

ATTENTION PARTICIPANTS

SIGN-IN CHATBOX WITH NAME, EMAIL, AGENCY



Community Development Block Grant Program

Certified CDBG Administrator Continuing Education Workshop

October 9, 2025



OKLAHOMA

**ODOC Certified CDBG Administrator Continuing Education Workshop
Oklahoma Association of Community Action Agencies**

Thursday, October 9, 2025

8:30 a.m. to 1:00 p.m.

AGENDA

- | | |
|---|-------------|
| ❖ Check-In/Sign-In (Required*All Participants) | 8:30 |
| ❖ Welcome & Announcements | 8:45-9:00 |
| ❖ CDBG Project Management Guide | 9:00-10:45 |
| ❖ Overview of Policy & Form Updates | |
| ❖ Break | 10:45-11:00 |
| ❖ CDBG Policy & Procedures | 11:00-12:45 |
| ❖ Overview of Policy Procedures
& supporting documentation | |
| ❖ Q&A – Open/Group Discussion | 12:45-1:00 |
-



Announcements & General Information



OKLAHOMA





- **CDBG Application Training in Fall of 2025 – Tuesday, November 4, 2025 – Via Zoom** https://okcommerce.zoomgov.com/meeting/register/_eKa2h2iRnGatZgUMgK0nw **or contact Kellon Dixon via email** Kellon.Dixon@okcommerce.gov
- ❑ **CDBG Administrator Certification Training – Tuesday, December 9, 2025, through Thursday, December 11, 2025. In-person at Oklahoma Association of Community Action Agencies.**
- **Continuing Education is REQUIRED to retain your Certified CDBG Administrator status. You must attend one of two workshops scheduled per year.**

CDBG Program Staff Contact Information



OKLAHOMA



CDBG Planning & Special Projects



Kellon Dixon, Director of Programs - CDBG Planning & Special Projects Teams

- Karen Adair, Senior Program Planner
 - CDBG-EDIF, CDBG-REAP, CDBG-CR, CDBG-W/S Construction
- Charlotte Conant, Contracts Developer/Program Planner
 - CDBG-W/S Engineering
- Mike Sexton, Program Planner
 - CDBG-CIP, GIS
- Jade Shain, Program Planner
 - CDBG-Disaster Recovery Program
- Taressa Jones, Program Representative
 - CDBG-CV
- Keri Foster, Program Representative
 - CDBG-CV & CDBG-Disaster Recovery
- Shannon Yarbrough, Program Representative
 - CDBG-Disaster Recovery
- Michael Carter, Program Representative
 - CDBG-Disaster Recovery

405-215-5626, cell

405-764-5164, cell

405-215-1834, cell

405-815-5189, desk

405-250-1844, cell

405-397-0292, cell

405-501-9336, cell

405-215-2425, cell

405-802-6812, cell

CDBG Monitoring



VACANT, Director of Programs-Monitoring

Christy Davis, Program Representative (405) 215-5395, cell

Robin Slawson, Senior Program Monitor (405) 881-3044, cell

Linda Goode, Administrative Assistant (405) 815-5351, desk

ROBIN



Project
Management



Small Cities &
EDIF –
contract
award to close
out



All CDBG
Environmental
Reviews
(RROF) –
includes
review of
procurement
of professional
services



Wage Rates
and 10-day
emails



Notice of
Contract
Award

Construction
Procurement
Checklist



Technical
Assistance/Training



Project
Management
Guide Updates

CHRISTY



Project Management

after ROF - except for
EDIF, CIP and Small Cities



Process pay
advances &
expenditures



Monitoring



Closeout



Technical
Assistance/Trainings



Project Management
Guide Updates

LINDA



ADMINISTRATIVE
ASSISTANT



LETTERS



TRAININGS

CDBG PROJECT MANAGEMENT GUIDE UPDATES



OKLAHOMA



CDBG Project Management Guide

Recent Additions, Deletions, and Revisions

NOTE 1: As of 2-14-25, as provided on okcommerce.gov website:

*The ODOC/CD Division, CDBG Project Management Guide, includes **some elements in Policy 404: Civil Rights, Equal Opportunity, Fair Housing, Section 3, Section 504, which might not follow Presidential Executive Order No. 14173.** The amendment will serve as official notification that ODOC/CD will not require or monitor any efforts that support activities revoked in the Presidential Executive Order. When ODOC/CD receives an official written notification on the final ruling from our federal partners, ODOC/CD will make the required permanent changes to the CDBG Project Management Guide and the CDBG Monitoring tools, as applicable.*

NOTE 2: The HUD.gov website <https://www.hud.gov/> has been redesigned, and several links are no longer available. The guide will be updated to remove the links that no longer work.

NOTE 3: The CDBG Certified Administrator's List has been updated on the OKCommerce.gov website.

Policy 401 Program Management Review



2. Removing Contract Conditions (Env. Review & Request for Release of Funds):

Added 2.11. The grant Contract Part II provides for 120-day RROF from the contract date requirement to complete and submit for the removal of these conditions. *If the grantee runs into issues that require additional time beyond the 120-days, the grantee may submit, via email, a written request on Grantee Letterhead with explanation and date needed beyond the 120-day in an email to the CDBG Senior Program Monitor.*

4. Revised 4.1.7 Budget Modifications

1. The CDBG Planners will review all Budget Modifications submitted in OKGrants for compliance with the original application and cost estimates.
2. 4.1.9—Two-Year contracts: The grantee may request review and approval of an extension beyond the 270-day benchmark for the construction award by emailing a written request on Grantee Letterhead with an explanation and a *date beyond the 270 days to the ODOC CDBG Program Monitor.*
3. 4.1.10—Three-year contracts: W/S Engineering—The grantee may request review and approval of an extension beyond the 120-day benchmark for construction award (1-year ROF plus 120 days) by submitting a written request on Grantee Letterhead with an explanation and the *date needed beyond the 120-day period to the ODOC CDBG Program Monitor.*

ADDED 5.5. Disclaimer: The CDBG Program Training and Consultant Certification Training curriculum is intended to cover the policies and procedures required for compliance with the State's CDBG annual allocation or regular program set-asides. Although similar program requirements, this training does not include specific training or entirely meet the qualifications for grant administration of a CDBG Disaster Recovery program, where the staff of the Oklahoma Department of Commerce, CDBG-DR Team, will provide additional specialized training for those contracted activities.

NOTE: Per Kellon Dixon, "the CDBG-CV program is winding down and participants that took the CDBG Certified Administrator training are no longer required to attend the CE trainings and keep their "certification" unless they are actively administering the regular CDBG State Program activities for Cities, Towns, or Counties."

No Longer Required to Attend CE Training: Entitlement Communities - Edmond, Enid, Lawton, Midwest City, Moore, Norman, Oklahoma City, Shawnee, Tulsa, and the Tulsa County Urban designated communities.

5.6: Mentorship – Revised language for clarity and only one form is required 401.8 and the second form 401.9 has been deleted:

In the event an individual working for a Substate Planning District/COG or perhaps another entity, that has a current CDBG Certified Administrator on staff, wishes to learn and perform CDBG duties for grant administration shall be “mentored” by that staff member prior to the individual attending and passing the Annual CDBG Certified Administrator Training course, the individual can act as an “Interim CDBG Administrator” upon the completion and submittal of the CDBG Form 401.8 for Mentorship of Interim CDBG Administrator.

- **Revised – Leverage Certification Form 401.1**
- **Revised – Mentorship Form 401.8**
- **Added - Project Management Task Chart 401.9**

GRANTEE CONTRACT
NUMBER

I confirm that the leverage amount committed **at the time of application** and agreed to by our Application Resolution **has not changed** and is dedicated and available for use on this CDBG Contract. **[This section is for confirmation at the time of RROF submittal].**

Authorized Official - Print Name & Title

Authorized Official - Signature

Date

Amended Leverage / Match Certification / Budget Modification

The leverage committed, as applicable, at the time of the application, **has changed** and requires the submittal of a budget modification request in OKGrants. Please refer to the CDBG Project Management Guide Policies & Procedures, Policy 401, Program Management. Please enter the original commitment information, as per application budget, and provide the changes to reflect the amended amounts to be committed toward the project. Required supporting documentation: **1) for commitment of funds provided by other entities, provide the commitment letter or contract; 2) for commitment of local funds, please provide a commitment letter signed by the Authorized Official or commitment by Board passed resolution.** Upon ODOC approval of the budget modification in OKGrants, the grantee will be prompted to update the application budget and re-submit for completion.

