State of Oklahoma
2019 CDBG-DR Action Plan

Non-Substantial Amendment #3

Public Law 116-20: $36,353,000 Allocation
Federal Register Notice:
Vol. 85, No. 17, Monday, January 27, 2020, Page 4681

Submitted to the
U.S. Department of Housing and Urban Development
by The Oklahoma Department of Commerce Community Development
Division on September 15, 2022. Effective Date September 22, 2022.

This document is available in English and Spanish

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Eligible Counties for the 2019 CDBG-DR Program

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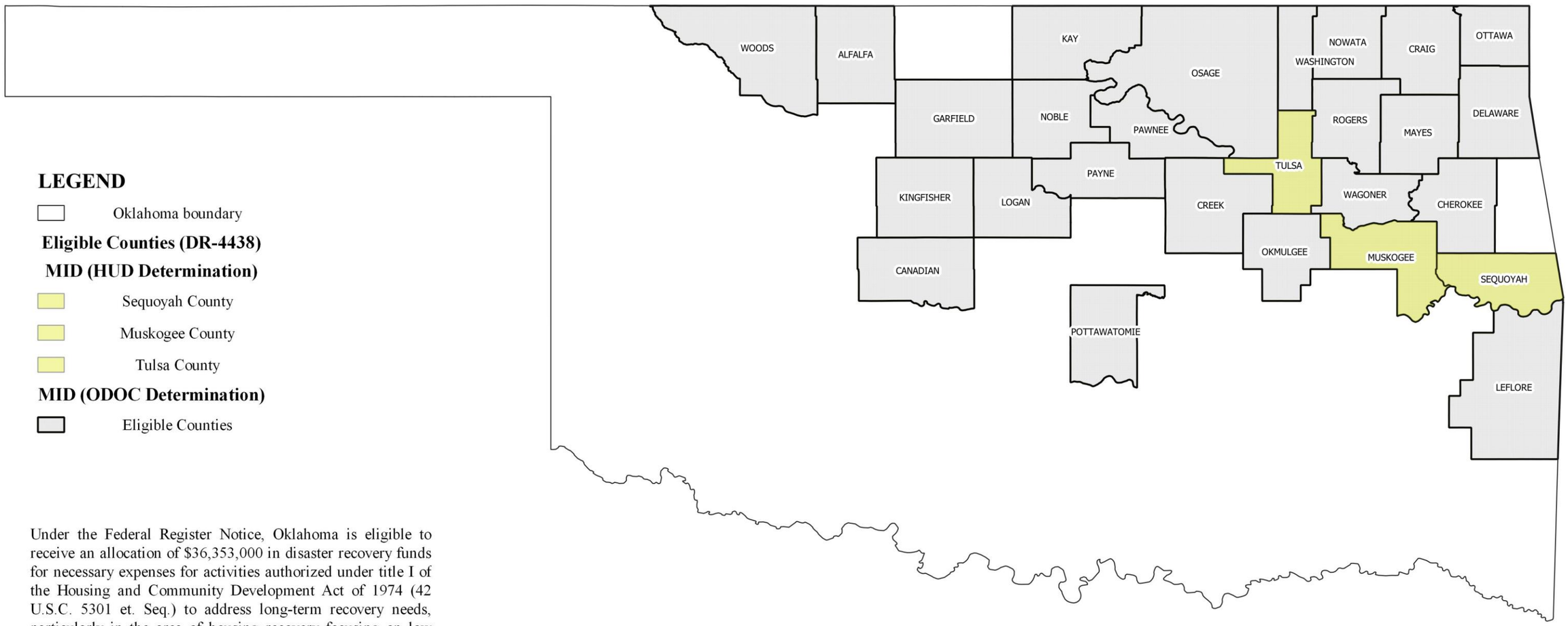


Under the Federal Register Notice, Oklahoma is eligible to receive an allocation of $36,353,000 in disaster recovery funds for necessary expenses for activities authorized under title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et. Seq.) to address long-term recovery needs, particularly in the area of housing recovery focusing on low and moderate-income beneficiaries. Per the Federal Register Notice, the only areas in which the funding can be expended lie in Presidentially Declared Disaster areas of the state occurring during the incident period as defined under the applicable Disaster Declaration 4438. Within these eligible areas, the Federal Register Notice requires that a minimum of $29,082,000 or 80% of the total State's $36,353,000 CDBG DR funding allocation must be expended on CDBG eligible disaster related activities in Muskogee, Tulsa, and Sequoyah (74946 Area Code) counties. The remaining funding will be available for CDBG eligible disaster related activities in eligible counties as defined by Disaster Declaration 4438.

Approval Letter

This page is left intentionally blank. Please see the U.S. Housing and Urban Development (HUD) approval letter on the following page.

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

ASSISTANT SECRETARY FOR
COMMUNITY PLANNING AND DEVELOPMENT

November 10, 2020

Mr. Marshall Vogts
Director
Community Development Services
Department of Commerce
State of Oklahoma
900 N. Stiles Avenue
Oklahoma City, OK 73104-3234

Dear Mr. Vogts:

The Department is approving the State of Oklahoma Action Plan for Community Development Block Grant disaster recovery (CDBG-DR) funds appropriated by the Additional Supplemental Appropriations for Disaster Relief Act, 2019 Public Law (P.L.) 116-20. On January 27, 2020, the Department announced in the *Federal Register* Notice the allocation of $3.8 billion CDBG-DR funds for the purpose of assisting in long-term recovery from major disasters that occurred in 2017, 2018, and 2019. The State of Oklahoma was allocated $36,353,000 from this appropriation and identified the Oklahoma Department of Commerce as its administrative agency for the funds. This allocation will be administered under grant number B-19-DF-40-0001.

Consistent with the January 27, 2020 Notice, Oklahoma Department of Commerce submitted the CDBG-DR Action Plan to HUD on August 27, 2020, which includes activities to assist in long-term recovery from major disasters. The Department is working with the State of Oklahoma related to four areas of the Action Plan: unmet needs analysis; community outreach and consultation (including tribal councils) to determine funded recovery projects; and cross cutting requirements. The Department will provide technical assistance to the State to strengthen these areas and build capacity. In accordance with the *Federal Register* Notice, the grantee has posted the Action Plan on its website. Posting the Action Plan gives the public and other key stakeholders the opportunity to review the Action Plan.

The submitted Action Plan proposes several projects and programs that meet the requirements of the *Federal Register* notice. The list of CDBG-DR funded programs and respective budgets are in the CDBG-DR Disaster Allocation Table below.

Table 1: CDBG-DR Disaster Allocation

Action Plan Activity	Budget
Housing	$18,176,500
Public Facilities/Improvements	$15,268,260
Planning	$1,090,590
Administration	$1,817,650

CDBG-DR Grant Total	$36,353,000

The Department also takes this opportunity to highlight that at least 70 percent of funds must be used to support activities benefiting low- and moderate-income persons. Further, the January 27, 2020 Notice requires grantees to primarily consider and address unmet housing needs. A grantee may also allocate funds to address unmet economic revitalization and infrastructure needs, but in doing so, the grantee must identify how unmet housing needs will be addressed or how its economic revitalization or infrastructure activities will contribute to the long-term recovery and restoration of housing in the most impacted and distressed areas. Additionally, the State must expend at least 80 percent of the total award amount within the HUD-identified "most impacted and distressed" areas as defined in the applicable *Federal Register* Notice.

Although you have completed an important step in the disaster recovery process, there are additional steps necessary to move forward. The CDBG-DR Financial Management and Grant Compliance Certification submitted on July 1, 2020, is currently under review. Once the review is complete, HUD will send the applicable grant agreement and grant conditions for signature. The Department remains committed to assisting the State of Oklahoma in its efforts to address the State's recovery needs and looks forward to working with you and your staff to achieve this goal. If you have any questions regarding the information in this letter, please contact Jessie Handforth Kome, Director, Office of Block Grant Assistance, at (202) 708-3587 or by email at disaster_recovery@hud.gov.

Sincerely,

Digitally signed by JOHN GIBBS
Date: 2020.11.10 08:34:02 -05'00'

John Gibbs
Principal Deputy Assistant Secretary
for Community Planning and Development

Accessibility Statement from the Oklahoma Department of Commerce

The Oklahoma Department of Commerce is committed to making its electronic and information technologies accessible to individuals with disabilities in accordance with both Section 508 of the Rehabilitation Act (29 U.S.C. 794d), as well as Oklahoma's Oklahoma Electronic and Information Technology Accessibility law, or EITA.

Oklahoma works to make its government more transparent, available, and useful. Making State technology resources accessible to people with disabilities helps the State to meet its goal of creating a more transparent government. Complete information can be found at https://www.ok.gov/accessibility/.

Commerce posts many documents to our websites in Adobe PDF format to provide enhanced document features and preserve design. The ability to open PDF documents is built into most popular web browsers and Adobe Reader is provided for free by Adobe at adobe.com. Commerce posts PDFs in text format so that documents can be read by screen readers.

Commerce posts some documents to our websites in Microsoft Office formats including Word, Excel, and PowerPoint format. Microsoft provides viewer applications for these formats for free on their website at microsoft.com.

Staff Contacts

Please contact Jade Shain or Rebecca LaVictoire by e-mail if you have any questions, public comments, or if in need of assistance for disability accommodations, translation, or interpretation services.

The agency contacts for the 2019 CDBG-DR Action Plan are:

Jade Shain | Programs Planner Community Development (CDBG-DR) Oklahoma Department of Commerce Jade.Shain@okcommerce.gov OKLAHOMA	**Rebecca LaVictoire** | Programs Manager Community Development Oklahoma Department of Commerce Rebecca.LaVictoire@okcommerce.gov OKLAHOMA

Summary of Non-Substantial Amendment #3

The Oklahoma Department of Commerce (ODOC) is proposing a change to the State's Action Plan, referred to as Non-Substantial Amendment #3, by reallocating $2 million from the Infrastructure Activity towards the Housing Activity. The proposed changes in the State's Action Plan are not considered a Substantial Amendment. As defined in this Action Plan, a Substantial Amendment consists of:

1. A change in program benefit or eligibility criteria;
2. The addition or deletion of an activity; or
3. The allocation or reallocation of more than $3.6 million.

No aspect of this revision meets the criteria for a Substantial Amendment.

For Non-Substantial Amendment #3, ODOC has reallocated $2,000,000.00 in funds from the Infrastructure activity towards the Housing activity; and specifically, to the Voluntary Buyout Program (VBP). This reallocation will help the state meet continued unmet housing need.

The table below shows the overall project allocation changes for Proposed Non-Substantial Amendment #3:

Project	**Allocation for Substantial Amendment #2**	**Proposed Allocation for Non-Substantial Amendment #3**	**Proposed Allocation Amount Change by Project**
Housing (Owner-Occupied and Multi-family Housing)	$ 19,250,000.00	$ 21,250,000.00	**$ 2,000,000.00**
Public Facilities & Improvements	$ 13,694,760.00	$ 11,694,760.00	**$ (2,000,000.00)**
Economic Revitalization	$ -	$ -	No change
Planning	$ 1,590,590.00	$ 1,590,590.00	No change
Administration	$ 1,817,650.00	$ 1,817,650.00	No change
TOTAL:	**$ 36,353,000.00**	**$ 36,353,000.00**	No change

HUD MIDs: 80% must be spent in HUD declared MIDs.	$ 29,082,000.00	$ 29,082,000.00	No change
Note: No less than 70% of CDBG-DR funds will be spent on activities benefitting Low-to-Moderate Income households. This a National Objective requirement.			

Below is the proposed change to the budget allocation for Non-Substantial Amendment #3:

Proposed Non-Substantial Amendment #3 Budget Allocation			
STATE OF OKLAHOMA: CDBG-DR Allocation (PL 116-20)			
	Substantial Amendment #2 Amount	**Proposed Non-Substantial Amendment #3 Amount**	**Proposed Change by Activity**
Housing Programs			
Voluntary Buyout Program	$14,750,000.00	$16,750,000.00	**$2,000,000.00**
Single-Family Reconstruction and Rehabilitation Program (owner occupied)	$4,500,000.00	$4,500,000.00	No change
Housing Programs Total	**$19,250,000.00**	**$21,250,000.00**	**$2,000,000.00**
Infrastructure	$13,694,760.00	$11,694,760.00	**($2,000,000.00)**
Planning	$1,590,590.00	$1,590,590.00	No change
Administration	$1,817,650.00	$1,817,650.00	No change
GRAND TOTAL:	$36,353,000.00	$36,353,000.00	No change

Executive Summary

On January 27, 2020, a new Community Development Block Grant Disaster Recovery (CDBG-DR) allocation notice was released by the U.S. Department of Housing and Urban Development (HUD) in the Federal Register Notice[1] (Vol. 85, No. 17, Page 4683 Public Law 116-20). Under this Federal Register Notice, Oklahoma is eligible to receive an allocation of $36,353,000 in disaster recovery funds for necessary expenses for activities authorized under Title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 *et seq*.) to address long-term recovery needs, particularly in the area of housing recovery focusing on low and moderate-income beneficiaries.

Per the Federal Register Notice, the only activities in which the funding can be expended must lie in a Presidentially Declared Disaster County of the state that is eligible for assistance occurring during the incident period as defined under the applicable Disaster Declaration 4438. Only the counties listed in the following paragraph are eligible to receive funding through CDBG-DR. Within these eligible areas, the Federal Register Notice requires that a minimum of 80%, or $29,082,000 of the total State's CDBG-DR funding allocation be expended on CDBG eligible disaster related activities in Muskogee, Tulsa, and Sequoyah (74946 Zip Code) counties. The State's Most Impacted and Distressed (MIDs) areas will include the remainder of Sequoyah County and the other 24 disaster declared counties. These areas will be eligible for the remaining (20%) of funds for CDBG-DR eligible activities. Those counties are listed in the following paragraph. All 27 eligible counties may apply for funds regardless of whether they submitted data during the first or second unmet needs surveys to ensure every affected community can apply for disaster relief funds.

Oklahoma Severe Storms, Straight-line Winds, Tornadoes, and Flooding (DR-4438)

Incident period: May 7, 2019, to June 9, 2019

Major Disaster Declaration declared on June 1, 2019

[1] Read the Federal Register Notice located here: https://www.govinfo.gov/content/pkg/FR-2020-01-27/pdf/2020-01204.pdf

Counties Included: Alfalfa, Canadian, Cherokee, Craig, Creek, Delaware, Garfield, Kay, Kingfisher, Le Flore, Logan, Mayes, Muskogee, Noble, Nowata, Okmulgee, Osage, Ottawa, Pawnee, Payne, Pottawatomie, Rogers, Sequoyah, Tulsa, Wagoner, Washington, Woods

The State is required to submit this CDBG-DR Action Plan and obtain its approval by HUD before it can receive any portion of the CDBG-DR funding. The CDBG-DR Action Plan describes the programs and activities for which the State intends to expend the CDBG-DR funding in compliance with the federal requirements set forth during the formal citizen participation process.

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

- Acquisition of real property
- Acquisition, rehabilitation and construction of public works and facilities
- Buyouts
- Relocation assistance
- Reconstruction and rehabilitation of residential and nonresidential properties
- Reconstruction and rehabilitation of public housing
- Repair or rehabilitation of infrastructure
- Accessibility improvements and reasonable modifications/accommodations as defined in Title II of the Americans with Disabilities Act
- Homeownership counseling and assistance
- Assistance to Community-Based Development Organizations for neighborhood revitalization, community economic development, energy conservation projects, homeownership assistance, fair housing, planning, including actions to meet the grantee's certification to affirmatively further fair housing.

DR 4438 Amendments

With the severe storms being so widespread, FEMA and the Oklahoma Department of Emergency Management (OEM) conducted many joint damage assessments for the incident period over the course of several weeks. The following amendments were added to the original Federal Disaster Declaration, DR-4438-OK:

- June 8, 2019, Amendment 1 added seven (7) additional counties to the disaster declaration FEMA 4438-DR-OK for Individual Assistance (IA).

Osage County for IA had already been designated for Emergency Protective Measures (Category B), limited to direct federal assistance under Public Assistance (PA). *Canadian, Creek, Logan, Osage, Ottawa, Rogers, and Washington*

- June 11, 2019, Amendment 2 added seven (7) additional counties to the disaster declaration FEMA 4438-DR-OK for Individual Assistance. Sequoyah County for IA had already been designated for Emergency Protective Measures (Category B), limited to direct federal assistance under PA. *Delaware, Kay, Mayes, Okmulgee, Payne, Pottawatomie, and Sequoyah*

- June 17, 2019, Amendment 3 added four (4) additional counties to the disaster declaration FEMA 4438-DR-OK for Individual Assistance. Le Flore and Noble counties for IA had already been designated for Emergency Protective Measures (Category B), limited to direct federal assistance under PA. *Cherokee, Le Flore, Noble and Nowata*

- June 17, 2019, Amendment 4 closes the Incident Period on June 9, 2019.

- June 20, 2019, Amendment 5 added six (6) additional counties to the disaster declaration FEMA 4438-DR-OK for Individual Assistance. *Alfalfa, Craig, Garfield, Kingfisher, Pawnee, and Woods*.

As of June 20, 2019, twenty-seven (27) counties in the State of Oklahoma have been declared for Individual Assistance (IA). The wide geographical range of these counties is comprised of urban, sub-urban, rural, and tribal areas and presents many challenges to comprehensive survivor recovery. Tribal nations, units of general local government, county commissioners, public housing authorities, councils of government, state entities, and non-profits were contacted to gather extensive information on the disasters experienced in the counties.

While the flooding and storms continued to impact the state, local Oklahoma Voluntary Organizations Active in Disaster (OKVOAD) organizations, private sector partners, and emergency management assisted the survivors with both response and recovery operations. Many of these resources have been exhausted by repeated non-federally declared disaster events. The dispersed nature of the disaster event, the exhaustion of many resources, and the large number of registrants all warn of a difficult recovery without additional funding assistance.

The CDBG-DR funding process begins with Congress who approves the appropriation. Afterwards, HUD calculates and announces the allocations; publishes a Notice in the Federal Register; and awards funds to the state grantees.

The CDBG-DR Action Plan development follows three primary phases.

1. Planning and Assessment:
    a. Assess and evaluate impacts from Disaster Declaration 4438.
    b. Primarily address unmet housing recovery needs.
    c. Develop the plan and identify programs/activities using unmet needs analysis, citizen participation, and stakeholder consultation.
2. HUD Approval: Submit the CDBG-DR Action Plan along with a projection of the proposed funding allocation to HUD for approval.
3. Implementation:
    a. Implement the programs as identified in the distribution of funds.
    b. Continue to assess the progress of the CDBG-DR Action Plan and amend the plan as needed.
    c. Implement the CDBG-DR Action Plan into the DRGR system.

The Federal Register Notice (Vol. 83, No. 28, Page 5844) provides that funding under the CDBG-DR Program must be used "for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas resulting from a major disaster."

