the Action Plan. As with the amendments, the CDBG Disaster Recovery Action Plan is posted online at the ODOC/CD CDBG Disaster Recovery webpage. Hard copies will also be made available upon request. Citizens, units of local government, and community partners will be provided notice and the opportunity to comment on proposed Substantial Amendments to the Action Plan. No less than seven (7) days will be provided for review and comment on the Substantial Amendment. Comments will be accepted electronically or in writing and will be posted online at the ODOC/CD CDBG Disaster Recovery webpage. A summary of all comments received and responses will be included in the Substantial Amendment that is submitted to HUD for approval. Each amendment submitted to HUD for approval will be numbered sequentially and is meant to supersede the earlier amendments in the published Action Plan.

Overview:

It should be noted that this amendment includes multiple budget modifications made necessary by projects entering their final stages of completion. As these projects enter completion and the final project costs are realized, it is necessary to start making various budgetary adjustments. As indicated in the Action Plan, ODOC/CD reserves the right to adjust any of the CDBG-DR funding to ensure the maximum utilization of funds. Such adjustments would be in conjunction with unforeseen events such as the cancellation of projects; projects completed under budget; or from funds designated but not allocated. These adjustments may be used to offset any unforeseen eligible project cost increases such as in the case of construction. Such adjustments, if made available by ODOC/CD, shall be the minimum amount necessary to fund projects efficiently. ODOC/CD will make adjustments as necessary using funding priorities outlined under the earlier published Action Plans.

The following table illustrates the State's requested revision at this time. Please note that the following tables account for the collective \$93.7 million in State CDBG-DR funding. **Amendment #13 effectively updates the previous Amendment #12.**

Activity Category	Current Allocation	Increase	Decrease	Proposed Allocation
Housing (Owner-Occupied & Multi-family Housing)	\$ 6,970,535.89	\$ -	\$ -	\$ 6,970,535.89
Infrastructure	\$ 60,720,202.57	\$ 324,937.75	\$ (34,505.98)	\$ 61,010,634.34
Resiliency & Mitigation	\$ 20,112,622.01	\$ 34,505.98	\$ -	\$ 20,147,127.99
Public Facilities	\$ -	\$ -	\$ -	\$ -
Economic Revitalization	\$ -	\$ -	\$ -	\$ -
Planning	\$ 1,632,811.58	\$ -	\$ (29,937.75)	\$ 1,602,873.83
Administration	\$ 4,263,827.95	\$ -	\$ (295,000.00)	\$ 3,968,827.95
Total	\$ 93,700,000.00			\$ 93,700,000.00

REVISIONS / MODIFICATIONS

The State's previous CDBG DR Action Plan amendments' #1 – #12 primarily focused on incremental requests for the allocation of additional CDBG DR funds. Tranche/Round #12 marked the last ODOC request to HUD for CDBG DR funding with the full \$93.7 million allocation realized. CDBG DR Action Plan amendment #12 also marked the start of multiple fund movement requests for such modifications as tranche to tranche and activity to another activity increases and decreases. The following changes outlined in the narratives below illustrate this as part of amendment #13. This revision is an update to the allocations already contained in amendment #12 dated 4/10/2017. This amendment serves as an update to amendment #12.

1. City of Oklahoma "DR-2014-OKLAHOMA CITY CI-00005" – OKC submitted a request to move unused PLANNING funds from the Drainage Master Plan (\$23,861.39) and Deep Fork Basin (\$6,076.36) to Drainage Improvements under INFRASTRUCTURE for a total of (\$29,937.75).
2. Cleveland County "DR-2014-CLEVELAND CO-00080" submitted requests for unused remaining INFRASTRUCTURE project funding to be moved to offset the additional \$2,919.98 fire truck activity costs under RESILIENCY/MITIGATION to Cedar County "DR-2014-CLEVELAND CO-(SP) Cedar Country 00085".
3. Cleveland County "DR-2014-CLEVELAND CO-00080" submitted requests for unused remaining INFRASTRUCTURE project funding to be moved to offset the additional \$18,995.00 fire truck activity costs under RESILIENCY/MITIGATION to Lexington "DR-2014-CLEVELAND CO-(SP) Lexington 00082".

4. Cleveland County “DR-2014-CLEVELAND CO-00080” submitted requests for unused remaining INFRASTRUCTURE project funding to be moved to offset the additional \$8,896.00 fire truck activity costs under RESILIENCY/MITIGATION to Little Axe “DR-2014-CLEVELAND CO-(SP) Little Axe 00084”.

5. Cleveland County “DR-2014-CLEVELAND CO-00080” submitted requests for unused remaining INFRASTRUCTURE project funding to be moved to offset the additional \$2,970.00 fire truck activity costs under RESILIENCY/MITIGATION to Noble “DR-2014-CLEVELAND CO-(SP) Noble 00081”.

6. Cleveland County “DR-2014-CLEVELAND CO-00080” submitted requests for unused remaining INFRASTRUCTURE project funding to be moved to offset the additional \$725.00 fire truck activity costs under RESILIENCY/MITIGATION to Slaughterville “DR-2014-CLEVELAND CO-(SP) Slaughterville 00083”.

7. Norman “DR-2014-NORMAN CI-00064” This City of Norman requested that funds under ADMINISTRATION be moved to INFRASTRUCTURE. Norman indicated that as the design for the designated CDBG DR projects are now finalized. It was determined that \$295,000.00 in additional construction funds were necessary for completion of the proposed projects.

Contact Information:

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Oklahoma Department of Commerce
Attn: Community Development: CDBG Disaster Recovery
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Individuos con Discapacidades o Impedimentos de Lenguaje

El Estado valora la opinión del público al aceptar los comentarios de los ciudadanos y otras partes interesadas durante el desarrollo y la implementación de su programa de Ayuda Local de Desarrollo

Comunitario Recuperación de Desastres (CDBG-DR). Se hará todo lo posible para llegar a las minorías, los residentes que no hablan inglés, así como a las personas con discapacidades. Para todas las reuniones, para facilitar comentarios, preguntas y otra información; Un traductor de habla hispana y / o un intérprete de lenguaje de señas para discapacidad auditiva está disponible si es solicitado. La información del programa publicada en el sitio web será accesible y estará disponible en formatos accesibles, incluidos los que puedan leer los lectores de pantalla. El Departamento de Comercio de Oklahoma/ Desarrollo Comunitario (ODOC/CD) trabaja para publicar toda la documentación pública en formatos compatibles con la tecnología de lector de pantalla. ODOC/CD pondrá a disposición información en formatos alternativos según sea necesario y a pedido para garantizar una comunicación efectiva a las personas con discapacidades y discapacidades relacionadas con el lenguaje.

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- Por el telefono: (405) 534-6814
- Por el correo electrónico: Jessica.Izquierdo@okcommerce.gov
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STATE OF OKLAHOMA

CDBG-DISASTER RECOVERY

NON-SUBSTANTIAL AMENDMENT #14 – 1/23/2020

The State is required to submit an Action Plan Amendment and obtain approval by the US Department of Housing and Urban Development (HUD) before it can receive any portion of the requested disaster funding. This Action Plan Amendment describes the programs and activities for which the State intends to expend the disaster funding in compliance with the federal requirements set forth in the Federal Register.

To date, the Oklahoma Department of Commerce / Community Development (ODOC/CD) has officially received two allocations (\$10.6 & \$83.1 Million) of CDBG Disaster Recovery funding (CDBG-DR). Collectively, these two allocations total \$93.7 million in disaster related funding being provided to the State of Oklahoma from HUD.

The first allocation (\$10.6 Million) was released by HUD on March 5, 2013, in the Federal Register at Vol. 78, No. 43, Page 14329 entitled: “Allocations, Common Application, Waivers and Alternative Requirements for Grantees Receiving Community Development Block Grant (CDBG) Disaster Recovery Funds in Response to Hurricane Sandy” (FR-5696-N-01); April 19, 2013 in the Federal Register at Vol. 78, No. 76, page 23578 entitled: “Clarifying Guidance, Waivers and Alternative Requirements for Hurricane Sandy Grantees in Receipt of Community Development Block Grant Disaster Recovery Funds” (FR-5710-N-01); and December 16, 2013 in the Federal Register at Vol. 78, No. 241 page 76154 “Allocations, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013” (FR-5696-N-07) (collectively, the “Federal Register Notice”).

The second allocation (\$83.1 Million) was released by HUD on June 3, 2014, in the Federal Register at Vol. 79, No. 106, Page 31964 in a notice entitled: “Second Allocation, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013”.

Pursuant to these aforementioned Federal Register Notices and as outlined in the State’s original CDBG-DR Action Plans (1st Allocation, \$10.6 Million & 2nd Allocation \$83.1 Million) submitted to HUD, the State

has reserved the right to “tranche” or segment the CDBG-DR allocation in order to enable the completion of large infrastructure projects under taken by the disaster recovery funding.

Action Plan Amendments

Non-Substantial: This CDBG DR Action Plan modification is classified as a Non-Substantial Amendment as referenced on page 114 of the CDBG DR Action Plan. Non-Substantial Amendments to the Action Plan are defined as minor, one that does not materially change the activities or eligible beneficiaries. This provision should not be construed as allowing the general administrative budget to exceed the allowable limit. Additionally, a Substantial Amendment is not required in the case where the State is simply requesting additional funding from HUD. HUD must be notified in advance of a Non-Substantial Amendment becoming effective. Non-Substantial Amendments are NOT subject to the public notification and public comment procedures such as a seven (7) day review and comment period. Per the Federal Register Notice guidelines, all amendments (Non-Substantial and Substantial) to the Action Plan will be posted online at the ODOC/CD CDBG Disaster Recovery webpage (<https://okcommerce.gov/about/reports-planning-documents/cdbg-disaster-recovery/>). Additionally, the CDBG Disaster Recovery Action Plan will be revised to reflect the amendments (Non-Substantial and Substantial) to the Action Plan. As with the amendments, the CDBG Disaster Recovery Action Plan is posted online at the ODOC/CD CDBG Disaster Recovery webpage. Hard copies will also be made available upon request. Each amendment submitted to HUD for approval will be numbered sequentially and is meant to supersede the earlier amendments in the published Action Plan.

Substantial: A Substantial Amendment to the Action Plan is defined as:

1. a change in program benefit or eligibility criteria;
2. the addition or deletion of an activity; or
3. the allocation or reallocation of more than \$1 million between activities.