Activities Budgeted	Original Leverage Amount Committed	Add / Deduct (-)	New Leverage Total	CDBG Budgeted Amount	Total CDBG and Leverage
Leverage Construction		\$ -	\$ -		\$ -
Leverage Non-Construction		\$ -	\$ -	\$ -	\$ -
CDBG Construction	\$ -	\$ -	\$ -	\$ -	\$ -
CDBG Non-Construction	\$ -	\$ -	\$ -	\$ -	\$ -
	\$ -	\$ -	\$ -	\$ -	\$ -
	\$ -	\$ -	\$ -	\$ -	\$ -
	\$ -	\$ -	\$ -	\$ -	\$ -
	\$ -	\$ -	\$ -	\$ -	\$ -
TOTALS	\$ -	\$ -	\$ -	\$ -	\$ -

Authorized Official - Print Name & Title

Authorized Official - Signature

Date

ODOC Review Name

Date Approved

CDBG Form 401.1

Rev. 2025

COG - REQUEST TO MENTOR - INTERIM CDBG ADMINISTRATOR

I, _____, a Certified CDBG Administrator is requesting to be assigned as the Mentor for:

Name: _____

Email: _____

Phone: _____

Council of Government (COG): _____

Please check below the range of experience the CDBG Certified Grant Administrator (Mentor) has:

☐ 1-5 years

☐ 6-10 years

☐ 10+ years

Acknowledgement:

As the Mentor for Interim Administrator, I will provide Community Development Block Grant Training, Compliance Oversight on Programmatic and Financial requirements, co-sign all forms and other documents with the interim CDBG Administrator; and if significant issues or monitoring findings are filed against an executed grant contract, an investigation will be instituted against the mentor to determine if the mentor properly supervised the Interim CDBG Administrator.

As the Interim CDBG Administrator, I will register and attend the next annual CDBG Certified Grant Administrator Training (normally held each December). I have read the CDBG Management Guide, Policy 401 Program Management, Part 5, Administering the Program.

Please sign below and email the executed copy to Linda.Goode@okcommerce.gov.

COG Mentor _____ Date _____

COG Interim _____ Date _____

COG Executive Director _____ Date _____

ODOC Approval _____ Date _____

Oklahoma Dept. of Commerce (ODOC) - CDBG Project Management - Task Chart

Oklahoma Dept. of Commerce (ODOC) - CDBG Project Management - Task Chart		Responsibility		Signature Required			OKGrants Upload	OKGrants Submission	
		Grantee	Grant Administrator (Certified by ODOC)	Grantee - Authorized Official	Grant Administrator	Project Engineer/ Architect	Item Upload	Grantee-Authorized Official (AO role)	Grant Administrator (writer role)
TASK COMPLETED	GRANT AWARD / CONTRACT CONDITIONS / GRANT MANAGEMENT / POLICIES AND PROCEDURES								
Choose from the dropdown selection below (Y, N, N/A)	NOTE: DO NOT COMMIT, OBLIGATE, OR EXPEND PROJECT FUNDS AS BUDGETED FROM ALL FUNDING SOURCES BEFORE PERFORMING THE ENVIRONMENTAL REVIEW - Statutory/Regulatory - Choice Limiting Action (CLA) violation, 24 CFR 58.22(a)	x							
	Execute Contract with ODOC in OKGrants - Review Contract Part II (Part III as applicable)	x		x				x	
	Download and Review the CDBG Project Management Guide from the OKCommerce.gov website	x							
	Download the Certified Grant Administrator Listing from the OKCommerce.gov website	x							
	Download and Review the OKGrants Guide from the OKCommerce.gov website	x							
	OKGrants - review the members listed and update as needed for AA, AO, FO, Writer	x							
	FINANCIAL - Is a bank account established to receive CDBG funds from the State? (Policy 406)	x							
	Recordkeeping begins for all project-related documents and correspondence	x							
	Prepare an RFQ or RFP for Professional Services, as applicable (Policy 407-Competitive Procurement)	x					x		
	Review, Score, and Select Professional Services & Execute Contracts (Board Action & Minutes)	x					x		
	Complete and Execute the Exempt Activity Form (Policy 403 - Environmental Review - Form 403.2)	x					x		
	Prepare mentorship requests to ODOC, as applicable, for grant administrative services (Policy 401)	x					EMAIL ODOC		
	Policy 401 - Program Management								
click here	120 days from the contract start date to complete the environmental review and RROF checklist items	x	x						
click here	270 days from the contract start date to award a construction contract	x	x						
	Required Accounting Systems / Required Purchase Orders	x							
	Contract & Budget Modifications (OKGrants Action)	x	x	x			x	x	
	Policy 401 - Forms (required as per project activity):								
	Leverage/Matching Funds Certification (Form 401.1)	x	x	x			x	x	
	Federal Funds Disclosure Update (Form 401.2)	x	x	x			x		
	EDIF- Company Employee Income Certification (Form 401.3)		x				x		
	EDIF-Instructions for Job Creation Quarterly Report (Form 401.4)		x						
	EDIF Company's Quarter Job Creation Quarterly Report (Form 401.5)		x				x		
	EDIF Company's Quarter Job Tracking Log (Form 401.6)		x				x		
	EDIF Company's Placement Plan (Form 401.7)		x				x		
	UGLG Mentorship (Form 401.8)		x				EMAIL ODOC		

Oklahoma Dept. of Commerce (ODOC) - CDBG Project Management - Task Chart

Responsibility		Signature Required			OKGrants Upload	OKGrants Submission	
Grantee	Grant Administrator (Certified by ODOC)	Grantee - Authorized Official	Grant Administrator	Project Engineer/Architect	Item Upload	Grantee-Authorized Official (AO role)	Grant Administrator (writer role)
Policy 404 CIVIL RIGHTS, EQUAL OPPORTUNITY, FAIR HOUSING, SECTION 3 & 504							
Grantee Personnel Policies (10 Fulltime employee) - Monitoring	x	x			x		x
Review 404 Attachment 30 Compendium of Federal Civil Rights Laws	x	x					
FAIR HOUSING REQUIREMENT							
Fair Housing Ordinance	x	x	x		x		x
Fair Housing Resolution	x	x	x		x		x
Fair Steps (all years)	x	x			x		x
Citizen's Participation Public Hearing - Application	x	x			x		x
Public Hearing Notice	x	x			x		x
Public Hearing Minutes - Signed Finalized	x	x	x		x		x
Public Hearing Attendance (sign in) Sheet	x	x			x		x
Citizen's Participation Public Hearing - Closeout	x	x			x		x
Public Hearing Notice	x	x			x		x
Public Hearing Minutes - Signed Finalized	x	x	x		x		x
Public Hearing Attendance Sheet	x	x			x		x
SECTION 504 REQUIREMENT							
Municipality/County Employment Practices Staff Composition Form (404.1)	x	x			x		x
SECTION 3 REQUIREMENT							
Review 404 Attachment 31 Section 3_FRN Notice 2020	x	x					
Grantee Section-3 Business-and-Employment-Notice-Sample Form (404.3)	x	x					
Contractor Section-3 Clause Form (404.4)		x					
Contractor Section 3 Business Self-Certification Form (404.5)		x			x		x
Contractor Section 3 Estimated Project Workforce Breakdown Form (404.6)		x			x		x
Contractor Section 3 Affirmative Action Plan Form (404.7)		x			x		x
Contractor Section 3 Monthly Utilization Report Form (404.8)		x			x		x
Contractor Section 3 Worker Status Certification Form (404.9)		x			x		x
Grantee Section 3 Review Checklist Form (404.10)	x	x			x		x
Grantee Section 3 PLAN Form (404.11)	x	x			x		x
Grantee Section 3 Plan Resolution Form (404.12)	x	x			x		x
Worker Section 3 HUD Complaint Form (404.13)	x	x			x		x
Policy 405 PROCUREMENT							
Review Procurement Policy 2 CFR Part 200.317-326 (405 Attachment 32)	x	x					
Engineering/Architect - Professional Services Procurment (RFQ)	x				x		x
Solicitations/Minority Businesses - Supporting Documentation					x		x
Professional Services Active Registration in SAM.gov	x				x		x
Grant Administration - Professional Services Procurment (RFP)	x				x		x
Solicitations/Minority Businesses - Supporting Documentation	x				x		x
Professional Services Active Registration in SAM.gov	x				x		x