This Action Plan focuses on the State's proposed use of the CDBG-DR funding, specifically the immediate unmet needs of individuals and families for housing and business assistance affected by the multiple disasters, as well as assisting local governments in repairing and rebuilding infrastructure and providing for greater resiliency statewide.

ODOC/CD has been designated as the principal state agency for the administration of the CDBG-DR funding. ODOC/CD will oversee the expenditure of the funding to assist impacted residents, organizations and municipalities with their recovery and rebuilding efforts. ODOC/CD will administer the funding directly or through Units of General Local Government (UGLG's) to benefit homeowners, property owners, business owners and other beneficiaries.

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

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

The Federal Register Notice also imposes strict expenditure and compliance deadlines on the State. This Action Plan was developed after extensive public outreach, data collection, consultation, and input from a host of stakeholders, constituents, organizations, and other state agencies, as described in more detail in this Action Plan. Multiple surveys were conducted to identify current needs still left unmet. Survey data was collected throughout the entire year of 2020 to ensure that all unmet needs were reported. ODOC remains committed to updating the unmet needs analysis as newer data is obtained.

Disaster Impact & Response

Overview

On May 31, 2019, the Governor of Oklahoma requested a major disaster declaration due to severe storms, straight-line winds, tornadoes, and flooding during the period of May 7 to June 9, 2019. The Governor requested a declaration for Individual Assistance, assistance for debris removal, and emergency protective measures (Categories A and B), including direct federal assistance, under the Public Assistance program for three counties; debris removal and emergency protective measures (Categories A and B), limited to direct federal assistance for seven counties; and Hazard Mitigation statewide. Beginning on May 16, 2019, and continuing, joint federal, state, and local government Preliminary Damage Assessments (PDAs) were conducted in the requested counties and are summarized below. PDAs estimate damages immediately after an event and are considered, along with several other factors, in determining whether a disaster is of such severity and magnitude that effective response is beyond the capabilities of the state and the affected local governments, and that federal assistance is necessary.

On June 1, 2019, the President declared that a major disaster exists in the State of Oklahoma. This declaration made Individual Assistance requested by the Governor available to affected individuals and households in Muskogee, Tulsa, and Wagoner Counties. This declaration also made debris removal and emergency protective measures (Categories A and B), including direct federal assistance, under the Public Assistance program requested by the Governor available to state, and eligible local governments and certain private nonprofit organizations on a cost-sharing basis in Muskogee, Tulsa, and Wagoner Counties; and emergency protective measures (Category B), limited to direct federal assistance, under the Public Assistance program for Haskell, Kay, Le Flore, Noble, Osage, Pawnee, and Sequoyah Counties. Finally, this declaration also made Hazard Mitigation Grant Program assistance requested by the Governor available for hazard mitigation measures statewide.

The Preliminary Damage Assessment (PDA) process is a mechanism used to determine the impact and magnitude of damage and resulting needs of individuals, businesses, the public sector, and the community as a whole. Information collected is used by the State as a basis for the Governor's request for a major disaster or emergency declaration, and by the President in determining a response to the Governor's request (44 CFR § 206.33). When

a Governor's request for major disaster assistance under the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended (Stafford Act) is under review, several primary factors are considered to determine whether assistance is warranted. These factors are outlined in FEMA's regulations (44 CFR § 206.48). The President has ultimate discretion and decision-making authority to declare major disasters and emergencies under the Stafford Act (42 U.S.C. § 5170 and § 5191). The following Individual Assistance (IA) and Public Assistance (PA) data was used in conjunction with the initial Disaster Declaration request.

Individual Assistance

- Total Number of Residences Impacted: 913.
- Destroyed: 335 - Total loss of structure, structure is not economically feasible to repair, or complete failure to major structural components (e.g., collapse of basement walls/foundation, walls, or roof).
- Major Damage: 517 – Substantial failure to structural elements of residences (e.g., walls floors, foundation or damage that will take more than 30 days to repair).
- Minor Damage: 38 – The home is damaged and uninhabitable but may be made habitable in a short period of time.
- Affected: 23 – Some damage to the structure and contents, but still habitable.

Public Assistance

- Primary Impact: Emergency Protective Measures
- Total Public Assistance Cost Estimate: $6,517,542.00

Description of Storm Events

On May 7, 2019, flooding and severe weather began, creating damage to roads and bridges and bringing Keystone and Kaw lakes to 86 percent and 47 percent flood pool, respectively. The U.S. Army Corps of Engineers (USACE) declared an emergency to allow for emergency operations support including levee assessments. Rain and flooding continued for several days and USACE began releasing water from Keystone and Kaw dams.

On May 20th, tornadoes, straight-line winds, large hail, and heavy rain began early in the day and continued into the morning hours on May 21st. Severe weather and heavy rain continued for more than a week, causing evacuations in at least a dozen counties, and leaving more than 1,000 homes damaged. Several neighborhoods and communities were evacuated in Kay, Logan, Muskogee, Nowata, Ottawa, Sequoyah, Tulsa, and Wagoner counties. The Arkansas River at Muskogee recorded the second largest crest on record.

USACE released 250,000 cubic feet of water per second (CFS) from the Keystone Dam in Tulsa County, Oklahoma since May 24, 2019. Due to higher inflows, releases at the Keystone Dam increased to 275,000 CFS at 7 a.m. on May 27, 2019. The releases caused significant widespread flooding in Tulsa County, as well as all counties down river.

At the time, a total of 69 wastewater systems and 20 water systems were affected statewide. Oklahoma Natural Gas had more than 1,100 gas meters out for an extended period. Farmers lost millions of dollars in crops. Statewide, USACE reported 16 lakes impacted, 44 recreation areas closed, 16 boat ramps closed, and 26 parks partially closed. In many areas, excessive vegetative debris, as well as debris from the hundreds of flooded homes, was required to be removed.

An aerial damage assessment was conducted by FEMA and the State for Muskogee, Tulsa and Wagoner counties who are among the hardest hit. The assessment determined that there were 913 homes impacted by this event. Of those homes, 23 homes were affected, 38 with minor damage, 517 with major damage and 335 homes destroyed.

In Muskogee County, voluntary evacuations occurred in Braggs. The Oklahoma National Guard performed air evacuations for the town and a temporary road was built to allow public safety vehicles access to residents who needed assistance. Supplies were sent into the town by rail car. After several days, the emergency road was opened on May 30, 2019, to allow residents to drive in and out of the town on their own. At that time, Webbers Falls was under a mandatory evacuation order and parts of Ft. Gibson were under a voluntary evacuation order. The Oklahoma Highway Patrol, Cherokee

Nation, and numerous local fire departments were on scene to help with water rescues. The Oklahoma Incident Management Team has been providing support in Muskogee as of May 27, 2019. An OG&E power plant in Muskogee was down due to damage to the substation facilities near the plant. OG&E had to stand up a mobile substation to maintain power to the area. Wastewater plants in Ft. Gibson and the City of Muskogee remain closed due to high water. Webbers Falls Public School complex, which includes kindergarten through 12th grade, is under water. Two barges sank on the backside of the Webbers Falls' dam.

In Tulsa County, evacuations occurred in numerous locations including Broken Arrow, Bixby, Leonard, Sand Springs, and the City of Tulsa. The National Guard closely monitored the levees and dropped HESCO containers to reinforce a threatened levee. HESCO containers are made of a collapsible wire mesh container and heavy-duty fabric liner and used as a temporary to semi-permanent levee filler. Three shelters were opened in Tulsa County and sandbags were made available to residents. A shelter at Crosstown Church of Christ in Tulsa sheltered 72 overnight occupants. Tulsa County also sustained damage from two tornadoes since May 20, 2019. Eighty power poles and 40 cross arms were damaged in a tornado on May 27, 2019, causing an extended power outage. In Sperry, several crude oil tanks were damaged, and a gas station was flooded, releasing crude oil and gasoline into the floodwaters. There was significant residential flooding reported west of Sand Springs.

In Wagoner County, a voluntary evacuation order was in place for all low-lying areas near the Arkansas and Verdigris Rivers. Verdigris River levels were on the rise for days and flooding impacts were seen in communities including Oak Grove and Okay. A shelter was opened at Coweta High School providing emergency supplies and temporary shelter to eight overnight occupants. Sandbags were made available for the public to pick up to protect their homes. The county built a 400-foot berm to protect the Coweta Water Treatment Plant to protect it from flooding and service disruption. A tank battery/wellhead was flooded and damaged, resulting in the discharge of an unknown amount of crude oil into the Verdigris River. The Wagoner Wastewater Plant was also partially under water.

In Sequoyah County, the Town of Moffett (Zip Code 74946) was under a mandatory evacuation order. Floodwaters from the Arkansas River completely ruined several classrooms at the local school. Additionally, Moffett suffered catastrophic residential flooding as evidenced in the following aerial photograph.

Aerial image taken over Ft. Smith, Arkansas, during the Arkansas River flood on June 1, 2019. The highway crossing the river from southeast to northwest is U.S. 64. (Satellite image ©2019 Maxar Technologies)

Overall, it is important to remember that flood control dams are designed to reduce the downstream impacts from flooding, but they do not eliminate the flood risk. Downstream flooding posed a significant problem during this disaster event. The Arkansas, Verdigris, and Neosho (Grand) watersheds were particularly affected by the record rainfall. Twelve reservoirs in the Tulsa district reached new records.

State, Local, & Tribal Response

The Oklahoma Department of Emergency Management (OEM) provided 24-hour coordination of all State response and recovery activities, as required. On May 20, 2019, at 12 p.m., the State Emergency Operations Center (EOC) was activated to Level Two, with OEM personnel and key liaisons working 24-hour operations. OEM also provided WebEOC support and assistance to the local jurisdictions and provided OEM staff support in the affect areas.

The Oklahoma Department of Public Safety (DPS) provided State Troopers for initial injury assessment, security, and traffic control in affected areas. DPS has worked with Oklahoma Department of Transportation (ODOT) on highway closures and provided more than 75 water rescues. All special service units were called in to supplement road troopers within the State. They canceled days off for all Oklahoma Highway Patrol troopers from May 22 to May 27 to support the incident.

The Oklahoma Department of Transportation worked with Oklahoma Highway Patrol to close dozens of highways including Interstate 40 for approximately 24 hours. They have provided personnel and equipment necessary to repair and/or barricade damaged transportation routes. Major highways, roads and bridges were cleared of debris, which assisted maintenance teams' accessibility to critical infrastructure.

The Oklahoma Department of Human Services contacted all vulnerable clients in the affected areas and coordinated community and state resources to meet human service needs.

The Oklahoma Insurance Department provided the Fraud Unit to ensure the enforcement of insurance laws for disaster victims.

The Oklahoma State Department of Health (OSDH) activated their Situation Room in addition to general emergency coordination activities in the field. Health department personnel also provided welfare checks on the aging. The Medical Reserve Corps provided support in numerous communities and nurse strike teams provided tetanus shots in affected areas.

The Oklahoma Military Department assisted with levee protection in Tulsa County by dropping HESCO containers on sand boils. They provided numerous flyover missions for situational awareness for state and local officials.

The Oklahoma Corporation Commission (OCC) provided updates regarding disruption of electric service and other utilities due to the storm. Additionally,

OCC provided technical assistance and support for restoration of utilities throughout the affected areas.

The Oklahoma Department of Tourism and Recreation provided emergency assistance to guests and cleared debris in numerous State parks, which were impacted by the flooding.

The Oklahoma Department of Environmental Quality (DEQ) provided technical assistance support for water and sewer operations, boil orders, and other needs. DEQ personnel also supervised cleanup of contaminated areas and conducted emergency disposal site evaluation and registration. They offered free well testing to residents.

The Oklahoma Department of Agriculture provided support to local animal shelters taking in displaced domestic animals and assisted with a large animal shelter in Muskogee. They also provided technical guidance regarding disposal of livestock and other animals deceased because of the storms and flooding.

The Oklahoma Forestry Services provided personnel and heavy equipment for debris removal as required.

The Oklahoma Office of the Attorney General provided information and assistance to the public about price gouging prohibitions. The price gouging statute prohibits an increase of more than 10 percent in the price of most goods and services when a State of Emergency has been declared. Anyone who suspected price gouging was instructed to contact the Attorney General's Consumer Protection Unit.

The Oklahoma Civil Air Patrol provided aerial photographic services to document flood and other storm damage.

The Cherokee Nation and Choctaw Nation both provided equipment, personnel, and technical assistance to local jurisdictions throughout this event in addition to supporting their tribal members.

The U.S. Army Corps of Engineers provided logistical and technical support and deployed liaison officers to the State EOC, Muskogee EOC, and Le Flore County EOC. They provided roughly 300,000 sandbags and operated three sandbagging machines.

The Oklahoma Housing Finance Agency provided $1,500 cash assistance for lodging, utility deposits, first and last month's rent.

Voluntary Agency Response

American Red Cross provided immediate emergency needs to disaster victims. They managed and supported shelters for those displaced by the tornadoes and other storms. The Red Cross also provided meals and other refreshments for storm victims and first responders. They delivered comfort items like toothbrushes and soap as well as clean-up materials like shovels, rakes, coolers, gloves, tarps, boxes, and hand sanitizer. Additionally, the Red Cross provided case management services. Since May 20, 2020, the American Red Cross has opened 17 shelters with a total population of 884 people. The peak population was 196 people.

Church World Service and United Methodists provided approximately 4,000 flood buckets.

The Salvation Army provided immediate emergency needs to disaster victims, which included supporting the American Red Cross shelters with snacks and drinks. They provided approximately 750 hygiene kits.

Southern Baptist Disaster Relief provided mud-out teams and debris removal/chainsaw teams once residents were allowed back into their flooded properties.

Oklahoma Volunteer Organizations Active in Disasters (OKVOAD) coordinated the delivery of services and assistance through member agencies.

Oklahoma 211 provided personnel and equipment to answer calls from concerned citizens about storm related damages and assisted providers. The call centers processed thousands of requests for information and assistance. They also took calls from residents reporting damages and reporting evacuation needs.

Community Food Bank of Eastern Oklahoma served as the distribution hub for the overall incident.

Feed the Children had four distribution sites identified with local partners in the Tulsa area.

The Regional Food Bank supported local communities with the sorting and distribution of donated food items. They provided approximately 200 pallets of water.

The Oklahoma Baptist Disaster Relief, The Salvation Army, and Operation Barbeque Relief setup three (3) kitchens along the Arkansas River. The kitchens could provide 5,000-8,000 meals each.

The Oklahoma Department of Emergency Management provided five (5) ADA shower/toilet trailers supporting Red Cross shelter operations across Oklahoma.

Unmet Needs Assessment

Overview

Many types of assistance fund projects that support disaster recovery. Several types of assistance have been provided to DR-4438 disaster survivors. Yet, in many cases, the total need for such survivors is greater than the total assistance provided since the disaster. The gap in total need and total assistance provided to disaster survivors is the current unmet need. Many of these needs can be addressed through CDBG-DR funds. Unmet need exists in the areas of housing, infrastructure, and planning. Data to determine the unmet need was compiled through two phases of data collection. The first phase occurred from February 21, 2020, to March 13, 2020. The second phase occurred from October 8, 2020, to February 16, 2021. In both phases, ODOC sent out an unmet needs survey to a variety of stakeholders in Oklahoma. For more information about the outreach efforts by ODOC, please refer to Outreach Efforts and Data Collection on page 75.

During both phases, Disaster Recovery notification letters were also mailed to each of the State's eight (8) Substate Planning Districts, also known as Councils of Government. Additionally, supplemental data from FEMA Individual Assistance and FEMA NIFP datasets were obtained and analyzed for a greater understanding for unmet housing needs in Oklahoma.

It is important to note that immediately after a disaster data is often preliminary and incomplete. ODOC has periodically collected data since May and June of 2019 when the disasters took place. Over time, a clearer picture of the unmet needs in the state have emerged.

Beyond the real property damage, high water can destroy the wiring, gas lines, furnace, and septic systems, as well as personal belongings. Adding high wind to the water can cause a house's structural components-the struts, studs, and foundation-to shift or warp. Tilting walls or shifted roof also suggest dangerous structural damage that could signal an imminent collapse. Inside the property, ceilings may sag under the weight of trapped water or soggy drywall. Wet floorboards bend and buckle, and the roof may leak or break altogether. Flooding in the basement can be especially dangerous; if the water is removed too quickly, pressure from the soaked earth outside can push inward and crack the foundation walls. Many of these types of structural damages are detailed in FEMA-IA data.

Structural hazards account for only one type of water damage. Anything that gets soaked through with water may contain sewage contaminants or provide a substrate for mold. A long-lasting flood provides more time for the mold to grow and requires more cleanup after the fact. Carpets must be thrown away, along with personal property such as mattresses, bedding, and furniture. Survivors living in their damaged homes not only risk injury from structural damage, health concerns from breathing in mold, but also the standing water. In some communities standing water lasted over nine (9) days, a ready breeding ground for insects and other animals that in turn create additional health and safety risks.

Communities in rural Oklahoma have access to fewer local resources, lengthy travel times to find equipment and materials, and fewer private sector solutions available. Dedicated disaster case managers can work with and for the survivor to assist them to maximize limited resources and supplies needed for successful recovery. Survivors experience exhaustion, emotional distress, and the devastating upheaval and potential ruin.

Barriers to disaster recovery for individuals with disabilities include a lack of accessible housing, transportation, and disaster services. Supports to disaster recovery include the individual effort and advocacy of case managers connecting with needed resources, collaboration with other agencies, and client motivation and persistence. In the impacted communities, these resources are limited normally and will require additional assistance through case management processes to overcome structural and systemic barriers.

Most Impacted and Distressed Areas – HUD CDBG-DR Determination

As with prior CDBG-DR appropriations, HUD is not obligated to allocate funds for all major disasters occurring in the statutory timeframes. HUD is directed to use the funds "in the most impacted and distressed areas." HUD has implemented this directive by limiting CDBG-DR formula allocations to grantees with major disasters that meet three standards:

1. Individual Assistance / Individual Households (IHP) designation. HUD has limited allocations to those disasters where FEMA had determined the damage was sufficient to declare the disaster as eligible to receive Individual and Households Program funding.
2. Concentrated damage. HUD has limited its estimate of serious unmet housing need to counties and zip codes with high levels of damage, collectively referred to as "most impacted areas." For this allocation,

HUD is defining most impacted areas as either most impacted counties – counties exceeding $10 million in serious unmet housing needs – and most impacted Zip Codes – Zip Codes with $2 million or more of serious unmet housing needs. The calculation of serious unmet housing needs is described below.

3. Disasters meeting the most impacted threshold. Only 2018 and 2019 disasters that meet this requirement for most impacted damage are funded if one or more county or zip codes meets the thresholds above. Note that this allocation only includes disasters declared as of October 4, 2019. Other 2019 disasters will be addressed in a future notice.