Only those amendments that meet the definition of a Substantial Amendment are subject to the public notification and public comment procedures. Specifically, a public notice will be published online at the ODOC/CD CDBG Disaster Recovery webpage (<https://okcommerce.gov/about/reports-planning-documents/cdbg-disaster-recovery/>) and comment will be sought when assistance programs are further defined (i.e. change in program benefit or eligibility criteria) or when funding allocations are further

refined by type of activity and location, if applicable. Per the Federal Register Notice guidelines, all amendments (Non-Substantial and Substantial) to the Action Plan will be posted online at the ODOC/CD CDBG Disaster Recovery webpage. Additionally, the CDBG Disaster Recovery Action Plan will be revised to reflect the amendments (Non-Substantial and Substantial) to the Action Plan. As with the amendments, the CDBG Disaster Recovery Action Plan is posted online at the ODOC/CD CDBG Disaster Recovery webpage. Hard copies will also be made available upon request. Citizens, units of local government, and community partners will be provided notice and the opportunity to comment on proposed Substantial Amendments to the Action Plan. No less than seven (7) days will be provided for review and comment on the Substantial Amendment. Comments will be accepted electronically or in writing and will be posted online at the ODOC/CD CDBG Disaster Recovery webpage. A summary of all comments received and responses will be included in the Substantial Amendment that is submitted to HUD for approval. Each amendment submitted to HUD for approval will be numbered sequentially and is meant to supersede the earlier amendments in the published Action Plan.

Overview:

It should be noted that this amendment includes multiple budget modifications made necessary by projects entering their final stages of completion. As these projects enter completion and the final project costs are realized, it is necessary to start making various budgetary adjustments. As indicated in the Action Plan, ODOC/CD reserves the right to adjust any of the CDBG-DR funding to ensure the maximum utilization of funds. Such adjustments would be in conjunction with unforeseen events such as the cancellation of projects; projects completed under budget; or from funds designated but not allocated. These adjustments may be used to offset any unforeseen eligible project cost increases such as in the case of construction. Such adjustments, if made available by ODOC/CD, shall be the minimum amount necessary to fund projects efficiently. ODOC/CD will make adjustments as necessary using funding priorities outlined under the earlier published Action Plans.

The following table illustrates the State's requested revision at this time. Please note that the following tables account for the collective \$93.7 million in State CDBG-DR funding. **Amendment #14 effectively updates the previous Amendment #13.**

Activity Category	Current Allocation	Increase	Decrease	Proposed Allocation
Housing (Owner-Occupied & Multi-family Housing)	\$ 6,970,535.89	\$ -	\$ -	\$ 6,970,535.89
Infrastructure	\$ 61,010,634.34	\$ -	\$ 700,000.00	\$ 60,310,634.34
Resiliency & Mitigation	\$ 20,147,127.99	\$ -	\$ -	\$ 20,147,127.99
Public Facilities	\$ -	\$ -	\$ -	\$ -
Economic Revitalization	\$ -	\$ -	\$ -	\$ -
Planning	\$ 1,602,873.83	\$ -	\$ -	\$ 1,602,873.83
Administration	\$ 3,968,827.95	\$ 700,000.00	\$ -	\$ 4,668,827.95
Total	\$ 93,700,000.00			\$ 93,700,000.00

REVISIONS / MODIFICATIONS

The State’s previous CDBG DR Action Plan amendments’ #1 – #12 primarily focused on incremental requests for the allocation of additional CDBG DR funds. Tranche/Round #12 marked the last ODOC/CD request to HUD for CDBG DR funding with the full \$93.7 million allocation realized. CDBG DR Action Plan amendment #12 also marked the start of multiple fund movement requests for such modifications as tranche to tranche and activity to another activity increases and decreases. The following changes outlined in the narratives below illustrate this as part of Non-Substantial Amendment #14. This amendment serves as an update to Non-Substantial Amendment #13.

ODOC/CD is working on closing Oklahoma’s current Disaster Recovery program and has currently exhausted the current allocation of CDBG DR administrative funds to do so. By regulation, ODOC/CD is entitled to a maximum of 5% (\$4,685,000.00) of the total CDBG DR (\$93,700,000.00) allocation. This amendment shifts \$700,000.00 in unspent funds currently under the CDBG DR “Infrastructure” category to “Administration” in order to access the funds for ODOC/CD staff payroll.

Cleveland County: (Cleveland Co 0080 83.1 Infra (Streets) R12 Ext.) – ODOC/CD will be taking \$700,000 in unspent funds recaptured by ODOC/CD for this disaster related street rehabilitation project. This contract has been closed out.

Category	Round #	Activity Title	Total Budget	Grant Funds Disbursed	Funds Available	Amend #14 Reallocation	Remaining Funds
Infrastructure	Round 12 Ext	Cleveland Co 0080 83.1 Infra (Streets) R12 Ext.	\$5,936,857.65	\$4,432,150.75	\$1,504,706.90	\$700,000.00	\$804,706.90

It should be noted that until a substantial amendment is completed, full reconciliation between the amendment and DRGR will not be reflected. A subsequent substantial amendment will provide a numerical reconciliation and a detailed explanation of the how the administration budget has changed over time.

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Attn: Community Development: CDBG Disaster Recovery
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Individuos con Discapacidades o Impedimentos de Lenguaje

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STATE OF OKLAHOMA
CDBG DISASTER RECOVERY
SUBSTANTIAL AMENDMENT #15 – 8/28/2020

To date, the Oklahoma Department of Commerce / Community Development (ODOC/CD) has officially received two allocations (\$10.6 & \$83.1 Million) of CDBG Disaster Recovery (CDBG-DR) funding. Collectively, these two allocations total \$93.7 million in disaster related funding being provided to the State of Oklahoma from HUD.

The first allocation (\$10.6 Million) was released by HUD on March 5, 2013, in the Federal Register at Vol. 78, No. 43, Page 14329 entitled: “Allocations, Common Application, Waivers and Alternative Requirements for Grantees Receiving Community Development Block Grant (CDBG) Disaster Recovery Funds in Response to Hurricane Sandy” (FR-5696-N-01); April 19, 2013 in the Federal Register at Vol. 78, No. 76, page 23578 entitled: “Clarifying Guidance, Waivers and Alternative Requirements for Hurricane Sandy Grantees in Receipt of Community Development Block Grant Disaster Recovery Funds” (FR-5710-N-01); and December 16, 2013 in the Federal Register at Vol. 78, No. 241 page 76154 “Allocations, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013” (FR-5696-N-07) (collectively, the “Federal Register Notice”).

The second allocation (\$83.1 Million) was released by HUD on June 3, 2014, in the Federal Register at Vol. 79, No. 106, Page 31964 in a notice entitled: “Second Allocation, Waivers, and Alternative Requirements for Grantees Receiving Community Development Block Grant Disaster Recovery Funds in Response to Disasters Occurring in 2013”.

Pursuant to these aforementioned Federal Register Notices and as outlined in the State’s CDBG-DR Action Plan 93.7 million submitted to HUD, the State has reserved the right to “tranche” or segment the CDBG-DR allocation in order to enable the completion of large infrastructure projects under taken by the disaster recovery funding.

Action Plan Amendments

Substantial Amendment: This CDBG-DR Action Plan modification is classified as a Substantial Amendment as referenced on page 114 of the CDBG-DR Action Plan.

A Substantial Amendment to the Action Plan is defined as:

1. a change in program benefit or eligibility criteria;
2. the addition or deletion of an activity; or
3. the allocation or reallocation of more than \$1 million between activities.

Only those amendments that meet the definition of a Substantial Amendment are subject to formal public hearing notification and public comment procedures as defined in Federal Register / Vol. 79, No. 106 / Tuesday, June 3, 2014 / Notice 31969. It is required that at least one public hearing be held regarding any substantial Action Plan Amendment. Citizens and other stakeholders must have reasonable and timely access to these public hearings. Citizen Participation includes a public hearing, publication of the Action Plan on the State's CDBG-DR website and public comment. The prior notices are modified to require grantees to publish substantial Action Plan Amendments for comment for thirty (30) days prior to submission to HUD.

Per the Federal Register Notice guidelines, all amendments (Non-Substantial and Substantial) to the Action Plan will be posted online at the ODOC/CD CDBG-DR webpage (<https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery/>). Public notice will also be given and published online at the ODOC/CD CDBG-DR webpage. Additionally, the CDBG-DR Action Plan will be revised to reflect the amendments (Non-Substantial and Substantial) to the Action Plan. As with the amendments, the CDBG-DR Action Plan is posted online at the ODOC/CD CDBG-DR webpage. Hard copies will also be made available upon request. All interested parties, to include Citizens, units of local government, and community partners will be provided notice and the opportunity to comment on proposed Substantial Amendments to the Action Plan. No less than thirty (30) days will be provided for review and comment on the Substantial Amendment. Comments will be accepted electronically or in writing and will be posted online at the ODOC/CD CDBG-DR webpage. A summary of all comments received and responses will be included in the Substantial Amendment that is submitted to HUD for approval. Each amendment submitted to HUD for approval will be numbered sequentially and is meant to supersede the earlier amendments in the published Action Plan.

Written or oral comments can be addressed through the contact information provided below. The deadline for the submission of public comments is October 29, 2020.

- Via telephone: (405) 227-3984 Toll Free: (800)-879-6552
- Via email: steven.hoover@okcommerce.gov
- Online at: <https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery/>

- In writing at:

Oklahoma Department of Commerce

Attn: Community Development: CDBG Disaster Recovery 900 N.
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Oklahoma Department of Commerce
Attn: Community Development: CDBG Disaster Recovery
900 N. Stiles Ave.
Oklahoma City, OK 73104-3234

Overview:

This amendment includes multiple budget modifications made necessary to reconcile final program budgets and reconcile the Disaster Recovery Grant Reporting System (DRGR). As CDBG-DR projects enter completion and the final project costs are realized, it is necessary to start making various budgetary adjustments. As indicated in the Action Plan, ODOC/CD reserves the right to adjust any of the CDBG-DR funding to ensure the maximum utilization of funds. Such adjustments would be in conjunction with unforeseen events such as the cancellation of projects; projects completed under budget; or from funds designated but not allocated. These adjustments may be used to offset any unforeseen eligible project cost increases such as in the case of construction. Such adjustments, if made available by ODOC/CD, shall be the minimum amount necessary to fund projects efficiently. ODOC/CD will make adjustments as necessary using funding priorities outlined under the earlier published Action Plans.

Table 1 below illustrates the State’s requested revision at this time. Please note that the following tables account for the collective \$93.7 million in State CDBG-DR funding. Substantial Amendment #15 effectively updates the previous Non-Substantial Amendment #14.

