



State of Oklahoma
Community Development Block Grant
2025 CDBG CIP Application Guidelines

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Section 1: Application Guidance

The purpose of this Application Guide is to provide guidance in preparing a Community Development Block Grant/Capital Improvement Planning (CIP) application. This program was developed in partnership with the Sub-State Planning Districts (SSPD) or Councils of Government (COG) to select the best projects in their respective area for the program year. Listed below are the tentative allocations available in each COG area. These figures are **estimated** until allocation is received from the U.S. Department of Housing and Urban Development (HUD).

CDBG CIP Set-Aside COG Allocations

#	Name	CDBG Amount
1	ACOG	\$40,000
2	ASCOG	\$40,000
3	COEDD	\$40,000
4	EODD	\$40,000
5	GGEDA	\$40,000
6	INCOG	\$40,000
7	KEDDO	\$40,000
8	NODA	\$40,000
9	OEDA	\$40,000
10	SODA	\$40,000
11	SWODA	\$40,000

Your local COG will review and recommend CDBG CIP projects in their area. All CIP applications should be coordinated with your local COG (see map on page 10). The applicant should contact their local COG to verify the application deadline.

After reviews, COGs will submit CIP applications to the Oklahoma Department of Commerce/Community Development (ODOC/CD) for contract consideration. The amount of CDBG funds that may be used for a CIP project varies depending on the project. **CIP applications must be submitted to ODOC no later than 5:00 P.M., June 27, 2025.**

After the **June 27, 2025**, application deadline has passed, if there are any CDBG CIP funds remaining in the set-aside that have not been applied for, additional time will be provided for a COG to submit an additional CDBG CIP application for those funds. To be eligible to submit an additional CDBG CIP application, a COG must have submitted an approved CDBG CIP application within the original deadline approved by the CDBG CIP Programs Planner. The deadline for the additional CDBG CIP applications is **September 5, 2025**.

After the second deadline has passed, any funds not applied for in the CDBG CIP set-aside will be transferred to another set-aside as determined by ODOC/CD.

Applicants are required to complete and submit their respective application and applicable attachments online at the following *OKGrants* web address: <https://grants.ok.gov>. **NO PAPER APPLICATIONS WILL BE ACCEPTED.** Application guidelines and specific program requirements can be found at the following *OKGrants* web address: <https://grants.ok.gov>.

WARNING: Prospective applicants should review the application guidance BEFORE attempting to complete the online application. Failure to meet application guidelines or properly submit required application documentation may result in a FAILED or DENIED application.

National Objective – CDBG Funds

The primary National Objective of the Community Development Block Grant (CDBG) Program is the “development of viable urban communities by providing decent housing and a suitable living environment, particularly for **persons of low and moderate incomes.**” The use of the “benefit to low and moderate income-persons” CDBG National Objective is considered a funding PRIORITY under the State’s CDBG Program and is treated as such under the State’s individual CDBG set-asides. All project proposals submitted for funding through the State’s CDBG Program must document the achievement of the low and moderate-income National Objective as delineated in 24 CFR §570.483 (Criteria for National Objectives).

- Provide benefit to low and moderate income (LMI) persons.

Eligible Entities

Eligible applicants for the CDBG CIP Program are units of local government (incorporated towns, cities, and counties) that are **not** participants in the CDBG Entitlement Program and that are CDBG CIP eligible. Oklahoma’s entitlement cities are:

- | | | |
|----------|----------------|-----------------|
| • Edmond | • Midwest City | • Oklahoma City |
| • Enid | • Moore | • Shawnee |
| • Lawton | • Norman | • Tulsa |

The entitlement areas also include the units of local government participating in the CDBG Urban County Designation for Tulsa County that consists of the following:

- | | | |
|------------------------|------------------------|-------------------------------|
| • City of Bixby | • City of Jenks | • Town of Skiatook |
| • City of Broken Arrow | • City of Owasso | • Town of Sperry |
| • City of Collinsville | • City of Sand Springs | • Unincorporated Tulsa County |
| • City of Glenpool | • City of Sapulpa | |

Project Definition

Under the State’s CDBG CIP program, a project is defined as one (1) eligible or sponsored unit of local government (UGLG) applying for one (1) activity in which there is a benefit to only one (1) community-wide or countywide area. These areas allow for an activity in which only one (1) LMI survey (as applicable) is required.

Leverage

Leverage is not required for CDBG CIP projects.

Application Submission Requirements

Local governments interested in doing a CDBG CIP project must coordinate with their local COG to submit an application. Cities, Towns and Counties may submit one (1) CDBG CIP application per Program Year.

Proper Sponsors

The unit of government with direct jurisdiction over the proposed beneficiaries must be the sponsor or applicant for CDBG CIP funds. In some instances, a county may submit an application on behalf of a town or city that cannot meet the minimum \$50,000 annual revenue financial requirements identified in the Threshold Requirements in this guide. Prospective applicants are advised to contact ODOC/CD BEFORE application submission regarding any questions relating to proper sponsorship should any additional clarification be required.

CDBG CIP Projects – Use of Funds

The CDBG CIP Program, GeoCIP®, is a standardized process for creating a GIS based inventory of local government assets to be used in annually evaluating asset conditions, setting improvement priorities for assets & updating the local government capital budget.

Under this category, an Applicant may submit a project proposal for any eligible activity listed in Section 105(a) of the Federal Housing and Community Development Act of 1974, as amended.