For disasters that meet the most impacted threshold described above, the unmet need allocations are based on the following factors summed together:

1. Repair estimates for seriously damaged owner-occupied units without insurance (with some exceptions) in most impacted areas after FEMA and SBA repair grants or loans; an estimate for homeowners served by FEMA's Permanent Housing Construction program is also deducted from the homeowner unmet need estimate.
2. Repair estimates for seriously damaged rental units occupied by very low-income renters in most impacted areas.
3. Repair and content loss estimates for small businesses with serious damage denied by SBA; and
4. The estimated local cost share for Public Assistance Category C to G projects.

METHODS FOR ESTIMATING SERIOUS UNMET NEEDS FOR HOUSING

The data HUD uses to calculate unmet needs for 2018 qualifying disasters come from the FEMA Individual Assistance program data on housing-unit damage as of July 17, 2019. The data for 2019 qualifying disasters are as of November 13, 2019.

The core data on housing damage for both the unmet housing needs calculation and the concentrated damage are based on home inspection data for FEMA's Individual Assistance program and SBA's disaster loan program. HUD calculates "unmet housing needs" as the number of housing units with unmet needs times the estimated cost to repair those units less repair funds already provided by FEMA and SBA.

Each of the FEMA inspected owner units are categorized by HUD into one of five categories:

A. Minor-Low: Less than $3,000 of FEMA inspected real property damage.
B. Minor-High: $3,000 to $7,999 of FEMA inspected real property damage
C. Major-Low: $8,000 to $14,999 of FEMA inspected real property damage and/or 1 to 3.9 feet of flooding on the first floor.
D. Major-High: $15,000 to $28,800 of FEMA inspected real property damage and/or 4 to 5.9 feet of flooding on the first floor.
E. Severe: Greater than $28,800 of FEMA inspected real property damage or determined destroyed and/or more feet of flooding on the first floor.

When owner-occupied properties also have a personal property inspection or only have a personal property inspection HUD reviews the personal property damage amounts such that if the personal property damage places the home into a higher need category over the real property assessment, the personal property amount is used as follows:

A. Minor-Low: Less than $2,500 of FEMA inspected personal property damage
B. Minor-High: $2,500 to $3,499 of FEMA inspected personal property damage
C. Major-Low: $3,500 to $4,999 of FEMA inspected personal property damage or 1 to 3.9 feet of flooding on the first floor.
D. Major-High: $5,000 to $9,000 of FEMA inspected personal property damage or 4 to 5.9 feet of flooding on the first floor.
E. Severe: Greater than $9,000 of FEMA inspected personal property damage or determined destroyed and/or 6 or more feet of flooding on the first floor.

To meet the statutory requirement of "most impacted" in this legislative language, homes are determined to have a high level of damage if they have damage of "major-low" or higher. That is, they have a FEMA inspected real property damage of $8,000 or above, personal property damage $3,500 or above, or flooding 1 foot or above on the first floor.

Furthermore, a homeowner with flooding outside the 1% risk flood hazard area is determined to have unmet needs if they reported damage and no flood insurance to cover that damage. For homeowners inside the 1% risk flood hazard area, homeowners without flood insurance with flood damage below the greater of national median or 120% of Area Median Income are determined to have unmet needs. For non-flood damage, homeowners without hazard insurance with incomes below the greater of national median or 120% of Area Median Income are included as having unmet needs.

FEMA does not inspect rental units for real property damage so personal property damage is used as a proxy for unit damage. Each of the FEMA-inspected renter units are categorized by HUD into one of five categories:

A. Minor-Low: Less than $1,000 of FEMA inspected personal property damage
B. Minor-High: $1,000 to $1,999 of FEMA inspected personal property damage
C. Major-Low: $2,000 to $3,499 of FEMA inspected personal property damage or 1 to 3.9 feet of flooding on the first floor.
D. Major-High: $3,500 to $7,500 of FEMA inspected personal property damage or 4 to 5.9 feet of flooding on the first floor.
E. Severe: Greater than $7,500 of FEMA inspected personal property damage or determined destroyed and/or 6 or more feet of flooding on the first floor.

To meet the statutory requirement of "most impacted" for rental properties, homes are determined to have a high level of damage if they have damage of "major-low" or higher. That is, they have a FEMA personal property damage assessment of $2,000 or greater or flooding 1 foot or above on the first floor.

Furthermore, landlords are presumed to have adequate insurance coverage unless the unit is occupied by a renter with income less than the greater of the Federal poverty level or 50% of median income. Units occupied by a tenant with income less than the greater of the poverty level or 50% of median income are used to calculate likely unmet needs for affordable rental housing. Affordable housing is generally defined as housing on which the occupant is paying no more than 30 percent of gross income for housing costs, including utilities.

The average cost to fully repair a home for a specific disaster to code within each of the damage categories noted above is calculated using the median real property damage repair costs determined by the SBA for its disaster loan program for the subset of homes inspected by both SBA and FEMA for each eligible disaster.

Minimum multipliers are not less than the 1st quarter median for all Individual Assistance (IA) eligible disasters combined in each disaster year at the time of the allocation calculation, and maximum multipliers are not more than the 4th quarter median for all IA eligible disasters combined in each disaster year with data available as of the allocation. Because SBA is inspecting for full repair costs, their estimate is presumed to reflect the full cost to repair the home, which is generally more than the FEMA estimates on

the cost to make the home habitable. If there is a match of fewer than twenty (20) SBA inspections to FEMA inspections for any damage category, the minimum multiplier is used.

For each household determined to have unmet housing needs (as described above), their estimated average unmet housing need is equal to the average cost to fully repair a home to code less assistance from FEMA and SBA provided for repair to the home, based on their damage category (noted above).

METHODS FOR ESTIMATING SERIOUS UNMET ECONOMIC REVITALIZATION NEEDS

Based on SBA disaster loans to businesses using data for 2018 disasters from as of date July 17, 2019, and for 2019 disasters from as of data November 14, 2019, HUD calculates the median real estate and content loss by the following damage categories for each state:

A. Category 1: real estate + content loss = below $12,000
B. Category 2: real estate + content loss = $12,000–$29,999
C. Category 3: real estate + content loss = $30,000–$64,999
D. Category 4: real estate + content loss = $65,000–$149,999
E. Category 5: real estate + content loss = $150,000 and above

For properties with real estate and content loss of $30,000 or more, HUD calculates the estimated amount of unmet needs for small businesses by multiplying the median damage estimates for the categories above by the number of small businesses denied an SBA loan, including those denied a loan prior to inspection due to inadequate credit or income (or a decision had not been made), under the assumption that damage among those denied at pre-inspection have the same distribution of damage as those denied after inspection.

METHODS FOR ESTIMATING UNMET INFRASTRUCTURE NEEDS

To calculate 2018 and 2019 unmet needs for infrastructure projects, HUD obtained FEMA cost estimates (as of July 17, 2019, for the 2018 disasters and November 13, 2019, for 2019 disasters) of the expected local cost share to repair the permanent public infrastructure (Categories C to G) to their pre-storm condition.

ALLOCATION CALCULATION

Once eligible entities are identified using the above criteria, the allocation to individual grantees represents their proportional share of the estimated unmet needs. For the formula allocation, HUD calculates total unmet recovery needs for eligible 2018 and 2019 disasters as the aggregate of:

A. Serious unmet housing needs in most impacted counties;
B. Serious unmet business needs; and
C. Unmet infrastructure need.

HOUSING: Oklahoma - DR 4438: Severe Storms/Straight-Line Winds/Tornadoes/Flooding

Serious Unmet Housing Need Estimate Most Impacted Area	Total Any Damage	Total Serious Damage	Owner Serious Unmet	Renter Serious Unmet	Total Serious Unmet	County Most Impacted Areas	Zip Code Most Impacted Areas	Total Most Impacted Areas
$24,206,420.00	1,086	689	391	88	479	2	1	3

Most Impacted Area	Serious Unmet Housing Need Estimate Most Impacted Area	Total Any Damage	Total Serious Damage	Owner Serious Unmet	Renter Serious Unmet	Total Serious Unmet
Muskogee County	$10,810,829.00	341	261	160 (80% of total)	40 (20% of total)	200
Tulsa County	$10,569,537.00	679	362	204 (89% of total)	24 (11% of total)	228
Sequoyah County Zip Code: 74946	$2,826,054.00	66	66	27 (53% of total)	24 (47% of total)	51

SERIOUS UNMET NEED HOUSING MULTIPLIERS FOR 2019 DISASTERS

Estimated average cost to repair for uninsured properties after subtracting out average per unit amount estimated to be covered by SBA and FEMA assistance.

A. Major – Low: $31,492.00
B. Major – High: $49,592.00
C. Severe: $69,101.00

Most Impacted and Distressed Areas – ODOC Determination

Federal Register Notice / Vol. 85, No. 17 / Monday, January 27, 2020, stipulates that a minimum of 80% of the $36,353,000 State of Oklahoma CDBG-DR allocation must be expended on eligible CDBG-DR projects within Muskogee, Tulsa, and Sequoyah (Area Code: 74946) Counties. The remaining 24 counties and the entirety of Sequoyah County will be considered the State's MIDs and will be eligible applicants consistent with the method of distribution with HUD's MIDs. Therefore, the remaining 20% of eligible funds will be delegated to such counties.

As shown in this 2019 CDBG-DR Action Plan, the State found little differing evidence in terms of number of damaged structures, unmet need, or social and economic characteristics that would distinguish any one county from another as Most Impacted and Distressed Area. There were no outliers in terms of data gathered that suggested certain counties needed funds significantly more for housing or infrastructure than others. Responses received during Survey I and Survey II were limited. Due to limited responses received, ODOC does not want to bar any county from the opportunity to apply for funding. Therefore, the State will consider the following counties as State MIDs: Alfalfa, Canadian, Cherokee, Craig, Creek, Delaware, Garfield, Kay, Kingfisher, Le Flore, Logan, Mayes, Noble, Nowata, Okmulgee, Osage, Ottawa, Pawnee, Payne, Pottawatomie, Rogers, Sequoyah (OUTSIDE of area code 74946), Wagoner, Washington, Woods. These counties are eligible to receive 20% of eligible funds. Applications for State MIDs will be scored competitively.

Repetitive Flood Loss

The National Flood Insurance Program (NFIP) is managed by the Federal Emergency Management Agency. The NFIP provides flood insurance to property owners, renters, and businesses. FEMA retains responsibility for underwriting flood insurance coverage sold under that program.

Flood insurance is required for homes and businesses located in high-risk areas if those homes and businesses have a mortgage from a lender that is federally regulated or insured. Property owners that live in a high-risk area, and who have received federal disaster assistance (including FEMA grants or SBA loans) in the past, are required to maintain flood insurance to be considered for future disaster aid.

Though it is true floods can happen anywhere, including in areas that are not considered high-risk, it is predictable that structures located in the floodplain will flood repeatedly over the years. ODOC/CD cross analyzed NFIP and FEMA-IA data to determine which structures within the 27 eligible counties had repetitive losses to the NFIP program. A repetitive loss is any coverage issued by a flood insurance provider more than once to compensate the property owner for building damage, damage to personal contents, or both.

Since 1978, NFIP has issued $58,410,231.99 to property owners in the 27 eligible counties that have experienced repetitive losses. A total of 22 dwelling structures experienced a repetitive loss under the May-June 2019 storm events. The results per county are as follows:

County Name	Number of Dwelling Structures with Repetitive Losses (since YR 1978)	Number of Dwelling Structures under DR-4438
Alfalfa	4	0
Canadian	28	0
Cherokee	11	2
Craig	3	0
Creek	25	0
Delaware	18	2
Garfield	4	0
Kay	45	2
Kingfisher	37	0
Le Flore	2	0
Logan	38	1
Mayes	15	0
Muskogee	23	0
Noble	0	0
Nowata	1	0

Okmulgee	11	2
Osage	4	0
Ottawa	126	2
Pawnee	0	0
Payne	5	0
Pottawatomie	23	0
Rogers	28	1
Sequoyah	6	0
Tulsa	224	3
Wagoner	53	7
Washington	27	0
Woods	0	0
TOTALS:	761	22

As shown, 22 of the residential structures that flooded in the 2019 storm events had flooded in the past and received insurance money from flood insurance for those past storm events. Repetitive loss structures will score higher on the application for the Voluntary Buyout Program.

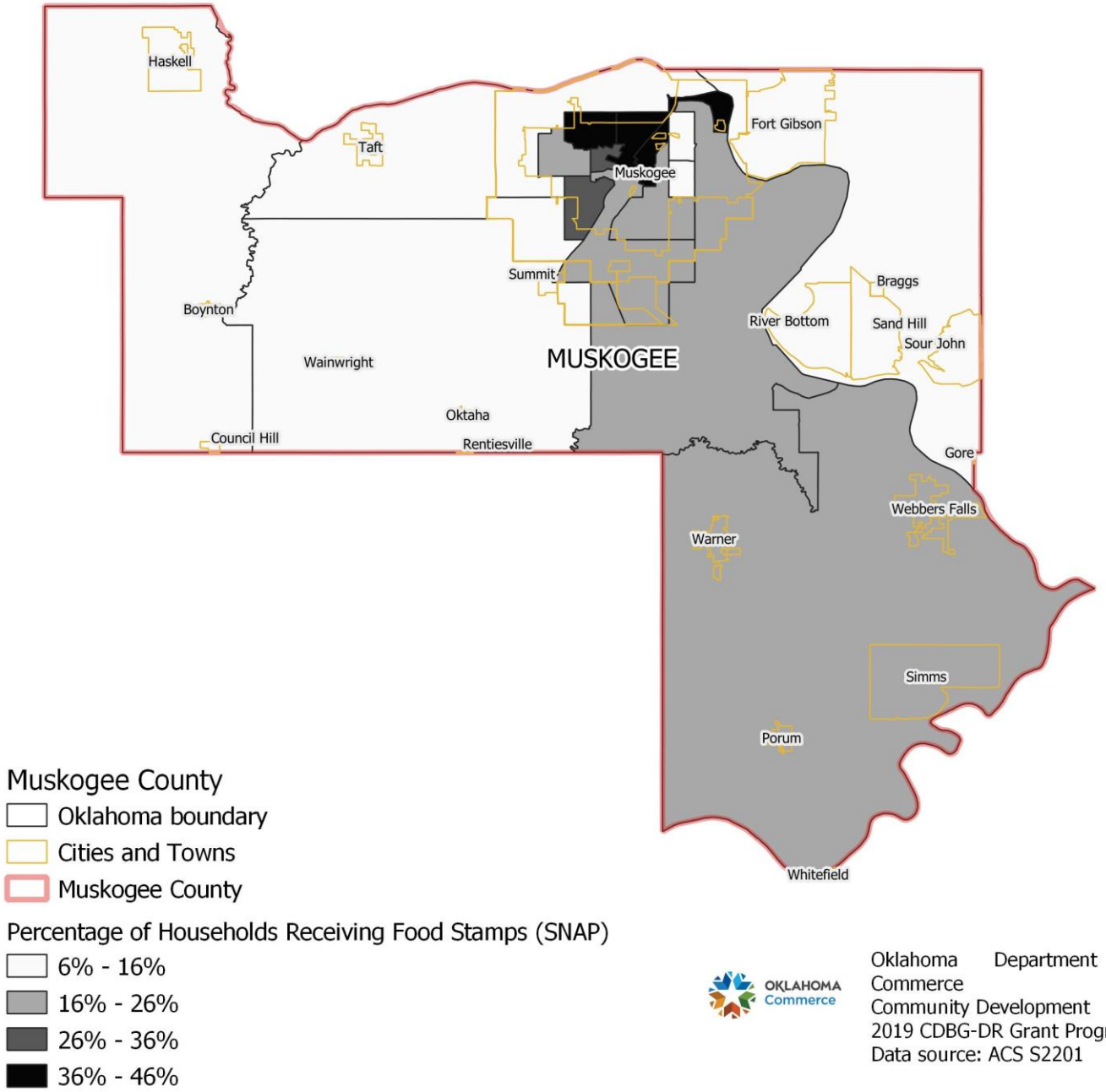
Socioeconomic Assessment of HUD-identified Most Impacted and Distressed (MID) Areas

ODOC wanted to know whether there was a concentration of damaged dwelling structures in areas of poverty in the three MID counties (Muskogee, Sequoyah, and Tulsa). Census Tracks were used along with American Community Survey (ACS) data that reported on the number of households receiving SNAP benefits (food stamps). SNAP benefits are used as a proxy to determine poverty because to receive SNAP benefits, one must be below poverty level in Oklahoma.

It must be noted that this analysis does not attempt to conclude that households who experienced damage to the dwelling structure did in fact receive SNAP benefits in 2019, nor does this analysis conclude that these households are currently receiving SNAP benefits. The purpose of this analysis is to put the whole collection of damaged structures within a geographical and economic context that describes a concentration of poverty. ODOC has determined that overall, there is a higher concentration of

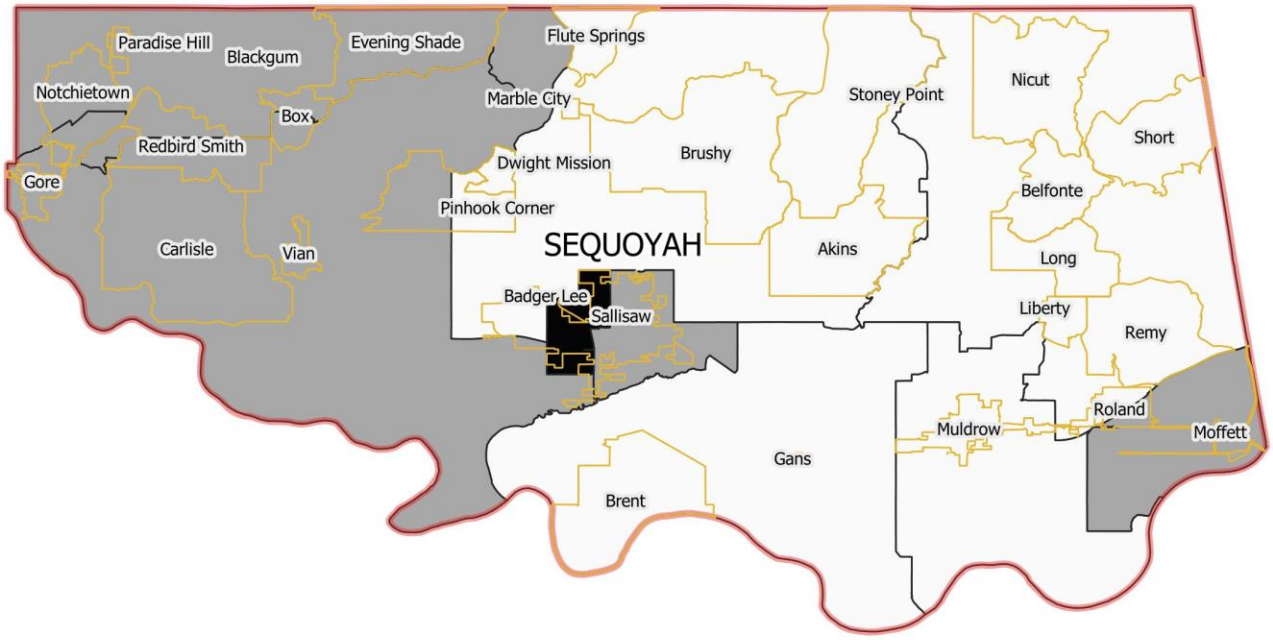
damaged dwelling structures in Census Tracts that report a high percentage of households using SNAP benefits.