Table 1: State Amendment #15 Revision

Amendment #15						
Activity Category	Current Allocation by Program	Subrecipient Admin Converted to Activity Delivery	ODOC Recaptured Funds	HUD Recapture of Expired Funds	Prior Non-Substantial Action Plan Amendments	Amended Allocation by Program
Housing	\$ 6,970,535.89	\$ 40,000.00	\$ -	\$ -	\$ 126,539.49	\$ 7,137,075.38
Infrastructure	\$ 60,310,634.34	\$ 1,100,301.91	\$ (804,706.90)	\$ (2,753,755.43)	\$ 1,250,197.95	\$ 59,102,671.87
Resiliency & Mitigation	\$ 20,147,127.99	\$ 352,336.25	\$ -	\$ (289,585.57)	\$ (8,895.45)	\$ 20,200,983.22
Public Facilities	\$ -	\$ -	\$ -	\$ -		\$ -
Economic Revitalization	\$ -	\$ -	\$ -	\$ -		\$ -
Planning	\$ 1,602,873.83	\$ -	\$ -	\$ 29,693.58		\$ 1,632,567.41
Administration	\$ 4,668,827.95	\$ (1,492,638.16)	\$ 804,706.90	\$ -	\$ (1,367,841.99)	\$ 2,613,054.70
Total	\$ 93,700,000.00	\$ -	\$ -	\$ (3,013,647.42)	\$ -	\$ 90,686,352.58

REVISIONS / MODIFICATIONS

The State’s previous CDBG-DR Action Plan amendments’ #1 – #12 primarily focused on incremental requests for the allocation of additional CDBG-DR funds. Tranche/Round #12 marked the last ODOC request to HUD for CDBG-DR funding with the full \$93.7 million allocation realized. The Previous CDBG-DR Action Plan Amendment’s #12 through #14 marked the start of multiple fund movement requests for such modifications as tranche to tranche and activity to another activity increases and decreases. As noted earlier, this amendment is intended to serve as the final amendment in preparation for the program closeout of this current CDBG-DR Program. This amendment includes the following budget modifications made necessary to reconcile final program budgets and reconcile the Disaster Recovery Grant Reporting System (DRGR).

1. Subrecipient Admin Converted to Activity Delivery

Grantees who receive CDBG-DR grants are limited to a 5% cap for Program Administrative Costs (PAC). In its subrecipient agreements, ODOC/CD provided funding for local governments to pay for certain administrative costs. These costs were originally classified as Administration costs for local government subrecipients in the HUD DRGR system, and counted toward the 5% cap under the CDBG-DR grant. Upon further review, and in consultation with HUD, ODOC/CD has determined that these costs were actually Activity Delivery Costs (ADC) for each subrecipient, and as such, do not count toward the 5% cap for Administration. ADCs are those allowable costs incurred for implementing and carrying out eligible CDBG-DR activities. All ADCs are allocable to a CDBG-DR activity, including direct and indirect costs integral to the delivery of the final CDBG-DR assisted activity. CDBG-DR relies on the core CDBG foundation. CDBG expenditures for activity delivery costs are not governed by 24 CFR 570.205 and 570.206. To recognize the difference between ADCs and PACs, 24 CFR 570.206 notes that “staff and overhead costs directly related to carrying out activities [are] eligible under 570.201 through 570.204, since those costs are eligible as part of such activities.” In addition, 24 CFR 570.205(a)(4)(iii) and (iv) state that “...engineering and design costs related to a specific activity... are eligible as part of the cost of such activity under 570.201-570.204.”

The table below identifies the budget revision from Administration to Activity Delivery for each subrecipient. These revisions did not impact the amount of funding for any subrecipient, but rather corrects this former misclassification. The adjustments will also allow the State to increase its Admin budget with remaining funds that may become available as subrecipient contracts are closed, while staying within the 5% Admin cap for the grant.

**Table 2: Subrecipient Admin Converted to ODOC/CD Activity Delivery
(By Program Area and Subrecipient)**

Program Area	Subrecipient	Amount
Housing	Mannford	\$40,000.00
Housing Subtotal		\$40,000.00
Infrastructure	Catoosa	\$5,111.51
Infrastructure	Cleveland County	\$293,660.32

Infrastructure	Kingfisher	\$8,939.40
Infrastructure	Norman	\$76,200.83
Infrastructure	Oklahoma City	\$716,389.85
Infrastructure Subtotal:		\$1,100,301.91
Mitigation/Resiliency	Cleveland County	\$56,252.50
Mitigation/Resiliency	Creek County	\$236,323.50
Mitigation/Resiliency	Drumright	\$13,535.25
Mitigation/Resiliency	Kiefer	\$6,412.00
Mitigation/Resiliency	Munds	\$3,845.00
Mitigation/Resiliency	Oilton	\$11,518.00
Mitigation/Resiliency	Sapulpa	\$24,450.00
Mitigation Subtotal:		\$352,336.25
Total Activity Delivery Adjustments		\$1,492,638.16

2. ODOC/CD Recaptured Funds: As local government subrecipients complete their disaster recovery projects, their subrecipient contracts are closed out by ODOC/CD. Any remaining balances under the closed agreement may be reallocated for new eligible uses within the grant by the grantee (ODOC/CD). The following funds were recaptured by the Oklahoma Department of Commerce following the subrecipient contract closeout for Cleveland County. The project activities were completed, and the remaining funds were no longer required by the sub-recipients. These remaining grant funds will be moved into the State’s Administration funding. A similar adjustment of \$700,000 was included under Non-Substantial Amendment #14. The current adjustment addresses the final \$804,706.90 remaining in Cleveland County, as illustrated below.

Table 3: ODOC Recaptured Funds

Category	Round #	Activity Title	Total Budget	Grant Funds Disbursed	Percent Disbursed	Funds Available
Infrastructure	Round 12 Extended	Cleveland Co 0080 83.1 Infra (Streets) R12 Ext.	\$5,936,857.65	\$4,432,150.75	75%	\$804,706.90
			\$5,936,857.65	\$4,432,150.75		\$804,706.90

3. HUD Recapture of Expired Funds:

Funds awarded to the state under this appropriation (Public Law 113-2) must meet a disbursement deadline. The grant was obligated under multiple grant agreements (referred to as Rounds), and the funds obligated under each round must be spent within 24 months of the date they were obligated to the state. Funds that do not meet the disbursement deadline are recaptured by HUD. The grantee failed to meet one of those disbursement deadlines, which resulted in an unexpended balance of \$3,013,647.42. The

recaptured amount is illustrated in the tables below. Table 4 below (Expired Funds by Round) identifies the amount of funds that missed their disbursement deadlines for each included Round. Table 5 below (Expired Funds by Subrecipient) identifies each subrecipient that was impacted by the missed deadline. This recaptured funding did not adversely affect the any project’s CDBG-DR eligibility or adversely affect successful project completion.

Table 4: Expired Funds by Round

Round	Expired
Round #1	(\$197.70)
Round #3	(\$315,974.25)
Round #4	(\$4,006.57)
Round #6	(\$127,853.05)
Round #9	(\$2,565,615.85)
Total	(\$3,013,647.42)

Table 5: Expired Funds by Subrecipient:

Subrecipient	Project Type	Impact of Budget Reduction	Expired Amount
City of Norman	street improvements	Project redesign.	\$2,587,339.61
Cleveland County	fire apparatus	No Impact	\$474.49
Creek County	fire apparatus	No Impact	\$3,532.08
Hughes County	various projects	No Impact	\$127,853.05
Oklahoma County	property buyouts	No Impact	\$285,579.00
Town of Catoosa	drainage improvements	No Impact	\$8,671.49
Oklahoma City	planning	No Impact	\$197.70
Total			\$3,013,647.42

Of these funds, the only project that required any modification was the City of Norman’s infrastructure activity for street reconstruction. The project budget was reduced by \$2,587,339.61 which required design and contract modifications as to not diminish the overall project activity and beneficiaries being served. All other identified subrecipients had completed their funded projects and the expired funds represent the remaining balances of those projects and/or subrecipient agreements.

4. Summary of Prior Non-Substantial Action Plan Amendments

These adjustments represent a compilation of non-substantial amendments that have been processed during the course of the grant. A non-substantial amendment does not impact the beneficiaries served, does not add or eliminate a program or project, and does not move more than \$1 million between program areas within a single adjustment. While HUD was aware of these amendments through their ongoing oversight, the budgetary adjustments were not fully captured in prior published Action Plan Amendments (Amendments 1 – 14). The table below identifies the allocation of grant funds by program category to all funded entities as a result of all Action Plan Amendments to date – both substantial and non-substantial:

Table 6: Allocation of Grant Funds by Program Category:

Funded Entity	Program Categories					Total Amount of Funding for Entity:
	Housing	Infrastructure	Resiliency & Mitigation	Planning	Administration	
Bristow		\$974,380.00	\$257,139.50			\$1,231,519.50
Catoosa		\$197,328.51				\$197,328.51
Cleveland County		\$10,706,373.02	\$1,974,758.48			\$12,681,131.50
Creek County			\$12,162,098.01			\$12,162,098.01
Drumright			\$463,311.25			\$463,311.25
Keifer			\$276,434.00			\$276,434.00
Kingfisher		\$2,200,000.00				\$2,200,000.00
Lincoln County		\$228,834.10				\$228,834.10
Mannford	\$5,150,000.00					\$5,150,000.00
Mounds			\$132,021.20			\$132,021.20
Norman		\$15,026,871.35				\$15,026,871.35
Oilton			\$395,460.00			\$395,460.00
Oklahoma City	\$1,845,770.68	\$29,768,884.89	\$900,430.36	\$982,765.11		\$33,497,851.04
Oklahoma County			\$1,169,921.00			\$1,169,921.00
Redlands Comm. College	\$141,304.70					\$141,304.70
Sapulpa			\$2,469,409.42			\$2,469,409.42
State of Oklahoma				\$649,802.30	\$2,613,054.70	\$3,262,857.00
Program Totals:	7,137,075.38	59,102,671.87	20,200,983.22	1,632,567.41	2,613,054.70	\$90,686,352.58

CDBG DISASTER RECOVERY

ACTION PLAN

APPENDIX E

DUPLICATION OF BENEFITS / SUPPORTING DOCUMENTATION

Duplication of Benefits Policy

Introduction

Section 312 of the Robert T. Stafford Disaster Assistance and Emergency Relief Act (42 U.S.C. 5155) prohibits any person, business concern, jurisdiction or other entity from receiving financial assistance with respect to any part of a loss resulting from a major disaster as to which financial assistance under any other program or from insurance or any other source has been received. In accordance with the Stafford Act, Disaster Recovery funds issued through the Department of Housing and Urban Development's Community Development Block Grant Disaster Recovery (CDBG-DR) program may not be used for any costs for which other disaster recovery assistance was previously provided for the same purpose.

The Oklahoma Department of Commerce will contract out Disaster Recovery Funds with Units of Local Government (sub-grantees) for the implementation of all project delivery and management activities. In performance of these activities the administrative function of the ODOC will be ensuring that all CDBG-DR requirements are met although the work is performed by the Sub-grantee. In order to prevent DOB, the State will procure a competitively qualified vendor to implement CDBG-DR DOB procedures. The competitively awarded vendor will perform a basic calculation known as the Housing Assistance Award Calculation which is completed by: (1) Determining each applicant's remaining recovery need; and then (2) Reducing that remaining recovery need by previously received funding for housing recovery, if any (less amounts expended on Allowable Activities). This activity will be monitored for accuracy and completeness by ODOC/CD. The competitively qualified vendor will establish a database for the collection of data on each resident/client receiving any portion of the Funding and will implement the following framework for determining and preventing Duplication of Benefits in its CDBG-DR Program:

Definition

A duplication of benefit occurs when a beneficiary receives assistance from multiple sources such as FEMA, the National Flood Insurance Program (NFIP), the Small Business Administration (SBA), private insurance companies, non-profits, City, State, or any other entity for a cumulative amount that exceeds the total need for a particular disaster recovery purpose. The amount of the duplication is the amount of

assistance provided in excess of need. Private sector or other loans which must be repaid in full are not duplicative. Forgivable loans and grants are duplicative.

