



Community Development Block Grant Disaster Recovery 2023–2024 – Subrecipient Handbook

Oklahoma Department of Commerce – Community Development
Division

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Document Purpose Statement

The purpose of this Handbook is to provide administrative, procedural, eligibility, compliance, documentation, and application guidance to eligible applicants seeking funding under the Oklahoma 2023–2024 Community Development Block Grant Disaster Recovery (CDBG-DR) Program administered by the Oklahoma Department of Commerce (ODOC). This Handbook is intended to assist applicants in preparing complete, accurate, and compliant submissions consistent with applicable federal and state laws, HUD guidance, Federal Register Notices, Uniform Guidance requirements, the approved State Action Plan, and other governing program requirements applicable to CDBG-DR disaster recovery assistance.

Program Purpose Statement

The purpose of the Oklahoma 2023–2024 CDBG-DR Program is to support long-term disaster recovery, restoration of infrastructure and housing, mitigation, resilience, and community revitalization activities associated with federally declared disaster events DR-4706 and DR-4776 within the State of Oklahoma. Program funds are intended to address unmet disaster-related needs through eligible activities authorized under federal law and administered in accordance with the Housing and Community Development Act of 1974, applicable U.S. Department of Housing and Urban Development (HUD) Federal Register Notices, the approved State Action Plan, and all applicable federal and state requirements governing the use of CDBG-DR funds.

Governing Authority Statement

This Handbook and the Oklahoma 2023–2024 Community Development Block Grant Disaster Recovery (CDBG-DR) Program shall be administered by the Oklahoma Department of Commerce (ODOC) in accordance with Title I of the Housing and Community Development Act of 1974, as amended, applicable HUD appropriations, Federal Register Notices, waivers and alternative requirements, the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 24 CFR Part 570, 2 CFR Part 200, the approved Oklahoma CDBG-DR Action Plan, executed grant agreements, and all other applicable federal and state laws, regulations, directives, and administrative requirements governing the use of CDBG-DR funds. Applicants and subrecipients shall comply with all applicable requirements associated with the application, administration, expenditure, procurement, reimbursement, reporting, monitoring, and use of CDBG-DR assistance.

In the event of conflict between governing authorities, controlling authority shall be determined by applicable federal statutes, HUD requirements, Federal Register Notices, waivers and alternative requirements, executed grant agreements, the approved State Action Plan, and then this Handbook.

ODOC reserves the right to interpret, revise, supplement, condition, limit, suspend, terminate, reject, request additional documentation for, or otherwise administer applications, eligibility determinations, awards, reimbursements, and program requirements as necessary to ensure compliance with applicable laws, regulations, funding conditions, audit requirements, HUD directives, risk assessments, and program administration requirements.

Applicants and subrecipients shall maintain records and supporting documentation sufficient to substantiate compliance with applicable requirements and shall provide ODOC, HUD, auditors, Inspectors General, and other authorized governmental entities access to such records upon request.

Disclaimer of Liability

This Handbook is provided solely for general informational and administrative guidance purposes and does not constitute a contract, funding commitment, entitlement, vested right, guarantee of award, approval of eligibility or activities, waiver of legal requirements, or assurance of funding, reimbursement, or continued program participation. Submission of an application does not create contractual, property, reliance, or third-party beneficiary rights.

All applications, awards, activities, reimbursements, and program participation remain subject to funding availability, HUD authorization, eligibility review, environmental clearance, procurement compliance, Duplication of Benefits review, audit review, risk evaluation, and ODOC approval.

Applicants and subrecipients remain solely responsible for compliance with all applicable federal, state, and local requirements governing the administration and use of CDBG-DR funds, including applicable procurement, environmental, labor, civil rights, accessibility, financial management, reporting, monitoring, audit, and record retention requirements. ODOC shall not be responsible for applicant errors or omissions, contractor or third-party actions, reliance on unofficial guidance, system failures, delays caused by external review or approval processes, denial of funding, repayment obligations, recapture actions, or costs determined to be ineligible.

ODOC reserves all rights, remedies, monitoring authority, corrective action authority, repayment and recapture authority, suspension and termination authority, audit authority, and administrative discretion permitted under applicable law, including applicable monitoring and enforcement authorities under 2 CFR Part 200. Nothing contained in this Handbook shall be construed to waive, limit, impair, or modify any sovereign immunity, governmental immunity, statutory protection, enforcement authority, audit authority, or legal remedy available to the State of Oklahoma or ODOC under applicable law.