Percentage of Households in Muskogee County, Oklahoma, using SNAP Benefits (Food Stamps)



Oklahoma Department of Commerce
Community Development
2019 CDBG-DR Grant Program
Data source: ACS S2201

Percentage of Households in Sequoyah County, Oklahoma, using SNAP Benefits (Food Stamps)



Sequoyah County

Cities and Towns

Sequoyah County

Percentage of Households Receiving Food Stamps (SNAP)

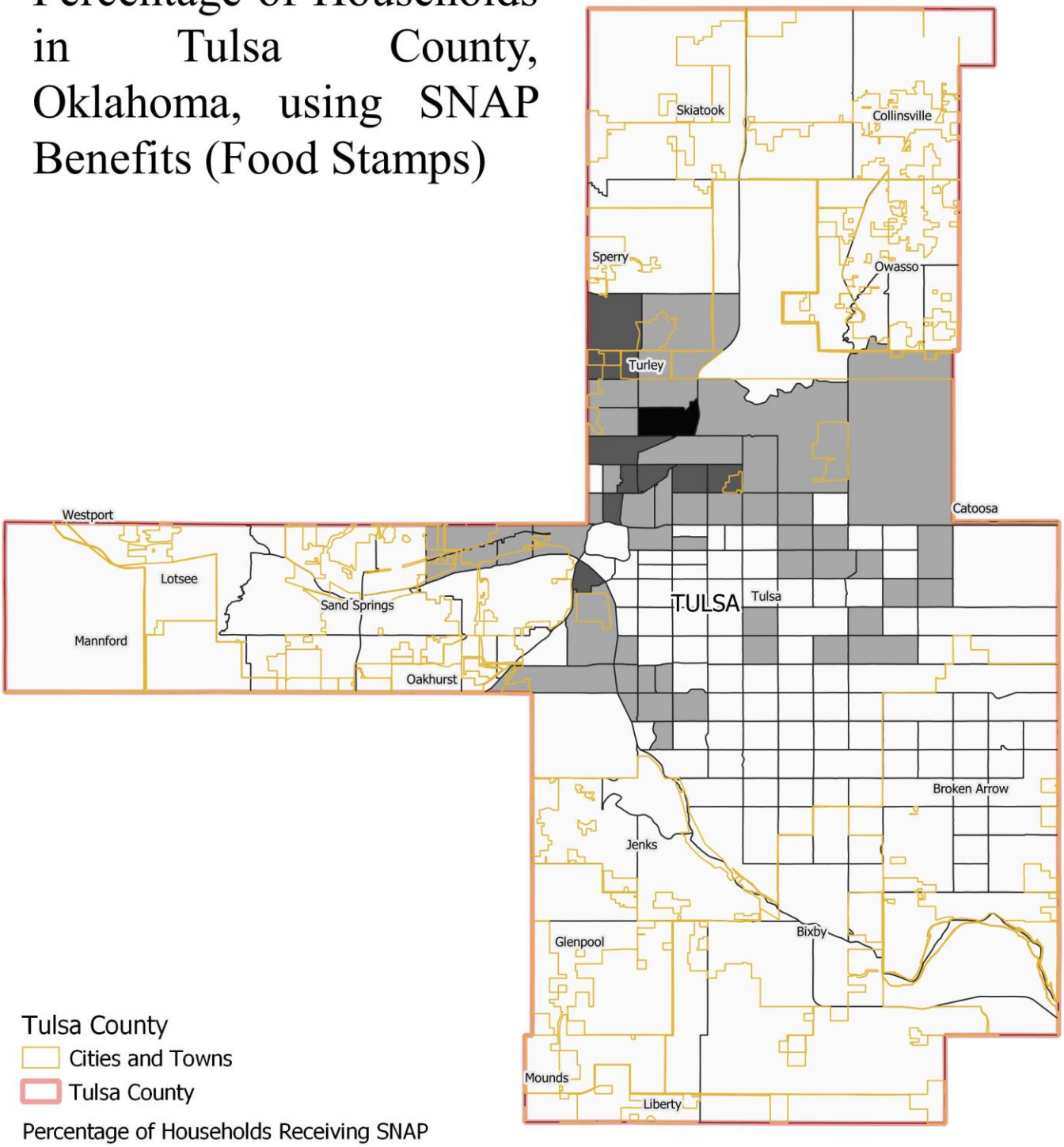
16% - 20.5%

20.5% - 25%

29.5% - 34%

Oklahoma Department of Commerce
Community Development
2019 CDBG-DR Grant Program
Data source: ACS S2201

Percentage of Households in Tulsa County, Oklahoma, using SNAP Benefits (Food Stamps)



Tulsa County

- Cities and Towns
- Tulsa County

Percentage of Households Receiving SNAP

- 0% - 17%
- 17% - 34%
- 34% - 50%
- 50% - 67%

OKLAHOMA Commerce

Oklahoma Department of Commerce
Community Development
2019 CDBG-DR Grant Program
Data source: ACS S2201

MUSKOGEE COUNTY

Outside of the City of Muskogee and Fort Gibson, Muskogee County is made up of mostly rural communities. ODOC determined there is a higher concentration of damaged dwelling structures in Census Tracts that report a high percentage of receiving SNAP benefits (26%-36%). This indicates that there is a strong likelihood that applicants will be considered LMI, a National Objective and threshold requirement for the 2019 CDBG-DR program. It is ODOC's primary objective to support Low-to-Moderate-Income individuals in their disaster recovery efforts.

SEQUOYAH COUNTY

Sequoyah County is also composed of mostly rural communities. ODOC determined there is a higher concentration of damaged dwelling structures in Census Tracts that report a high percentage of receiving SNAP benefits (20%-25%). This indicates that there is a strong likelihood that applicants will be considered LMI, a National Objective and threshold requirement for the 2019 CDBG-DR program. It is ODOC's primary objective to support Low-to-Moderate-Income individuals in their disaster recovery efforts.

TULSA COUNTY

Of the three HUD Identified MID areas, Tulsa County is the most urbanized though it still holds many thriving rural communities within its borders. ODOC determined the concentration of damaged dwelling structures in Census Tracts were spread out more evenly. There were, however, pockets of higher concentrations of damaged dwelling structures in some Census Tracts. Based on the data, there will be many potential LMI applicants in Tulsa County that could benefit from CDBG-DR programs.

NOTE
The other 24 eligible counties have not been analyzed for SNAP usage.

POVERTY STATUS IN THE PAST 12 MONTHS FOR THE HUD DESIGNATED MOST IMPACTED AND DISTRESSED AREAS

The following data was obtained from the American Community Survey (S1701 2019) at the Census Tract Level.

MUSKOGEE COUNTY

There are an estimated 15,355 persons below the poverty level in Muskogee County. This information is summarized in the chart below:

Muskogee County, Oklahoma: Poverty Status in the Past 12 Months	Estimate
Total Population	64,107
Below Poverty Level	15,355
Percent Below Poverty	24%

SEQUOYAH COUNTY

There are an estimated 8,851 persons below the poverty level in Muskogee County. This information is summarized in the chart below:

Sequoyah County, Oklahoma: Poverty Status in the Past 12 Months	Estimate
Total Population	41,210
Below Poverty Level	8,851
Percent Below Poverty	21.5%

TULSA COUNTY

There are an estimated 91,962 persons below the poverty level in Tulsa County. This information is summarized in the chart below:

Tulsa County, Oklahoma: Poverty Status in the Past 12 Months	Estimate
Total Population	641,445
Below Poverty Level	91,962
Percent Below Poverty	14.3%

FY2020 STATEWIDE INCOME LIMITS

The current Median Household Income (MHI) for the State of Oklahoma is $54,449 (per 2019 ACS estimates). This is $11,263 lower than National MHI. The Statewide Income Limits for Oklahoma are as follows for FY 2020:

FY 2020 Low-Income (80%) Limit (LIL)							
1 Person	**2 Person**	**3 Person**	**4 Person**	**5 Person**	**6 Person**	**7 Person**	**8 Person**
$36,550	$41,800	$47,000	$52,250	$56,400	$60,600	$64,800	$68,950

FY 2020 Very Low-Income (50%) Limit (VLIL)							
1 Person	**2 Person**	**3 Person**	**4 Person**	**5 Person**	**6 Person**	**7 Person**	**8 Person**
$22,850	$26,100	$29,400	$32,650	$35,250	$37,850	$40,500	$43,100

FY 2020 Extremely Low-Income Limit (ELIL)							
1 Person	**2 Person**	**3 Person**	**4 Person**	**5 Person**	**6 Person**	**7 Person**	**8 Person**
$13,700	$15,650	$17,650	$19,600	$21,150	$22,700	$24,300	$25,850

County Level Income Limits for 2019 CDBG-DR

The Income Limits for all 27 affected counties are as follows:

FY 2021 Income Limits	Median Family Income	FY 2021 Income Limit Category	Family of 1	Family of 2	Family of 3	Family of 4	Family of 5	Family of 6	Family of 7	Family of 8
Alfalfa County, OK	**$71,000**	**Extremely Low-Income**	14,950	17,420	21,960	**26,500**	31,040	35,580	40,120	44,660
		Very-Low Income	24,900	28,450	32,000	**35,550**	38,400	41,250	44,100	46,950
		Low Income	39,850	45,550	51,250	**56,900**	61,500	66,050	70,600	75,150
Oklahoma City Metro Area (Canadian County, OK)	**$73,200**	**Extremely Low-Income**	15,400	17,600	21,960	**26,500**	31,040	35,580	40,120	44,660
		Very-Low Income	25,650	29,300	32,950	**36,600**	39,550	42,500	45,400	48,350
		Low Income	41,000	46,850	52,700	**58,550**	63,250	67,950	72,650	77,300
Cherokee County, OK	**$56,600**	**Extremely Low-Income**	12,880	17,420	21,960	**26,500**	31,040	34,400	36,800	39,150
		Very-Low Income	20,800	23,750	26,700	**29,650**	32,050	34,400	36,800	39,150
		Low Income	33,250	38,000	42,750	**47,450**	51,250	55,050	58,850	62,650
Craig County, OK	**$50,200**	**Extremely Low-Income**	12,880	17,420	21,960	**26,500**	31,040	34,400	36,800	39,150
		Very-Low Income	20,800	23,750	26,700	**29,650**	32,050	34,400	36,800	39,150

		Low Income	33,250	38,000	42,750	**47,450**	51,250	55,050	58,850	62,650
Tulsa Metro Area (Creek County, OK)	**$74,200**	**Extremely Low-Income**	15,150	17,420	21,960	**26,500**	31,040	35,580	40,120	44,660
		Very-Low Income	25,200	28,800	32,400	**36,000**	38,900	41,800	44,650	47,550
		Low Income	40,350	46,100	51,850	**57,600**	62,250	66,850	71,450	76,050
Delaware County, OK	**$52,400**	**Extremely Low-Income**	12,880	17,420	21,960	**26,500**	31,040	34,400	36,800	39,150
		Very-Low Income	20,800	23,750	26,700	**29,650**	32,050	34,400	36,800	39,150
		Low Income	33,250	38,000	42,750	**47,450**	51,250	55,050	58,850	62,650
Enid Metro Area (Garfield County, OK)	**$52,400**	**Extremely Low-Income**	12,880	17,420	21,960	**26,500**	31,040	34,400	36,800	39,150
		Very-Low Income	20,800	23,750	26,700	**29,650**	32,050	34,400	36,800	39,150
		Low Income	33,250	38,000	42,750	**47,450**	51,250	55,050	58,850	62,650
Kay County, OK	**$59,300**	**Extremely Low-Income**	12,880	17,420	21,960	**26,500**	31,040	34,400	36,800	39,150
		Very-Low Income	20,800	23,750	26,700	**29,650**	32,050	34,400	36,800	39,150
		Low Income	33,250	38,000	42,750	**47,450**	51,250	55,050	58,850	62,650
Kingfisher County, OK	**$74,500**	**Extremely Low-Income**	15,650	17,900	21,960	**26,500**	31,040	35,580	40,120	44,660
		Very-Low Income	26,100	29,800	33,550	**37,250**	40,250	43,250	46,200	49,200
		Low Income	41,750	47,700	53,650	**59,600**	64,400	69,150	73,950	78,700
		Extremely Low-Income	12,880	17,420	21,960	**26,500**	31,040	34,400	36,800	39,150

Le Flore County, OK	**$51,500**	**Very-Low Income**	20,800	23,750	26,700	**29,650**	32,050	34,400	36,800	39,150
		Low Income	33,250	38,000	42,750	**47,450**	51,250	55,050	58,850	62,650
Oklahoma City Metro Area (Logan County, OK)	**$73,200**	**Extremely Low-Income**	15,400	17,600	21,960	**26,500**	31,040	35,580	40,120	44,660
		Very-Low Income	25,650	29,300	32,950	**36,600**	39,550	42,500	45,400	48,350
		Low Income	41,000	46,850	52,700	**58,550**	63,250	67,950	72,650	77,300
Mayes County, OK	**$61,400**	**Extremely Low-Income**	12,900	17,420	21,960	**26,500**	31,040	35,580	38,100	40,550
		Very-Low Income	21,500	24,600	27,650	**30,700**	33,200	35,650	38,100	40,550
		Low Income	34,400	39,300	44,200	**49,100**	53,050	57,000	60,900	64,850
Muskogee County, OK	**$59,300**	**Extremely Low-Income**	12,880	17,420	21,960	**26,500**	31,040	34,400	36,800	39,150
		Very-Low Income	20,800	23,750	26,700	**29,650**	32,050	34,400	36,800	39,150
		Low Income	33,250	38,000	42,750	**47,450**	51,250	55,050	58,850	62,650
Noble County, OK	**$68,200**	**Extremely Low-Income**	14,350	17,420	21,960	**26,500**	31,040	35,580	40,120	44,660
		Very-Low Income	23,900	27,300	30,700	**34,100**	36,850	39,600	42,300	45,050
		Low Income	38,200	43,650	49,100	**54,550**	58,950	63,300	67,650	72,050
Nowata County, OK	**$53,900**	**Extremely Low-Income**	12,880	17,420	21,960	**26,500**	31,040	34,400	36,800	39,150
		Very-Low Income	20,800	23,750	26,700	**29,650**	32,050	34,400	36,800	39,150
		Low Income	33,250	38,000	42,750	**47,450**	51,250	55,050	58,850	62,650

Okmulgee County, OK	**$54,900**	**Extremely Low-Income**	12,880	17,420	21,960	**26,500**	31,040	34,400	36,800	39,150
		Very-Low Income	20,800	23,750	26,700	**29,650**	32,050	34,400	36,800	39,150
		Low Income	33,250	38,000	42,750	**47,450**	51,250	55,050	58,850	62,650
Tulsa Metro Area (Creek County, OK)	**$74,200**	**Extremely Low-Income**	15,150	17,420	21,960	**26,500**	31,040	35,580	40,120	44,660
		Very-Low Income	25,200	28,800	32,400	**36,000**	38,900	41,800	44,650	47,550
		Low Income	40,350	46,100	51,850	**57,600**	62,250	66,850	71,450	76,050
Ottawa County, OK	**$49,900**	**Extremely Low-Income**	12,880	17,420	21,960	**26,500**	31,040	34,400	36,800	39,150
		Very-Low Income	20,800	23,750	26,700	**29,650**	32,050	34,400	36,800	39,150
		Low Income	33,250	38,000	42,750	**47,450**	51,250	55,050	58,850	62,650
Pawnee County, OK	**$57,300**	**Extremely Low-Income**	12,880	17,420	21,960	**26,500**	31,040	34,400	36,800	39,150
		Very-Low Income	20,800	23,750	26,700	**29,650**	32,050	34,400	36,800	39,150
		Low Income	33,250	38,000	42,750	**47,450**	51,250	55,050	58,850	62,650
Payne County, OK	**$71,100**	**Extremely Low-Income**	13,750	17,420	21,960	**26,500**	31,040	35,580	40,120	43,100
		Very-Low Income	22,900	26,150	29,400	**32,650**	35,300	37,900	40,500	43,100
		Low Income	36,550	41,800	47,000	**52,200**	56,400	60,600	64,750	68,950
Pottawatomie County, OK	**$61,500**	**Extremely Low-Income**	12,950	17,420	21,960	**26,500**	31,040	35,580	38,150	40,600
		Very-Low Income	21,550	24,600	27,700	**30,750**	33,250	35,700	38,150	40,600

		Low Income	34,450	39,400	44,300	**49,200**	53,150	57,100	61,050	64,950
Tulsa Metro Area (Rogers County, OK)	**$74,200**	**Extremely Low-Income**	15,150	17,420	21,960	**26,500**	31,040	35,580	40,120	44,660
		Very-Low Income	25,200	28,800	32,400	**36,000**	38,900	41,800	44,650	47,550
		Low Income	40,350	46,100	51,850	**57,600**	62,250	66,850	71,450	76,050
Fort Smith, AK -OK Metro Area (Sequoyah County, OK)	**$54,300**	**Extremely Low-Income**	12,880	17,420	21,960	**26,500**	29,350	31,500	33,700	35,850
		Very-Low Income	19,050	21,750	24,450	**27,150**	29,350	31,500	33,700	35,850
		Low Income	30,450	34,800	39,150	**43,450**	46,950	50,450	53,900	57,400
Tulsa Metro Area (Tulsa County, OK)	**$74,200**	**Extremely Low-Income**	15,150	17,420	21,960	**26,500**	31,040	35,580	40,120	44,660
		Very-Low Income	25,200	28,800	32,400	**36,000**	38,900	41,800	44,650	47,550
		Low Income	40,350	46,100	51,850	**57,600**	62,250	66,850	71,450	76,050
Tulsa Metro Area (Wagoner County, OK)	**$74,200**	**Extremely Low-Income**	15,150	17,420	21,960	**26,500**	31,040	35,580	40,120	44,660
		Very-Low Income	25,200	28,800	32,400	**36,000**	38,900	41,800	44,650	47,550
		Low Income	40,350	46,100	51,850	**57,600**	62,250	66,850	71,450	76,050
		Extremely Low-Income	14,000	17,420	21,960	**26,500**	31,040	35,580	40,120	44,050

Washington County, OK	**$66,700**	**Very-Low Income**	23,350	26,700	30,050	**33,350**	36,050	38,700	41,400	44,050
		Low Income	37,350	42,700	48,050	**53,350**	57,650	61,900	66,200	70,450
Woods County, OK	**$78,500**	**Extremely Low-Income**	16,850	19,250	21,960	**26,500**	31,040	35,580	40,120	44,660
		Very-Low Income	28,050	32,050	36,050	**40,050**	43,300	46,500	49,700	52,900
		Low Income	44,900	51,300	57,700	**64,100**	69,250	74,400	79,500	84,650

Data Source: HUD Income Limit Documentation System[2]

Note: The FY 2014 Consolidated Appropriations Act changed the definition of extremely low-income to be the greater of 30/50ths (60 percent) of the Section 8 very low-income limit or the poverty guideline as established by the Department of Health and Human Services (HHS), provided that this amount is not greater than the Section 8 50% very low-income limit. Consequently, the extremely low-income limits may equal the very low (50%) income limits. Income Limit areas are based on FY 2020 Fair Market Rent (FMR) areas. For information on FMRs, please see our associated FY 2020 Fair Market Rent documentation system.