Planning & Capacity Building

The HCDA

Section 105(a)(12)

Activities assisted under this title may include only

1. Activities necessary to develop a comprehensive community development plan. While every comprehensive plan is unique, in general, all address four topics: (1) existing conditions, (2) goals and objectives, (3) implementation strategies and (4) the future land-use map.
2. Activities necessary to develop a policy-planning-management capacity so that the recipient of assistance under this title may more rationally and effectively
 - determine its needs
 - set long-term goals and short-term objectives
 - devise programs and activities to meet these goals and objectives
 - evaluate the progress of such programs in accomplishing these goals and objectives
 - carry out management, coordination and monitoring of activities necessary for effective planning implementation

Section 105(a)(16)

1. Activities assisted under this title may include only activities necessary to the development of energy use strategies related to a recipient's development goals, to assure that those goals are achieved with maximum energy efficiency, including items such as
 - an analysis of the manner in, and the extent to, which energy conservation objectives will be integrated into local government operations, purchasing and service delivery, capital improvements budgeting, waste management, district heating and cooling, land use planning and zoning, and traffic control, parking, and public transportation functions

- a statement of the actions the recipient will take to foster energy conservation and the use of renewable energy resources in the private sector, including the enactment and enforcement of local codes and ordinances to encourage or mandate energy conservation or use of renewable energy resources, financial and other assistance to be provided (principally for the benefit of low and moderate-income persons) to make energy conserving improvements to residential structures, and any other proposed energy conservation activities

CDBG CIP Set-Aside Eligible Activities

CDBG CIP Set-Aside funds may be used for:

- Studies
- Analysis
- Data gathering
- Preparation of plans
- Identification of actions that will implement plans

Under HCDA Section 105(a)(14), planning activities may also be carried out by public or private nonprofit entities.

Example: Types of plans which may be paid for with CDBG CIP funds include, but are not limited to:

- Comprehensive plans
- Individual project plans
- Community development plans
- Capital improvement programs
- Small area and neighborhood plans
- Local analyses of impediments to fair housing choice
- Environmental and historic preservation studies
- Functional plans (such as housing, land use, energy conservation, economic development)

Planning and capacity building activities do **not** include:

- Engineering, architectural, and design costs related to a specific project (for example, detailed engineering specifications and working drawings)
- Other costs of implementing plans

Example: While developing an economic development strategy for the city or county is an eligible planning activity, printing brochures promoting the city or county in order to attract businesses is not.

Complying with National Objectives Planning & Capacity Building

CDBG CIP funds spent for planning and capacity building costs, when undertaken in conjunction with other CDBG CIP assisted activities, are considered to address the national objectives of the CDBG CIP program as a whole; no documentation of such compliance is required. Reference: 24 CFR 570.483(f)

However, states may also award grants to units of general local government in which planning is the only activity, or in which planning activities are unrelated to any other activity funded as part of the grant. These are often referred to as “planning-only grants” or “planning-only activities.” Planning-only grants or activities must comply with the requirements of the L/M income or slum and blight national objectives. (It is not possible for a planning-only grant or activity to comply with the Urgent Needs national objective.)

Planning-only grants or activities can meet the Low/Moderate Income Benefit objective if it can be shown that at least 51 percent of the persons who would benefit from implementation of the plan are L/M income persons. Planning-only grants or activities can meet the Slum/Blight national objective if the plans are for a slum or blighted area, or if all the elements of the planning are both necessary for and related to an activity which, if implemented, could be shown to meet the Slum/Blight national objective criteria. For either the L/M Income Benefit or the Slum/Blight national objective, such determinations are not dependent on the planned-for activity or project actually being implemented at some point. Reference: 24 CFR 570.483(b)(5); 24 CFR 570.483(c)(3).

Additional Considerations - Capacity Building

Note that capacity building is also eligible under two other categories of Technical Assistance. The Technical Assistance provision (HCDA Section 105(a)(19)) makes eligible the use of CDBG CIP funds to increase the capacity of public or nonprofit entities to carry out eligible neighborhood revitalization or economic development activities.

See SAM.Gov Debarred / Exclusion Check Requirement

The System for Award Management (SAM.gov) is an official website of the U.S. government. You must have an active registration in SAM.gov to do business with the Federal Government. There is no cost to use SAM.gov. The General Services Administration (GSA) is required by the Federal Acquisition Regulation (FAR) to compile and maintain a list of parties debarred, suspended, or disqualified by federal agencies in SAM.gov. Units of General Local Government (UGLG's), contractors as well as recipients of federal financial assistance must be registered at SAM.gov. Active registration in SAM.gov is required to apply for an award and for HUD to make a payment. ODOC/CD is required by HUD to check UGLG grantees' debarment/exclusion status in the federal SAM database and place a record on file. You can use this site for FREE to:

- Register to do business with the U.S. government
- Update or renew your entity registration
- Check status of an entity registration
- Search for entity registration and exclusion records
- Search for assistance listings (formerly CFDA.gov), wage determinations (formerly WDOL.gov), contract opportunities (formerly FBO.gov), and contract data reports (formerly part of FPDS.gov)

Per the SAM.gov User Guide, the No Active Exclusions field on the SAM.gov Entity summary indicates whether the entity has a current debarment. SAM.gov will check the exclusions list for the Unique Identify Identifier Number (UEI#) of your entity and indicate whether any exclusion records exist. If an active exclusion record exists for your entity, this question will default to "Yes," meaning that the contractor is debarred. No Record Found means that the entity is not registered or has let its registration lapse. The entity should ensure that the email address is current in SAM.gov so that when automated reminders are sent to renew registration each year that this reminder does not go into spam due to an obsolete email address.

Get started with a SAM.gov registration and the Unique Entity Identifier Number: If you have not yet started your registration, please create an individual user account and log into SAM.gov to register your entity. To register in SAM.gov, at a minimum, you will need the following information:

U.S. REGISTRANTS:

1. Legal Business Name, and Physical Address (A post office box may not be used as your physical address).).
2. Your Taxpayer Identification Number (TIN) and Taxpayer Name associated with your TIN. Review your tax documents from the IRS (such as a 1099 or W-2 form) to find your Taxpayer Name.

3. Your bank's routing number, your bank account number, and your bank account type, i.e. checking or savings, to set up Electronic Funds Transfer (EFT).
4. The following link provides assistance with registration:

<https://sam.gov/content/entity-registration>

Refer to the following website SAM.gov | Home for the applicable options provided for your entity. If you have already registered, check your status by clicking on “Check Registration Status” and logging in with your username and password; then provide your UEI Number or CAGE Code. You will need to download the information provided by the site by clicking on the Download heading toward the top of the page which creates an electronic pdf copy of the document that will need to be saved for your records. That pdf will be required to be uploaded into OKGrants with the status that shows that the UGLG has an Active status and has NO ACTIVE EXCLUSIONS.