Applicants and subrecipients subject to federal audit requirements shall comply with applicable audit requirements under 2 CFR Part 200, Subpart F.

Definitions

Activity Delivery Costs (ADC) - Project-specific costs directly associated with the administration, implementation, and delivery of an eligible CDBG-DR activity, including eligible environmental, engineering, architectural, underwriting, and project administration costs allowable under applicable federal requirements.

Action Plan - The approved Oklahoma Community Development Block Grant Disaster Recovery (CDBG-DR) Action Plan, including all approved amendments, governing the administration and use of CDBG-DR funds allocated to the State of Oklahoma.

Applicant - An eligible entity submitting an application for CDBG-DR assistance through the Oklahoma Department of Commerce.

Community Development Block Grant Disaster Recovery – (CDBG-DR) - a federally funded disaster recovery program administered by the U.S. Department of Housing and Urban Development (HUD) to assist communities recovering from presidentially declared major disasters. CDBG-DR funds are intended to address unmet recovery needs related to housing, infrastructure, economic revitalization, and mitigation activities that are not fully covered by other disaster assistance sources. The program is governed by federal statutes, HUD Federal Register Notices, applicable waivers and alternative requirements, and state-administered Action Plans approved by HUD.

Citizen Participation Plan - A written plan adopted by an applicant describing procedures for public notice, public hearings, citizen participation, complaint resolution, and public access to information consistent with applicable HUD requirements.

Direct Tie-Back - Documentation demonstrating a clear relationship between the proposed activity and the applicable federally declared disaster event.

Disaster Declaration - A federally declared disaster event authorized under the Robert T. Stafford Disaster Relief and Emergency Assistance Act.

Duplication of Benefits (DOB) - Financial assistance received from multiple sources for the same purpose and same disaster-related need, resulting in assistance exceeding the remaining unmet need.

Environmental Review - The environmental compliance review process required under applicable federal environmental laws and HUD environmental review requirements prior to obligating or expending certain federal funds.

Federal Emergency Management Agency (FEMA) - a federal agency within the U.S. Department of Homeland Security responsible for coordinating the federal government's response to disasters and emergencies. FEMA provides disaster

assistance, emergency response coordination, hazard mitigation funding, floodplain management, and recovery support to states, local governments, Tribal governments, eligible nonprofits, businesses, and individuals following presidentially declared disasters. FEMA programs and documentation are frequently used in CDBG-DR programs to support disaster nexus determinations, damage assessments, Duplication of Benefits reviews, and unmet need calculations.

Federal Register Notice - An official notice published by HUD in the Federal Register establishing CDBG-DR allocations, waivers, alternative requirements, program rules, or administrative requirements applicable to disaster recovery funding.

Grant Agreement - The executed agreement between ODOC and the awarded subrecipient governing the administration and use of CDBG-DR funds.

United States Department of Housing and Urban Development (HUD) - a federal agency responsible for national policy and programs related to housing, urban development, and community development. HUD administers funding programs such as the Community Development Block Grant (CDBG) and Community Development Block Grant Disaster Recovery (CDBG-DR), and establishes regulations, guidance, and requirements governing their use. HUD also oversees compliance with federal housing laws, fair housing protections, and program integrity standards for grantees and subrecipients receiving federal housing and disaster recovery funds.

Low-to-Moderate Income (LMI) - Income levels defined by HUD for purposes of determining national objective compliance and program eligibility.

Most Impacted and Distressed (MID) Areas - Geographic areas identified by HUD or the State as having sustained significant disaster-related impacts and designated for prioritized disaster recovery funding.

National Objective - A federal eligibility requirement under Title I of the Housing and Community Development Act of 1974 that must be met by all CDBG-assisted activities.

Oklahoma Department of Commerce Community Development Division (ODOC/CD) - a division within the Oklahoma Department of Commerce responsible for administering community and economic development programs that support infrastructure, housing, and disaster recovery efforts across the state. It manages and oversees programs such as the Community Development Block Grant (CDBG) and Community Development Block Grant Disaster Recovery (CDBG-DR), including application review, funding administration, compliance monitoring, and technical assistance to subrecipients. The division ensures that awarded funds are implemented in accordance with applicable federal and state requirements, HUD guidance, and the State's approved Action Plan.

Oklahoma Grants Exchange (OGX) - Oklahoma Grants Exchange Grant Management System utilized for electronic application submission, grants management, reporting, and program administration activities.

Program Income - Gross income generated directly from the use of CDBG-DR funds, subject to applicable federal requirements.