[2] https://www.huduser.gov/portal/datasets/il.html

SOCIAL VULNERABILITY INDEX

For more detailed information on population characteristics, please refer to Appendix F: Population Characteristics of the 27 eligible counties.

An additional component to consider when looking at unmet needs for impacted counties in Oklahoma is what level of social vulnerability to natural hazards they are experiencing. The Social Vulnerability Index (SoVI®) measures the social vulnerability of counties across the United States to their vulnerability to environmental hazards. This index, developed by the University of South Carolina's Hazards & Vulnerability Research Institute, utilizes twenty-nine (29) socioeconomic variables which contribute to reduction in a community's ability to prepare for, respond to, and recover from hazards. SoVI is a comparative metric that facilitates the examination of the differences in vulnerability among counties. It is a valuable tool because it graphically illustrates the geographic variation in social vulnerability, which in turn contributes greatly to response and recovery capabilities. SoVI shows where there is uneven capacity for disaster preparedness and response, and where resources might be used most effectively to reduce preexisting vulnerability. The data sources for the development of SoVI come primarily from the United States Census Bureau. The SoVI data combines the best available data from both the 2010 U.S. Decennial Census and five-year estimates from the American Community Survey (ACS). Additionally, the SoVI scores at the Census Tract level provides a more granular assessment of vulnerability within each county.

The SoVI details above are further explained by some of the characteristics at the individual level that affect vulnerability. One of these characteristics is that of Socioeconomic Status which affects the ability of a community to absorb losses and be resilient to hazard impacts. For example, of the 27 eligible counties, 24 of them can be considered mostly rural. Rural areas lack access to certain business types that can accelerate the recovery from disasters. This is due to the idea that wealth enables communities to absorb and recover from losses using insurance, social safety nets, and entitlement programs. Other factors used in SoVI relate to gender as well as race and ethnicity being that these factors impose language and cultural barriers and affect access to post-disaster funding. Additional factors used in SoVI are special-needs populations, social dependence (i.e., people who are totally dependent on social services for survival), education, family structure, occupation, and other demographic characteristics that help to define social

vulnerability for communities and individuals. The following table illustrates the twenty-nine (29) used in the calculation of the Social Vulnerability index.

VARIABLE	DESCRIPTION
QASIAN	Percent Asian
QBLACK	Percent Black
QSPANISH	Percent Hispanic
QINDIAN	Percent Native American
QAGEDEP	Percent Population under 5 years or 65 and over
QFAM	Percent Children Living in Married Couple Families
MEDAGE	Median Age
QSSBEN	Percent Households Receiving Social Security Benefits
QPOVTY	Percent Poverty
QRICH	Percent Households Earning over $200,000 annually
PERCAP	Per Capita Income
QESL	Percent Speaking English as a Second Language with Limited English Proficiency
QFEMALE	Percent Female
QFHH	Percent Female Headed Households
QNRRES	Nursing Home Residents Per Capita
HOSPTPC	Hospitals Per Capita (County Level ONLY)
QNOHLTH	Percent of population without health insurance (County Level ONLY)
QED12LES	Percent with Less than 12th Grade Education
QCVLUN	Percent Civilian Unemployment
PPUNIT	People per Unit
QRENTER	Percent Renters
MDHSEVAL	Median Housing Value
MDGRENT	Median Gross Rent
QMOHO	Percent Mobile Homes
QEXTRCT	Percent Employment in Extractive Industries
QSERV	Percent Employment in Service Industry
QFEMLBR	Percent Female Participation in Labor Force
QNOAUTO	Percent of Housing Units with No Car
QUNOCCHU	Percent Unoccupied Housing Units

What Population Characteristics Affect Vulnerability?

- Socioeconomic Status (Income, Political Power, Prestige): Socioeconomic status affects the ability of a community to absorb losses and cope with hazard impacts. Wealth enables communities to better prepare for disasters through mitigation and absorb and recover from losses more quickly using insurance, social safety nets, and entitlement programs. Low status communities have little ability to absorb losses due to poverty and disadvantaged populations.
- Gender: Women often have a more difficult time during recovery than men because of sector-specific employment (e.g., personal services), lower wages, and family care responsibilities.
- Race and ethnicity: These factors impose language and cultural barriers and affect access to post-disaster funding and occupation of high-hazard areas.
- Age: Extremes of age affect movement out of harm's way and require outside supervision and care. Parents lose time and money caring for children when day care facilities are affected; the elderly may have mobility constraints or medical and cognitive concerns increasing the burden of care before, during, and after the emergency.
- Employment loss: The potential loss of employment following a disaster increases the existing number of unemployed workers in a community. Such losses compound the impact of the hazard and leads to a slower recovery from the disaster. At an individual level, employment loss equates to a lower ability to pay for necessary goods and services, effectively lowering the ability to prepare and recovery from disasters.
- Residential property: Home value is an indicator of financial capacity. The value and quality of residential construction affect potential losses and recovery. Expensive homes are costly to replace, mobile homes are easily destroyed by water and winds. The viability of neighborhoods based on the number of unoccupied housing units also contributes to slower long-term recovery.
- Renters: People rent because they are transients, do not have the financial resources for home ownership, or do not want the responsibility of home ownership. They often lack access to information about financial aid during recovery and are not covered by current federal disaster recovery programs. In extreme cases, renters lack sufficient shelter options when lodging becomes uninhabitable or too costly to afford.
- Occupation: Some occupations, especially those characterized as primary extractive industries, may be severely affected by a hazard event. Primary sector jobs are impacted first during major disasters. For example, self-employed fishermen suffer when their means of

production is lost (boats), and they may not have the requisite capital to resume work in a timely fashion; therefore, they may seek alternative employment. The same is true of migrant workers engaged in agriculture. Low-skilled service jobs (housekeeping, childcare, and gardening) may suffer similarly as disposable income fades and the need for services declines.

- Family structure: Families with large numbers of dependents and/or single-parent households often have limited resources to outsource care for dependents and thus must juggle work responsibilities with care for family members. All these factors affect coping with and recovering from hazards.
- Education: Education is linked to socioeconomic status in that higher educational attainment affects lifetime earnings, and limited education constrains the ability to understand warning information and access recovery information.
- Medical Services and Access: Health care providers, including physicians and hospitals, are important post-event sources of relief. The lack of proximate medical services lengthens the time needed to obtain short-term relief and achieve longer-term recovery from disasters. Nursing homes represent an increase in socially vulnerable people as the resident populations are less able to independently cope with disasters. The availability of health insurance is another factor influencing social vulnerability.
- Social dependence: People who are totally dependent on social services (social security, food assistance) for survival are already economically and socially marginalized and require additional support in the post-disaster period.
- Special-needs population: Special needs populations (infirm, institutionalized, transient, homeless) are difficult to identify, let alone measure and monitor. Yet it is this segment of society that invariably is left out of recovery efforts, largely because of this invisibility in communities.

Effectively addressing social vulnerability decreases both human suffering and the economic loss related to providing social services and public assistance after a disaster. While a stand-alone component when compared to total unmet need and other factors like per capita unmet need, the SoVI contributes to the ultimate funding decision process by adding a layer that looks at the components involved closely with an individual's or community's effort to recover from a disaster event. SoVI is classified using standard deviations. Social vulnerability scores that are greater than 1.5 standard

deviations above the mean are considered the most socially vulnerable places, while scores below 1.5 standard deviations less than the mean are the least vulnerable places.
SoVI Categorical ratings range from: High (Top 20%), Medium High, Medium, Medium Low, and Low (Bottom 20%). The following counties were specifically identified under DR 4438.

Alfalfa	LOW
Canadian	LOW
Cherokee	MEDIUM HIGH
Craig	MEDIUM HIGH
Creek	MEDIUM LOW
Delaware	MEDIUM HIGH
Garfield	MEDIUM
Kay	MEDIUM HIGH
Kingfisher	MEDIUM LOW
Le Flore	MEDIUM
Logan	LOW
Mayes	MEDIUM
Muskogee	MEDIUM HIGH
Noble	MEDIUM LOW
Nowata	MEDIUM
Okmulgee	MEDIUM
Osage	MEDIUM
Ottawa	MEDIUM HIGH
Pawnee	MEDIUM
Payne	MEDIUM LOW
Pottawatomie	MEDIUM
Rogers	MEDIUM LOW
Sequoyah	MEDIUM HIGH
Tulsa	MEDIUM
Wagoner	MEDIUM LOW
Washington	MEDIUM
Woods	MEDIUM LOW

The HUD-identified most impacted and distressed counties of Muskogee, Tulsa, and Sequoyah do share a moderate to moderately high social vulnerability (SoVI) relationship. Eighty-eight percent of these counties rate at

the “Medium” or higher category rating suggesting there is a strong social vulnerability correlation present.

The connection between physical hazards and populations that may have factors that reduce their ability to plan, cope during an event and recover after an event is directly related with housing. It is important to plan for housing in locations away from repeated risk factors such as flooding and aid during natural events like tornadoes. Assistance that may be needed includes transportation during an event to a shelter or safe place. Public shelters are often needed for those in apartments, mobile homes, or housing without private shelters. The elderly may have general mobility or cognitive issues that can mean additional assistance is needed for transportation or even design of facilities. Those that may be unemployed or underemployed, renters, minorities, persons in poverty and many other factors may lead to a great need for temporary housing if their housing or employment has been destroyed in an event. Many of these socially vulnerable people may not have insurance or family or other resources to assist them if they experience losses from an event. This analysis helps to raise awareness that while hazards exist for all the population within a county, some may need additional attention and focus to ensure their safety, health, and recovery.

Vulnerable Population Analysis of the 27 Eligible Counties

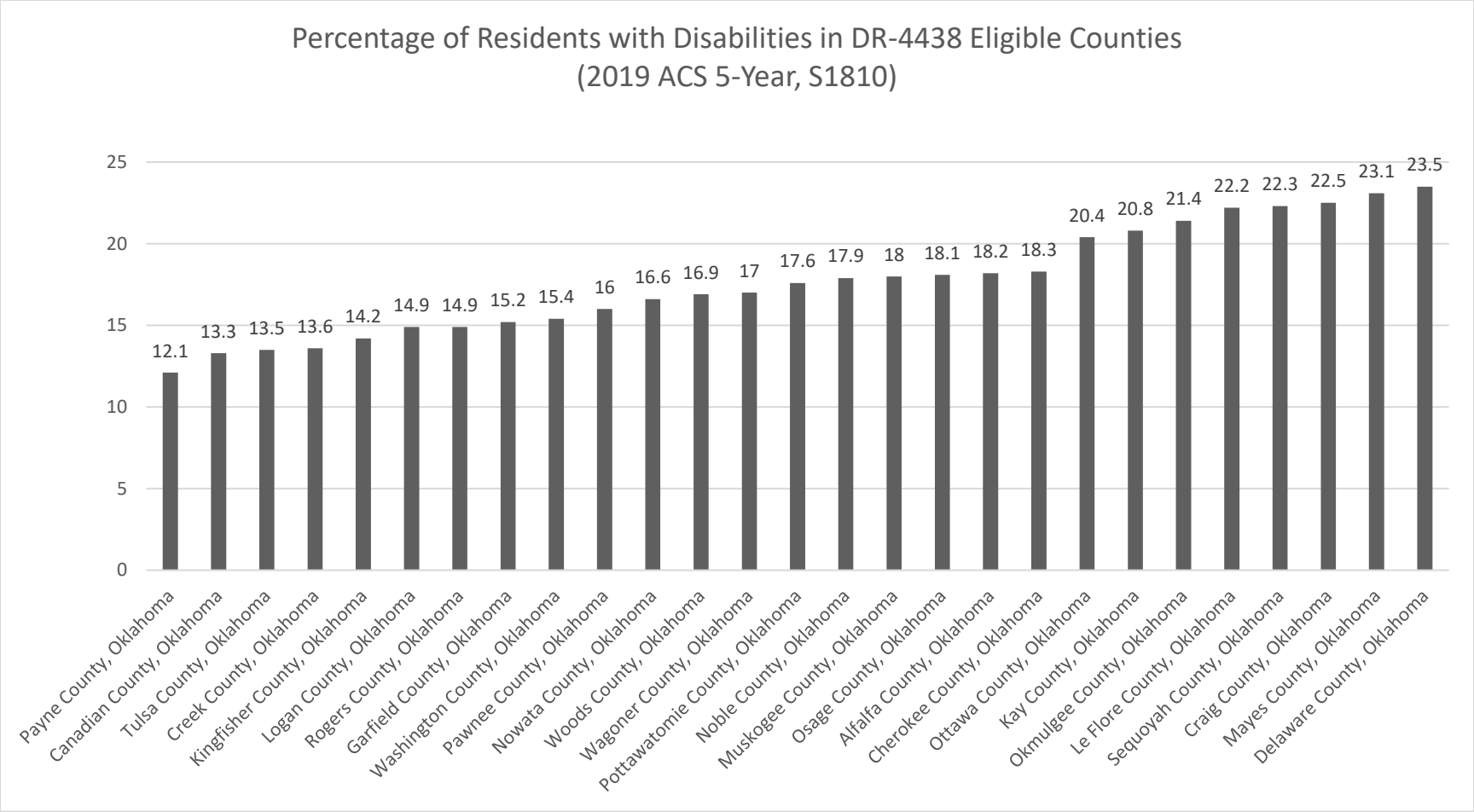
DISABILITY CHARACTERISTICS

Having a disability poses unique challenges for survivors of natural disasters. According to the 2019 ACS 5-Year S1810, the percentage of people reporting a disability in the 27 eligible counties ranges from 12.1% to as high as 23.5%. Persons with disabilities are considered a vulnerable population and ODOC is committed to ensuring such persons are adequately served during disaster recovery. During Survey I and II, ODOC did not identify specific unmet needs of persons with disabilities. To ensure vulnerable populations are still adequately served in the recovery process, ODOC will add additional points to an applicant's score if they identify projects that support the recovery efforts of persons with disabilities. Below shows percentage of civilian noninstitutionalized persons with a disability for each affected county:

Geographic Area Name	Total civilian noninstitutionalized population	Total civilian noninstitutionalized population with a disability	Total civilian noninstitutionalized population percent with a disability	Margin of Error (MOE), total civilian noninstitutionalized population percent with a disability
Alfalfa County, Oklahoma	4745	865	18.2	2.1
Canadian County, Oklahoma	138461	18391	13.3	0.7
Cherokee County, Oklahoma	48254	8824	18.3	1.1
Craig County, Oklahoma	13593	3062	22.5	1.6
Creek County, Oklahoma	70625	9599	13.6	0.7
Delaware County, Oklahoma	42058	9888	23.5	1.2
Garfield County, Oklahoma	59739	9069	15.2	0.9
Kay County, Oklahoma	43691	9095	20.8	1.1

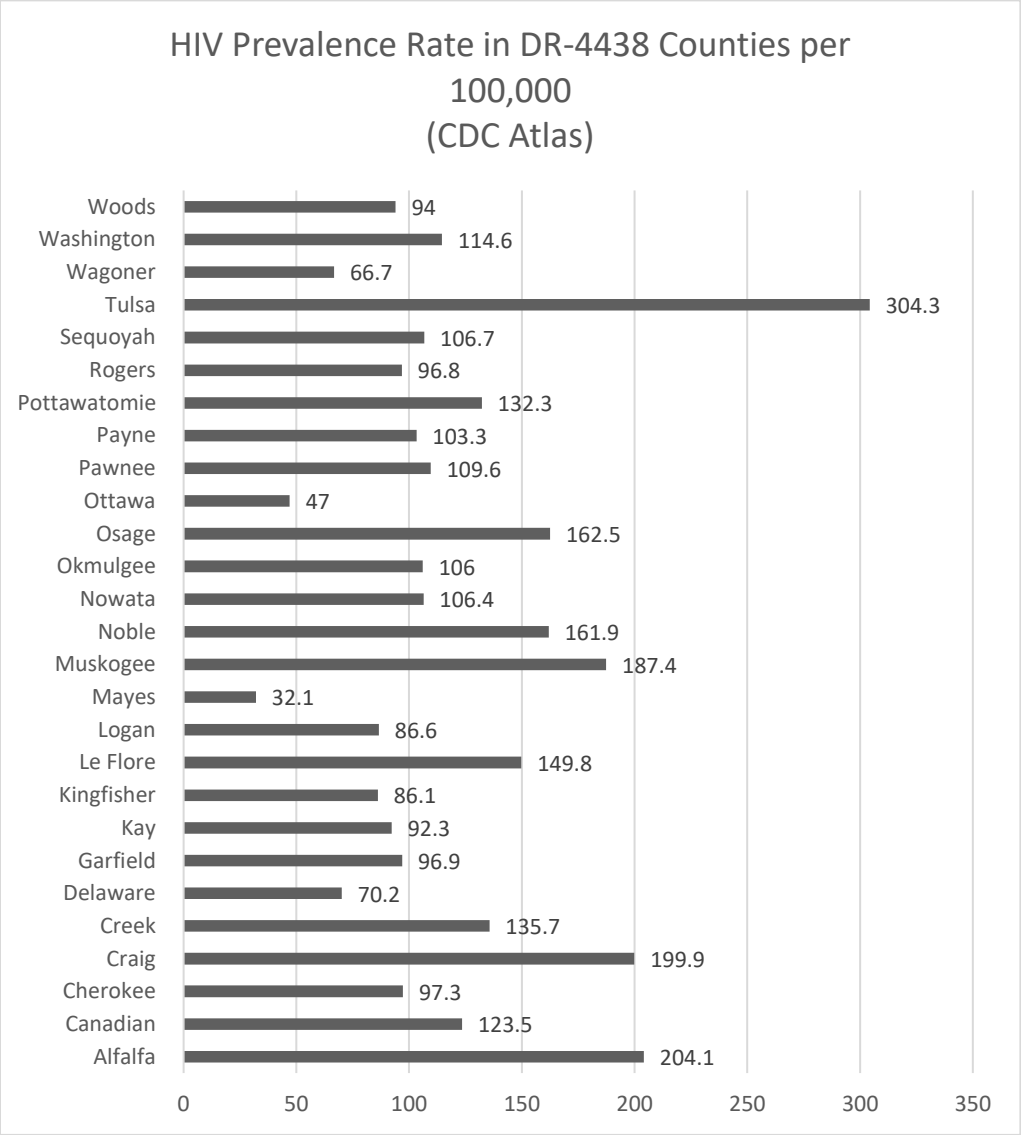
Kingfisher County, Oklahoma	15525	2202	14.2	1.7
Le Flore County, Oklahoma	48819	10856	22.2	0.9
Logan County, Oklahoma	46284	6902	14.9	1.2
Mayes County, Oklahoma	40611	9384	23.1	1.1
Muskogee County, Oklahoma	65760	11812	18	0.8
Noble County, Oklahoma	11247	2018	17.9	2
Nowata County, Oklahoma	10156	1684	16.6	1.7
Okmulgee County, Oklahoma	38077	8130	21.4	0.9
Osage County, Oklahoma	45806	8299	18.1	0.9
Ottawa County, Oklahoma	30996	6330	20.4	0.7
Pawnee County, Oklahoma	16246	2600	16	1
Payne County, Oklahoma	80350	9748	12.1	0.7
Pottawatomie County, Oklahoma	70235	12363	17.6	0.7
Rogers County, Oklahoma	90246	13484	14.9	0.5
Sequoyah County, Oklahoma	41268	9187	22.3	0.9
Tulsa County, Oklahoma	641435	86840	13.5	0.3
Wagoner County, Oklahoma	78663	13342	17	0.7
Washington County, Oklahoma	51473	7932	15.4	0.7
Woods County, Oklahoma	8464	1430	16.9	2.5

Note: This condensed table does not break down the number of people experiencing specific disabilities for ease of reading purposes. The 2019 ACS 5-Year S1810 complete table does describe the numbers and percentages by disability type (visual, hearing, physical, mental, etc.). For more information, please refer to Census.gov or contact ODOC for the complete dataset.