Applicable Law and Regulation

Duplication of Benefit applies to all programs or projects funded with CDBG-DR funds. The State of Oklahoma/Oklahoma Department of Commerce--Duplication of Benefit (DOB) policy adheres to the guidelines published in the [Federal Register, Vol. 76, No.221, November 16, 2011 \(76 FR 71060\)](#) and:

- Section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act ([42 U.S.C. 5155](#)), as amended;
- [Public Law 113-2](#): Disaster Relief Appropriations Act, 2013 (at HR 152-34) Signed January 28, 2013
- Section 18 of the Small Business Act, as amended (14A U.S.C. 647) [44 CFR 206.191 Duplication of Benefit](#)
- The HUD *Federal Register Notice* at [78 FR 14329](#) published March 5, 2013
- HUD *Federal Register Notice* at [78 FR 23578](#) published April 19, 2013
- HUD *Federal Register Notice* at [78 FR 76154](#) published December 16, 2013

Requirements and Criteria

Overview

The State of Oklahoma/Oklahoma Department of Commerce will first determine the applicant's total post-disaster need in the absence of any duplicative benefits or program caps. Following the identification of total need, duplicative assistance will be subtracted; program caps applied; and underwriting standards and cost reasonableness principles will be applied to arrive at a final award.

Assessment of Need Prior to Assistance

For rehabilitation and reconstruction programs (housing; commercial; public facilities and infrastructure) the applicant's total post-disaster need shall be determined by a work write-up and cost estimate completed by the State of Oklahoma/Oklahoma Department of Commerce or a third party contractor designated by the Sub grantee.

When providing funds for the repair, replacement, rehabilitation, or new construction of public facilities, infrastructure or improvements, the State of Oklahoma/Oklahoma Department of Commerce will address whether other sources of funds are available for that same purpose and for that specific project. Funds used directly by the State of Oklahoma/Oklahoma Department of Commerce or other government entities for public facilities or other purposes are also subject to the duplication of benefits prohibitions under the Stafford Act.

For economic development and revitalization programs that do not require construction, the applicant's post disaster need shall be determined by standard underwriting criteria and the cost reasonableness requirements of OMB Circular A-87.

Total Assistance Available to the Person or Entity

Total assistance includes all benefits available to the person or entity including:

- FEMA assistance;
- National Flood Insurance Program payments;
- Small Business Administration (SBA) loans;
- Private Insurance Proceeds;
- Private donations or gifts of cash and/or other resources (at market value)
- State, Local and/or other grants

Funds are not reasonably anticipated when the source and/or amount is indefinite, or the applicant is unaware that he/she may be eligible to receive additional funds at a later date.

All applicants shall be required to provide, at the time of application, documentation supporting all benefits received for the specified purpose or activity to be undertaken with CDBG-DR funds. The applicant will also identify reasonably anticipated assistance, such as future insurance claims payments or approved SBA loan proceeds, either directly from the sources or through a required applicant signed certification. Reasonably anticipated funds include assistance that has been awarded, but has not yet been received.

All applicants shall be required to sign, at the time of application, an affidavit as follows:

I/We agree to notify the State of Oklahoma/Oklahoma Department of Commerce within five (5) business days of any additional or new payments, loans, grants or awards by FEMA, the Small Business Administration, the State, or any other entity I/We have not specifically disclosed in this application. Further, I/We understand and acknowledge the State of Oklahoma/Oklahoma Department of Commerce right and responsibility to enforce this requirement by recapturing all or a portion of the CDBG-DR award if the funds I/We receive are determined to be a duplication of the CDBG-DR benefit I/We are applying for with this application.

I/We have read and understand the foregoing statement.

Date _____ Applicant (s) _____

All applicants shall be required to sign, at the time of application, an affidavit as follows:

PENALTY FOR FALSE OR FRAUDULENT STATEMENT: U.S.C. Title 18, Sec. 1001, provides: "Whoever, in any matter within the jurisdiction of any department or agency of the United States knowingly and willfully falsifies . . . or makes any false, fictitious or fraudulent statement or representation, or makes or uses any false writing or document knowing the same to contain any false, fictitious or fraudulent statement or entry, shall be fined not more than \$10,000 or imprisoned not more than five years, or both."

I/We have read and understand the foregoing statement.

Date _____ Applicant (s) _____

Non Duplicative Assistance Excluded from the Final Benefit Calculation.

Once the State of Oklahoma/Oklahoma Department of Commerce has determined the potential award and the total assistance received or to be received, the State of Oklahoma/Oklahoma Department of Commerce may exclude for duplication of benefit purposes, assistance that was:

- Provided for a different purpose other than the purpose of the program from which the applicant seeks assistance; or
- Was used for a different, eligible purpose within the same program; or
- Is not available to the applicant; or
- Consists of a private loan not guaranteed by SBA; or
- Consists of any other asset or line of credit available to the applicant.

Funds for a Different Purpose

Any funds provided for a different purpose, or a general, non-specific purpose (*e.g.*, “disaster relief/recovery”), **may** be excluded by State of Oklahoma/Oklahoma Department of Commerce from the final award calculation if the funds were not used by the applicant for the proposed purpose.

For example, funds provided by FEMA or private insurance for interim housing or commercial space when a household or business is temporarily unable to reside in its permanent residence have a different purpose than the rehabilitation or replacement of a business or housing unit and may be excluded by State of Oklahoma/Oklahoma Department of Commerce.

Rehabilitation includes repair and reconstruction. If a property owner receives rehabilitation funds from CDBG disaster recovery, all other assistance provided to address the rehabilitation must be included in determining Duplication of Benefit. If award amounts are related to a property’s value or estimated cost of repair/replacement, then award amounts will be for the purpose of rehabilitation or reconstruction.

Funds for Same Purpose, Different Eligible Use

In some instances, funds provided for the same general purpose as the CDBG disaster recovery funds will have been used by the applicant for a different specific eligible purpose. In these circumstances, if the applicant can document that the funds received were used for a different, *eligible* purpose, then the

funds are not duplicative. In general, acceptable documentation may include, but is not limited to, receipts as well as sworn statements and certifications that can be verified or substantiated. FEMA requires individuals to keep receipts or bills for three years to demonstrate how all FEMA-funded assistance was used in meeting an eligible, disaster related need.

Whether the funds are used for an eligible purpose is dependent upon the program that provided the funds. For example, assume the State of Oklahoma/Oklahoma Department of Commerce is administering a property owner rehabilitation program and an applicant to the program previously received housing assistance from FEMA. If the applicant can document that the FEMA funds were used for eligible interim housing costs (such as rent, in accordance with FEMA program eligibility), and not housing replacement or rehabilitation (which may also be an eligible use of the funds), then his or her CDBG award for permanent housing would not be reduced by the amount of FEMA assistance used for interim housing. Because FEMA may allow its recovery funds to be used for multiple purposes, CDBG disaster recovery funds may not duplicate the ultimate use of the FEMA funds.

Funds Not Available to the Applicant

Funds that are not available to an applicant will be excluded from the final award calculation by State of Oklahoma/Oklahoma Department of Commerce.

For example, funds are not available to the person or entity if the person does not have legal control of the funds when they are received and are used for a non-duplicative purpose. If a property owner's mortgage requires any insurance proceeds to be applied to reduce the lien balance, then the bank/mortgage holder (not the property owner) has legal control over the funds. Thus, the funds are not available to the applicant and may be excluded. If, however, a mortgage requires insurance proceeds to be used for rehabilitation of the property, those proceeds must be considered as assistance for that purpose

Private Loans

Private loans **may** be excluded by the State of Oklahoma/Oklahoma Department of Commerce from the final award calculation when such loans must be repaid. Public or private loans with a forgiveness provision will not be excluded. SBA loans will not be excluded.

Private loans are defined as non-federal loans (neither direct or guaranteed) that are made in a commercial lending transaction at fair market rates with a willing borrower and willing lender, under standard commercial lending terms in which the borrower must repay the full amount of the loan (plus interest if applicable), including private loans for construction and bridge financing.

When State of Oklahoma/Oklahoma Department of Commerce is making final award determinations, necessary and reasonable cost principles as defined in OMB Circular A-87 (2 CFR part 225) apply. While private loans need not be considered for duplication of benefit purposes, State of Oklahoma/Oklahoma Department of Commerce will consider private loans in underwriting and in determining the level of assistance to be awarded.

Other Assets or Lines of Credit

Other assets or lines of credit available to a property owner or a business owner need not be included in the award calculation. This includes, but is not limited to: checking or savings accounts, stocks, bonds, mutual funds, pension or retirement benefits, credit cards, mortgages or lines of credit, and life insurance.

When State of Oklahoma/Oklahoma Department of Commerce is making final award determinations, necessary and reasonable cost principles as defined in OMB Circular A-87 (2 CFR part 225) apply. While other assets and lines of credit need not be considered for duplication of benefit purposes, State of Oklahoma/Oklahoma Department of Commerce will consider assets and lines of credit in underwriting and in determining the level of assistance to be awarded.

Re-assessment of Need After Award and Before Project Completion

If, after needs are initially calculated and a CDBG award has been made, an applicant for CDBG disaster recovery assistance or the State of Oklahoma/Oklahoma Department of Commerce can demonstrate a change in circumstances, such as vandalism, contractor fraud, an increase in the cost of materials and/or labor, a change in local zoning law or building code, or subsequent damage to a home or business that was partially repaired, the State of Oklahoma/Oklahoma Department of Commerce may reevaluate the calculation of the award by taking into account the increased need. However, any reevaluation must be completed before the initial need for which the assistance was granted has been fully met (*e.g.*, before the damaged property is fully repaired).

Recapture of Duplicative Benefits

To address any potential future duplication of benefits, applicant beneficiaries must, at closing, enter into a signed subrogation agreement to repay any assistance later received for the same purpose as the CDBG-DR funds. If, subsequent to an award, a re-assessment of need occurs and the applicant receives an increased award, then the applicant shall be required to sign a revised subrogation agreement to repay any assistance later received for the same purpose as the CDBG-DR funds.

Methodology – Initial Award

All households, business concerns or other entities shall submit an application to the standard required by State of Oklahoma/Oklahoma Department of Commerce. During the intake/application process, persons, business concerns and other entities receiving financial assistance will be required to disclose all sources of disaster recovery assistance received. The applicant will be required to submit specific documentation for each type of assistance received. The State of Oklahoma/Oklahoma Department of Commerce will verify the amounts received.