Public Hearing - A publicly noticed meeting conducted to obtain citizen input regarding proposed CDBG-DR activities, funding applications, project changes, or grant performance.

SAM.gov - The System for Award Management maintained by the federal government for entity registration, exclusion verification, and federal award eligibility.

Section 3 - Section 3 of the Housing and Urban Development Act of 1968, as amended, requires certain economic opportunities generated by HUD financial assistance to be directed toward low- and very low-income persons and eligible businesses.

Stafford Act - The Robert T. Stafford Disaster Relief and Emergency Assistance Act.

State Action Plan - The Oklahoma CDBG-DR Action Plan approved by HUD governing disaster recovery funding priorities, eligible activities, and program administration requirements.

Subrecipient - An eligible entity receiving a CDBG-DR award from ODOC to carry out an approved activity or program.

Subrogation Agreement - An agreement requiring repayment of duplicative disaster recovery assistance received after a CDBG-DR award where required under applicable federal requirements.

Technical Assistance - Guidance, training, or administrative support provided by ODOC regarding program requirements, application preparation, grant administration, or compliance matters.

Unit of General Local Government (UGLG) - a city, county, town, or other general-purpose local government that is eligible to receive and administer federal or state grant funds, including Community Development Block Grant (CDBG) and CDBG-DR assistance. UGLGs are responsible for implementing approved activities in accordance with applicable program requirements, including procurement, financial management, reporting, and compliance with federal, state, and grant-specific regulations. In CDBG-DR programs, UGLGs typically serve as subrecipients of the state grantee and are accountable for ensuring proper use of funds and achievement of eligible program objectives.

Uniform Guidance - The federal administrative, cost, audit, and procurement requirements contained in 2 CFR Part 200.

Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) - a federal law that establishes uniform policies and procedures for the fair treatment of individuals, businesses, and farm operations displaced by federally funded or federally assisted projects. It requires that displaced persons receive equitable relocation assistance, including advisory services, moving costs, and replacement housing payments where applicable. URA also sets standards for real property acquisition to ensure that property owners are treated fairly and consistently when their property is acquired for federally funded public purposes.

Unmet Need - The remaining disaster-related recovery need after accounting for all available funding sources, insurance proceeds, and disaster recovery assistance.

Unique Entity Identifier (UEI) - assigned through SAM.gov for participation in federally funded programs.

Section 1: Introduction

On behalf of the Oklahoma Department of Commerce Community Development Division (ODOC/CD), we appreciate the opportunity to partner with eligible communities and applicants as recovery and rebuilding efforts continue following recent federally declared disasters. The CDBG-DR program is intended to support long-term recovery, infrastructure restoration, housing stabilization, and community resiliency in accordance with federal disaster recovery requirements established by HUD.

The ODOC/CD CDBG-DR team is available throughout the application and grant administration process to provide technical assistance, program guidance, and support to eligible applicants. Please note that the 2023–2024 CDBG-DR application process is competitive. Applications will be evaluated and scored based on consistency with the 2023–2024 CDBG-DR Action Plan, applicable HUD requirements, federal eligibility criteria, and ODOC policies and procedures. Infrastructure projects involving water and wastewater systems may also receive consideration based on documented Consent Orders, Notices of Violation, and demonstrated disaster-related impacts.

The Oklahoma 2023–2024 CDBG-DR Action Plan is available on the ODOC Disaster Recovery website: [CDBG Disaster Recovery 2023-2024 - Oklahoma Department of Commerce](#)

The Action Plan outlines the State's disaster recovery priorities, program requirements, eligible activities, and funding framework. Applicants are strongly encouraged to review the Action Plan in its entirety prior to submitting an application.

What You Need to Know Before Applying

Before submitting a 2023–2024 CDBG-DR application, applicants should ensure the following administrative and compliance requirements have been addressed:

- **Audit Requirements:** All required audits should be current and in compliance with applicable state and federal requirements. Applicants experiencing audit delays due to financial constraints may be eligible for assistance through external funding programs, including the ORWA RIG Grant program, which may provide support for audit-related expenses. [RIG - Oklahoma Rural Water Association](#)
- **Oklahoma Grant Exchange (OGX) Account Management:** Applicant OGX accounts must be current and maintained with accurate user roles and permissions. Personal email addresses should not be used for official grant administration activities, and login credentials should not be shared.