Percentage of Residents with Disabilities in DR-4438 Eligible Counties
(2019 ACS 5-Year, S1810)
25
20
15
10
5
0
12.1
13.3
13.5
13.6
14.2
14.9
14.9
15.2
15.4
16
16.6
16.9
17
17.6
17.9
18
18.1
18.2
18.3
20.4
20.8
21.4
22.2
22.3
22.5
23.1
23.5
Payne County, Oklahoma
Canadian County, Oklahoma
Tulsa County, Oklahoma
Creek County, Oklahoma
Kingfisher County, Oklahoma
Logan County, Oklahoma
Rogers County, Oklahoma
Garfield County, Oklahoma
Washington County, Oklahoma
Pawnee County, Oklahoma
Nowata County, Oklahoma
Woods County, Oklahoma
Wagoner County, Oklahoma
Pottawatomie County, Oklahoma
Noble County, Oklahoma
Muskogee County, Oklahoma
Osage County, Oklahoma
Alfalfa County, Oklahoma
Cherokee County, Oklahoma
Ottawa County, Oklahoma
Kay County, Oklahoma
Okmulgee County, Oklahoma
Le Flore County, Oklahoma
Sequoyah County, Oklahoma
Craig County, Oklahoma
Mayes County, Oklahoma
Delaware County, Oklahoma

HIV STATUS

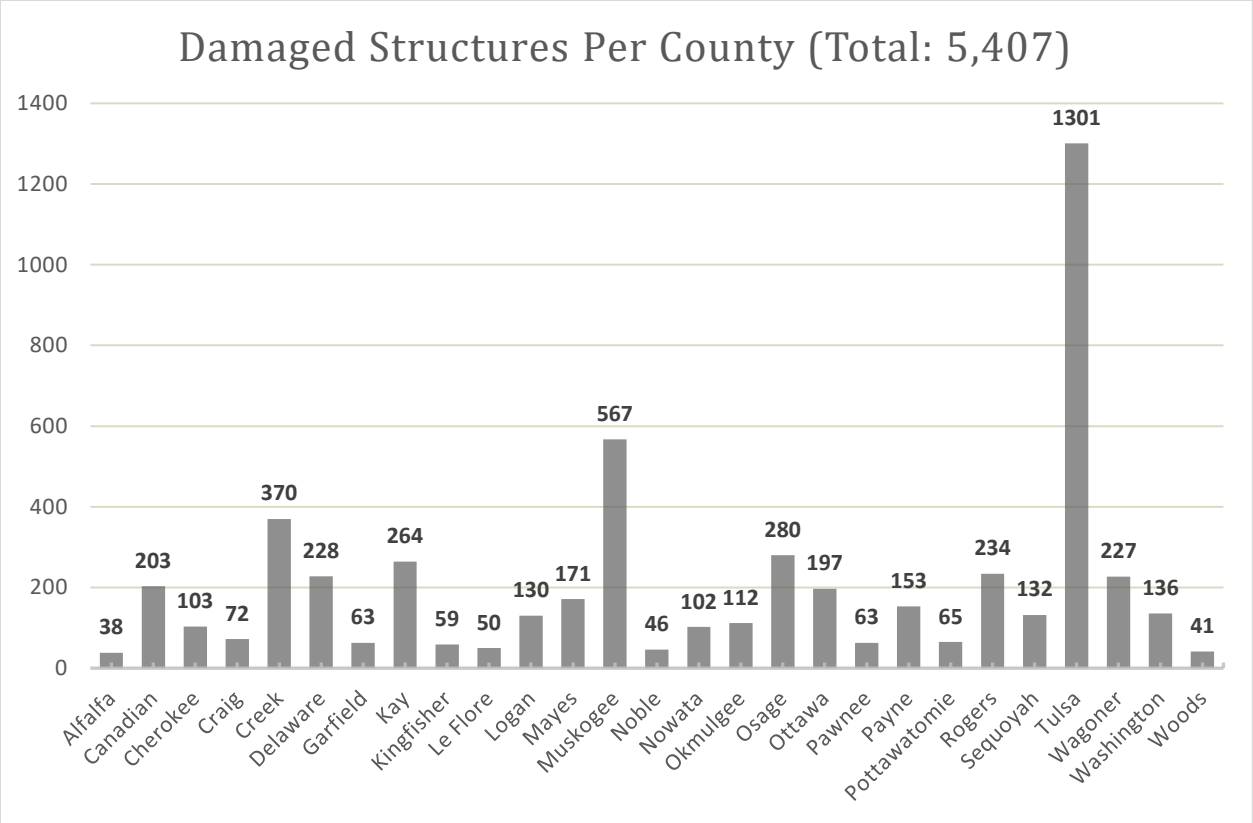
Those with HIV are considered vulnerable for disasters. Activities for transitional housing to support those with disabilities, HIV/AIDS status, or homeless will receive additional points when CDBG-DR applications are scored. These populations are a priority for ODOC. The following data comes from 2019 CDC Atlas[3].



[3] https://gis.cdc.gov/grasp/nchhstpatlas/tables.html

Housing Needs Assessment

The State analyzed FEMA-IA data for the Most Impacted and Distressed Areas (MID) to determine unmet housing needs. Unmet housing needs are those needs that are not covered by other sources of funding and can be covered by CDBG-DR funds (No interim housing needs were noted). A total of 5,407 dwelling structures in 27 counties were damaged from the storms that occurred from May 1, 2019, to June 9, 2019. This data was obtained from FEMA-IA in February of 2021.



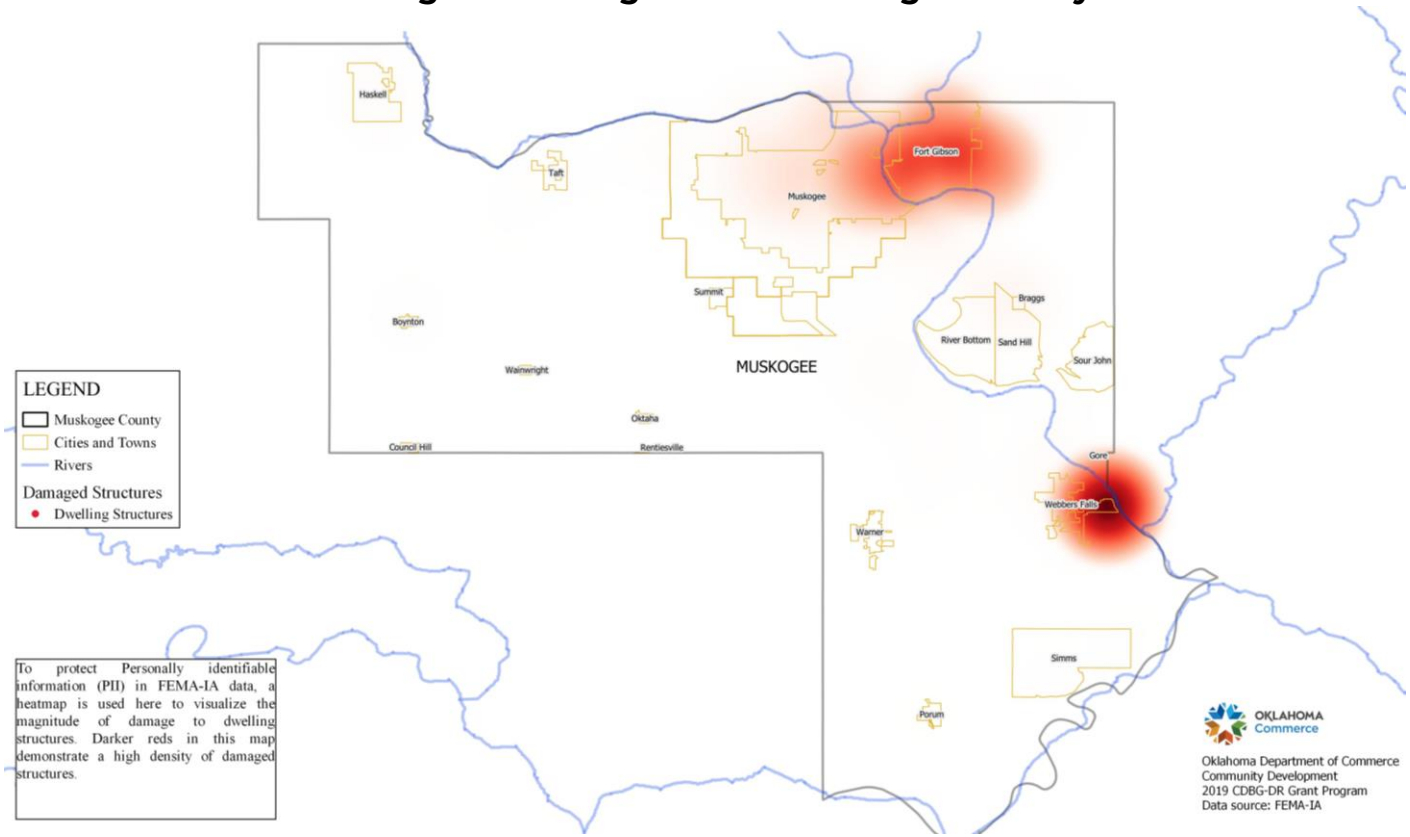
The type of damage varied across these dwelling structures. Documented damage types include foundation, roof, and flooding. It should be noted that flood damage can, and often does, cause damage to foundations. Flooded dwelling structures comprised the largest damage type (45%) at 2,435 structures with an average water depth at 18 inches (1.5 feet). Of all the structures that flooded, 82% of households did not have flood insurance.

Based upon the review of available data, HUD concluded that the counties Muskogee, Sequoyah (Zip code 74946), and Tulsa are the Most Impacted and Distressed Areas (MID). The remaining 24 counties and the remainder of Sequoyah County will be considered the State's Most Impacted and Distressed Areas (MID). The other 24 counties and the remainder of Sequoyah County had considerable damage due to the disasters that occurred. Many cities and towns have reported homes that were severely flooded and have since been abandoned. Other communities reported serious infrastructure damage due to the disasters and was reported within the FEMA Public Assistance (PA) data. Data shows several needs including debris removal and public utility and roads/bridge repair for all 24 counties. All data and evidence showed that the remaining counties were all eligible to receive assistance and therefore should be considered part of the State's MID.

MUSKOGEE COUNTY

Muskogee County is part of HUD's Most Impacted and Distressed Areas. A total of 567 dwelling structures were damaged. The red areas represent clusters of damaged structures. The darker the red, the more damaged structures were present.

Damaged Dwelling Units in Muskogee County



Of these 567 structures, 57% (327 structures) flooded with an average water depth of 34 inches (2.8 feet). Only 19% (62) of households had flood insurance.

Owner occupied housing comprised 70% of the damaged housing. Renter occupied housing comprised 30% of the damaged housing. Note: Apartments show “0” under the Owned column because none of the

property owners lived in the apartment at the time of the disaster. This table is also available for the State identified Most Impacted and Distressed Areas (MID), please refer to the appendix to find this table.

Structure Type	Damaged Structure Count	Owned	Rented
Apartment	30	0	30
House/Duplex	293	232	52
Mobile Home	159	103	54
Other	76	47	28
Travel Trailer	9	8	1
Totals	**567**	**390**	**165**
Percentage	**100%**	**69%**	**29%**

The unmet needs for Muskogee County are significant. ODOC analyzed the most recent FEMA-IA dataset and summarized the data in the following table. In total, there are $2,787,929.71 in unmet needs spread across the different dwelling types.

SUBSTANTIAL AMENDMENT 2 UPDATE TO THIS SECTION

The initial CDBG-DR Action Plan evaluated unmet housing needs by analyzing the FEMA-IA dataset obtained through an FSA agreement between ODOC and FEMA. According to the State's analysis, 29% of the dwelling structures in Muskogee County were renter-occupied during the May-June 2019 disaster. ODOC attempted to augment the unmet housing needs analysis in the Action Plan by surveying impacted communities for additional data. Unfortunately, during the development of the initial Action Plan through Substantial Amendment 2, ODOC was unable to obtain data beyond the initial FEMA-IA dataset.

ODOC has proposed deleting the Multifamily Housing Rehabilitation activity for the following reasons:

1. No eligible community has informed ODOC that there is an unmet need for MFH housing.
2. No eligible applicant has applied for the Multifamily Housing Rehabilitation program.
3. It is reasonable to assume that landlords have fixed their rental properties by this point either through insurance or some other means.

Individual Assistance Data for Muskogee County

County/Residence Type	Count of Residence Type	Real Property FEMA Verified Loss	Sum of Insurance Settlement	Sum of Repair Assistance Amount	Sum of Replacement Assistance Amount	Sum of Unmet Need
Muskogee						
[A]Apartment	30	$0.00	**$ 0.00**	**$ 0.00**	**$ 0.00**	$0.00*
[B]House/Duplex	293	$4,585,400.44	$968,522.49	$1,895,085.51	$139,600.00	$2,257,143.47
[C]Mobile Home	159	$1,388,016.88	$65,067.98	$1,019,725.29	$135,360.00	$232,809.88
[D]Other	76	$180.20	**$ 0.00**	**$ 0.00**	**$ 0.00**	$180.20
[E]Travel Trailer	9	$23,341.60	**$ 0.00**	$19,238.61	**$ 0.00**	$4,102.99
Muskogee Total	**567**	**$5,996,939.12**	**$1,033,590.47**	**$2,934,049.41**	**$274,960.00**	**$2,494,236.54***

* Rental Assistance (which includes mortgage assistance) is not calculated when determining unmet need according to FEMA-IA data because it does not address property damage. The Rental Assistance amount does not go towards rehabilitation expenses of damaged structures and is not noted in FEMA-IA data. Therefore, funds beyond the "Sum of Unmet Need" are necessary to ensure all residents affected in Muskogee County receive adequate disaster recovery assistance.

It is important to note that row [A] for Apartment is $0.00 because renters do not own the property and therefore received no financial assistance for repairs. Though it can be assumed that the property owner of an apartment complex had insurance to recover from storm damages, ODOC has no data to confirm or deny this at this time. A better understanding of unmet need for Apartments will occur at the application phase of the disaster recovery program.

The damage to rental stock is concerning since 30% of all damage in Muskogee County occurred for rental properties. ODOC has determined the best way to address the lack of rental stock in the county is to allow for rehabilitation or reconstruction.

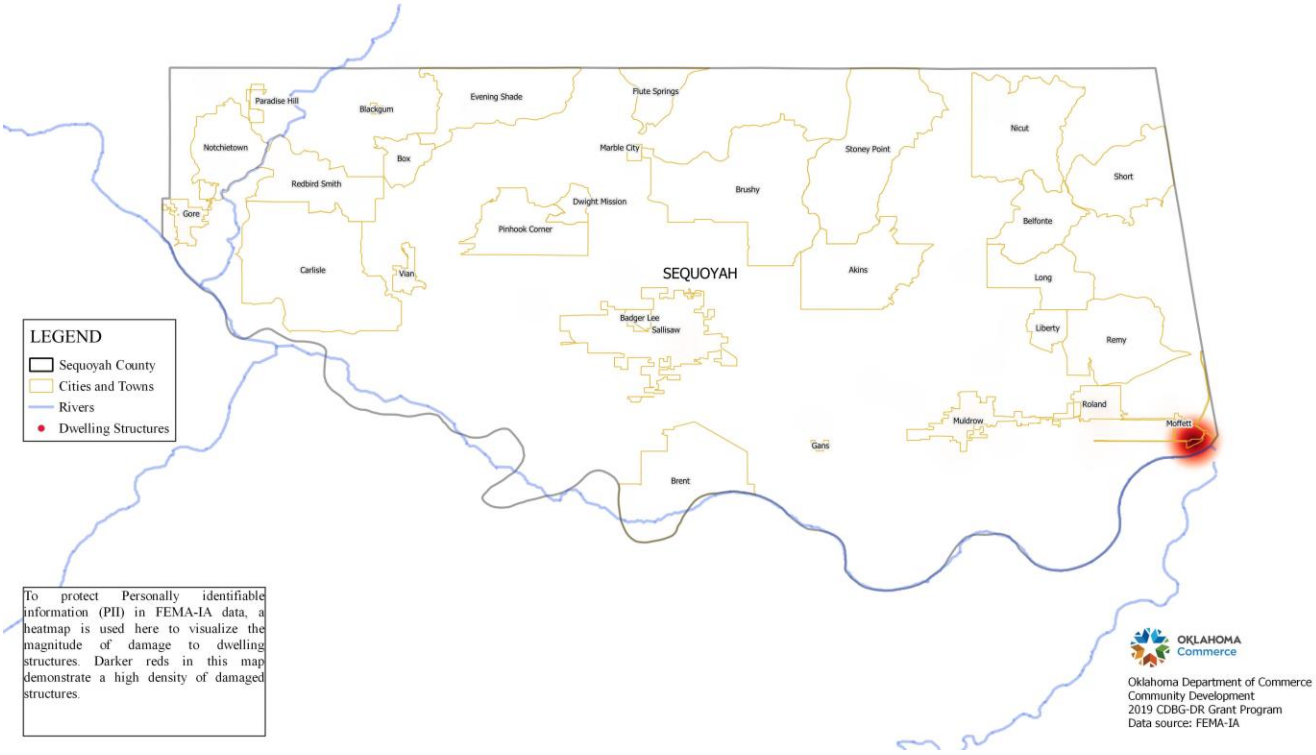
DAMAGED DWELLING STRUCTURES WITHIN THE 100-YEAR (1%) FLOODPLAIN IN MUSKOGEE COUNTY

ODOC analyzed FEMA-IA damaged structures against FEMA NFHL (floodplain) to determine the number of damaged structures in the 1% floodplain. A 1% floodplain refers to those areas with a 1% annual chance of flooding and a 26% chance of flooding over the life of a 30-year mortgage. For Muskogee County, 250 damaged structures are in the 1% floodplain.