Prior to an initial award for any CDBG-DR eligible activity, the State of Oklahoma/Oklahoma Department of Commerce will complete a Duplication of Benefits Worksheet (“the Worksheet”) for the activity. The Worksheet will:

- Identify the total need for assistance for the specific activity;
- Identify the total of all assistance available to the applicant for the specific activity;
- Identify the assistance provided to the applicant that has been determined not to be available or excluded by State of Oklahoma/Oklahoma Department of Commerce for the activity; including:
 - Assistance provided for a different purpose
 - Funds used for a different, eligible purpose
 - Funds not available to the applicant
 - Funds from a private loan not guaranteed by SBA, unless such a loan is forgivable.
 - Any other asset or line of credit available to the applicant
- Perform a calculation determining the total funds available from other sources for the specific activity

- Calculated by subtracting the assistance not available to the applicant or excluded by State of Oklahoma/Oklahoma Department of Commerce from the total assistance received by the applicant
- Perform a calculation determining the maximum award
 - Calculated by subtracting the available funds from other sources (as defined above) from the total need for assistance; and
 - Comparing the result to the program cap (if applicable) and entering the lesser of the program cap or the maximum award as the maximum eligible award.

The completed Worksheet shall be signed and dated by the person completing the Worksheet and placed in the permanent file of the applicant.

Methodology – Post Award – Prior to Completion

In the event an increase occurs in the costs identified in the Assessment of Need, the State of Oklahoma/Oklahoma Department of Commerce will complete a Post Award Duplication of Benefits Worksheet (“Post Worksheet”) as follows:

The Post Worksheet will:

- Identify the original total need for assistance for the specific activity;
- Identify the total of all assistance available to the applicant for the specific activity;
- Identify the assistance provided to the applicant that has been determined not to be available or excluded by State of Oklahoma/Oklahoma Department of Commerce for the activity; including:
 - Assistance provided for a different purpose
 - Funds used for a different, eligible purpose
 - Funds not available to the applicant
 - Funds from a private loan not guaranteed by SBA, unless such a loan is forgivable.
 - Any other asset or line of credit available to the applicant
- Perform a calculation determining the total funds available from other sources for the specific activity

- Calculated by subtracting the assistance not available or excluded by State of Oklahoma/Oklahoma Department of Commerce to the applicant from the total assistance received by the applicant
- Perform a calculation determining the maximum award
 - Calculated by subtracting the available funds from other sources (as defined above) from the total need for assistance; and
 - Comparing the result to the program cap (if applicable) and entering the lesser of the program cap or the maximum award as the maximum eligible award.
- Enter the additional unmet need as defined by a change order or revised work-write-up and cost estimate;
- Perform a calculation to determine the maximum revised award
 - Calculate by adding original unmet need as identified in the Duplication of Benefits Worksheet to the additional unmet need;
 - Comparing the revised total unmet need to the program cap (if applicable)
 - Entering the lesser of the program cap or the revised total unmet need

The completed Post Worksheet shall be signed and dated by the person completing the Post Worksheet and placed in the permanent file of the applicant.

Methodology – Recapture of Duplicative Benefits

When State of Oklahoma/Oklahoma Department of Commerce is notified of, or becomes aware of a payment to an applicant from any source that may be duplicative of a CDBG-DR funded purpose, the State of Oklahoma/Oklahoma Department of Commerce shall require the applicant to provide all pertinent information necessary for the State of Oklahoma/Oklahoma Department of Commerce to make a determination of whether or not the payment was duplicative and whether or not the applicant must repay State of Oklahoma/Oklahoma Department of Commerce the any portion of the CDBG-DR award.

The State of Oklahoma/Department of Commerce shall review the payment received by completing the Initial Award Methodology outlined above. The resulting Duplication of Benefits Worksheet (the Worksheet) shall be signed and dated by the person completing the Worksheet and placed in the permanent file of the applicant. A copy of the worksheet shall be forwarded to the legal department of State of

Oklahoma/Oklahoma Department of Commerce who shall take all legal steps permitted and required by the subrogation agreement to recapture any funds deemed duplicative.

Administrative Procedures for Identifying the Duplication of Benefits

Overview

The Administrative Procedures are designed to promote consistency in identifying and accounting for duplication of benefit and to prevent waste, fraud and abuse.

Application Requirements

All applicants for assistance from the State of Oklahoma/Oklahoma Department of Commerce CDBG-DR programs will be required to provide, at the time of application, documentation supporting all benefits received for the specified purpose or activity to be undertaken with CDBG-DR funds. The applicant will also identify reasonably anticipated assistance, such as future insurance claims payments or approved SBA loan proceeds, either directly from the sources or through a required applicant signed certification. The applicant will be required to sign an affidavit requiring the applicant to report changes or additions in any benefits received within five (5) business days of the applicant's receipt of notification of the benefit.

In conjunction with its actions to prevent fraud, waste, and abuse, the State of Oklahoma/Oklahoma Department of Commerce will require all applicants to self-certify all information provided in the application. In addition, State of Oklahoma/Oklahoma Department of Commerce will employ data systems and data sharing and data matching to identify duplication of benefits. The State of Oklahoma/Oklahoma Department of Commerce will enter into data-sharing agreements with relevant federal and state agencies, and other entities, as appropriate.

Defining Duplicative Benefits

The following procedures will be utilized to define duplicative benefits for housing rehabilitation or reconstruction

FEMA Individual Assistance (FEMA IA)

FEMA IA will be determined and verified by the State of Oklahoma/Oklahoma Department of Commerce through the FEMA database. If the State of Oklahoma/Oklahoma Department of Commerce is unable to verify the FEMA IA amount through the FEMA database, it will use the payment amount provided by the applicant at the time of application. If an applicant is able to provide written documentation demonstrating that the FEMA IA amount provided by the FEMA database includes amounts not paid to cover structural loss, the State of Oklahoma/Oklahoma Department of Commerce will use that documentation to adjust the FEMA IA payout amount used to calculate the housing rehabilitation or reconstruction assistance it provides. The documentation provided by the applicant must come from FEMA for the IA amount, and the documentation demonstrating all or part of IA was not used to cover structural loss must be in form and detail acceptable to the program.

FEMA National Flood Insurance Program (NFIP) Insurance

Any payments for loss to the dwellings under NFIP insurance claims are deducted from the amount the applicant is eligible to receive. Payments for contents or other expenses are not deducted from the applicant's award.

The State of Oklahoma/Oklahoma Department of Commerce will identify and confirm payment to applicants under NFIP policies using the NFIP database. If the State of Oklahoma/Oklahoma Department of Commerce is unable to verify the NFIP insurance proceeds through the NFIP database, the State of Oklahoma/Oklahoma Department of Commerce will use documentation supplied by the applicant. If an applicant is able to provide documentation demonstrating that the insurance proceeds amount provided by the NFIP database includes items not covered in the home evaluation or not paid to cover structural loss, the State of Oklahoma/Oklahoma Department of Commerce will use the documentation provided by the applicant to adjust the insurance payout used to calculate the housing rehabilitation or reconstruction assistance it provides. The documentation provided by the applicant must come from the insurance company which issued the payments and be verifiable by the insurance company.

Increased Cost of Compliance (ICC) under NFIP

Increased Cost of Compliance (ICC) coverage is one of several resources for flood insurance policyholders who need additional help rebuilding after a flood. It provides up to \$30,000 to help cover the cost of

mitigation measures that will reduce flood risk. ICC coverage is a part of most standard flood insurance policies available under the National Flood Insurance Program (NFIP).

The State of Oklahoma/Oklahoma Department of Commerce will determine duplication of benefits regarding ICC funds provided by NFIP. The State of Oklahoma/Oklahoma Department of Commerce will identify and confirm payments to applicants under ICC policies through the NFIP database. If the State of Oklahoma/Oklahoma Department of Commerce is unable to verify the NFIP ICC amount through the NFIP database, the State of Oklahoma/Oklahoma Department of Commerce will use documentation supplied by the applicant. The documentation must be in sufficient detail to be independently verifiable. If an applicant is able to provide documentation demonstrating that the ICC amount provided by the NFIP database includes items not covered in the home evaluation or not paid to cover structural loss, the State of Oklahoma/Oklahoma Department of Commerce will use the documentation provided by the applicant to adjust the ICC payout used in its calculations. The documentation provided by the applicant must come from the insurance company that issued the payments. The documentation showing use of ICC proceeds for specific expenses must clearly show services, materials, products, or any other tangible deliverable that is outside the scope of structural loss and the basis for the home evaluation.

Private Insurance

Generally, all private insurance settlement amounts for loss to dwellings are deducted from the applicant's award. However, private insurance payments for contents or other expenses such as fences, storage sheds, etc., are not deducted from the applicant's award providing such expenses are not related or eligible for funding from the program for which the applicant is seeking funds.

Insurance proceeds are identified and confirmed by the State of Oklahoma/Oklahoma Department of Commerce through the applicant's insurance settlement. If an applicant can provide documentation demonstrating that the amount of proceeds provided by the insurance company includes items not covered in the home evaluation or not paid to cover structural loss, the State of Oklahoma/Oklahoma Department of Commerce may use that documentation to adjust the private insurance DOB calculation. The documentation provided by the applicant must come from the insurance company that issued the payments. The documentation must clearly show the use of proceeds

for specific expenses, e.g., services, materials, products, or any other tangible deliverable, outside the scope of structural loss and the home evaluation.

The Small Business Administration (SBA)

The application will require the applicant to disclose whether or not an SBA loan was applied for, approved, and accepted or declined. Applicants who declined an SBA approved loan will be required to provide an explanation for declining the SBA loan.

Approved amounts for repair to the dwellings under SBA Disaster Loan programs are deducted from the amount the applicant is eligible to receive. Approved amounts for contents or other expenses are not deducted from the applicant's award.

The State of Oklahoma/Oklahoma Department of Commerce will identify and confirm amounts approved for applicants under SBA Disaster Loan programs through the SBA data matching. If the State of Oklahoma/Oklahoma Department of Commerce is unable to verify the SBA approved amount through the SBA database, the State of Oklahoma/Oklahoma Department of Commerce will use documentation supplied by the applicant. If an applicant is able to provide documentation demonstrating that the approved amount provided by the SBA database includes items not covered in the home evaluation or not for structural loss, or in the case of addressing structural loss is insufficient to cover all costs needed to correct the structural loss, the State of Oklahoma/Oklahoma Department of Commerce will use the documentation to adjust the SBA approved amount used in its calculation. The documentation provided by the applicant must come from SBA on SBA letterhead, and clearly show use of loan funds for specific expenses, e.g., services, materials, products, or any other tangible deliverable that is outside the scope of structural loss and the home evaluation. The documentation to show insufficient loan proceeds to cover all costs tied to structural loss must be itemized and on the letterhead and signed by a licensed professional acceptable to the State of Oklahoma/Oklahoma Department of Commerce.