- SAM.gov Registration: Applicants must maintain an active and current registration in SAM.gov throughout the application and grant administration process.
- Application Completeness: Applications must be fully completed and include all required documentation at the time of submission. Incomplete applications may be deemed ineligible for consideration.
- Administrative Capacity: Applicants should ensure they have sufficient staffing, administrative capacity, and operational capability to successfully manage and implement the grant if awarded.
- Procurement and Contracting: Applicants should not enter into project-related procurement, contracting, or construction activities prior to receiving applicable environmental clearance, grant authorization, and ODOC approval, unless otherwise authorized under federal or state requirements.

OGX Grant Management System

All applications and required supporting documentation for CDBG-DR funding opportunities must be submitted electronically through the OGX Grant Management System. Paper applications will not be accepted. Applicants are encouraged to review the training materials and guidance documents below prior to beginning the application process.

Resource	Description
OGX Main Page - <u>Main Page & Login</u>	Main access page for the OGX Grant Management System, including login information and general system resources.
OGX for New Users Guide -	Introductory overview of the OGX system for first-time users.
OGX Frequently Asked Questions (FAQ) -	Frequently asked questions, troubleshooting guidance, and instructions for resetting usernames and passwords.
OGX – Status Glossary and Definitions -	Definitions and explanations of OGX application and grant status terminology.
OGX Subgrantee User Manual -	Comprehensive user manual containing detailed instructions for navigating and using the OGX system.

Eligible Applicants

Eligible applicants for 2023–2024 CDBG-DR funding include Units of General Local Government (UGLGs), including incorporated towns, cities, and counties. Eligible entities may also include qualifying nonprofit organizations, state agencies, and tribal nations, as permitted under applicable federal and state program requirements.

To be considered eligible, all proposed activities and projects must demonstrate a direct connection to the federally declared disaster events occurring during the following periods:

April 19–20, 2023 (FEMA Disaster Declaration DR-4706-OK)

April 25–May 9, 2024 (FEMA Disaster Declaration DR-4776-OK)

Projects must also be located within, or directly serve, areas covered under the applicable Presidential Disaster Declarations. Each application must clearly document and describe how the disaster event caused or contributed to the identified damage, infrastructure need, housing impact, economic disruption, or recovery activity. Applications that do not establish a clear nexus to DR-4706-OK or DR-4776-OK may be determined ineligible and removed from consideration.

Only activities directly related to federally declared disaster events DR-4706-OK and DR-4776-OK, and occurring within the applicable incident periods, geographic areas, waivers, alternative requirements, and eligibility standards identified in the applicable HUD Federal Register Notices, approved Oklahoma CDBG-DR Action Plan, and applicable federal requirements governing CDBG-DR assistance, shall be eligible for funding consideration.

Pursuant to the applicable HUD Federal Register allocation requirements, a minimum of \$31,524,000, representing at least 80 percent of the State's total \$39,405,000 CDBG-DR allocation, must be expended on eligible disaster-related activities benefiting designated Most Impacted and Distressed (MID) areas.

The State-identified MID counties include:

- McClain County
- Murray County
- Osage County

Remaining funds may be utilized for eligible planning, administration, and other authorized disaster recovery activities consistent with the approved Action Plan and applicable HUD requirements.

HUD Federal Register Notice Links

HUD CDBG-DR Federal Register Notices Page

[HUD CDBG-DR Laws, Regulations, and Federal Register Notices](#)

2025 Allocation Announcement Notice (covers 2023–2024 disasters)

[HUD Allocation Announcement Notice – 2023–2024 Disaster Allocations](#)

Official Federal Register PDF Version

[Federal Register Allocation Notice PDF \(90 FR 4760\)](#)

Oklahoma State Action Plan

[Oklahoma 2023–2024 CDBG-DR Action Plan PDF](#)

How to Apply for the 2023–2024 CDBG-DR Program

Eligible applicants are strongly encouraged to coordinate with the Oklahoma Department of Commerce Community Development Division (ODOC/CD) prior to submitting an application. Pre-application meetings are intended to assist applicants in evaluating project eligibility, identifying potential compliance considerations, and ensuring proposed activities align with applicable program requirements and disaster recovery objectives.

Applicants that do not participate in a pre-application meeting with ODOC/CD prior to submission may be at increased risk of submitting an ineligible or incomplete application.