SEQUOYAH COUNTY

Sequoyah County is part of HUD's Most Impacted and Distressed Areas. A total of 132 dwelling structures were damaged. The red areas represent clusters of damaged structures. The darker the red, the more damaged structures were present.

DAMAGED DWELLING UNITS IN SEQUOYAH COUNTY



Of these 132 structures, 57% (76 structures) flooded with an average water depth of 53 inches (4.4 feet). Of all the structures that flooded, only one had flood insurance. Owner occupied housing comprised 59% of the damaged housing. Renter occupied housing comprised 39% of the damaged housing. Note: Apartments show "0" under the Owned column because none of the property owners lived in the apartment at the time of the disaster. This table is also available for the State identified Most Impacted and Distressed Areas (MID), please refer to the appendix to find this table.

Structure Type	Damaged Structure Count	Owned	Rented
Apartment	24	0	24

House/Duplex	62	48	12
Mobile Home	22	10	11
Other	22	19	3
Travel Trailer	2	1	1
Totals	**132**	**78**	**51**
Percentage	**100%**	**59%**	**39%**

The unmet needs for Sequoyah County are less than Muskogee County. ODOC analyzed the most recent FEMA-IA dataset and summarized the data in the following table. In total, there are $134,233.85 in unmet needs spread across the different dwelling types.

SUBSTANTIAL AMENDMENT 2 UPDATE TO THIS SECTION

The initial CDBG-DR Action Plan evaluated unmet housing needs by analyzing the FEMA-IA dataset obtained through an FSA agreement between ODOC and FEMA. According to the State's analysis, 39% of the dwelling structures in Sequoyah County were renter-occupied during the May-June 2019 disaster. ODOC attempted to augment the unmet housing needs analysis in the Action Plan by surveying impacted communities for additional data. Unfortunately, during the development of the initial Action Plan through Substantial Amendment 2, ODOC was unable to obtain data beyond the initial FEMA-IA dataset.

ODOC has proposed deleting the Multifamily Housing Rehabilitation activity for the following reasons:

1. No eligible community has informed ODOC that there is an unmet need for MFH housing.
2. No eligible applicant has applied for the Multifamily Housing Rehabilitation program.
3. It is reasonable to assume that landlords have fixed their rental properties by this point either through insurance or some other means.

FEMA INDIVIDUAL ASSISTANCE DATA – SEQUOYAH COUNTY

County/Residence Type	Count of Residence Type	Real Property FEMA Verified Loss	Sum of Insurance Settlement	Sum of Repair Assistance Amount	Sum of Replacement Assistance Amount	Sum of Unmet Need
Sequoyah						
[A]Apartment	24	$0.00	$0.00	$0.00	$0.00	$0.00*
[B]House/Duplex	62	$545,623.85	$0.00	$492,759.77	$0.00	$54,018.16
[C]Mobile Home	22	$123,922.62	$0.00	$42,616.81	$0.00	$81,305.81
[D]Other	22	$9,667.50	$0.00	$9,667.50	$0.00	$0.00
[E]Travel Trailer	2	$63.96	$0.00	$0.00	$0.00	$63.96
Sequoyah Total	**132**	**$679,277.93**	$0.00	**$545,044.08**	$0.00	**$135,387.93***

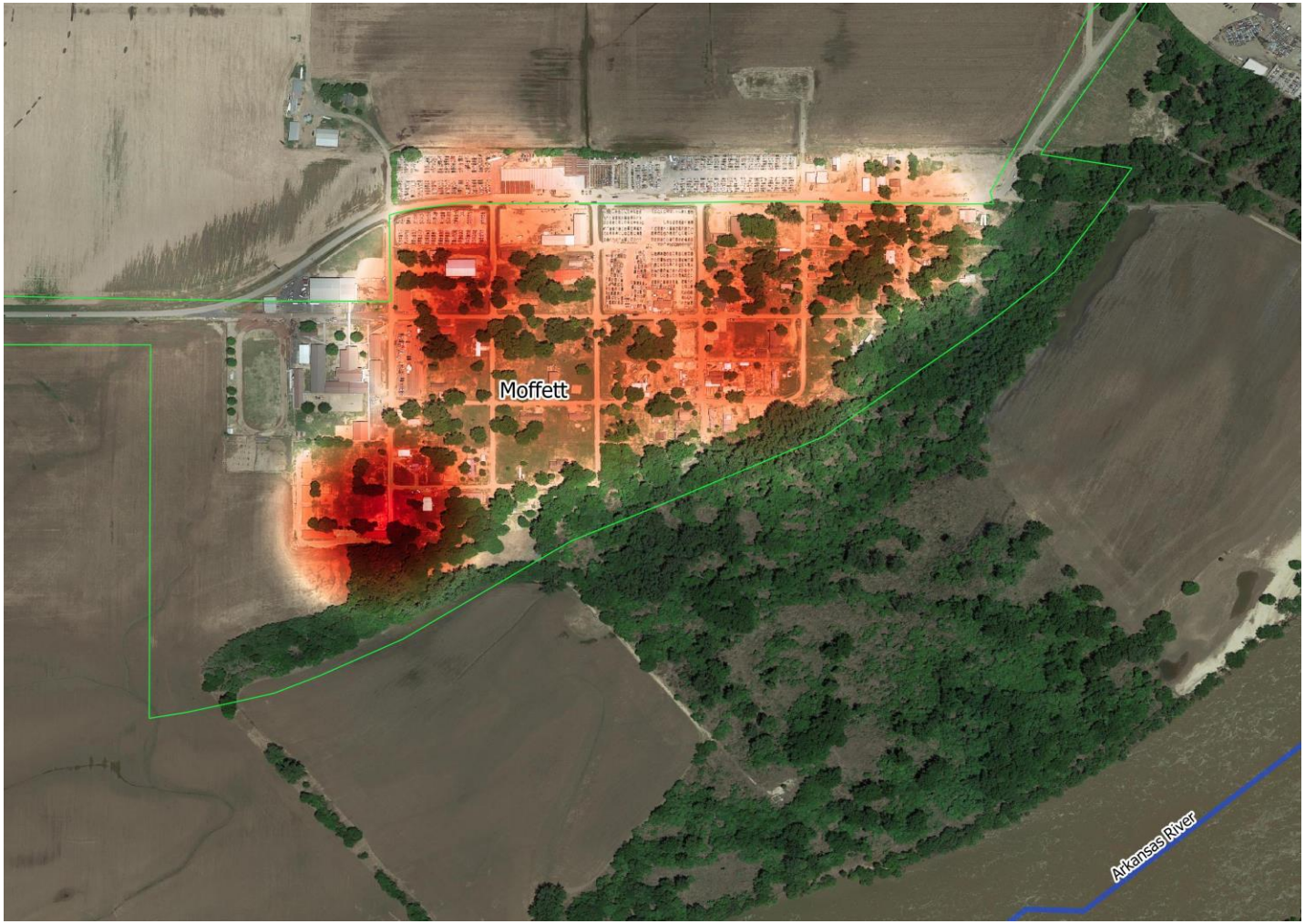
* Rental Assistance (which includes mortgage assistance) is not calculated when determining unmet need according to FEMA-IA data because it does not address property damage. The Rental Assistance amount does not go towards rehabilitation expenses of damaged structures and is not noted in FEMA-IA data. Therefore, funds beyond the "Sum of Unmet Need" are necessary to ensure all residents affected in Sequoyah County receive adequate disaster recovery assistance.

It is important to note that row [A] for Apartment is blank because renters do not own the property and therefore received no financial assistance. Though it can be assumed that the property owner of an apartment complex had insurance to recover from storm damages, ODOC has no data to confirm or deny this at this time. Additionally, since apartments are a larger proportion of the damage type, ODOC anticipates the actual Unmet Need to be higher.

The damage to rental stock is concerning since 39% of all damage in Sequoyah County occurred for rental properties. ODOC has determined the best way to address the lack of rental stock in the county is to allow for rehab (or reconstruction for those structures completely destroyed) on a one-to-one replacement basis.

The Town of Moffett, Oklahoma, represented the majority of damaged dwelling structures (Total of 83) in Sequoyah County. The image below details where the damaged structures are located within the Town of Moffett.

DAMAGED DWELLING UNITS IN SEQUOYAH COUNTY



The red areas represent clusters of damaged structures. The darker the red, the more damaged structures that were present.

Many of these structures have been demolished and are now empty lots. There are some households that continue to live in damaged structures which pose significant health concerns. As mentioned elsewhere in this Action Plan, the State is proposing a voluntary buyout program for residential units in the 100-year (1%) floodplain and the Disaster Risk Reduction Area (DRRA).

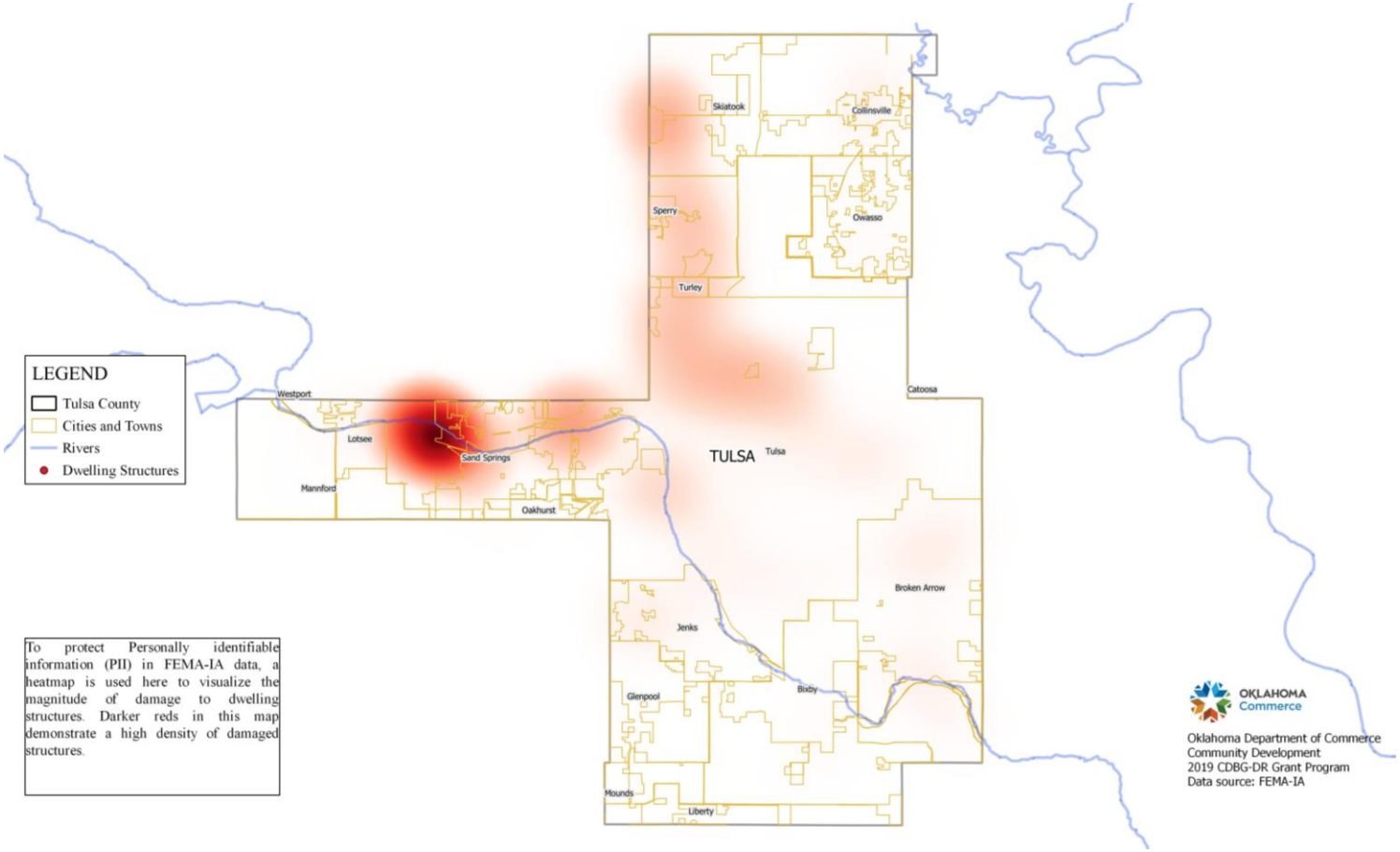
DAMAGED DWELLING STRUCTURES WITHIN THE 100-YEAR (1%) FLOODPLAIN IN SEQUOYAH COUNTY

ODOC analyzed FEMA-IA damaged structures against FEMA NFHL (floodplain) to determine the number of damaged structures in the 1% floodplain. A 1% floodplain refers to those areas with a 1% annual chance of flooding and a 26% chance of flooding over the life of a 30-year mortgage. For Sequoyah County, 90 damaged structures (or 68% of all damaged structures in the county) are in the 1% floodplain.

TULSA COUNTY

Tulsa County is part of HUD's Most Impacted and Distressed Areas. A total of 1,301 dwelling structures were damaged. The red areas represent clusters of damaged structures. The darker the red, the more damaged structures were present.

DAMAGED DWELLING UNITS IN TULSA COUNTY



Of these 1,301 structures, 48% (Total of 634) flooded with an average water depth of 18.6 inches (1.5 feet). Of all the structures that flooded, 69% did not have flood insurance.

Owner occupied housing comprised 71% of the damaged housing. Renter occupied housing comprised 28% of the damaged housing. Note: Apartments show “0” under the Owned column because none of the property owners lived in the apartment at the time of the disaster. This table is also available for the State identified Most Impacted and Distressed Areas (MID), please refer to the appendix to find this table.

Structure Type	Damaged Structure Count	Owned	Rented
Apartment	59	0	59
House/Duplex	968	743	211
Mobile Home	146	106	38
Other	111	55	55
Travel Trailer	17	15	2
Totals	**1301**	**919**	**365**
Percentage	**100%**	**71%**	**28%**

The unmet needs for Tulsa County are significant. ODOC analyzed the most recent FEMA-IA dataset and summarized the data in the following table. In total, there are $2,997,260.80 in unmet needs spread across the different dwelling types.

SUBSTANTIAL AMENDMENT 2 UPDATE TO THIS SECTION

The initial CDBG-DR Action Plan evaluated unmet housing needs by analyzing the FEMA-IA dataset obtained through an FSA agreement between ODOC and FEMA. According to the State's analysis, 28% of the dwelling structures in Tulsa County were renter-occupied during the May-June 2019 disaster. ODOC attempted to augment the unmet housing needs analysis in the Action Plan by surveying impacted

communities for additional data. Unfortunately, during the development of the initial Action Plan through Substantial Amendment 2, ODOC was unable to obtain data beyond the initial FEMA-IA dataset.

ODOC has proposed deleting the Multifamily Housing Rehabilitation activity for the following reasons:

1. No eligible community has informed ODOC that there is an unmet need for MFH housing.
2. No eligible applicant has applied for the Multifamily Housing Rehabilitation program.
3. It is reasonable to assume that landlords have fixed their rental properties by this point either through insurance or some other means.

FEMA Individual Assistance Data – Tulsa County

County/Residence Type	Count of Residence Type	Real Property FEMA Verified Loss	Sum of Insurance Settlement	Sum of Repair Assistance Amount	Sum of Replacement Assistance Amount	Sum of Unmet Need
Tulsa						
[A]Apartment	59	$0.00	$0.00	$0.00	$0.00	$0.00*
[B]Condo	3	$983.10	$0.00	$0.00	$0.00	$983.10
[C]House/Duplex	968	$5,364,792.31	$3,442,260.43	$2,711,416.96	$0.00	$2,113,338.84
[D]Mobile Home	146	$755,828.69	$120,612.89	$420,901.11	$0.00	$287,641.43
[E]Other	103	$0.00	$0.00	$0.00	$0.00	$0.00
[F]Townhouse	5	$0.00	$0.00	$0.00	$0.00	$0.00
[G]Travel Trailer	17	$27,464.74	$0.00	$19,489.97	$0.00	$7,974.77
Tulsa Total	**1301**	**$6,149,068.84**	**$3,562,873.32**	**$3,151,808.04**	$0.00	**$2,409,938.14***

* Rental Assistance (which includes mortgage assistance) is not calculated when determining unmet need according to FEMA-IA data because it does not address property damage. The Rental Assistance amount does not go towards rehabilitation expenses of damaged structures and is noted in FEMA-IA data. Therefore, funds beyond the "Sum of Unmet Need" are necessary to ensure all residents affected in Tulsa County receive adequate disaster recovery assistance.

It is important to note that row [A] for Apartment is blank because renters do not own the property and therefore received no financial assistance. Though it can be assumed that the property owner of an apartment complex had insurance to recover from storm damages, ODOC has no data to confirm or deny this at this time.

The damage to rental stock is concerning since 28% of all damage in Tulsa County occurred for rental properties. ODOC has determined the best way to address the lack of rental stock in the county is to allow for rehab (or reconstruction for those structures destroyed) on a one-to-one replacement basis.

DAMAGED DWELLING STRUCTURES WITHIN THE 100-YEAR (1%) FLOODPLAIN IN TULSA COUNTY

ODOC analyzed FEMA-IA damaged structures against FEMA NFHL (floodplain) to determine the number of damaged structures in the 1% floodplain. A 1% floodplain refers to those areas with a 1% annual chance of flooding and a 26% chance of flooding over the life of a 30-year mortgage. For Tulsa County, 385 damaged structures are in the 1% floodplain.

FEMA Individual Assistance Data for all 27 Eligible Counties

The following chart summarizes property damage in the 27 eligible counties. This chart was created from FEMA-IA data obtained through an FSA between ODOC and FEMA. The definitions for the terms used in the table are noted below:

(A) **County:** Only the 27 eligible counties are included in this table. Those counties include Alfalfa, Canadian, Cherokee, Craig, Creek, Delaware, Garfield, Kay, Kingfisher, Le Flore, Logan, Mayes, Muskogee, Noble, Nowata, Okmulgee, Osage, Ottawa, Pawnee, Payne, Pottawatomie, Rogers, Sequoyah, Tulsa, Wagoner, Washington, and Woods.