Oklahoma Dept. of Commerce (ODOC) - CDBG Project Management - Task Chart

		Responsibility		Signature Required			OKGrants Upload	OKGrants Submission	
		Grantee	Grant Administrator (Certified by ODOC)	Grantee - Authorized Official	Grant Administrator	Project Engineer/Architect	Item Upload	Grantee-Authorized Official (AO role)	Grant Administrator (writer role)
	CDBG Sample Bid Document must be used - Attachment 407.33	x	x				x		x
	Construction Procurement Checklist Form (407.7)		x				x		x
	Policy 406 FINANCIAL MANAGEMENT								
	Advances - Embedded in OKGrants	x					EMBEDDED	x	
	Supporting Documentation: Invoices		x				x		x
	Signed Purchase Orders		x				x		x
	Contractor's Weekly Payrolls		x				x		x
	Contractor Section 3 Monthly Reports		x				x		x
	Employee interview Forms		x		x		x		x
	In-Kind labor/Force Account labor/Voluntary labor documents		x				x		x
	Monthly Expenditure Reports - Embedded in OKGrants	x					EMBEDDED	x	
	Supporting Documentation: Cancelled Checks		x				x		x
	Certified spreadsheet/ledger		x	x			x		x
	Finalized Board Minutes of approval of payment		x	x			x		x
	Policy 407 CONTRACT DEVELOPMENT								
	Notice of Award (407.1)	x	x	x			x		x
	Contractor Debarment Review Certification (407.2)						x		x
	Notice to Proceed by Owner (407.3)	x					x		x
	Pre-Construction Meeting Format (407.4)	x	x				x		x
	Grantee Debarment Review Certification Form (407.5)	x	x	x			x		x
	BABA (BAP) Certification Form (407.6)		x				x		x
	Policy 408 LABOR STANDARDS & CONSTRUCTION MANAGEMENT								
	Contractor Payroll Certification Form (408.1)		x						x
	Contractor Appointing Payroll Officer (408.2)		x						x
	Payroll Deduction Authorization (408.3)		x				x		x
	CDBG Employee Interview Form - English (408.4)		x		x		x		x
	CDBG Employee Interview Form - Spanish (408.5)		x		x		x		x
	Contractor Weekly Payroll Report Form (408.6)		x				x		x
	Weekly Payroll Form Instructions (408.7)		x				x		x
	Policy 409 MONITORING & CLOSEOUT								
	Desk Monitoring Grantee Survey Checklist (Monitoring Checklist)		x	x			x	x	
	Closeout Checklist (409.1)		x	x			x	x	
	CDBG Closeout Certification Page - Embedded in OKGrants (LMI have to match)	x		x			EMBEDDED	x	
	LMI Beneficiary Form (409.2)		x	x			x	x	
	Final Wage Compliance Form		x	x			x	x	
	Certificate of Project Completion (409.4)	x		x		x	x	x	
	BABA LISTING OF MATERIALS USED AND APPROVED FOR PROJECT	x	x				x	x	
	Project Photos - Before Construction/During Construction/Completed	x	x				x	x	

Oklahoma Dept. of Commerce (ODOC) - CDBG Project Management - Task Chart

		Responsibility		Signature Required			OKGrants Upload	OKGrants Submission	
		Grantee	Grant Administrator (Certified by ODOC)	Grantee - Authorized Official	Grant Administrator	Project Engineer/ Architect	Item Upload	Grantee- Authorized Official (AO role)	Grant Administrator (writer role)
	Section -3 Grantee-Total Worker Hours Closeout Report (409.5)		x	x			x	x	
	Section -3 Reconciliation Hours Form (409.6)		x	x			x	x	
	(Fire Trucks) 5-year Post-Closeout Inventory & Insurance Form (409.7)	x	x	x			x	x	

Policy 402

Property Acquisition

No modifications made.



Policy 403 Environmental Review





Environmental Justice worksheet will not be required – Deleted Worksheet



Floodplain Management – Revised to include the new final rule implementing the FFRMS & Inserted the New Floodplain Worksheet



Revised/Updated the RROF Checklist



Revised 403 Attachment 19 Sample “concurrence” letters to include Tribal Sample



Revised 403 Attachment 21 Floodplain Notices – FFRMS



Revised 403 Attachment 26.1 HUD CPD Notice 12-06 When to Consult with Tribes & Form



Environmental Review for Activity/Project that is Categorically Excluded Subject to Section 58.5 Pursuant to 24 CFR 58.35(a)

This is a HUD suggested format that may be used by Responsible Entities to document completion of a Categorically Excluded Subject to Section 58.5 environmental review. Some of the information has been filled out by the Oklahoma Department of Commerce as it pertains to the State CDBG Program.

Project Information

State/Local Identifier: **Oklahoma Department of Commerce**

CDBG Grantee Responsible Entity (RE) Name:

Sponsored Entity Name (as applicable):

CDBG Contract Number:

Certifying Officer Name and Title:

Preparer/Grant Consultant Name:

Direct Comments to (email/phone):

Project Location (city/town/county legal description):

Description of the Proposed Project [24 CFR 50.21 & 58.32]:

Level of Environmental Review Determination: Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5:

58.35(a)(1) Acquisition, repair, improvement, reconstruction, or rehabilitation of public facilities and improvements (other than buildings) when the facilities and improvements are in place and will be retained in the same use without change in size or capacity of more than 20 percent (e.g., replacement of water or sewer lines, reconstruction of curbs and sidewalks, repaving of streets).

Funding Information

Grant Number	HUD Program	Funding Amount
CFDA 14.228	Formula - State CDBG	\$

Estimated Total HUD Funded Amount: **\$**

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: **\$**

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate:

NOTE: Double click on the appropriate Yes or No boxes for selection and enter the compliance determination as per completed environmental worksheets and supporting documentation.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.6		
Airport Hazards - 24 CFR Part 51 Subpart D -	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Activity does not enter an Airport Clear Zone or Accidental Potential Zone
Coastal Barrier Resources - Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Oklahoma does not fall under the Coastal Barrier Resources Act.
Flood Insurance - Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a] -	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	24 CFR 58.6(a)(3): HUD State-administered assistance such as Community Development Block Grants (CDBG), Emergency Shelter Grants (ESG), and HOME Investment Partnership Grants are considered "formula grants made to States." By law, "formula grants made to States" and along with "general and special revenue sharing" are exempt from the flood insurance purchase requirements by Section 3(a)(3) of the Act.

STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and <u>1541</u> ; 7 CFR Part 658	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes <input type="checkbox"/> No <input type="checkbox"/>	

Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) & (c). Oklahoma SB1010 (2025) recognizes the following (8) counties for activities requiring review and possible mitigation: <u>Adair, Cherokee, Choctaw, Delaware, LeFlore, McCurtain, Pushmataha, and Sequoyah.</u>	Yes <input type="checkbox"/> No <input type="checkbox"/>	

Field Inspection Completed by: (Type Name & Date):

Summary of Findings and Conclusions:

Mitigation Measures and Conditions

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure

Determination:

- ☐ This categorically excluded activity/project converts to Exempt, per 58.34(a)(12) **because there are no circumstances which require compliance with any of the federal laws and authorities cited at §58.5.** Funds may be committed and drawn down after certification of this part for this (now) EXEMPT project; OR
- ☐ This categorically excluded activity/project cannot convert to Exempt **because there are circumstances which require compliance with one or more federal laws and authorities cited at §58.5.** Complete consultation/mitigation protocol requirements, **publish NOI/RROF and obtain "Authority to Use Grant Funds"** (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds; OR
- ☐ This project is now subject to a **full Environmental Assessment** according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).

Preparer Signature: _____ Date: _____

Provide Name/Title/Organization:

Responsible Entity Agency Official Signature:

Signature _____ Date: _____

Print Name/Title:

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).

Oklahoma Department of Commerce (ODOC) - Community Development Block Grant Program

Request for Release of Funds & Removal of Contract Conditions Checklist

Initiate a Request for Release of Funds in OKGrants. Prepare Checklist, save as "RROF Checklist_Name_Contract Number" & upload (do not scan checklist). Upload all applicable Items with supporting documents as individual files using the checklist as a guide into ROF Menu - Uploads, change status to submit by the Authorized Official.