You must renew your registration every 365 days to keep it active. You can make updates to your registration anytime or during renewal.

The System for Award Management (SAM) is an official website of the U.S. government. **You must have an active registration in SAM to do business with the Federal Government.** There is no cost to use SAM. The General Services Administration (GSA) is required by the Federal Acquisition Regulation (FAR) to compile and maintain a list of parties debarred, suspended, or disqualified by federal agencies in SAM.gov. Units of General Local Government (UGLG's), contractors as well as recipients of federal financial assistance must be registered at SAM.gov. Active registration in SAM is required to apply for an award and for HUD to make a payment. ODOC is required by HUD to check UGLG grantees' debarment/exclusion status in the federal SAM database and place a record on file. You can use this site for FREE to:

- Register to do business with the U.S. government
- Update or renew your entity registration
- Check status of an entity registration
- Search for entity registration and exclusion records

Per the SAM User Guide, the No Active Exclusions field on the SAM Entity summary indicates whether the entity has a current debarment. SAM.gov will check the exclusions list for the DUNS number of your entity and indicate whether any exclusion records exist. If an active exclusion record exists for your entity, this question will default to “Yes,” meaning that the contractor is debarred. No Record Found means that the entity is not registered or has let its registration lapse. The entity should ensure that the email address is current in SAM.gov so that when automated reminders are sent to renew registration each year that this reminder does not go into spam due to an obsolete email address.

How do I start a SAM registration? If you have not yet started your registration, please create an individual user account and log into SAM to register your entity. To register in SAM, at a minimum, you will need the following information:

U.S. REGISTRANTS:

1. Your DUNS Number, Legal Business Name, and Physical Address from your Dun & Bradstreet (D&B) record. If you don't already have one, you can request a DUNS Number for FREE from Dun & Bradstreet (D&B).
2. Your Taxpayer Identification Number (TIN) and Taxpayer Name associated with your TIN. Review your tax documents from the IRS (such as a 1099 or W-2 form) to find your Taxpayer Name.

3. Your bank's routing number, your bank account number, and your bank account type, i.e. checking or savings, to set up Electronic Funds Transfer (EFT).

If you already started your registration, check your status by entering your DUNS Number or CAGE Code in the SAM Status Tracker. You will be required to upload the PDF copy provided which the check which shows that the UGLG is NOT excluded into OKGrants.

SAM.Gov Website Exclusion Check – NOTE: CONDUCT A PUBLIC SEARCH. DO NOT LOG INTO SAM.Gov. This will ensure that the information is available for PUBLIC review. Choose “Search Records” and then use “Quick Search” Enter the UGLG’s nine digit DUN’s number in the “DUNS Number Search” field. Select the “SEARCH” button the bottom of the page.

QUICK SEARCH:

Enter your specific search term
(Example of search term includes the entity's name, etc.)

DUNS Number Search: 123456789

CAGE Code Search: Enter CAGE code ONLY

SEARCH Need Help?

ADVANCED SEARCH:
Use specific criteria in multiple categories to structure your search.

ADVANCED SEARCH - ENTITY

ADVANCED SEARCH - EXCLUSION

DISASTER RESPONSE REGISTRY SEARCH

Save a copy of the search by selecting the “Save PDF” button at the top of the box. This will provide the electronic PDF file copy needed to be uploaded into the CDBG CIP application in OKGrants.

TOTAL RECORDS: 1
Result page 1 of 1

Save PDF Export Results Print

Sort by Modified Date Order by Descending

FILTER RESULTS

By Record Status

☒ Active
☐ Inactive

By Record Type

☒ Entity Registration
☒ Exclusion

Apply Filters

Your search returned the following results...

Entity	Seminole, County Of	Status: Active +
DUNS: 085541225	CAGE Code: 7WDM5	View Details
Has Active Exclusion?: No	DoDAAC:	
Expiration Date: 06/13/2018	Debt Subject to Offset?: No	
Purpose of Registration: Federal Assistance		
Awards Only		