- During the pre-application meeting, ODOC/CD staff may review and discuss:
- Applicant eligibility
- Activity eligibility
- Qualified geographic areas
- Applicable disaster incident periods
- Proposed project scope and budget
- Leveraged or matching funding sources
- Prior CDBG-DR performance and compliance history
- Administrative and staffing capacity

To request a pre-application meeting, applicants should contact:

Please use the subject line:

“DR 2023–2024 Pre-Application Meeting Request”

Application Submission Process

All applications and required supporting documentation must be submitted electronically through the OGX Grant Management System. Paper applications will not be accepted under any circumstances.

Applicants may access the OGX system here:

[OGX Grant Management System](#)

Applicants that do not already have an OGX account must select “Agency Administrator Registration” on the login page and follow the on-screen registration instructions.

Once logged into the system, applicants must:

- Complete all required OGX application forms
- Upload all required supporting documentation
- Submit the completed application through the OGX portal for ODOC/CD review

Incomplete applications, missing documentation, or applications submitted outside the established application window may be deemed ineligible and will not be considered for funding.

Income Limits

HUD requires that at least 70 percent of CDBG-DR program expenditures benefit Low-to-Moderate Income (LMI) persons or households. Applicants should review applicable HUD income limit requirements and supporting guidance prior to submitting an application.

Current HUD income limits are available here:

[HUD CDBG Income Limits](#)

Technical Assistance

Technical assistance regarding project eligibility, project development, application requirements, program guidelines, and other CDBG-DR related questions is available upon request.

Applicants are encouraged to contact ODOC/CD Disaster Recovery staff whenever clarification or assistance is needed regarding:

- Program requirements
- Project conceptualization
- Eligibility determinations

- Application preparation
- Compliance considerations
- Grant administration requirements

Following contract execution, technical assistance services remain available to all subrecipients and consultants throughout the grant administration process.

To request technical assistance, contact:

Please use the subject line:

“Technical Assistance Request”

Application Deadline

The 2023–2024 CDBG-DR application period for Infrastructure and Planning activities will begin on September 14, 2026, and remain open until all available program funds are committed or the application period is otherwise closed by ODOC.

Applications for Infrastructure and Planning activities will be accepted and reviewed on an ongoing basis, subject to the availability of funds. Submission of an application does not guarantee funding.

Applications must be complete and include all required documentation to be considered for funding. Incomplete applications may not be considered for funding until all required information and documentation have been received. Funding will be awarded in accordance with the program’s established eligibility, prioritization, and selection requirements and remains subject to the availability of CDBG-DR funds.

Economic Development and Housing activities are not included in this application period and remain subject to approval by the U.S. Department of Housing and Urban Development (HUD). ODOC will provide additional information regarding the availability and application process for Economic Development and Housing activities following receipt of the required HUD approval.

Section 2: CDBG-DR Program Requirements

Eligible Activities

Eligible CDBG-DR activities are authorized under Title I of the Housing and Community Development Act of 1974 and must address a demonstrated disaster-related need associated with the federally declared disaster events occurring during:

- April 19–20, 2023 (DR-4706-OK)
- April 25–May 9, 2024 (DR-4776-OK)

Eligible activities must support one or more disaster recovery objectives, including housing recovery, infrastructure restoration, long-term recovery, economic revitalization, mitigation incorporated into recovery activities, or other eligible disaster relief efforts consistent with HUD requirements and the approved Action Plan.

Examples of eligible CDBG-DR activities may include, but are not limited to:

1. Acquisition of real property
2. Acquisition, rehabilitation, or construction of public facilities and public improvements
3. Property acquisition and voluntary buyout activities
4. Relocation assistance
5. Reconstruction or rehabilitation of residential properties
6. Reconstruction or rehabilitation of public housing
7. Repair, replacement, or rehabilitation of damaged infrastructure
8. Americans with Disabilities Act (ADA) accessibility improvements
9. Homeownership counseling and housing assistance activities

Ineligible Activities

Activities that are not authorized under Title I of the Housing and Community Development Act of 1974, or that fail to demonstrate a clear disaster-related nexus to DR-4706-OK or DR-4776-OK, are generally ineligible for CDBG-DR funding.

Examples of ineligible activities include, but are not limited to:

1. Duplicate or previously funded projects
2. Projects not compliant with applicable local, state, or federal laws and regulations
3. Direct income payments
4. Activities unrelated to the declared disaster events
5. Political activities
6. Purchase of general construction equipment

7. Standalone mitigation activities not directly tied to disaster recovery or rebuilding efforts
8. Routine maintenance or general repair of public facilities
9. Ongoing operational or maintenance costs for public facilities

Activity Delivery Costs (ADC)

Activity Delivery Costs (ADCs) are allowable project-specific costs directly associated with the administration, implementation, and delivery of an eligible CDBG-DR activity. When a subrecipient administers a project, eligible ADC expenses should be included within the total project budget.