Other Sources

Other funds from any source that is specifically provided for the purpose of repair, reconstruction, or other improvements to the dwelling are deducted from the amount the applicant is eligible to receive. Private Loans that are structured as "forgivable loans" are considered a duplication, as well cash gifts,

donations and other funds, if specifically provided for the purpose of repair, reconstruction or other improvements to the dwelling.

The documentation provided by the applicant must come from the source that issued the payments. Notable exceptions of other sources are described in above sections “Private Loans” and “Other Assets or lines of Credit.”

Adjustments and Offset to the Amount of Assistance

Applicant must provide evidence of funds spent for repairs and rehabilitation that would be subject to duplication of benefit.

No receipts provided:

If the applicant is unable to provide receipts as required in this policy to demonstrate other, unrelated uses of funds already received, the full amount of housing repair and/or replacement assistance previously received must be deducted from the amount of funding for which the applicant would otherwise be eligible.

Partial receipts provided:

If partial receipts are provided by the applicant documenting that only a portion of the housing repair and/or replacement assistance previously received was used as intended, the amount received not supported by receipts must be deducted from the amount of funding for which the applicant would otherwise be eligible.

All receipts provided:

If receipts are provided by the applicant documenting that the full amount of housing repair and/or replacement assistance previously received was used as intended, and as required in this policy to demonstrate other, unrelated uses of funds already received no deduction is made from the award amount for which applicant is eligible.

In instances where no receipts or only partial receipts were provided by the property owner, the State of Oklahoma/Oklahoma Department of Commerce may consider self-

certifications when calculating the amount of assistance that can be provided. In these instances, the following requirements apply:

The property owner must provide a signed self-certified statement prepared and provided by the State of Oklahoma/Oklahoma Department of Commerce based on information provided by the applicant that documents in detail all labor and or repairs made to the damaged property following the hurricane; and

A Certified Inspector must determine with verifiable assurances (i.e. permit dates, utility restart dates, etc.) that the repairs were made after the date of the tornado and that the repairs are consistent with damage resulting from the tornado; and

The State of Oklahoma/Oklahoma Department of Commerce will document, through photographs, the repairs that were made.

A Certified Inspector(s) is a person or persons hired by the State of Oklahoma/Oklahoma Department of Commerce, qualified to inspect for labor and or repairs made to the damaged home in the absence of receipts. Self-certified statements of the property owner must be reviewed in detail by a Certified Inspector to determine:

- Whether repairs were made to the home;
- Whether the repairs could be reasonably determined as occurring after the applicable tornado; and
- A reasonable value of the cost of repairs to the home (including labor)

Allowed Activities:

Applicants must provide documentation for allowable activities to off-set potential Duplication of Benefit.

Temporary Housing:

Allowable activities are temporary housing such as rent, hotel stays and applicable utilities that occurred because of temporary displacement from their primary residence because of the tornado. Eligible

temporary displacement is from the time of the event until the date of the verification letter. Evacuation costs are not eligible for Duplication of Benefits offset.

Although Rental Assistance is not considered to be a source of duplication of benefits under this program, temporary housing expenses can offset the potential duplication of benefits amount. To offset the total amount, the following applies:

The offsetting amount would be the amount of documented expenses that exceed the amount received for Rental Assistance.

Contractor Fraud:

If an applicant was a victim of contractor fraud, the amount paid to the contractor may not be counted as a duplication of benefits. The applicant would have had to file a formal complaint with a government authority, e.g., consumer protection or police department, setting forth in detail the cause and amount of fraud in sufficient form to be verifiable and affirmed through enforcement follow-up.

Mortgage Force Payment:

If an applicant's mortgage company placed a force payment on insurance proceeds, the insurance amount paid to satisfy a force payment is not a duplication of benefits. The applicant would have to provide the document proving that that the mortgage company did not release the insurance proceeds.

Legal Fees:

Legal fees that were paid in successfully obtaining insurance proceeds will be credited to the applicant and will not be deducted as part of their duplication of benefits. Applicants will need to provide evidence of payment and self-certify in accordance with State of Oklahoma/Oklahoma Department of Commerce policy in order to be credited.

Tax Filing:

Tax filings related to losses to the home do not affect funding assistance awards and are not considered duplication of benefits. Applicants should consult their personal tax advisor about any tax related matter



Date of Issuance: August 16, 2016

Solicitation No. FY17-04-0809

Requisition No. _____

Amendment No. FY17-04-0816

Hour and date specified for receipt of offers is changed: No Yes, to: _____ CST

Pursuant to OAC 260:115-7-30(d), this document shall serve as official notice of amendment to the solicitation identified above. Such notice is being provided to all suppliers to which the original solicitation was sent.

Suppliers submitting bids or quotations shall acknowledge receipt of this solicitation amendment prior to the hour and date specified in the solicitation as follows:

- (1) Sign and return a copy of this amendment with the solicitation response being submitted; or,
- (2) If the supplier has already submitted a response, this acknowledgement must be signed and returned prior to the solicitation deadline. All amendment acknowledgements submitted separately shall have the solicitation number and bid opening date printed clearly on the front of the envelope.

ISSUED BY and RETURN TO:

U.S. Postal Delivery:

Oklahoma Department of Commerce
900 N. Stiles
Oklahoma City, OK 73104

LaKeshia Lofton
Contracting Officer

405 - 815 - 5167
Phone Number

or

Personal or Common Carrier Delivery

Oklahoma Department Of Commerce
900 N. Stiles
Oklahoma City, OK 73104

Lakeshia_lofton@okcommerce.gov
E-Mail Address

Description of Amendment:

a. This is to incorporate the following:

Section F. Cost
The RFQ should include a costs for completing the Duplication of Benefits.

b. All other terms and conditions remain unchanged.

Supplier Company Name (**PRINT**)

Date

Authorized Representative Name (**PRINT**)

Title

Authorized Representative Signature



**State of Oklahoma
Oklahoma Department of Commerce**

Solicitation

Solicitation #: FY17-04-0809

Solicitation Issue Date: August 9, 2016

Brief Description of Requirement:

The Oklahoma Department of Commerce (ODOC) invites the submission of a Statement of Qualifications to provide Duplication of Benefits analysis and verification services including the execution of Subrogation Agreements for the Community Development Block Grant-Disaster Recovery program (CDBG-DR). Duplication of Benefit requirements are prescribed by Section 312 of the Robert T. Stafford Disaster Assistance and Emergency Relief Act (42 U.S.C 5155).

Response Due Date¹: September 16,2016

Time:3:00 PM CST/CDT

Issued By and RETURN SEALED BID TO²:

Agency Name: Oklahoma Department of Commerce

- U.S. Postal Delivery: 900 N. Stiles Oklahoma City, Oklahoma 73104
- Carrier Delivery: 900 N. Stiles Oklahoma City, Oklahoma 73104

Solicitation Type (type "X" at one below):

- Invitation to Bid
- Request for Proposal
- Request for Quote

1. Shipping Location:900 N. Stiles Oklahoma City, Oklahoma 73104

2. Contracting Officer:

Name: LaKeshia Lofton

Phone: 405-815-5167

Email: lakeshia_lofton@okcommerce.gov

¹ Amendments to solicitation may change the Response Due Date (read GENERAL PROVISIONS, section 3, "Solicitation Amendments")

² If "U.S. Postal Delivery" differs from "Carrier Delivery", use "Carrier Delivery" for courier or personal deliveries



"Certification for Competitive Bid and Contract" (see page 3) MUST be submitted along with the response to the Solicitation.

1. RE: Solicitation # FY17-04-0809

2. Bidder General Information:

FEI / SSN : VEN ID:
Company Name:

3. Bidder Contact Information:

Address:
City: State: Zip Code:
Contact Name:
Contact Title:
Phone #: FAX#:
Email: Website:

4. Oklahoma Sales Tax Permit (type "X" at one below):

- YES - Permit #:
NO - Exempt pursuant to Oklahoma Laws or Rules

5. Registration with the Oklahoma Secretary of State (type "X" at one below):

- YES - Filing Number:
NO - Prior to the contract award, the successful bidder will be required to register with the Secretary of State or must attach a signed statement that provides specific details supporting the exemption the supplier is claiming

6. Workers' Compensation Insurance Coverage:

Bidder is required to provide with the bid a certificate of insurance showing proof of compliance with the Oklahoma Workers' Compensation Act (type "X" at one below):

- YES - include a certificate of insurance with the bid
NO - attach a signed statement that provides specific details supporting the exemption you are claiming from the Workers' Compensation Act

Authorized Signature Date
Printed Name Title

3 For frequently asked questions concerning Oklahoma Sales Tax Permit, see
4 For frequently asked questions concerning workers' compensation insurance, see



**State of Oklahoma
Department of Commerce**

**Certification for Competitive
Bid and/or Contract
(Non-Collusion Certification)**

NOTE: A certification shall be included with any competitive bid and/or contract exceeding \$5,000.00 submitted to the State for goods or services.

Solicitation or Purchase Order #: FY17-04-0809

Supplier Legal Name: _____

SECTION I [74 O.S. § 85.22]:

A. For purposes of competitive bid,

1. I am the duly authorized agent of the above named bidder submitting the competitive bid herewith, for the purpose of certifying the facts pertaining to the existence of collusion among bidders and between bidders and state officials or employees, as well as facts pertaining to the giving or offering of things of value to government personnel in return for special consideration in the letting of any contract pursuant to said bid;
2. I am fully aware of the facts and circumstances surrounding the making of the bid to which this statement is attached and have been personally and directly involved in the proceedings leading to the submission of such bid; and
3. Neither the bidder nor anyone subject to the bidder's direction or control has been a party:
 - a. to any collusion among bidders in restraint of freedom of competition by agreement to bid at a fixed price or to refrain from bidding,
 - b. to any collusion with any state official or employee as to quantity, quality or price in the prospective contract, or as to any other terms of such prospective contract, nor
 - c. in any discussions between bidders and any state official concerning exchange of money or other thing of value for special consideration in the letting of a contract, nor
 - d. to any efforts or offers with state agency or political subdivision officials or others to create a sole brand acquisition or a sole source acquisition in contradiction to 74 O.S. 85.45j.1.

B. I certify, if awarded the contract, whether competitively bid or not, neither the contractor nor anyone subject to the contractor's direction or control has paid, given or donated or agreed to pay, give or donate to any officer or employee of the State of Oklahoma any money or other thing of value, either directly or indirectly, in procuring this contract herein.

SECTION II [74 O.S. § 85.42]:

For the purpose of a contract for services, the supplier also certifies that no person who has been involved in any manner in the development of this contract while employed by the State of Oklahoma shall be employed by the supplier to fulfill any of the services provided for under said contract.

The undersigned, duly authorized agent for the above named supplier, by signing below acknowledges this certification statement is executed for the purposes of:

the competitive bid attached herewith and contract, if awarded to said supplier;

OR

the contract attached herewith, which was not competitively bid and awarded by the agency pursuant to applicable Oklahoma statutes.