Result page 1 of 1

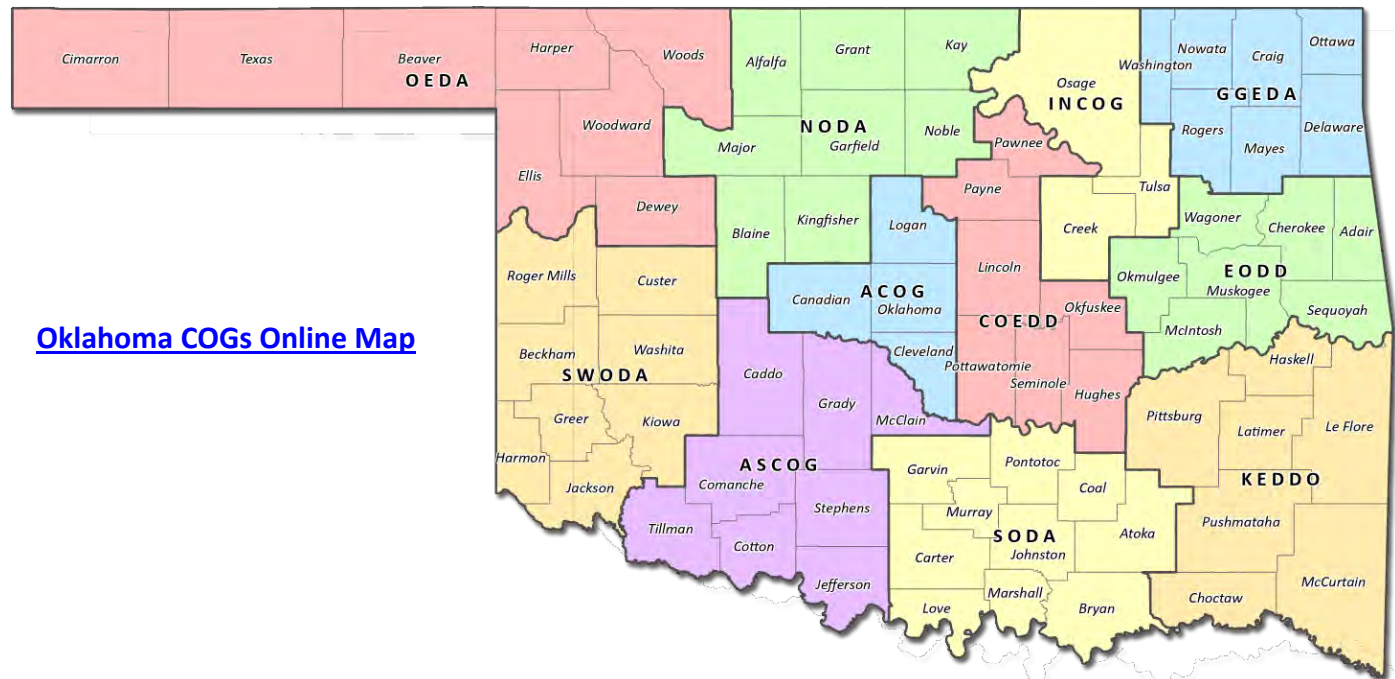
Save PDF Export Results Print

Proposal Guidance

Technical assistance regarding eligible projects, project concepts, the application guidelines and other information pertaining to the CDBG CIP Program is available upon request. Applicants are encouraged to contact the staff person listed below anytime they are uncertain with regard to Program requirements, project conceptualization, or any portion of the application process and/or guidelines.

CIP Application inquiries may be directed to:

Mike Sexton
(405) 815-5189
(800) 879-6552 x5189
mike.sexton@okcommerce.gov



Oklahoma COGs Online Map

ACOG Association of Central Oklahoma Governments
4205 N Lincoln Boulevard
Oklahoma City, OK 73105
(405) 234-2264
<http://www.acogok.org/>

KEDDO Kiamichi Economic Development District of Oklahoma
1002 Highway 2 N
Wilburton, OK 74578
(800) 722-8180
<https://www.keddo.org/>

ASCOG Association of South Central Oklahoma Governments
PO Box 1647
Duncan, OK 73534-1647
(580) 252-0595
<http://www.ascog.org/>

NODA Northern Oklahoma Development Authority
2901 N. Van Buren
Enid, OK 73703
(580) 237-4810
<https://noda-ok.org/>

COEGD Central Oklahoma Economic Development District
400 N Bell Ave
Shawnee, OK 74801
(405) 273-6410
<https://www.coedd.net/>

OEDA Oklahoma Economic Development Authority
302 Glaydas St
Hooker, OK 73945
(580) 823-7639
<http://www.oeda.org/>

EODD Eastern Oklahoma Economic Development District
1012 N 38th St
Muskogee, OK 74402
(918) 682-7891
<http://www.eoddok.org/>

SODA Southern Oklahoma Development Association
2704 N 1st Street
Durant, OK 73401
(580) 920-1388
<https://www.soda-ok.org/>

GGEDA Grand Gateway Economic Development Association
333 S Oak St
Big Cabin, OK 74332
(918) 783-5793
<https://grandgateway.multiscreensite.com/>

SWODA Southwest Oklahoma Development Authority
420 Sooner Dr
Burns Flat, OK 73624
(580) 562-4882
<https://www.swoda.org/>

INCOG Indian Nation Council of Governments
2 W 2nd St, Suite 800
Tulsa, OK 74103
(918) 584-7526
<http://www.incog.org/>

Section 2: Required Documentation

The following narration provides detailed guidance on submitting a complete CDBG CIP application. The information input process is divided into two parts. Part A is the information that must be completed online in OKGrants. Part B discusses the required documents that are completed offline and submitted in PDF format in the Upload Section of OKGrants.

A. OKGrants Online Completion

This section discusses the information required in OKGrants that is completed online. Each section must be completed and saved to register as completed in OKGrants.

1. CDBG Application Summary & Certification (OKGrants Online Completion)

This section requests general information about the applicant. The form must be completed in full. The certification attests to the accuracy and completeness of the application. A Summary form is available in the CDBG CIP Application spreadsheet. Filling out this form will help in completing this section OKGrants as well as auto-populating repetitive information into the other required upload documents for the application.

Determining the beneficiaries and performing a survey for any activity under any project category is critical. ODOC/CD guidance regarding beneficiaries and surveys is well advised. *Therefore, all Applicants should take the time to discuss their project activities and surveys with CD staff before performing their survey(s).*

2. CDBG Detailed Line Item Budget (OKGrants Online Completion)

All proposed activities in a CDBG CIP project fall under the Planning (CIP Participants only) category. Enter the total grant amount in this section. Save the section to register as completed in OKGrants.

3. CDBG Water Wastewater Rate Structure (OKGrants Online Completion)

This section does **not** apply to CDBG CIP. OKGrants does require the section be saved in order to submit the application.

4. CDBG Strategic Planning Verification (OKGrants Online Completion)

This section is **not** applicable to CDBG CIP. Select any option in this category and **Save** to register as completed in OKGrants.

5. Consultant Form (OKGrants Online Completion)

For a CDBG CIP project, the COG is the consultant. Enter the primary name and contact information of the person at the COG associated with this project. Save the section to register as completed in OKGrants.

6. CDBG Budget Summary (OKGrants Online Completion)

A CDBG CIP is a planning project. All funding should be listed under the Planning Category brought forward from the Detailed Line Item Budget. Verify that the amount is correct and save the section. Section must be saved in order to register as completed in OKGrants.

B. OKGrants Uploads

This section discusses the information required in OKGrants that is completed outside of OKGrants. The completed documents are uploaded as PDFs into the Upload section in OKGrants.

1. Audit

(OKGrants Online Completion)

Towns and cities (counties are exempt) must submit a copy of their audit or the agreed upon procedures by the application deadline. All towns and cities that have a June 30, 2024, fiscal year end date are required to submit a copy of their FY 2024 audit and towns and cities that have a December 31 fiscal year end date are required, as a minimum, to submit a copy of their FY 2023 audit. No application will be considered for review or funding that does not meet the requirements stated above.