Examples of eligible ADCs may include:

- Site-specific environmental review costs
- Engineering, design, and architectural services
- Applicant intake and eligibility determinations
- Project underwriting and selection activities
- Project-specific administrative staff costs

All Activity Delivery Cost (ADC) expenditures must be reasonable, necessary, and directly attributable to the eligible activity being administered. ADC expenditures should not exceed fifteen percent (15%) of the associated eligible project activity costs. Any proposed ADC expenditure exceeding the 15% threshold must be supported by additional written justification demonstrating that the costs are reasonable, necessary, and proportionate to the complexity and requirements of the activity and are subject to ODOC review and approval. ADC expenditures will be attributed to the same national objective and LMI benefit category as the project activity to which they are connected.

Item 1: Application Summary and Certification

Provide general information about the applicant and a concise summary of the proposed project. Applicants with an active Consent Order or Notice of Violation should include a brief description in this section. The Certification confirms that all information submitted in the application is accurate, complete, and authorized by the applicant.

Item 2: Detailed Line-Item Budget

Applicants must submit a detailed project budget identifying all proposed project costs and all leverage or matching funding sources. The OGX budget form should be completed with as much specificity as possible, as the approved budget will serve as the basis for the grant agreement and project implementation if funding is awarded.

Item 3: Audit Requirements

Cities, towns, nonprofit organizations, and tribal nations must submit a copy of their most recent audit with their application. Counties and state agencies are exempt from this requirement. Applicants with a June 30 fiscal year-end must submit their FY25 audit. Applicants with a December 31 fiscal year-end must submit their FY24 audit. Audits may also be mailed to:

Oklahoma Department of Commerce
Financial Services
900 N. Stiles Ave.
Oklahoma City, OK 73104

Audits sent by mail must be postmarked on or before the application submission. Late submissions will not be accepted.

For audit-related questions, contact Financial Services: 405-815-5312 or 800-879-6552 ext. 5312

Item 5: Application Forms Checklist

Applicants must complete and upload the Application Forms Checklist to OGX. The checklist identifies all required forms and supporting documentation necessary for a complete application submission.

Item 6: Applicant Resolution

Applications must include an officially adopted resolution from the applicant's governing body authorizing the submission of the CDBG-DR application and requesting assistance.

Examples include:

- City Council approval for municipalities
- Board of County Commissioners approval for counties
- Board approval for nonprofit organizations or tribal entities

The executed resolution must be uploaded to OGX.

Item 7: Citizen Participation Plan

Applicants must adopt and implement a Citizen Participation Plan that complies with federal citizen participation requirements.

Prior to submitting an application, applicants must:

- Officially adopt the Citizen Participation Plan
- Conduct a public hearing related to the proposed CDBG-DR application

Previously adopted Citizen Participation Plans may be reused if reviewed and updated to reflect the proposed project.

Public Hearing Requirements

Documentation of the application-phase public hearing is required and must include an Affidavit of Publication. ODOC/CD requires a minimum fifteen (15) working-day public notice before any hearing or public meeting related to the CDBG-DR application.

Public hearings must:

- Be held at locations and times accessible to beneficiaries
- Include accommodations for persons with disabilities
- Address the needs of non-English-speaking residents when applicable

The Citizen Participation Plan must explain how the applicant will:

- Encourage citizen participation, particularly among low- and moderate-income residents
- Provide public access to meetings, records, and program information
- Notify citizens of proposed project changes
- Address complaints and grievances in a timely manner
- Conduct at least two public hearings:
 - One before application submission
 - One at project closeout if funding is awarded

The application-phase hearing must address:

- Community development and housing needs

- The purpose and objectives of the CDBG-DR program
- Proposed project activities

The Citizen Participation Plan must be signed and dated by the chief elected official and either:

- Include the official municipal, county, or tribal seal, or
- Be notarized

Item 8: Certified Cost Estimate

Applicants must provide detailed project cost estimates prepared by qualified professionals such as engineers, architects, vendors, contractors, or other personnel experienced in developing cost estimates. Supporting documentation may be submitted in Word, Excel, or PDF format.

Engineering Fee Schedule

Engineering costs shall be reimbursed based upon documented completion and acceptance of the applicable engineering design milestone. The percentages below represent the **maximum cumulative reimbursement of the approved engineering design fee** at each stage.