Supplier Authorized Signature

Certified This Date

Printed Name

Title

Phone Number

Email

Fax Number

A. GENERAL PROVISIONS

A.1. Definitions

As used herein, the following terms shall have the following meaning unless the context clearly indicates otherwise:

- A.1.1. "Acquisition" means items, products, materials, supplies, services, and equipment a state agency acquires by purchase, lease purchase, lease with option to purchase, or rental pursuant to the Oklahoma Central Purchasing Act;
- A.1.2. "Bid" means an offer in the form of a bid, proposal, or quote a bidder submits in response to a solicitation;
- A.1.3. "Bidder" means an individual or business entity that submits a bid in response to a solicitation;
- A.1.4. "Solicitation" means a request or invitation by the State Purchasing Director or a state agency for a supplier to submit a priced offer to sell acquisitions to the state. A solicitation may be an invitation to bid, request for proposal, or a request for quotation; and
- A.1.5. "Supplier" or "vendor" means an individual or business entity that sells or desires to sell acquisitions to state agencies.

A.2. Bid Submission

- A.2.1. Submitted bids shall be in strict conformity with the instructions to bidders and shall be submitted with a completed Responding Bidder Information, OMES-FORM-CP-076, and any other forms required by the solicitation.
- A.2.2. Bids shall be submitted to the procuring agency in a single envelope, package, or container and shall be sealed, unless otherwise detailed in the solicitation. The name and address of the bidder shall be inserted in the upper left corner of the single envelope, package, or container. SOLICITATION NUMBER AND SOLICITATION RESPONSE DUE DATE AND TIME MUST APPEAR ON THE FACE OF THE SINGLE ENVELOPE, PACKAGE, OR CONTAINER.
- A.2.3. The required certification statement, "Certification for Competitive Bid and/or Contract (Non-Collusion Certification)", OMES-FORM-CP-004, must be made out in the name of the bidder and must be properly executed by an authorized person, with full knowledge and acceptance of all its provisions.
- A.2.4. All bids shall be legible and completed in ink or with electronic printer or other similar office equipment. Any corrections to bids shall be identified and initialed in ink by the bidder. Penciled bids and penciled corrections shall NOT be accepted and will be rejected as non-responsive. In addition to a hard copy submittal, the bidder will also be required to submit an electronic copy. Electronic responses must be submitted in the identical format contained in the solicitation (for example Microsoft Word, Microsoft Excel, but not Adobe PDF). In the event the hard copy of the price worksheets and electronic copy of the price worksheets do not agree, the electronic copy will prevail.
- A.2.5. All bids submitted shall be subject to the Oklahoma Central Purchasing Act, Central Purchasing Rules, and other statutory regulations as applicable, these General Provisions, any Special Provisions, solicitation specifications, required certification statement, and all other terms and conditions listed or attached herein—all of which are made part of this solicitation.

A.3. Solicitation Amendments

- A.3.1. If an "Amendment of Solicitation", OMES-FORM-CP-011, is issued, the bidder shall acknowledge receipt of any/all amendment(s) to solicitations by signing and returning the solicitation amendment(s). Amendment acknowledgement(s) may be submitted with the bid or may be forwarded separately. If forwarded separately, amendment acknowledgement(s) must contain the solicitation number and response due date and time on the front of the envelope. The procuring agency must receive the amendment acknowledgement(s) by the response due date and time specified for receipt of bids for the bid to be deemed responsive. Failure to acknowledge solicitation amendments may be grounds for rejection.
- A.3.2. No oral statement of any person shall modify or otherwise affect the terms, conditions, or specifications stated in the solicitation. All amendments to the solicitation shall be made in writing by the procuring agency.
- A.3.3. It is the Bidder's responsibility to check frequently for any possible amendments that may be issued. The procuring agency is not responsible for a bidder's failure to download any amendment documents required to complete a solicitation.

A.4. Bid Change

If the bidder needs to change a bid prior to the solicitation response due date, a new bid shall be submitted to the procuring agency with the following statement "This bid supersedes the bid previously submitted" in a single envelope, package, or container and shall be sealed, unless otherwise detailed in the solicitation. The name and address of the bidder shall be inserted in the upper left corner of the single envelope, package, or container. SOLICITATION NUMBER AND SOLICITATION RESPONSE DUE DATE AND TIME MUST APPEAR ON THE FACE OF THE SINGLE ENVELOPE, PACKAGE, OR CONTAINER.

A.5. Certification Regarding Debarment, Suspension, and Other Responsibility Matters

By submitting a response to this solicitation:

- A.5.1. The prospective primary participant and any subcontractor certifies to the best of their knowledge and belief, that they and their principals or participants:
 - A.5.1.1. Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any Federal, State or local department or agency;
 - A.5.1.2. Have not within a three-year period preceding this proposal been convicted of or pled guilty or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State or local) contract; or for violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
 - A.5.1.3. Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State, or local) with commission of any of the offenses enumerated in paragraph A.5.1.2. of this certification; and
 - A.5.1.4. Have not within a three-year period preceding this application/proposal had one or more public (Federal, State, or local) contracts terminated for cause or default.
- A.5.2. Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to its solicitation response.

A.6. Bid Opening

Sealed bids shall be opened by the _____ Oklahoma Department of Commerce _____ located at _____
900 N. Stiles Oklahoma _____ at the time and date specified in the solicitation as the Response Due Date and

A.7. Open Bid / Open Record

Pursuant to the Oklahoma Public Open Records Act, a public bid opening does not make the bid(s) immediately accessible to the public. The procurement or contracting agency shall keep the bid(s) confidential, and provide prompt and reasonable access to the records only after a contract is awarded or the solicitation is cancelled. This practice protects the integrity of the competitive bid process and prevents excessive disruption to the procurement process. The interest of achieving the best value for the State of Oklahoma outweighs the interest of vendors immediately knowing the contents of competitor's bids. [51 O.S. § 24A.5(5)]

Additionally, financial or proprietary information submitted by a bidder may be designated by the Purchasing Director as confidential and the procurement entity may reject all requests to disclose information designated as confidential pursuant to 62 O.S. (2012) § 34.11.1(H)(2) and 74 O.S. (2011) § 85.10. Bidders claiming any portion of their bid as proprietary or confidential must specifically identify what documents or portions of documents they consider confidential and identify applicable law supporting their claim of confidentiality. The State Purchasing Director shall make the final decision as to whether the documentation or information is confidential pursuant to 74 O.S. § 85.10. Otherwise, documents and information a bidder submits as part of or in connection with a bid are public records and subject to disclosure after contract award or the solicitation is cancelled.

A.8. Late Bids

Bids received by the procuring agency after the response due date and time shall be deemed non-responsive and shall NOT be considered for any resultant award.

A.9. Legal Contract

- A.9.1. Submitted bids are rendered as a legal offer and any bid, when accepted by the procuring agency, shall constitute a contract.
- A.9.2. The Contract resulting from this solicitation may consist of the following documents in order of preference:
 - A.9.2.1. Purchase order, as amended by Change Order (if applicable);
 - A.9.2.2. Solicitation, as amended (if applicable); and
 - A.9.2.3. Successful bid (including required certifications), to the extent the bid does not conflict with the requirements of the solicitation or applicable law.
- A.9.3. Any contract(s) awarded pursuant to the solicitation shall be legibly written or typed.

A.10. Pricing

- A.10.1. Bids shall remain firm for a minimum of sixty (60) days from the solicitation closing date.
- A.10.2. Bidders guarantee unit prices to be correct.

- A.10.3. In accordance with 74 O.S. §85.40, ALL travel expenses to be incurred by the supplier in performance of the Contract shall be included in the total bid price/contract amount.

A.11. Manufacturers' Name and Approved Equivalent

Unless otherwise specified in the solicitation, manufacturers' names, brand names, information and/or catalog numbers listed in a specification are for information and not intended to limit competition. Bidder may offer any brand for which they are an authorized representative, and which meets or exceeds the specification for any item(s). However, if bids are based on equivalent products, indicate on the bid form the manufacturer's name and number. Bidder shall submit sketches, descriptive literature, and/or complete specifications with their bid. Reference to literature submitted with a previous bid will not satisfy this provision. The bidder shall also explain in detail the reason(s) why the proposed equivalent will meet the specifications and not be considered an exception thereto. Bids that do not comply with these requirements are subject to rejection.

A.12. Clarification of Solicitation

- A.12.1. Clarification pertaining to the contents of this solicitation shall be directed in writing to the Contracting Officer specified in the solicitation.
- A.12.2. If a bidder fails to notify the State of an error, ambiguity, conflict, discrepancy, omission or other error in the SOLICITATION, known to the bidder, or that reasonably should have been known by the bidder, the bidder shall submit a bid at its own risk; and if awarded the contract, the bidder shall not be entitled to additional compensation, relief, or time, by reason of the error or its later correction. If a bidder takes exception to any requirement or specification contained in the SOLICITATION, these exceptions must be clearly and prominently stated in their response.
- A.12.3. Bidders who believe proposal requirements or specifications are unnecessarily restrictive or limit competition may submit a written request for administrative review to the State prior to the closing date.

A.13. Rejection of Bid

The State reserves the right to reject any bids that do not comply with the requirements and specifications of the solicitation. A bid may be rejected when the bidder imposes terms or conditions that would modify requirements of the solicitation or limit the bidder's liability to the State. Other possible reasons for rejection of bids are listed in OAC 580:16-7-32.

A.14. Award of Contract

- A.14.1. The State Purchasing Director may award the Contract to more than one bidder by awarding the Contract(s) by item or groups of items, or may award the Contract on an ALL OR NONE basis, whichever is deemed by the State Purchasing Director to be in the best interest of the State of Oklahoma.
- A.14.2. Contract awards will be made to the lowest and best bidder(s) unless the solicitation specifies that best value criteria is being used.
- A.14.3. In order to receive an award or payments from the State of Oklahoma, suppliers must be registered. The vendor registration process can be completed electronically through the OMES website at the following link: <https://www.ok.gov/dcs/vendors/index.php>.

A.15. Contract Modification

- A.15.1. The Contract is issued under the authority of the State Purchasing Director who signs the Contract. The Contract may be modified only through a written Contract Modification, signed by the State Purchasing Director.
- A.15.2. Any change to the Contract, including but not limited to the addition of work or materials, the revision of payment terms, or the substitution of work or materials, directed by a person who is not specifically authorized by the procuring agency in writing, or made unilaterally by the supplier, is a breach of the Contract. Unless otherwise specified by applicable law or rules, such changes, including unauthorized written Contract Modifications, shall be void and without effect, and the supplier shall not be entitled to any claim under this Contract based on those changes. No oral statement of any person shall modify or otherwise affect the terms, conditions, or specifications stated in the resultant Contract.