If the city or town receives less than \$50,000 in annual revenues from its normal business and does not have an audit or agreed upon procedure, the city or town cannot apply directly to ODOC/CD. The city or town can apply only by having the local County apply on their behalf, if the County chooses to do so.

An audit is required to be uploaded as part of the application process. Alternatively, the audit may also be submitted via postal mail to:

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

General audit inquiries and questions regarding audit submissions should be directed to the Oklahoma Department of Commerce/Financial Services at 800-879-6552.

2. Project Narrative

(GeoCIP® Excel – Upload to OKGrants)

The Project Assessment is a detailed explanation & description of the scope of the project. It should include all work to be done and the tasks to be accomplished. Details on methodology and workflow used in the field as well as in the office should be provided. It should also include a description of the deliverables that are expected to be submitted at the end of the project.

3. Project Resolution

(GeoCIP® Excel – Upload to OKGrants)

Applications must include a resolution passed by the current governing body requesting that particular assistance. The Resolution is required to be uploaded as part of the application process. A sample resolution is provided in Attachment “A” of the application.

4. Citizen Participation Plan

(GeoCIP® Excel – Upload to OKGrants)

All applicants must complete and document the following requirements to apply for a CDBG CIP grant:

- Create and adopt a Written Citizen Participation Plan
- Hold an application phase public hearing regarding the CIP Program.

Citizen Participation Plans must be officially adopted and followed by all Applicants and submitted in the application. Re-stating the Citizen Participation Plan outline requirements does not constitute a valid plan. Applicants must clearly state the actions they will undertake to meet the requirements of Written Citizen Participation Plans. (Sample Citizen Participation Plan can be found in the Attachment “B” of the application.) Applicants may readopt prior years Citizen Participation Plans provided that the previous plan has been reviewed and updated as needed to adequately support the proposed project.

Documentation of the “application phase” Public Hearing is also an application requirement. Acceptable documentation consists only of the **affidavit of publication, official posting announcing where and when the hearing is to be held along with a listing of the posting locations** (posting is an acceptable method of advertising only where it is the standard method used by a unit of local government to provide notice of official meeting), or a copy of the newspaper article announcing the public hearing.

ODOC/CD requires no less than seven (7) WORKING DAYS given as advance notice of the application phase Public Hearing or any subsequent public meetings held for the purpose of discussing project activities as they relate to the CDBG grant funds.

ADDITIONALLY, WHEN POSTING DO NOT COUNT THE DAY OF THE POSTING, BUT THE DAY AFTER AS DAY ONE (1). If the posting is not posted as instructed, a failed application will result.

All written Citizen Participation Plans must explain how an Applicant unit of local government will:

1. Provide for and encourage citizen participation, particularly by low and moderate income persons who reside in areas where CDBG CIP funds are proposed to be used.
2. Ensure citizens will be given reasonable and timely access to local meetings, information and records relating to the unit of local government's proposed and actual use of the CDBG funds; including, but not limited to, the following:
 - a. The amount of CDBG CIP funds expected to be made available for the current fiscal year if the project is approved;
 - b. The range of activities that may be undertaken with CDBG CIP funds;
 - c. The estimated amount of CDBG CIP funds proposed to be used for activities that will meet the National Objective of benefit to low and moderate income persons;
 - d. The proposed CDBG CIP activities likely to result in displacement and the sponsoring unit of local government's anti-displacement and relocation plans developed in accordance with Section 104(d)(1) and (2) of the Act; and
 - e. The basis on which the sponsoring unit of local government may provide technical assistance to groups' representative of persons of low and moderate income that request assistance in developing proposals. The level and type of assistance to be provided are at the discretion of the sponsoring unit of local government. Such assistance need not include providing funds to such groups.

3. Provide for a minimum of two (2) public hearings; one prior to submission of the application for funding of the project that favors the purpose of obtaining citizens' views and formulating or responding to proposals and questions; the other at the end of the grant period, if the Applicant receives funding, that discusses Grantee performance. There must be reasonable notice of the public hearings (ODOC requires seven [7] to ten [10] days), and they must be held at times and locations convenient to potential or actual beneficiaries, with accommodations for persons with disabilities.
4. Meet the needs of non-English speaking residents in the case of public hearings where a significant number of non-English speaking residents can reasonably be expected to participate.
5. Provide citizens with reasonable advance notice (ODOC requires seven [7] to ten [10] days), and the opportunity to comment on proposed activities not previously described in a unit of local government's funding request and activities which are proposed to be deleted or substantially changed in terms of purpose, scope, location or beneficiaries. Substantially changed means changes made in terms of purpose, scope, location or beneficiaries.
6. Provide the place, phone numbers, and times where and when citizens are able to communicate when submitting written complaints and grievances; the process the unit of local government will use to provide for a timely written answer to written complaints and grievances, within fifteen (15) working days where practicable.
7. The application phase public hearing must, at a minimum, address the following topics:
 - a. Community development and housing needs
 - b. CDBG Program purpose, i.e. meet one of three (3) National Objectives
 - c. The development of proposed activities
8. The Citizen Participation Plan is required to be signed and dated by the chief elected official. The Citizen Participation Plan also requires a Town/City/County seal or it must be notarized in lieu of the seal.

5. Applicant/Recipient Disclosure/Update Report

(GeoCIP® Excel – Upload to OKGrants)

This document is also called Form 2880. It must be completed if the minimum requirements of the disclosure are met and certified by the interested parties as set forth in the disclosure. The Applicant/Recipient Disclosure/Update Report must be signed and uploaded into the application in OKGrants.

6. Fair Housing Resolution

(GeoCIP® Excel – Upload to OKGrants)

A Fair Housing Resolution must be adopted by the local government for the CDBG CIP project. The document must be signed and uploaded into the application in OKGrants.