Grant Recipient Name: <input type="text"/> CDBG Contract Number: <input type="text"/> Describe Project(brief): <input type="text"/>	Submitted Items - GRANTEE	Reviewed Items – ODOC ONLY
<p>Determine Level of Environmental Review - Please complete separate environmental forms for each applicable activity & refer to the Project Guide - Policy 403, 403 Attachments, and 403 Forms</p> <p>1. Exempt Activity - Complete and Upload Forms into OKGrants</p> <p>a. Part 58 Environmental Review–Exempt Activity (Form 403.2)</p> <p>*Be sure to <u>ONLY</u> include funds committed to Exempt Activities under Sec. 58.34 (a)(3) (i.e., Consulting, Engineering, Inspection/professional services)</p> <p>b. Procurement for Professional Services: UPLOAD Procurement Policy, RFQ's & RFP's and Executed Contracts.</p> <p>c. Contractor Debarment Review Cert (Form 407.2)</p> <p>2. Categorically Excluded Activity (i.e. fire truck)-<u>NOT Subject to 58.5 Part 58 Environmental Review - Exempt - CENST</u> (Form 403.2)</p> <p>*Categorically Excluded Not Subject to Section 58.5 Form (Pursuant to 24 CFR Part 58.35(b))</p> <p>*Be sure to <u>ONLY</u> include funds committed to Categorically Excluded activities under 58.35(b)(3) (ex. Purchase of Fire Truck)</p>	<p>1a. <input type="checkbox"/></p> <p>1b. <input type="checkbox"/></p> <p>1c. <input type="checkbox"/></p> <p>2. <input type="checkbox"/></p>	<p>1a. <input type="checkbox"/></p> <p>1b. <input type="checkbox"/></p> <p>1c. <input type="checkbox"/></p> <p>2. <input type="checkbox"/></p>

3. Categorically Excluded SUBJECT TO 58.5 - Complete All Worksheets (refer to 403 Attachments 28, 29, 29.1 for Blanket Clearance letters)
 Complete and Upload all worksheets individually with supporting documentation for each Related Federal Law and Authorities:
<https://www.hudexchange.info/programs/environmental-review/federal-related-laws-and-authorities/>

1. Airport Hazards <input type="checkbox"/>	5. Coastal Zone Mgmt. <input type="checkbox"/>	9. Farmland Protection <input type="checkbox"/>	13. Sole Source Aquifers <input type="checkbox"/>
2. Coastal Barrier Resources <input type="checkbox"/>	6. Contamination & Toxic substance <input type="checkbox"/>	10. Floodplain Management <input type="checkbox"/>	14. Wetlands Protection <input type="checkbox"/>
3. Flood Insurance <input type="checkbox"/>	7. Endangered Species <input type="checkbox"/>	11. Historic Preservation <input type="checkbox"/>	15. Wild and Scenic Rivers <input type="checkbox"/>
4. Air Quality <input type="checkbox"/>	8. Explosive & Flammable Facilities <input type="checkbox"/>	12. Noise Abatement & Control <input type="checkbox"/>	<input type="checkbox"/>

3.
 Env.
 Worksheets

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 Worksheets

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Complete and Upload Part 58 - Categorically Excluded Review:

Categorically Excluded under 58.35(a)(CEST) ([Form 403.3](#))

*Be sure to ONLY include funds committed to Categorically Excluded activities under 58.35(a); (i.e., Replacement of water/sewer lines, reconstruction of curbs and sidewalks, repaving of streets)

a. **Historical Clearance Letter (SHPO & THPO)** ([see 403 Attachment 19](#))

<https://www.okhistory.org/shpo/section106.htm>

<https://www.okhistory.org/shpo/tribal106> ([See Attachments 24,25,26](#))

b. **Archaeological Survey Letter** - <https://www.ou.edu/archsurvey/cultural-resource-management/agencies-and-applicants>



1. Did the CE Form 403.3 (statutory checklist) convert the activity to exempt at 58.34 (a)(12)? IF YES, skip Items d & e and complete **Item f - RROF 7015.15;**

2. IF NO, **complete c,d,e,f**, as applicable to the activity (improvements that exceed 20% and/or compliance & mitigation to any related authority)

c. **Activity located in a Floodplain?** <https://www.hudexchange.info/programs/environmental-review/floodplain-management/>

FEMA FIRMette Map (Please provide Panel No. & Date below)

- Eight Step Analysis (24 CFR Part 55.20) Upload or blank if N/A:
Early Notice (must be [published](#) one time, 15 day comment period)
Final Notice (must be [published](#) one time, 7 day comment period)
([403 Attachment 21](#))

3. CATEX Form

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3a.

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3b.

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3c.

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3. CATEX Form

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3a.

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3c.

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d. **Notice of Intent** (Proof of Publication or Posting) ([403 Attachment 26](#))

e. **DIST LIST** ([403 Attachment 20](#))- Distribute the Notice to the appropriate agencies and interested parties in relation to the activity and upload with publication

f. **REQUEST RELEASE OF FUNDS - 7015.15** ([Form 403.6](#))

4. **Environmental Assessment (EA)** - Complete and Upload all worksheets individually with supporting documentation for each Related Federal Law and Authorities.

1.Airport Hazards <input type="checkbox"/>	5.Coastal Zone Mgmt. <input type="checkbox"/>	9.Farmland Protection <input type="checkbox"/>	13.Sole Source Aquifers <input type="checkbox"/>
2.Coastal Barrier Resources <input type="checkbox"/>	6.Contamination & Toxic Substance <input type="checkbox"/>	10.Floodplain Management <input type="checkbox"/>	14.Wetlands Protection <input type="checkbox"/>
3.Flood Insurance <input type="checkbox"/>	7.Endangered Species <input type="checkbox"/>	11.Historic Preservation <input type="checkbox"/>	15.Wild and Scenic Rivers <input type="checkbox"/>
4.Air Quality <input type="checkbox"/>	8.Explosive & Flammable Facilities <input type="checkbox"/>	12. Noise Abatement & Control <input type="checkbox"/>	<input type="checkbox"/>

3d. ☐

3e. ☐

3f. ☐

4.
Env.
Worksheets

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3d. ☐

3e. ☐

3f. ☐

4.
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Worksheets

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Complete and Upload Environmental Assessment Form:

Part 58 - Environmental Assessment Checklist ([Form 403.4](#)):

- a. **Historical Clearance Letter** (SHPO & THPO) ([see 403 Attachment 19](#))
<https://www.okhistory.org/shpo/section106.htm>
<https://www.okhistory.org/shpo/tribal106>
- b. **Archaeological Survey Letter** - <https://www.ou.edu/archsurvey/cultural-resource-management/agencies-and-applicants>
- c. **Floodplain Management**- <https://www.hudexchange.info/programs/environmental-review/floodplain-management/>
FEMA FIRMette Map -Please provide Panel No. & Date below:
- Eight Step Analysis (24 CFR Part 55.20) Upload or blank if N/A:
- Early Notice ([must be published one time, 15 day comment period](#))
- Final Notice ([must be published one time, 7 day comment period](#))([403 Attachment 25](#))
- d. **Combined Notice** ([403 Attachment 27](#)) ([Proof of Pub or Posting](#))
- e. **DIST LIST** ([403 Attachment 20](#)) - Distribute the Notice to the appropriate agencies and interested parties in relation to the activity and upload with publication
- f. **REQUEST RELEASE OF FUNDS** - 7015.15 ([Form 403.6](#))

4. EA Form

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4. EA Form

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4f.