A.16. Delivery, Inspection and Acceptance

- A.16.1. Unless otherwise specified in the solicitation or awarding documents, all deliveries shall be F.O.B. Destination. The bidder(s) awarded the Contract shall prepay all packaging, handling, shipping and delivery charges and firm prices quoted in the bid shall include all such charges. All products and/or services to be delivered pursuant to the Contract shall be subject to final inspection and acceptance by the State at destination. "Destination" shall mean delivered to the receiving dock or other point specified in the purchase order. The State assumes no responsibility for goods until accepted by the State at the receiving point in good condition. Title and risk of loss or damage to all items shall be the responsibility of the supplier until accepted by the receiving agency. The supplier(s) awarded the Contract shall be responsible for filing, processing, and collecting any and all damage claims accruing prior to acceptance.
- A.16.2. Supplier(s) awarded the Contract shall be required to deliver products and services as bid on or before the required date. Deviations, substitutions or changes in products and services shall not be made unless expressly authorized in writing by the procuring agency.

A.17. Invoicing and Payment

- A.17.1. Pursuant to 74 O.S. §85.44(B), invoices will be paid in arrears after products have been delivered or services provided.
- A.17.2. Interest on late payments made by the State of Oklahoma is governed by 62 O.S. §34.71 and 62 O.S. §34.72.

A.18. Tax Exemption

State agency acquisitions are exempt from sales taxes and federal excise taxes. Bidders shall not include these taxes in price quotes.

A.19. Audit and Records Clause

- A.19.1. As used in this clause, "records" includes books, documents, accounting procedures and practices, and other data, regardless of type and regardless of whether such items are in written form, in the form of computer data, or in any other form. In accepting any Contract with the State, the successful bidder(s) agree any pertinent State or Federal agency will have the right to examine and audit all records relevant to execution and performance of the resultant Contract.
- A.19.2. The successful bidder(s) awarded the Contract(s) is required to retain records relative to the Contract for the duration of the Contract and for a period of seven (7) years following completion and/or termination of the Contract. If an audit, litigation, or other action involving such records is started before the end of the seven (7) year period, the records are required to be maintained for two (2) years from the date that all issues arising out of the action are resolved, or until the end of the seven (7) year retention period, whichever is later.

A.20. Non-Appropriation Clause

The terms of any Contract resulting from the solicitation and any Purchase Order issued for multiple years under the Contract are contingent upon sufficient appropriations being made by the Legislature or other appropriate government entity. Notwithstanding any language to the contrary in the solicitation, purchase order, or any other Contract document, the procuring agency may terminate its obligations under the Contract if sufficient appropriations are not made by the Legislature or other appropriate governing entity to pay amounts due for multiple year agreements. The Requesting (procuring) Agency's decisions as to whether sufficient appropriations are available shall be accepted by the supplier and shall be final and binding.

A.21. Choice of Law

Any claims, disputes, or litigation relating to the solicitation, or the execution, interpretation, performance, or enforcement of the Contract shall be governed by the laws of the State of Oklahoma.

A.22. Choice of Venue

Venue for any action, claim, dispute or litigation relating in any way to the Contract shall be in Oklahoma County, Oklahoma.

A.23. Termination for Cause

- A.23.1. The supplier may terminate the Contract for default or other just cause with a 30-day written request and upon written approval from the procuring agency. The State may terminate the Contract for default or any other just cause upon a 30-day written notification to the supplier.
- A.23.2. The State may terminate the Contract immediately, without a 30-day written notice to the supplier, when violations are found to be an impediment to the function of an agency and detrimental to its cause, when conditions preclude the 30-day notice, or when the State Purchasing Director determines that an administrative error occurred prior to Contract performance.
- A.23.3. If the Contract is terminated, the State shall be liable only for payment for products and/or services delivered and accepted.

A.24. Termination for Convenience

- A.24.1. The State may terminate the Contract, in whole or in part, for convenience if the State Purchasing Director determines that termination is in the State's best interest. The State Purchasing Director shall terminate the Contract by delivering to the supplier a Notice of Termination for Convenience specifying the terms and effective date of Contract termination. The Contract termination date shall be a minimum of 60 days from the date the Notice of Termination for Convenience is issued by the State Purchasing Director.
- A.24.2. If the Contract is terminated, the State shall be liable only for products and/or services delivered and accepted, and for costs and expenses (exclusive of profit) reasonably incurred prior to the date upon which the Notice of Termination for Convenience was received by the supplier.

A.25. Insurance

The successful bidder(s) awarded the Contract shall obtain and retain insurance, including workers' compensation, automobile insurance, medical malpractice, and general liability, as applicable, or as required by State or Federal law, prior to commencement of any work in connection with the Contract. The supplier awarded the Contract shall timely renew the policies to be carried pursuant to this section throughout the term of the Contract and shall provide the procuring agency with evidence of such insurance and renewals.

A.26. Employment Relationship

The Contract does not create an employment relationship. Individuals performing services required by this Contract are not employees of the State of Oklahoma or the procuring agency. The supplier's employees shall not be considered employees of the State of Oklahoma nor of the procuring agency for any purpose, and accordingly shall not be eligible for rights or benefits accruing to state employees.

A.27. Compliance with the Oklahoma Taxpayer and Citizen Protection Act of 2007

By submitting a bid for services, the bidder certifies that they, and any proposed subcontractors, are in compliance with 25 O.S. §1313 and participate in the Status Verification System. The Status Verification System is defined in 25 O.S. §1312 and includes but is not limited to the free Employment Verification Program (E-Verify) through the Department of Homeland Security and available at www.dhs.gov/E-Verify.

A.28. Compliance with Applicable Laws

The products and services supplied under the Contract shall comply with all applicable Federal, State, and local laws, and the supplier shall maintain all applicable licenses and permit requirements.

A.29. Special Provisions

Special Provisions set forth in SECTION B apply with the same force and effect as these General Provisions. However, conflicts or inconsistencies shall be resolved in favor of the Special Provisions.

TABLE OF CONTENTS

A.	General Provisions	4
B.	General Information	9
C.	Solictaion Specifications	9
D.	Instructions to Suppliers	9
E.	Statement of Qualifications	9
F.	Cost.....	10
G.	Evaluation	10
H.	Checklist	10

B. GENERAL INFORMATION

- B.1.** The Project Description is Duplication of Benefit analysis, verification and documentation on each unit of local government awarded through the Community Development Block Grant-Disaster Recovery program to ensure full compliance with Section 312 of the Robert T. Stafford Disaster Assistance and Emergency Relief Act (42 U.S. C. 5155). In evaluating the response to the RFQ ODOC will take into consideration the experience, capacity and costs that are being proposed by the Respondent

C. SOLICITATION SPECIFICATIONS

- C.1.** The firm/consultant will execute a contract with the Oklahoma Department of Commerce (ODOC) to provide Duplication of Benefit (DOB) analysis and verification on units of general local government funded through the CDBG-DR program. The scope of services will include calculating and documenting funds received by units of local government from other sources such as FEMA, SBA, Insurance, and any other sources and determine whether a Duplication of Benefit has occurred. Subrogation Agreements will be developed for each unit of local government. The Subrogation Agreement ensures that the unit of local government will repay any assistance later received for the same purpose as the CDBG-DR funds. All services will meet DOB guidelines as provided by the U.S. Department of Housing and Urban Development and set forth in Section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act) at 42 U.S.C 5155; 24 CFR Part 570 and OMB Circulars and DOB Federal Register Notice 76 FR 71060.
- C.2.** Firms/consultants interested in providing Duplication of Benefit services must submit a State of Qualifications (RFQ) that address the following evaluation criteria. Applicants are encouraged to organize their submission in such a way as to follow the general evaluation criteria listed below. Information included with the RFQ may be used to evaluate the firm/consultant as party of any criteria regardless of where that information is found within the RFQ. Information obtained from the RFQ and from any other relevant source may be used in the evaluation and selection process.

D. INSTRUCTIONS TO SUPPLIER

- D.1.** Cover Letter (1-page) containing at a minimum: Firm/Consultant name, email address, phone number
 - D.1.1.** Qualification Criteria
 - D.1.2.** General Information
 - Description of firm/team
 - Legal Firm organization, organization chart as applicable

E. STATEMENT OF QUALIFICATIONS

E.1. Relevant Firm/Consultant Experience

- E.1.1.** Applicants overall reputation, service capabilities as it relates to this project
 - E.1.1.1.** List and briefly describe 2-4 comparable project's completed by firm/consultant or currently in progress; include role, and discuss contract amendment history, if applicable. For each project, include: contract value (original value plus contract amendments, if applicable), project name and location (State or Local government), contact name and title, address, current/accurate telephone number, fax number, and email address.

- E.1.1.2. A minimum of three referrals and references from other State and Local governments. If possible, references should be from project's listed above.
- E.1.1.3. Provide resume(s) of each proposed team member.
- E.1.1.4. List and describe any litigation; arbitration; claims filed by firm/consultant against any project owner as a result of a contract dispute; any claim filed against your firm; termination from a project.
- E.1.1.5. Applicants capacity and intent to proceed without delay if selected for this work

E.2. Project Understanding and Approach

- E.2.1. Describe your understanding of the project.
 - E.2.1.1. Identify and discuss any potential problems during DOB process.
 - E.2.1.2. Identify and discuss methods to mitigate those problems.

E.3. Approach to Project Management

- E.3.1. Describe your management approach and organization during programming, design and implementation phases of the DOB process
 - E.3.1.1. Describe systems used for planning, scheduling, estimating and managing project services.
 - E.3.1.2. Describe experience on quality assurance and dispute resolution

E.4. Other Key Factors

- E.4.1.1. Current workload and ability to proceed promptly.
- E.4.1.2. Willingness to abide by the State and Federal Agreements with few or no objection or changes
- E.4.1.3. Provide a statement regarding your assurance that this engagement will not result in a conflict of interest.
- E.4.1.4. Relevant factors impacting the quality of and value of work

F. COST

- F.1. The RFQ should include a costs for completing the Duplication of Benefits.
(Note: there are 17 Units of General Local Government funded with CDBG-DR funds and 45 individual projects)

G. EVALUATION

- G.1. A minimum of three (3) Panel Member from the Community Development Division of the Oklahoma Department of Commerce will evaluate each Statement of Qualifications (RFQ) according the above criteria, as well as past performance evaluations and select one finalist.

H. CHECKLIST

- H.1. The RFQ shall include a one (1) page cover letter, a one (1) page table of contents and a maximum of ten (10) pages to address the RFQ criteria specified in the Statement of Qualifications Selection Criteria listed above, for a maximum of 12 pages excluding Resumes. Resumes shall be limited to no more than one (1) page, one electronic copy and two Paper copies of the Completed RFQ must be submitted to ODOC

- H.2.** Failure to comply with following criteria may be grounds for disqualifications: Receipt of submittal by the specified cut-off date and time, and adherence to maximum page requirements.
- H.3.** Adherence to the maximum page criteria is critical; each page side (maximum 8.5 x 11) with criteria information will be counted. Pages that have photos, charts and graphs will be counted towards the maximum number of pages.