1. **15% Design Completion – Maximum Cumulative Reimbursement: 15%**
A 15% design completion summary and supporting documentation demonstrating completion of the applicable engineering services are required.
2. **30% Design Completion – Maximum Cumulative Reimbursement: 30%**
A 30% design completion summary and supporting documentation demonstrating completion of the applicable engineering services are required.
3. **50% Design Completion – Maximum Cumulative Reimbursement: 50%**
A 50% design completion summary and supporting documentation demonstrating completion of the applicable engineering services are required.
4. **80% Design Completion – Maximum Cumulative Reimbursement: 80%**
An 80% design completion summary and supporting documentation demonstrating completion of the applicable engineering services are required.
5. **100% Design Completion – Maximum Cumulative Reimbursement: 100%**
Final plans and specifications must be complete and approved by the subrecipient. A 100% design completion summary and supporting

documentation demonstrating completion of the applicable engineering services are required.

Reimbursement Requirements: The percentages above establish the maximum cumulative amount of the approved engineering design fee eligible for reimbursement at each milestone. Reimbursement is limited to actual, reasonable, necessary, eligible, and adequately documented costs incurred. Completion of a milestone does not automatically entitle the subrecipient to reimbursement of the maximum amount. ODOC reserves the right to request additional documentation and to reduce, withhold, or defer reimbursement when costs or deliverables are not adequately supported.

Item 9: Applicant/Recipient Disclosure Update Report (HUD Form 2880)

HUD Form 2880 is a federally required disclosure form and must be completed when applicable disclosure thresholds are met. The form must include all required certifications and signatures from interested parties before being uploaded to OGX.

Item 10: Low-to-Moderate Income (LMI) Documentation

Applicants seeking to qualify under the Low-to-Moderate Income (LMI) National Objective must submit all required LMI documentation through OGX.

National Objective eligibility determinations and LMI benefit calculations shall be administered in accordance with applicable HUD requirements under 24 CFR Part 570, applicable CDBG-DR waivers and alternative requirements, and the approved Oklahoma CDBG-DR Action Plan.”

Required uploads for applicants conducting Random Sample Income Surveys include:

- LMI Beneficiary Summary Form
- Random Number Table
- Survey Map
- Copies of all original Field Survey Sheets

Projects must demonstrate that at least 51% of beneficiaries within the service area are low- to moderate-income households as defined by current HUD income limits.

Failure to meet the LMI National Objective requirements will result in application rejection.

Determining LMI Eligibility

Applicants must clearly define:

- The project service area
- The population benefiting from the project
- How the activity improves living conditions for eligible beneficiaries

Income eligibility may be documented through:

- HUD-approved income surveys, or
- Census data with prior ODOC/CD approval

Applicants intending to use Census data must contact the ODOC/CD CDBG Planner at least thirty (30) days before application submission. Census data may not be prorated or used without approval.

Income Survey Requirements

Applicants conducting income surveys must:

- Use the Random Sample Survey methodology
- Maintain verifiable household-level documentation
- Upload all required survey documentation and mapping materials
- Clearly identify surveyed households and income status on a color-coded map

Surveys conducted incorrectly or lacking required documentation may be rejected.

Applicants are strongly encouraged to coordinate with ODOC/CD staff before conducting surveys to ensure compliance with HUD requirements.

Item 11: W-9 Taxpayer Identification & Certification

Applicants must complete and upload a signed IRS W-9 form as part of the application process.

Item 12: SAM.gov Exclusion/Debarment Verification

Applicants, subrecipients, contractors, subcontractors, and other covered parties participating in federally funded transactions shall comply with applicable federal suspension and debarment requirements under 2 CFR Part 180 and 2 CFR Part 2424. Covered parties shall not knowingly enter into transactions with suspended, debarred, or otherwise excluded entities.

Applicants must provide documentation verifying they are not suspended or debarred from participation in federally funded programs. Instructions for obtaining the required SAM.gov exclusion verification are provided in Appendix A.

Item 13: Subrogation Agreement

Applicants must submit a signed Subrogation Agreement acknowledging that any duplicative disaster recovery funds received must be repaid if required under federal duplication-of-benefits regulations.

Item 14: Duplication of Benefits (DOB) Chart

Applicants must complete a Duplication of Benefits (DOB) chart identifying all known funding sources associated with the disaster recovery project, including:

- Insurance proceeds
- FEMA assistance
- SBA funding
- Other federal, state, local, or private assistance

Supporting documentation should be included whenever available.