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OTHER REQUIREMENTS:

5. **Leverage/Matching Funds** ([Form 401.1](#)):
 - UPLOAD Leverage Confirmation & supporting document as applicable.
6. **Insurance & Bonding** (as applicable) UPLOAD Items:
 - Evidence of City/County general liability insurance coverage
 - Evidence of City/County bonding
7. **Anti-Displacement Plan** ([402 Attachment 15](#))
 - UPLOAD Executed Plan
8. **Fair Housing Activity** - UPLOAD one (1) activity:
Refer to Project Management Guide - Policy 404
9. **Section 3** - UPLOAD Resolution & Plan adopted by grantee:
(\$200,000) Refer to Project Guide - Policy 404 - ([Forms 404.11-404.12](#))
10. **Engineer Acknowledgment** ([Form 403.5](#))
 - UPLOAD Executed Form
11. **ODEQ Permit to Construct** - UPLOAD for W/S Eng. Contracts & Part II
Contract Conditions as applicable. Leave blank if N/A

5.	<input type="checkbox"/>	5.	<input type="checkbox"/>
6.	<input type="checkbox"/>	6.	<input type="checkbox"/>
7.	<input type="checkbox"/>	7.	<input type="checkbox"/>
8.	<input type="checkbox"/>	8.	<input type="checkbox"/>
9.	<input type="checkbox"/>	9.	<input type="checkbox"/>
10.	<input type="checkbox"/>	10.	<input type="checkbox"/>
11.	<input type="checkbox"/>	11.	<input type="checkbox"/>

Preparer Name, Title, & Agency (Typed)

Date

ODOC Reviewer Name & Title

Date

Policy 404
Civil Rights, E.O., Fair
Housing, Section 504,
HUD Section 3



- Executive Order 11246 – until HUD provides direction

- The Trump administration issued E.O. 14173 on January 25, 2025, titled "Ending Illegal Discrimination and Restoring Merit-Based Opportunity," which revoked E.O. 11246, "Equal Employment Opportunity."
- E.O. 14173 ended the requirement for federal contractors to undertake affirmative action for women and minorities:
This removed the requirement for federal contractors to develop and implement written affirmative action programs to promote the employment of women and minorities. The Office of Federal Contract Compliance Programs stopped its enforcement activities related to E.O. 11246.
- E.O. 14173 Promotes Merit-Based Opportunity:
The order aimed to shift federal contractor policies toward focusing on merit-based opportunity, rather than affirmative action based on demographic factors.
- Impact on Federal Contractors - No More Affirmative Action for E.O. 11246:
Contractors are no longer obligated to implement affirmative action for women and minorities under this former order.
- Continued Obligations:
Contractors remain obligated under other laws, such as Section 503 of the Rehabilitation Act and the Vietnam Era Veterans' Readjustment Assistance Act, which deal with disabled individuals and veterans.

- Effective Date: April 2, 2025, AFFH Revision; E.O. 11063:

§ 5.150 Affirmatively Furthering Fair Housing: Definitions

- (a) The phrase “fair housing” in 42 U.S.C. 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437c–1(d)(16) means housing that, among other attributes, is affordable, safe, decent, free of unlawful discrimination, and accessible as required under civil rights laws.
- (b) The phrase “affirmatively further” in 42 U.S.C. 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437c–1(d)(16) means to take any action rationally related to promoting any attribute or attributes of fair housing as defined in the preceding subsection.

§ 5.151 Affirmatively Furthering Fair Housing: AFFH Certifications – HUD Secretary Turner’s Statement:

A HUD program participant’s certification that it will affirmatively further fair housing is sufficient if the participant takes, in the relevant period, any action that is rationally related to promoting one or more attributes of fair housing as defined in section 5.150(a). Nothing in this paragraph relieves jurisdictions of their other obligations under civil rights and fair housing statutes and regulations.

*ODOC requires all CDBG Grant Recipients to 1. Have or adopt a Fair Housing Ordinance; and 2. Pass a Fair Housing Resolution (RROF item). FY25-26 We will not place a monitoring finding for not having the additional steps.

**NOTE: the amended Fair Housing Rule has not been “officially adopted”.

New Section 3 Resource HUB <https://www.hudexchange.info/programs/section-3/resource-hub/>



HUD EXCHANGE



New



Section 3 Resource Hub

The Section 3 Resource Hub is a centralized platform that offers a **filterable search for state-specific resources**, making it easier for users to discover local opportunities for workforce and business development.

[View the Resource Hub](#)

The hub is a central destination for workers, businesses, and HUD funding recipients to find employment, training, business development and Section 3 resources.

Policy 405 Procurement

No modifications made.



Policy 406 Financial Management



OKLAHOMA



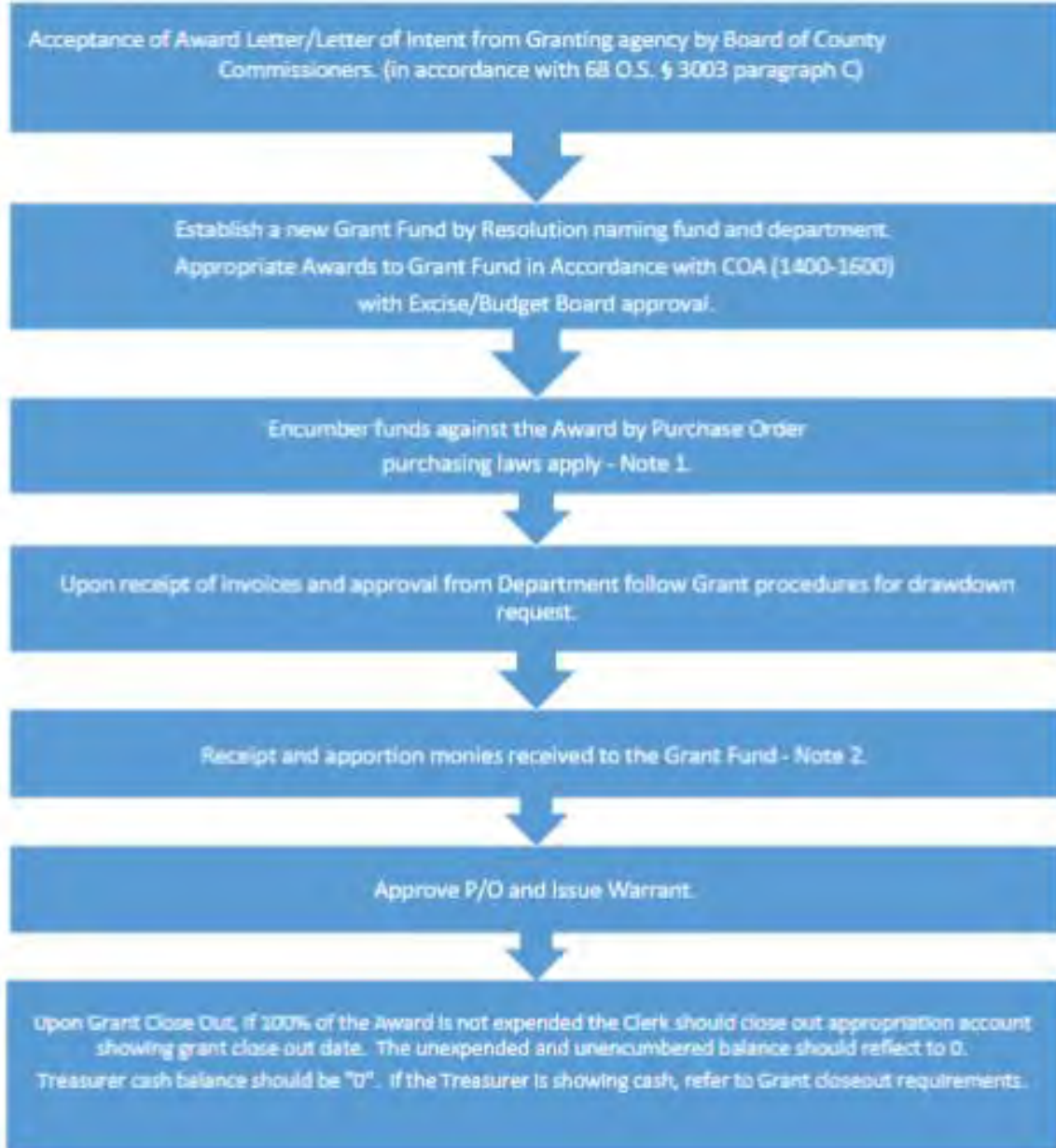
2.5 Added the State Auditor's Office County Requirements (as of July 1, 2025):

Chart of Accounts and Standard Operating
Procedures for guidance with County
Financials for Grant Awards – SOP #1

<https://www.sai.ok.gov/forms-pubs/>

SOP #1 – Grant Award

Appropriating monies based on Letter of Intent/Award Letter



Note 1 – Clerk may need a supplemental ledger to track cash received. Payment CANNOT be made until Cash is received.