7. Anti-Displacement & Relocation Assistance Plan

(GeoCIP® Excel – Upload to OKGrants)

An Anti-Displacement & Relocation Assistance Plan must be adopted by the local government for the CDBG CIP project. The document signed and uploaded into the application in OKGrants.

8. LPAC Establishment**(GeoCIP® Excel – Upload to OKGrants)**

The local government must establish a LPAC (local planning activities committee) for the CDBG CIP project. The LPAC Establishment form documents the fulfillment of this requirement. A copy of the document must be signed and uploaded into the application in OKGrants.

9. Meeting Minutes**(Obtain from LG – Upload to OKGrants)**

A CIP project must be discussed and approved at an official meeting. A copy signed copy of the official minutes from that meeting uploaded into the application in OKGrants.

10. SAM.gov Verification**(Obtain from COG – Upload to OKGrants)**

The local government must submit documentation of registration in SAM.gov and be in good standings. See the **SAM.Gov Debarred / Exclusion Check Requirements** section of the guidelines for details. Upload the documentation in OKGrants.

11. LMI Documentation**(GeoCIP® Excel – Upload to OKGrants as Applicable)**

CDBG Capital Improvement Planning applicants must qualify their project activities under the low and moderate-income National Objective. Local governments can qualify through direct Census LMI percent or by conducting an LMI income survey. If qualifying through a Random Sample Income Survey, the following documents are mandatory uploads.

a. LMI Beneficiary Summary Form

(Blank Copy Attachment F)

NOTE: The LMI Beneficiary Summary Form summarizes the beneficiary data and uploaded Field Survey Sheets on one form and is required to be completely filled out (as applicable). Please follow the form's instructions for completion.

b. Random Number Table

c. Survey Map

d. Copy of the Original LMI Field Survey Sheets

Documentation of Project Qualification under National Objective.

a. Qualifying under the National Objective of Benefit to Low and Moderate Income Persons

To qualify for CDBG CIP funding under the National Objective of benefit to low and moderate income persons, the proposed project activities must show a positive or general improvement of living condition in a definable geographic target area where at least 51% of the occupied households/homes are of low and moderate income families. Low and moderate income families have an income equal to or less than the current Section 8 low income limits established by the United States Department of Housing and Urban Development (HUD), (Appendix E of this guidance document).

Each activity proposed for funding with CDBG CIP dollars claiming the National Objective of benefit to low and moderate income persons, must provide data indicating the percentage of low and moderate income beneficiaries.

Various questions must be answered before determining whether or not an activity proposed for CDBG CIP funding provides benefit to principally low and moderate income families. Questions to be answered include:

1. How does the proposed activity serve the residents of the geographic target area in which it is taking place?

2. Which occupied households/homes within the geographic target area are directly affected or impacted by the proposed activity?
3. Is there a larger set of households/homes that will be served by the proposed activity?

Once the beneficiaries for each activity proposed for funding with CDBG CIP dollars have been identified, the next step is to document the percentage of low and moderate income households/homes that will benefit from each of those activities. This is best accomplished by performing an income survey in order to determine family incomes.

Income surveys for each proposed CDBG CIP funded activity are typically a requirement. However, in some very limited cases, other techniques may be used to document the percentage of low and moderate income families receiving benefit, such as the use of the Census Data. However, the use of any Census Data to document the percentage of low and moderate income beneficiaries for any CDBG CIP funded activity should receive prior ODOC review and approval. An Applicant's failure to obtain prior ODOC review and approval of the use of Census Data to qualify CDBG CIP activities may result in rejection of the data's conclusions.

Income survey techniques consist of door-to-door surveys, telephone surveys, mail surveys, or any combination of the three. Regardless of the technique used, an Applicant must be able to link each income response to a specific family within a specific household/home. Blind survey techniques that cannot match households/homes and their respective family incomes will not be accepted, as they do not allow for verification should it become necessary.

For all FY 2024 income surveys, applicants must use the provided HUD Income Limits included in this Application Guidance. Any other numbers used will result in a failed application with the exception of the Income Surveys that have been conducted within the previous five program years (FY 2020, 2021, 2022, 2023, or 2024). To be eligible for previous program years' surveys, the Applicant will be responsible for providing copies of the original Field Survey Summary Sheet, Survey Field Sheets, Random # Table, and Survey Map. Only the Random Sample Survey methodology will be accepted by ODOC/CD.

b. Conducting an Income Survey

A CIP is a city/town/county-wide project. The defined geographical target of a CDBG CIP project is the entire local government area.

For those Applicants conducting Random Sample Income Surveys, a sample Field Survey Form can be found in Appendix "A" of this guidance document. All applicants are required to complete the Direct Project Beneficiary Income Survey Summary located in the online application at OKGrants. Additionally, the following LMI documentation is required to be uploaded the Application "UPLOADS" section of OKGrants:

1. Upload a copy of the Random Number Table that was generated by ODOC/CD to perform the survey.
2. Upload a map that identifies each surveyed home's income status (above or below low/moderate income status); the location of all proposed CDBG CIP and leverage activities, and the central business district.
3. Upload all scanned copies of the original Direct Beneficiary Income Field Survey sheets.
4. Upload a copy of the LMI Field Survey Summary sheet. (A blank copy of this form is located in Attachment F)

NOTE: The LMI Field Survey Summary Sheet summarizes the uploaded Field Survey Sheets on one form and is required to be completely filled out to include: Town/City/Target Area, County, and Survey Date.

If any of the numbers on Attachment F are manually changed by the applicant the application will automatically fail.

An overview of the Random Sample Survey procedures is provided below.