Item 15: Project Narrative

The Project Narrative must clearly describe:

- The need for the proposed activity
- The scope of work
- The project's relationship to the declared disaster
- How the project meets HUD National Objectives
- The expected project outcomes

Incomplete or insufficient narratives may result in a failed threshold review.

Item 16: Damage Verification

Applicants must provide photographs and supporting documentation demonstrating disaster-related damage associated with the proposed project. Documentation should clearly support the requested funding activity.

Failure to adequately document damages may result in a failed threshold review.

Item 17: Damage Timeline

Applicants must provide a timeline identifying significant disaster-related events, impacts, and recovery milestones associated with the proposed project.

Incomplete timelines may result in a failed threshold review.

Item 18: Unmet Need Documentation

Applicants must provide documentation demonstrating remaining unmet recovery needs after accounting for all other available funding sources.

Failure to adequately document unmet need may result in a failed threshold review.

Item 19: Capacity Assessment Verification

Applicants must demonstrate sufficient administrative and staffing capacity to manage the grant successfully.

Required documentation includes:

- Organizational chart
- Staff roles and responsibilities
- Prior federal grant management experience
- Planned capacity improvements, if applicable

Examples of capacity improvements may include:

- Hiring additional staff
- Contracting with consultants
- Staff training
- Partnerships with other organizations

Item 20: Procurement Policies and Procedures

Procurement activities funded with CDBG-DR assistance shall comply with applicable federal, state, HUD, and ODOC procurement requirements, including 2 CFR §§ 200.317 through 200.327 and applicable contract provisions required under 2 CFR Part 200, Appendix II.

Applicants and subrecipients shall maintain written procurement policies and conflict-of-interest standards consistent with 2 CFR § 200.318 and shall maintain procurement records sufficient to document the history of each procurement transaction, including procurement method selection, solicitations, bids or proposals, contractor selection, cost or price analysis, contract administration, and compliance with applicable requirements.

Applicants and subrecipients shall perform and document cost or price analysis, including for contract modifications, as required under 2 CFR § 200.324, and shall maintain documentation supporting price reasonableness within the procurement file.

Applicants and subrecipients shall take affirmative steps to utilize minority businesses, women's business enterprises, veteran-owned businesses, Tribal enterprises, and labor surplus area firms consistent with 2 CFR § 200.321.

Applicants must describe their procurement policies and procedures and demonstrate compliance with applicable local, federal, and ODOC procurement requirements. Where requirements conflict, the more restrictive requirement shall apply.

Item 21: Duplication of Benefits Policies & Procedures

Applicants must describe the internal policies and procedures that will be used to prevent duplication of benefits and ensure compliance with federal disaster recovery requirements.

Applicants should reference the applicable guidance contained in the 2023–2024 CDBG-DR Policies and Procedures Manual.

The Oklahoma 2023–2024 CDBG-DR Program shall be administered in accordance with Title I of the Housing and Community Development Act of 1974, as amended; applicable supplemental appropriations acts; the Robert T. Stafford Disaster Relief and Emergency Assistance Act; applicable HUD Federal Register notices governing CDBG-DR allocations, waivers, and alternative requirements, including 90 FR 4760, “Allocations for Community Development Block Grant Disaster Recovery and Implementation of the CDBG-DR Consolidated Waivers and Alternative Requirements Notice,” as amended or superseded; the approved Oklahoma CDBG-DR Action Plan; 24 CFR Part 570; 2 CFR Part 200; and all other applicable federal and state laws, regulations, guidance, grant conditions, and administrative requirements governing the use of CDBG-DR funds.

DOB requirements shall be administered in accordance with Section 312 of the Stafford Act, applicable HUD guidance and Federal Register notices, the approved Oklahoma CDBG-DR Action Plan, and ODOC policies and procedures. Applicants and subrecipients shall disclose all disaster-related assistance received, reasonably anticipated, or pending from federal, state, local, private, insurance, charitable, or other sources for the same purpose and activity.

Item 22: Consent Orders, Notices of Violation, and Permitting

Applicants requesting funding for water or wastewater infrastructure projects must disclose any:

- Consent Orders
- Notices of Violation
- Relevant permits

If applicable, supporting documentation must be uploaded to OGX as part of the application package.

Section 3: Administrative Conclusion

Administrative requirements governing funded activities shall be administered in accordance with applicable federal requirements, executed grant agreements, the approved State Action Plan, ODOC policies and procedures, and all other governing authorities applicable to the CDBG-DR program.