Note 2 – Apportionment does not need BOCC or Excise Board (or Budget Board) approval as previously approved by Board(s);

- Use Form 240 as notification of receipt and apportionment.

Some grants require expenditure of funds within 10 days. This may require a Special Apportionment by the Treasurer.

Policy 407

Contract Development





Build America, Buy America Act (BABA)

NEW Website <https://www.hudexchange.info/programs/baba/>



OKLAHOMA

BABA information is located on HUD Exchange

HUD NOTICE CPD-2025-01 – Issued January 13, 2025

BABA Implementation Guidance for BAP

Added 407.8 NEW BAP Checklist – Construction Contract Document

Added 409.9 NEW BAP Certification – Closeout Document

Added 407.7 NEW Construction Procurement Checklist

Training and Resources

<https://www.hudexchange.info/programs/baba/>

Featured



Beyond the Basics: Implementing the BAP

This pre-recorded webinar is designed to assist grantees in achieving compliance with the BAP. Additionally, it explores strategies for optimizing the flexibilities provided by current HUD general waivers and guidance on requesting project-specific waivers.

View all webinars in the [Build America, Buy America Act \(BABA\) Webinar Series](#).

BABA Quick Guides

These quick guides are intended to assist grantees in understanding key aspects of complying with BAP requirements relevant to their program-funded infrastructure projects. They provide insights on how grantees should factor in BAP considerations when it comes to planning, project implementation, and recordkeeping, as well as project completion.

Optional BAP Checklist

This optional checklist assists grantees with determining if BAP applies to a specific project. The checklist follows the six-step analysis described in CPD's BABA Implementation Guidance and can be maintained for recordkeeping purposes.

Optional BAP Certification

This optional certification can be used by grantees to assist with subrecipient recordkeeping for procurement of BABA-compliant materials for projects that must comply with BAP.

BAP CHECKLIST

Form 407.8

TO BE PROVIDED AS AN UPLOAD
WITH THE NEW CONSTRUCTION
PROCUREMENT CHECKLIST

CHECKLIST

Build America, Buy America Act: Buy America Preference (BAP) Applicability Checklist

Requirement Overview

Please complete this worksheet to assist with determining the Buy America Preference (BAP). This checklist follows the analysis steps as described in NOTICE CPD-25-01 and should be uploaded with the CDBG Construction Procurement Checklist at time of Notice of Award Submittal. You may seek assistance from the project engineer and construction contractor to complete the worksheet and provide supporting documents.

Project Information

Grantee Name	
Grant Contract Number	
Activity Description	

Step 1:

Is the project an infrastructure project, as defined by the BABA statute?

<input type="checkbox"/> Yes	Continue to Step 2.
<input type="checkbox"/> No	The BAP does not apply. The BAP only applies to infrastructure projects. Stop here.



For more information on BABA and the BAP, [visit the BABA page](#) on the HUD exchange.

Step 2:

Is the project funded using a covered CPD program? (Check the box below for each CPD program funding this project.)

Group A: Covered CPD Programs

<input checked="" type="checkbox"/>	CDBG	<input type="checkbox"/>	SHOP
<input type="checkbox"/>	Section 108	<input type="checkbox"/>	VHRMP
<input type="checkbox"/>	HOME	<input type="checkbox"/>	CPF/EDI
<input type="checkbox"/>	HTF	<input type="checkbox"/>	Section 4
<input type="checkbox"/>	RHP	<input type="checkbox"/>	Rural Capacity Building
<input type="checkbox"/>	ESG	<input type="checkbox"/>	PRO Housing
<input type="checkbox"/>	CoC	<input type="checkbox"/>	PRICE
<input type="checkbox"/>	HOPWA	<input type="checkbox"/>	FY23 PSH Funds

Group B: CPD Programs Not Covered by the BAP

<input type="checkbox"/>	CDBG-DR	<input type="checkbox"/>	CDBG-CV
<input type="checkbox"/>	CDBG-MIT	<input type="checkbox"/>	HOPWA-CV
<input type="checkbox"/>	CDBG-NDR	<input type="checkbox"/>	ESG-CV
<input type="checkbox"/>	HOME-ARP		

If you selected **any** Group A programs (even if Group B programs are also selected), answer yes. If you selected **only** Group B programs, answer no.

<input checked="" type="checkbox"/> Yes	Continue to Step 3.
<input type="checkbox"/> No	The BAP does not apply to this project because it is not funded by a covered CPD program. Stop here.

Step 3:

Will the project use covered materials?

Each material should be classified into only one category: iron and steel, specifically listed construction materials, not listed construction materials, or manufactured products. This classification is necessary to apply HUD's Phased Implementation waiver.

Check the box below for each type of covered material incorporated into this infrastructure project.

<input type="checkbox"/>	Iron or steel
<input type="checkbox"/>	Specifically Listed Construction materials
<input type="checkbox"/>	Not Listed Construction materials
<input type="checkbox"/>	Manufactured products

If you checked any boxes above, answer yes.

<input type="checkbox"/> Yes	Continue to Step 4.
<input type="checkbox"/> No	The BAP does not apply to this project because it will not incorporate any covered materials. Stop here.

Step 4:

Based on the obligation date of the covered CPD program funds, does the BAP apply to the funding source and covered materials that will be used in the project?

Use the phased implementation table to determine whether the BAP applies based on the obligation date for the covered CPD program funds and classification of materials. The BAP may only apply to some covered materials used in the project.

The obligation date is generally the date that HUD executed the grant agreement for covered CPD program funds to the grantee. This date may be found in the grant agreement. The obligation date is not the date when the grantee commits funds to a project under a subrecipient agreement.

BAP will apply to...	Iron and Steel	Specifically Listed Construction Materials	Not Listed Construction Materials	Manufactured Products
CDBG	CDBG funds obligated on or after 11/15/22	Projects using FY24 CDBG funds	Projects using FY25 CDBG funds	Projects using FY25 CDBG funds
RHP	RHP funds obligated on or after 8/23/23	Projects using FY24 RHP funds	Projects using FY25 RHP funds	Projects using FY25 RHP funds
All other CPD programs except HOME and HTF	Funds obligated on or after 2/22/24	Funds obligated on or after 8/23/24	Funds obligated on or after 8/23/24	Funds obligated on or after 8/23/24
HOME and HTF	HOME or HTF funds obligated on or after 8/23/24	HOME or HTF funds obligated on or after 8/23/24	HOME or HTF funds obligated on or after 8/23/24	HOME or HTF funds obligated on or after 8/23/24

<input type="checkbox"/> Yes	Indicate here which covered materials the BAP applies to and continue to Step 5: <input type="checkbox"/> Iron and steel <input type="checkbox"/> Specifically listed construction materials <input type="checkbox"/> Not listed construction materials <input type="checkbox"/> Manufactured products
<input type="checkbox"/> No	The BAP does not apply to this project because the funds were obligated before the effective date for the program/materials used in the project. Stop here.

Step 5:

HUD has issued several general waivers. Check the box next to any conditions that apply to the project.

Infrastructure projects that meet the conditions of a general waiver may be exempt in whole or in part from the BAP.

<input type="checkbox"/>	The total cost of the project from all sources (Federal and non-Federal) is an amount equal to or less than the 2 CFR 200.1 simplified acquisition threshold, which is currently \$250,000. If checked, the Small Grants Waiver applies, and the project is exempt from the BAP. (Waiver effective until November 23, 2027.)
<input type="checkbox"/>	There is an urgent need to immediately complete the project because of a threat to life, safety, or property. If checked, the Exigent Circumstances Waiver applies, and the project is exempt from the BAP. (Waiver effective until November 23, 2027.)
<input type="checkbox"/>	The project is in Guam, American Samoa, or the Northern Mariana Islands. If checked, the Pacific Island Territories Waiver applies, and the project is exempt from the BAP. (Waiver effective until February 15, 2025.)
<input type="checkbox"/>	The project is being funded by a Tribal recipient. If checked, the Tribal Recipients Waiver may apply, and the project is exempt from the BAP. (Waiver effective until September 30, 2024.)

If you checked any of the boxes above, answer yes below.

<input type="checkbox"/> Yes	The HUD general waiver selected above is being applied to this project, so the BAP does not apply to the entire project. Documentation of the conditions of the waiver should be attached.
<input type="checkbox"/> No	Proceed to Step 5a.