1. List by name and address, the households within the geographic area to be covered by the project (for example, the following listings may be used to identify the number of households within your universe: water billing, wastewater billing, solid waste billing, 911 emergency service databases, or in the case of a county, the voting rolls).
2. Alphabetize your universe by last name (all households) or list in ascending or descending order by account numbers. This establishes a random distribution for your universe.
3. Number all households composing your universe.
4. Based on the number of households provided, a random survey sample will be generated by ODOC and provided to the Applicant along with the required response rate that must be achieved.
5. Match the random sampling numbers to your numbered household universe and survey those locations. For example, if the random sample provided by ODOC is “#47”, match that number 47, to the 47th entry on your numbered universe and survey that location. Continue to survey until you have achieved the required response rate. Do not over survey.
6. Survey using the “Direct Project Beneficiary Income Survey Field Worksheet” provided in the appendix to this application packet (these working papers are to be retained with the permanent records of the unit of local government) and the low-income figures for your county (provided in Appendix A).
7. Aggregate the survey results by family size and record that data on the “Direct Project Beneficiary Income Survey Summary Form” provided in the Forms Section of this application packet.
8. Calculate the LMI percentage by dividing the total number of low and moderate households resulting from your survey by the total number of households surveyed. Record the results on the “Survey Summary Form.”
9. Complete the online “Income Survey Summary Form” in your *OKGrants* application.

The table below provides the sample size of households that must be surveyed compared to the number of households identified in the target area. For example, if you had 230 occupied households in the target area you would need to survey 150 occupied households. Seasonal (or Part-time) residents (e.g., migrant farmers who reside in manufactured homes) may not participate in an income survey if their benefit of a service or an activity is incidental. For example, the use of a library or senior center by seasonal residents would be considered an incidental benefit. Season residents may participate in income surveys for CDBG funded activities such as installation of sewer lines and sewage treatment plants. This would also include water activities.

Required Sample Sizes for Universes of Various Sizes

Number of Occupied Households in Target Area	Survey Sample Size
1 - 55	50 or all if less than 50 households in universe
56 - 63	55
64 - 70	60
71 - 77	65
78 - 87	70
88 - 99	80
100 - 115	90
116 - 138	100
139 - 153	110
154 - 180	125
181 - 238	150
239 - 308	175
309 - 398	200
399 - 650	250
651 - 1200	300
1201 - 2700	350
2701 or more	400

The results of the Random Survey **must be clearly shown on a map** that identifies each surveyed home with the low and moderate income homes designated with a distinct color. Applicants performing income surveys are cautioned that incorrectly administered surveys or their resulting data regarding low and moderate income percentage claims will be rejected. **Failure to include a properly marked map with the application will result in rejection and return of the application.**

Determining the beneficiaries and performing a survey for any activity under any project category is critical. ODOC/CD guidance regarding beneficiaries and surveys is well advised. *Therefore, all Applicants should take the time to discuss their project activities and surveys with CD staff before performing their survey(s).*

12. LMI Field Survey Map**(Obtain from COG – Upload to OKGrants)**

If a LMI survey was done to qualify the local government for the CDBG CIP grant, a map of the surveyed area must be submitted. The map must be legible and clearly show the location of the houses surveyed and be color-coded denoting whether the house is above or below the appropriate income levels

13. LMI Field Survey Random Number List**(Obtained from ODOC – Upload to OKGrants)**

If a LMI survey was done to qualify the local government for the CDBG CIP grant, a copy of the random number list obtained from ODOC and used for the survey must be submitted with the survey map.

Note: If the local government meets the 51% or greater LMI requirement by Citywide Census number, then no worksheets, map or random number table are needed.

CDBG CIP Closeout Documents**1. Capital Improvement Needs 5-Year Plan Summary****(GeoCIP® Excel – Upload to OKGrants)**

A list of the top 10 priorities from the 5-year plan approved and adopted by the local government.

2. Capital Improvement 5-Year Plan LPAC Recommendation**(GeoCIP® Excel – Upload to OKGrants)**

Documentation and verification that the 5-year plan submitted was recommended by the LPAC.

3. Capital Improvement Needs 5-Year Plan Adoption**(GeoCIP® Excel – Upload to OKGrants)**

Documentation that the Capital Improvement Needs 5-Year Plan was reviewed and adopted by the local government. A template document is provided in the CIP Excel.

4. Capital Improvement Close-Out Resolution**(GeoCIP® Excel – Upload to OKGrants)**

A resolution from the local government that the CIP project has been completed and approved. A template document is provided in the CIP Excel.

5. Official Meeting Notice**(Obtain from Local Government – Upload to OKGrants)**

Proof of publication of notice for 2nd public meeting posted at 3 different locations

6. Official Meeting Minutes**(Obtain from Local Government – Upload to OKGrants)**

Official minutes from meeting where the 5-year plan was discussed, approved & adopted.

7. Official Meeting Sign-In Sheet**(Obtain from Local Government – Upload to OKGrants)**

Official sign-in sheet from meeting where the 5-year plan was discussed, approved & adopted.

CDBG CIP Application Forms Checklist

*See the **2025 CDBG GeoCIP Forms** Excel file for checklist.

Section 3: Threshold Criterion

Under this broad category, an Applicant may submit a project proposal for any eligible activity listed under Section 105(a) of the Federal Housing and Community Development Act of 1974, as amended.

Applications for the 2025 CDBG CIP Program will be accepted through 5:00 p.m., June 27, 2025. Applications received after this date will NOT be considered for funding. Additionally, CDBG CIP projects not meeting all of the threshold requirements will NOT be considered for funding.

Application Threshold Criteria

The Application Guidelines associated with this CDBG CIP Set-Aside contains an APPLICATION FORMS CHECKLIST outlining all application related documentation required to be uploaded into the online OKGrants application. It is the Applicant's responsibility to follow this checklist and seek additional guidance from ODOC staff as required. Applicants will be responsible for following and providing each item listed on the checklist. **Failure to provide any of the required application documentation listed on the checklist will result in a FAILED application.** Additionally, Applicants must provide a response to all application questions and satisfy all documentation requirements delineated in the Application Guidelines and online OKGrants Application System including, but not limited to: Resolution, income survey results, resolution requesting assistance, survey maps, certifications, Section 102 Disclosures, project budget, etc.