Step 5a:

Calculate the *De Minimis* limit for the project:

The total cost of all covered materials includes all iron and steel, construction materials, and manufactured products used in the project, regardless of whether the BAP currently applies under the Phased Implementation waiver.

Enter the total cost of all covered materials:	
Multiply that amount by 0.05 (5%):	
Enter the lower of the number calculated in the row above or \$1,000,000 (whichever is less).	

The amount in the third row above is the *De Minimis* limit for this project. The BAP can be waived for covered materials from foreign or unknown sources at a cost not to exceed the *De Minimis* limit of 5% of the total cost of materials or \$1,000,000 (whichever is less). The BAP will still apply to other covered materials used in the project. **Please attach a list of covered materials and their associated costs to which the *De Minimis* limit has been applied.**

Step 6:

Is there a need for a project-/product-specific waiver?

If the BAP applies to a project and all general waiver flexibilities have been utilized, but there are remaining covered materials that can only be sourced from foreign or unknown sources, then a grantee may apply for a project-/product-specific waiver.

<input type="checkbox"/> Yes	Refer to guidance in Section VIII and IX of Notice CPD-25-01 - (Waiver Instructions from HUD)
<input type="checkbox"/> No	

Completed by Name and Phone Number	Date Completed

Policy 408

Labor Standards



WEEKLY PAYROLL REPORT FORMS

- OLD DOL WH347 Payroll Form with expiration date of 9/30/2026
- ✓ NEW DOL WH347 Payroll Form fillable PDF

Note: Until the older form expires, either format is acceptable for submittals.

Policy 409

Monitoring & Closeout



Revised the monitoring narratives for current processes –

- ❖ Desk Monitoring
- ❖ Project Site – Quarterly Visits
- ❖ On-Site Monitoring

Added Form - 409.9 BAP
Certification for all materials
used in the project

Closeout Checklist Submittals

CERTIFICATION

Build America, Buy America Act:
Buy America Preference
(BAP) Certification - CDBG



COMMUNITY
PLANNING
&
DEVELOPMENT

Project Information

CDBG GRANTEE NAME	
CDBG CONTRACT NUMBER	
ACTIVITY DESCRIPTION	

This “Buy America Preference Certification” is used to certify that, as required by the Build America, Buy America (BABA) Act, all of the iron, steel, manufactured products, and construction materials incorporated into an infrastructure project are produced in the United States, unless exempted by a HUD general waiver or a project-/product-specific waiver approved by the Made in America Office (MIAO) at the Office of Management and Budget (OMB).

Added Form - 409.9 BAP
Certification for all materials
used in the project

Closeout Checklist Submittals

For covered materials not otherwise exempted from the Buy America Preference (BAP), the undersigned certifies the following:

- All iron and steel used in the project are produced in the United States. This means all manufacturing processes, from the initial melting stage through the application of coatings, occurred in the United States;
- All manufactured products used in the project are produced in the United States. This means the manufactured product was manufactured in the United States, and the cost of the components of the manufactured product that are mined, produced, or manufactured in the United States is greater than 55 percent of the total cost of all components of the manufactured product, unless another standard that meets or exceeds this standard has been established under applicable law or regulation for determining the minimum amount of domestic content of the manufactured product;
- All construction materials used in the project are manufactured in the United States. This means that all manufacturing processes for the construction material occurred in the United States.

Attach a list of all covered materials procured by the signatory and used in the project.

I hereby certify this information is complete and accurate and agree to provide documentation collected on the country of origin for all covered materials I caused to be incorporated into or affixed to an infrastructure project to the CDBG Project Activity described above, to the OK Dept. of Commerce, and HUD upon request. I understand and agree that the provisions of 31 U.S.C. Chap. 38, Administrative Remedies for False Claims and Statements, apply to this certification and disclosure, if any.

GRANTEE AUTHORIZED OFFICIAL SIGNATURE	Title/Organization	Date

POLICY & PROCEDURES



OKLAHOMA





Presidential Executive Orders

Upcoming Addenda to CDBG Contracts;
Amendments to the CDBG Project
Management Guide and CDBG Monitoring
Tools



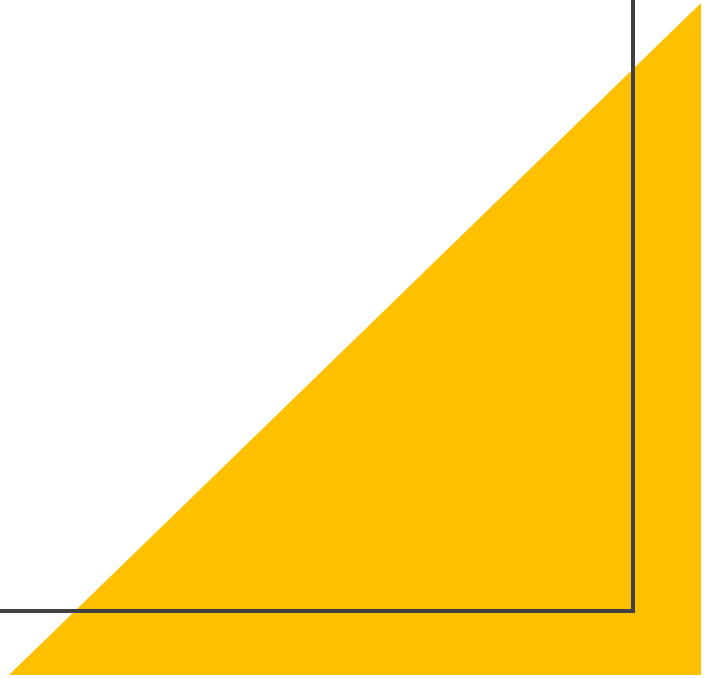
Presidential Executive Orders

1. Must not use Grant Funds to promote "gender ideology" as required in E.O. 14168;
 2. Must comply with all applicable Federal Anti-Discrimination Laws;
 3. Must not use Grant Funds to Fund or Promote elective abortions as required in E.O. 14182;
 4. Must administer Grant Funds in accordance with all applicable immigration restrictions (won't affect infrastructure activities but mainly services that provide a direct benefit, then the use of the SAVE system will apply)
 5. Must not use grant funds to facilitate the subsidization or promotion of illegal immigration or shields illegal aliens from deportation.
-

Administrative Contracts

- Fully Executed Contract between COG & Grantee
- Fully Executed Contract between Grantee & Independent Certified Grant Administrator
- NOTE: The above are RROF Items

- 120 Deadline Extension –
Policy 403-2.1
- 270 Deadline Extension –
Policy 407-5-5.2



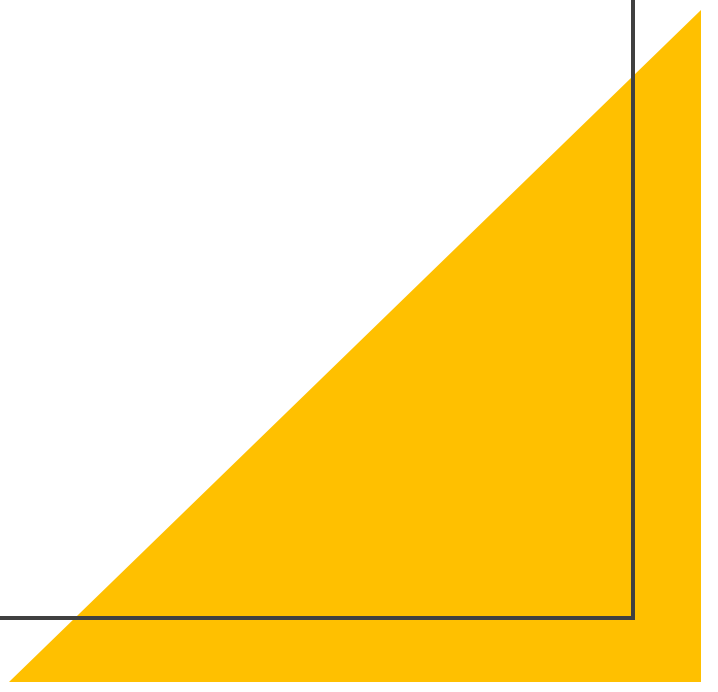
ADMINISTRATION REMITTANCE SCHEDULE

<u>Maximum Fee</u>	<u>Activity</u>
20%	Release of Funds achieved within 120 days
5%	Release of Funds achieved greater than 120 days
20%	Construction started within 270 days
5%	Construction started greater than 270 days
40%	Construction as project funds are expended (Pro rata)
20%	Submission and acceptance of Final Closeout documents

WATER/WASTEWATER ENGINEERING CONTRACT SCHEDULE

<u>Maximum Fee</u>	<u>Activity</u>
<u>Year One (1)</u>	
25%	can be drawn from total allowable public administrative funds
<u>Year two through three (2-3)</u>	
20%	Construction started within 120 days
5%	Construction started greater than 120 days
35%	Construction as project funds are expended (Pro rata)
20%	Submission and acceptance of Final Closeout documents


Matching Funds Documentation

- Must be reported on Expenditures
 - Payrolls
 - Purchase Orders
 - Invoices
 - Cancelled Checks/EFTs
- 
- A large yellow triangle is positioned in the bottom right corner of the slide, pointing towards the top right.

Payroll Wages & Classification

- Classification must match Prevailing Wage Document
- Executive Order 14026 & 13658 – Do not Apply

Note: Contracts subject to the Davis-Bacon Act are generally required to pay at least the applicable minimum wage rate required under Executive Order 14026 or Executive Order 13658. Please note that these Executive Orders apply to covered contracts entered into by the federal government that are subject to the Davis-Bacon Act itself, but do not apply to contracts subject only to the Davis-Bacon Related Acts, including those set forth at 29 CFR 5.1.(a)(1)

A large yellow triangle is positioned in the bottom right corner of the slide, pointing towards the top right.

Superseded General Decision Number: OK20240070

State: Oklahoma

Construction Type: Building
Building Construction -does not include residential construction consisting of single family homes and apartments up to and including 4 stories.

Counties: Caddo, Cotton, Greer, Harmon, Jefferson, Kiowa, Roger Mills, Tillman and Washita Counties in Oklahoma.

Note: Contracts subject to the Davis-Bacon Act are generally required to pay at least the applicable minimum wage rate required under Executive Order 14026 or Executive Order 13658. Please note that these Executive Orders apply to covered contracts entered into by the federal government that are subject to the Davis-Bacon Act itself, but do not apply to contracts subject only to the Davis-Bacon Related Acts, including those set forth at 29 CFR 5.1(a)(1).

If the contract is entered into on or after January 30, 2022, or the contract is renewed or extended (e.g., an option is exercised) on or after January 30, 2022:	<ul style="list-style-type: none">. Executive Order 14026 generally applies to the contract.. The contractor must pay all covered workers at least \$17.75 per hour (or the applicable wage rate listed on this wage determination, if it is higher) for all hours spent performing on the contract in 2025.
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Certified Payroll Report

Contractor

Project

Hours Worked by Day

Employee Name	ID	Work Classification	Pay Type	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Timesheet Hours	Paid Hours	Pay Rate	G
				27	28	29	30	31	1	2				
[REDACTED]	[REDACTED]	Hourly - Driver	RT					2.50			2.50	2.50	22.00	
			OT					7.50	12.00		19.50	19.50	33.00	
[REDACTED]	[REDACTED]	Hourly - Driver	RT					3.50			3.50	3.50	21.00	
			OT					4.00			4.00	4.00	31.50	

Certified Payroll Report


Contractor

Project

				Hours Worked by Day								Timesheet Hours	Paid Hours	Pay Rate
Employee Name	ID	Work Classification	Pay Type	Sun 3	Mon 4	Tue 5	Wed 6	Thu 7	Fri 8	Sat 9				
	3037	Hourly - Driver	RT			1.50	6.00				7.50	7.50	22.00	
	5605	Hourly - Operator	RT				8.50				8.50	8.50	20.00	
	8124	Hourly - Laborer	RT				8.50				8.50	8.50	18.00	
	7820	Hourly - Operator	RT		11.00						11.00	11.00	28.00	
	0039	Hourly - Driver	RT				8.00				8.00	8.00	21.00	

Expenditure Report Uploads

ODOC will accept cancelled checks, bank statements, and copies of EFT for providing proof of payment.

A large yellow triangle is positioned in the bottom right corner of the slide, pointing towards the top right.

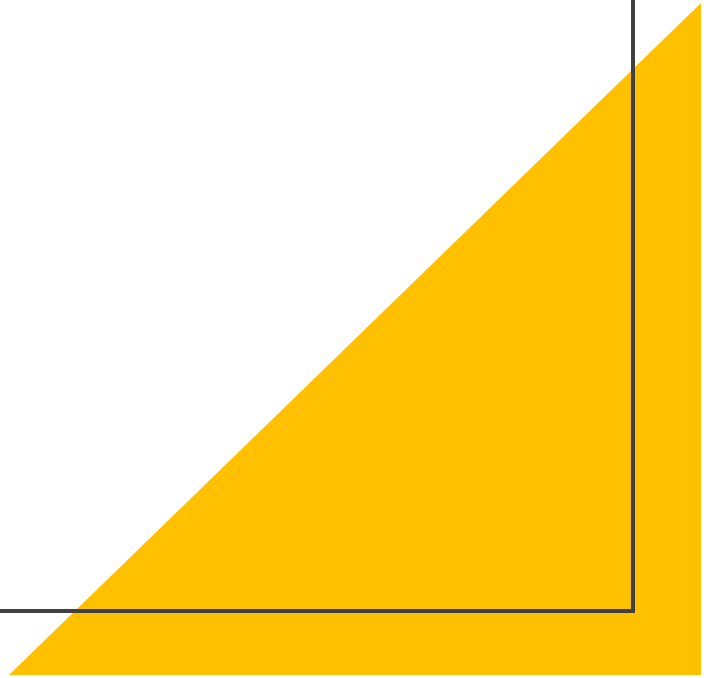
CDBG Budget Funding Sources Modifications

- Did the Low Bid Received match the budgeted amount for Construction?
- Do the bid items align with the original project description and line-item budget?
- Additional work or Area of work?
- ❖ May Require a Project Modification – Submittal in OKGrants
- ✓ Review by Planners, Monitors, and on occasion, the ODOC Review Committee

Budget Modification

Note:

All Budget Modifications must get CDBG
Planners' Approval – Submittal in OKGrants



4.1.7. Budget Modification: If the existing project budget requires modification, the grantee will:

Step 1 – Change the status to initiate a Request for Budget Modification in OKGrants.

Step 2 - The OKGrants **modification screen** must provide a detailed justification/explanation.

Step 3 - Upload the grantee's detailed letter justification, explanation, and the Certification of Leverage, CDBG Form 401., Save and change the status to submit for the ODOC Planning and Monitoring staff review.

OKGRANTS & Grantee Information

****All Contact information is the responsibility of the Grantee****
Our Authorized Official/Financial Officer/Writer has changed!
How do we update the organization in OKGrants?

Your Agency Administrator can update and maintain the organization's OKGrants accounts using the "My Organization" link at the top right of the OKGrants home page.

See the Subgrantee User Manual, Section 4. B for a walkthrough of this process.

It's important to note that new AOs, FOs, and Writers are not automatically associated with your organization's existing applications. If there are open projects that your new user needs to view or work on, they will need to be associated with those projects.

A quick call or email to the OKGrants Administrator will get them associated:

Cody Butler: Cody.Butler@OKCommerce.gov or 405-213-8667

Or

Mike Sexton: Michael.Sexton@OKCommerce.gov or 405-706-6453

OKGrants Organization Members & Roles

MUST * **Agency Administrator**: Anyone + other roles under a different username

Handles User Accounts Only

MUST * **Authorized Official**: Chief Elected Official

Full Permissions

Executes all documents related to contracts & modifications

Environmental Review & Request for Release of Funds submittal

If the Chief Elected Official (Mayor or Chairman) wishes to appoint another AO, such as a Vice-Mayor, City Manager, City Clerk, County Commissioner(s), board minutes of this action must be submitted ASAP to the CDBG Program Representative of the Monitoring Team.

MUST * **Financial Officer**: Usually Clerk or Treasurer

Edit, Save, & Submit

Financial Documents, Pay Advances, and Expenditure Reports

Writers can edit and save. Cannot submit.

Viewers cannot edit or save. Used for Auditors.

Q&A – Open/Group Discussion



THANK YOU FOR
ATTENDING!