Threshold Criteria for CDBG CIP Set-aside

1. CDBG Water/Wastewater Engineering requests for funds must meet the principle CDBG National Objective of providing a direct benefit (fifty-one percent [51%] or more) to persons of low and moderate-income.
2. COGs will evaluate CDBG CIP needs in their regions and recommend potential projects for eligible applicants to Commerce.
3. Eligible applicants for the CDBG CIP Program are units of general local governments (counties and incorporated towns and cities) that are CDBG eligible as identified by the Sub-state Planning District and in accordance with 62 O.S. § 2006 et al as amended.
4. Eligible applicants are required to work with their local COG to discuss doing a project.
5. Requests for funds must address at least one or more of the Primary National Objectives of the CDBG program:
 - a. Provide a direct benefit (fifty-one percent [51%] or more) principally for persons of low income;
 - b. Aid in the prevention or elimination of slums or blight; and
 - c. Address a particular urgent need posing a serious and immediate threat to the health or welfare of a community.
6. Cities, towns, and counties with previous CDBG funding must have closeout documents submitted by January 31, 2025. Close-out exceptions are:
 - a. Counties may have two (2) open grants and still remain eligible for application submission.
 - b. An open Economic Development grant do **not** count against application submission eligibility.

7. A proper sponsor for CDBG CIP projects is defined as a Unit of Local government with direct jurisdiction over the majority (60%) of the proposed project beneficiaries.
8. Proof that citizen participation requirements have been met, as evidenced by an application phase public hearing and written Citizen Participation Plan.
9. The Project Assessment is a detailed explanation of the scope of the project. It should include all work to be done and the tasks to be accomplished. Details on methodology and workflow used in the field as well as in the office should be provided. It should also include a description of the deliverables that are expected to be submitted at the end of the project.
10. The CDBG CIP grant request cannot exceed \$2,000 per beneficiary.
11. Applicants must provide a response to all application questions and satisfy all documentation requirements delineated in the Guideline and Application package including, but not limited to: Resolution, income survey results, survey maps, certifications, Section 102 Disclosures, project budget; etc.
12. Towns and cities (counties are exempt) must submit a copy of their audit or the agreed upon procedures by the application deadline. All towns and cities that have a June 30, 2024, fiscal year end date are required to submit a copy of their FY 2023 (June 30) audit and towns and cities that have a December 31, 2023, fiscal year end date are required, as a minimum, to submit a copy of their FY 2023 (December 31, 2023) audit. No application will be considered for review or funding that does not meet the requirements stated above.

If the city or town receives less than \$50,000 in annual revenues from its normal business and does not have an audit or agreed upon procedure, the city or town cannot apply directly to ODOC/CD. The city or town can apply only by having the local County apply on their behalf, if the County chooses to do so.

13. Applicants are responsible for accomplishing online application corrections/revisions along with any applicable application upload corrections/revisions as directed by ODOC staff within the pre-determined deadline. In fairness to other applicants and in order to maintain HUD required CDBG funding expenditure rates, ODOC can NOT indefinitely hold applications until the respective application corrections/revisions are accomplished. Applications will be considered INCOMPLETE if the prescribed corrections/revisions are not made to the application within the pre-determined deadline established by ODOC. This will result in a **FAILED** threshold application rating.
14. The Application Guidelines associated with this CDBG CIP Set-Aside contains an APPLICATION FORMS CHECKLIST outlining all application related documentation required to be uploaded into the online OKGrants application. It is the Applicant's responsibility to follow this checklist and seek additional guidance from ODOC staff as required. Applicants will be responsible for following and providing each item listed on the checklist. **Failure to provide any of the required application documentation listed on the checklist will result in a FAILED application rating.** Additionally, Applicants must provide a response to all application questions and satisfy all documentation requirements delineated in the Application Guidelines and online OKGrants Application System including, but not limited to: Resolution, income survey results, resolution requesting assistance, survey maps, certifications, Section 102 Disclosures, project budget, etc.
15. The application must sufficiently demonstrate an applicant's need for the requested CDBG activity. For any requested CDBG project, there is an underlying "need" for such a project. It is the responsibility of the applicant to communicate to ODOC/CD why the particular CDBG activity is being requested in the application. Failure to adequately demonstrate a project need will result in a FAILED threshold application rating. The project need is communicated in the "Project Description" section of the "CDBG Application Summary" page of the online OKGrants application. Additional narratives and supporting documentation can be uploaded in the "Uploads" page of the OKGrants application if required.

Section 4: 2025 CDBG CIP Project Documents

The required documents for a 2024 CDBG CIP project are provided in the CDBG 2025 GeoCIP Forms Excel file. Attachment A is a **sample** of the Project Summary form. The forms are designed and intended to be filled out in Excel. Once completed, the forms can be saved as a .pdf and submitted when and where appropriate in the OKGrants Uploads sections during a project.

Attachment A is a **sample** of the Project Summary form. When entering information in the forms, begin with the Summary tab. Filling out the Summary first will organize the required information for a CIP project. Any of the other documents that require the same information in the Summary will automatically be populated in the appropriate places. Note that some documents require unique information that must be entered on that specific form. Filling out the Summary will also help in entering the information into OKGrants.

The 2025 CDBG CIP Excel forms will be emailed out to each COG when the 2025 CDBG application period officially begins. Additional copies of the Excel forms will be available and emailed upon request.

Attachment A: Application Documents

*See the **2025 CDBG GeoCIP Forms** Excel file for project documents.

Appendix A: Table Definitions

The following definitions should be useful in the determination of a CDBG project's benefit to low and moderate income households.

Household – A Household is defined as all persons who occupy a housing unit. The occupants may be a single-family, one person living alone, two (2) or more families living together, or any other group of related or unrelated persons who share living arrangements.

Low and Moderate Income Household – A Low and moderate income household is defined as a household having an income equal to or less than the current Section 8 lower income limits established by HUD (please refer to the attached HUD Section 8 income limits).

Appendix B: Low/Moderate Income Percentages (County/Town/City)

*See the **Appendix C 2025 County-City Wide HUD LMI numbers** pdf document in the 2025 CIP packet.

Appendix C: HUD Income Limits

*See the **Oklahoma Section8-IncomeLimits-FY24** pdf document in the 2025 CIP packet.