(B) **Residence Type:** Structures with the primary purpose of being a place for dwelling. Note: Not every eligible county has every possible residence type. Counties that do not have residences, such as condos, will not be listed.

(C) **County of Residence Type:** The occurrence of damaged residential structures within each eligible county.

(D) **Real Property FEMA Verified Loss:** When someone registers for FEMA assistance after a disaster, FEMA is required to verify losses to determine eligibility for disaster assistance. FEMA's standard

method to verify a loss due to disaster damage and to determine initial eligibility is an onsite inspection by a FEMA inspector. Home damage must be disaster related.

(E) **Sum of Insurance Settlement:** The sum of all insurance payouts in a particular county.

(F) **Sum of Repair Assistance Amount:** The sum of FEMA repair assistance in a particular county.

(G) **Sum of Replacement Assistance Amount:** The sum of FEMA replacement assistance in a particular county.

(H) **Sum of Unmet Need:** Is the value minus “Sum of Total FEMA Verified Loss”, minus “Sum of Insurance Settlement”, minus “Sum of Repair Assistance Amount”, minus “Sum of Replacement Assistance Amount”, and minus “Sum of SBA Received Amount”

Note 1: The source of this data is from FEMA-IA.
Note 2: Not every county reported damage to every possible housing type.

County/Residence Type	Count of Damaged Residence Type	Sum of Total FEMA Verified Loss	Sum of Insurance Settlement	Sum of Repair Assistance Amount	Sum of Replacement Assistance Amount	Sum of SBA Received Amount	Sum of Unmet Need
Alfalfa	**38**	**$ 62,965.39**		**$ 46,565.95**		$ -	**$ 16,399.44**
House/Duplex	29	$ 46,476.01		$ 31,588.77		$ -	$ 14,887.24
Mobile Home	4	$ 16,489.38		$ 14,977.18		$ -	$ 1,512.20
Other	4	$ -				$ -	$ -
Townhouse	1	$ -				$ -	$ -
Canadian	**203**	**$ 819,986.22**	**$ 171,222.86**	**$ 184,322.83**	**$ 202,800.00**	$ -	**$ 382,498.71**
Apartment	3	$ 1,424.61				$ -	$ 1,424.61
House/Duplex	122	$ 291,058.72	$ 89,722.86	$ 156,865.44		$ -	$ 134,507.87
Mobile Home	59	$ 527,325.41	$ 81,500.00	$ 27,457.39	$ 202,800.00	$ -	$ 246,388.75
Other	17	$ -				$ -	$ -
Townhouse	1	$ -				$ -	$ -
Travel Trailer	1	$ 177.48				$ -	$ 177.48
Cherokee	**103**	**$ 152,311.32**	**$ 307,221.90**	**$ 56,409.61**		$ -	**$ 90,875.79**
House/Duplex	60	$ 30,633.62	$ 307,221.90	$ 18,521.75		$ -	$ 7,085.95
Mobile Home	28	$ 111,070.73		$ 37,887.86		$ -	$ 73,182.87
Other	11	$ -				$ -	$ -
Travel Trailer	4	$ 10,606.97				$ -	$ 10,606.97
Craig	**72**	**$ 146,885.95**	**$ 127,733.70**	**$ 20,408.21**		$ -	**$ 95,419.92**
Apartment	1	$ -				$ -	$ -
House/Duplex	56	$ 133,810.38	$ 124,443.10	$ 19,207.56		$ -	$ 85,220.10
Mobile Home	9	$ 13,054.13	$ 3,290.60	$ 1,200.65		$ -	$ 10,178.38
Other	5	$ -				$ -	$ -
Travel Trailer	1	$ 21.44				$ -	$ 21.44
Creek	**370**	**$ 192,973.32**	**$ 174,960.71**	**$ 93,015.43**		$ -	**$ 98,624.36**
Apartment	2	$ -				$ -	$ -
House/Duplex	306	$ 109,242.19	$ 174,960.71	$ 51,428.31		$ -	$ 56,480.35
Mobile Home	31	$ 82,798.26		$ 41,587.12		$ -	$41,211.14
Other	25	$ 113.91				$ -	$ 113.91
Townhouse	1	$ -				$ -	$ -
Travel Trailer	5	$ 818.96				$ -	$ 818.96
Delaware	**228**	**$ 683,941.30**	**$ 85,437.46**	**$ 76,321.16**	**$ 110,048.57**	$ -	**$ 446,262.58**
House/Duplex	124	$ 412,050.93	$ 5,134.92	$ 29,864.23		$ -	$ 380,973.27
Mobile Home	77	$ 247,883.05	$ 80,302.54	$ 45,058.29	$ 90,460.00	$ -	$ 62,269.20
Other	20	$ 87.53				$ -	$ 87.53
Townhouse	1	$ -				$ -	$ -
Travel Trailer	6	$ 23,919.79		$ 1,398.64	$ 19,588.57	$ -	$ 2,932.58

County/Residence Type	Count of Damaged Residence Type	Sum of Total FEMA Verified Loss	Sum of Insurance Settlement	Sum of Repair Assistance Amount	Sum of Replacement Assistance Amount	Sum of SBA Received Amount	Sum of Unmet Need
Kay	**264**	**$ 224,217.69**	**$ 40,568.07**	**$ 117,197.27**		$ -	**$ 110,158.28**
Apartment	1	$ -				$ -	$ -
Condo	1	$ -				$ -	$ -
House/Duplex	216	$ 200,890.13	$ 40,568.07	$ 107,498.99		$ -	$ 96,529.00
Mobile Home	14	$ 22,364.28		$ 9,698.28		$ -	$12,666.00
Other	30	$ 963.28				$ -	$ 963.28
Townhouse	1	$ -				$ -	$ -
Travel Trailer	1	$ -				$ -	$ -
Kingfisher	**59**	**$ 174,870.68**		**$ 53,480.27**		$ -	**$ 121,564.37**
House/Duplex	49	$ 162,169.20		$ 50,494.66		$ -	$ 111,848.50
Mobile Home	9	$ 12,701.48		$ 2,985.61		$ -	$ 9,715.87
Other	1	$ -				$ -	$ -
Le Flore	**50**	**$ 85,161.19**		**$ 24,500.83**		$ -	**$ 60,660.36**
House/Duplex	30	$ 22,035.87		$ 7,437.51		$ -	$ 14,598.36
Mobile Home	11	$ 63,125.32		$ 17,063.32		$ -	$ 46,062.00
Other	7	$ -				$ -	$ -
Travel Trailer	2	$ -				$ -	$ -
Logan	**130**	**$ 719,424.51**	**$ -**	**$ 94,221.94**	**$ 104,600.00**	$ -	**$ 530,186.97**
Apartment	1	$ -				$ -	$ -
House/Duplex	90	$ 668,567.89	$ -	$ 88,437.16	$ 69,800.00	$ -	$ 519,915.13
Mobile Home	28	$ 50,260.54		$ 5,784.78	$ 34,800.00	$ -	$ 9,675.76
Other	8	$ -				$ -	$ -
Travel Trailer	3	$ 596.08				$ -	$ 596.08
Mayes	**171**	**$ 544,651.51**	**$ 139,324.85**	**$ 264,996.01**	**$ 33,640.00**	$ -	**$ 197,529.88**
House/Duplex	96	$ 244,382.53	$ 19,339.88	$ 122,022.89		$ -	$ 119,582.82
Mobile Home	53	$ 299,227.66	$ 119,984.97	$ 142,294.04	$ 33,640.00	$ -	$77,584.82
Other	11	$ -				$ -	$ -
Travel Trailer	11	$ 1,041.32		$ 679.08		$ -	$ 362.24
Muskogee	**567**	**$ 7,245,119.08**	**$ 1,033,590.47**	**$ 2,934,049.41**	**$ 274,960.00**	$ -	**$ 3,710,950.53**
Apartment	30	$ 96,386.10				$ -	$ 96,386.10
House/Duplex	293	$ 5,344,026.81	$ 968,522.49	$ 1,895,085.51	$ 139,600.00	$ -	$ 2,994,776.44
Mobile Home	159	$ 1,772,651.65	$ 65,067.98	$ 1,019,725.29	$ 135,360.00	$ -	$ 606,972.08
Other	76	$ 1,432.00				$ -	$ 1,432.00
Travel Trailer	9	$ 30,622.52		$ 19,238.61		$ -	$ 11,383.91
Noble	**46**	**$ 226,795.91**	**$ 2,468.77**	**$ 29,371.22**		$ -	**$ 197,002.94**
House/Duplex	33	$ 219,010.04		$ 27,837.14		$ -	$ 191,172.90
Mobile Home	7	$ 7,785.87	$ 2,468.77	$ 1,534.08		$ -	$ 5,830.04

County/Residence Type	Count of Damaged Residence Type	Sum of Total FEMA Verified Loss	Sum of Insurance Settlement	Sum of Repair Assistance Amount	Sum of Replacement Assistance Amount	Sum of SBA Received Amount	Sum of Unmet Need
Other	6	$ -				$ -	$ -
Nowata	**102**	**$ 218,246.15**		**$ 112,483.60**		$ -	**$ 112,639.90**
Condo	1	$ 743.46				$ -	$ 743.46
House/Duplex	79	$ 201,355.03		$ 92,646.42		$ -	$ 108,708.61
Mobile Home	9	$ 15,585.43		$ 19,837.18		$ -	$ 2,625.60
Other	11	$ -				$ -	$ -
Travel Trailer	2	$ 562.23				$ -	$ 562.23
Okmulgee	**112**	**$ 75,243.25**	**$ 7,867.81**	**$ 43,231.73**		$ -	**$ 31,510.69**
Apartment	1	$ 437.55				$ -	$ 437.55
House/Duplex	88	$ 58,731.21	$ 3,917.81	$ 31,988.83		$ -	$ 26,570.87
Mobile Home	20	$ 16,074.49	$ 3,950.00	$ 11,242.90		$ -	$ 4,502.27
Other	3	$ -				$ -	$ -
Osage	**280**	**$ 1,280,287.27**	**$ 279,949.91**	**$ 743,162.55**		$ -	**$ 431,313.11**
Apartment	1	$ 639.91				$ -	$ 639.91
House/Duplex	196	$ 982,663.35	$ 279,949.91	$ 555,489.09		$ -	$ 321,362.65
Mobile Home	59	$ 274,293.24		$ 175,510.66		$ -	$ 98,782.58
Other	15	$ -				$ -	$ -
Travel Trailer	9	$ 22,690.77		$ 12,162.80		$ -	$ 10,527.97
Ottawa	**197**	**$ 637,978.67**	**$ 343,284.48**	**$ 128,603.19**		$ -	**$ 448,060.26**
Apartment	11	$ 31,244.59				$ -	$ 31,244.59
House/Duplex	132	$ 455,565.62	$ 342,401.25	$ 81,218.34		$ -	$ 313,426.93
Mobile Home	21	$136,562.48	$ 883.23	$ 47,384.85		$ -	$ 88,782.76
Other	26	$ -				$ -	$ -
Townhouse	1	$ -				$ -	$ -
Travel Trailer	6	$ 14,605.98				$ -	$14,605.98
Pawnee	**63**	**$ 168,633.05**		**$ 75,715.46**		$ -	**$ 92,917.59**
House/Duplex	36	$ 83,578.26		$ 39,721.11		$ -	$ 43,857.15
Mobile Home	21	$ 85,054.79		$ 35,994.35		$ -	$ 49,060.44
Other	4	$ -				$ -	$ -
Travel Trailer	2	$ -				$ -	$ -
Payne	**153**	**$ 203,801.84**	**$ 139,164.83**	**$ 83,069.87**		$ -	**$ 89,774.19**
Apartment	6	$ -				$ -	$ -
House/Duplex	118	$ 188,556.97	$ 139,164.83	$ 81,106.49		$ -	$ 76,492.70
Mobile Home	14	$ 15,244.87		$ 1,963.38		$ -	$ 13,281.49
Other	14	$ -				$ -	$ -
Travel Trailer	1	$ -				$ -	$ -
Pottawatomie	**65**	**$ 20,378.87**	**$ 30,452.29**	**$ 10,609.25**		$ -	**$ 12,167.62**

County/Residence Type	Count of Damaged Residence Type	Sum of Total FEMA Verified Loss	Sum of Insurance Settlement	Sum of Repair Assistance Amount	Sum of Replacement Assistance Amount	Sum of SBA Received Amount	Sum of Unmet Need
Apartment	1	$ -				$ -	$ -
House/Duplex	33	$ 7,500.35	$ 14,065.40	$ 1,650.07		$ -	$ 4,997.28
Mobile Home	24	$ 12,878.52	$ 16,386.89	$ 8,959.18		$ -	$ 7,170.34
Other	7	$ -				$ -	$ -
Rogers	**234**	**$ 1,187,924.60**	**$ 154,949.49**	**$ 471,171.51**	**$ 34,900.00**	$ -	**$ 618,437.48**
House/Duplex	159	$ 928,260.49	$ 24,184.49	$ 348,824.02	$ 34,900.00	$ -	$ 523,521.90
Mobile Home	51	$ 252,316.10	$ 130,765.00	$ 122,347.49		$ -	$ 87,567.57
Other	22	$ -				$ -	$ -
Travel Trailer	2	$ 7,348.01				$ -	$ 7,348.01
Sequoyah	**132**	**$ 996,457.99**		**$ 545,044.08**		$ -	**$ 451,413.91**
Apartment	24	$ 87,742.27				$ -	$ 87,742.27
House/Duplex	62	$ 721,208.32		$ 492,759.77		$ -	$ 228,448.55
Mobile Home	22	$ 172,935.04		$ 42,616.81		$ -	$ 130,318.23
Other	22	$ 14,508.40		$ 9,667.50		$ -	$ 4,840.90
Travel Trailer	2	$ 63.96				$ -	$ 63.96
Tulsa	**1301**	**$ 7,589,365.31**	**$ 3,562,873.32**	**$ 3,151,808.04**		$ -	**$ 3,741,107.88**
Apartment	59	$ 4,509.96				$ -	$ 4,509.96
Condo	3	$ 2,541.63				$ -	$ 2,541.63
House/Duplex	968	$ 6,519,501.96	$ 3,442,260.43	$ 2,711,416.96		$ -	$ 3,162,594.36
Mobile Home	146	$ 1,023,136.71	$ 120,612.89	$ 420,901.11		$ -	$ 551,276.85
Other	103	$ 2,933.35				$ -	$ 2,933.35
Townhouse	5	$ -				$ -	$ -
Travel Trailer	17	$ 36,741.70		$ 19,489.97		$ -	$ 17,251.73
Wagoner	**227**	**$ 1,547,025.19**	**$ 848,761.71**	**$ 592,936.83**	**$ 33,840.00**	$ -	**$ 792,499.22**
House/Duplex	156	$ 1,111,213.94	$ 674,885.71	$ 413,454.43		$ -	$ 624,394.14
Mobile Home	54	$ 424,960.12	$ 173,876.00	$ 177,137.02	$ 33,840.00	$ -	$ 159,599.33
Other	10	$ -				$ -	$ -
Townhouse	1	$ -				$ -	$ -
Travel Trailer	6	$ 10,851.13		$ 2,345.38		$ -	$ 8,505.75
Washington	**136**	**$ 703,957.23**	**$ 419,732.09**	**$ 118,163.26**		$ -	**$ 417,565.87**
Apartment	1	$ 2,348.39				$ -	$ 2,348.39
House/Duplex	102	$ 639,469.83	$ 408,259.09	$ 99,731.79		$ -	$ 382,982.94
Mobile Home	20	$ 59,510.55	$ 11,473.00	$ 18,431.47		$ -	$ 29,606.08
Other	9	$ 894.08				$ -	$ 894.08
Travel Trailer	4	$ 1,734.38				$ -	$ 1,734.38
Woods	**41**	**$ 44,009.09**		**$ 31,404.40**		$ -	**$ 15,459.73**
House/Duplex	39	$ 44,009.09		$ 31,404.40		$ -	$ 15,459.73

County/Residence Type	Count of Damaged Residence Type	Sum of Total FEMA Verified Loss	Sum of Insurance Settlement	Sum of Repair Assistance Amount	Sum of Replacement Assistance Amount	Sum of SBA Received Amount	Sum of Unmet Need
Other	2	$ -				$ -	$ -
Apartment Count	142	$ 142.00				$ 142.00	$ 142.00
Condo Count	5	$ 5.00				$ 5.00	$ 5.00
House/Duplex Count	3672	$ 3,672.00	$ 127.00	$ 844.00	$ 7.00	$ 3,672.00	$ 3,672.00
Mobile Home Count	950	$ 950.00	$ 25.00	$ 249.00	$ 17.00	$ 950.00	$ 950.00
Other Count	469	$ 469.00		$ 1.00		$ 469.00	$ 469.00
Townhouse Count	12	$ 12.00				$ 12.00	$ 12.00
Travel Trailer Count	94	$ 94.00		$ 14.00	$ 1.00	$ 94.00	$ 94.00
Grand Total		**$ 25,952,612.58**	**$ 7,869,564.72**	**$ 10,102,263.91**	**$ 794,788.57**	**$ -**	**$ 13,313,001.58**

Note: FEMA does not report loss to apartments.

The Voluntary Buyout Program

The 100-year floodplain is a hostile place to live. Long periods between major flooding events lead many people to underestimate the risk of living in a flood- prone area. Some people incorrectly assume that nothing bad will happen there at all ("I have lived here thirty years and never once saw a flood; no reason to start worrying about one now"). And then quite suddenly, that can change when the flood waters rise and destroy residential and commercial structures, resulting in millions of dollars in damage and years of repairs. Public infrastructure is commonly damaged as well, from roads and bridges to potable water and sewer systems. Those who do not escape in time can find themselves homeless or swept away in the flood waters.

Due to the danger of the 100-year floodplain, the Oklahoma Department of Commerce Community Development division (ODOC/CD) set out to design a Voluntary Buyout Program (VBP) that could mitigate against future loss of life and property. The VBP offers eligible households the opportunity to relocate to a safer location. Owners of many types of real property are eligible to receive a buyout in the Voluntary Buyout Program. ODOC has also expanded the possible buyout target area with a newly created Disaster Risk Reduction Area (DRRA).

NATIONAL OBJECTIVE REQUIREMENTS

The primary focus of CDBG-DR funding is to help communities recover from disasters. For communities to be eligible for funding, the U.S. Department of Housing and Urban Development (HUD) requires that *every* CDBG-DR funded activity meet a national objective. Eligible Subrecipients are required to explain which National Objectives will be met in their Project Narrative. ODOC will only consider the following National Objectives for the VBP:

1. Low-to-Moderate Income (direct benefit): If the household to be assisted is Low-to-Moderate Income; or
2. Urgent Need (direct benefit): If the activity addresses the serious threat to community welfare following the disaster and the household assisted is above 80% AMI. Urgent Need should be used to inform the Disaster Risk Reduction Area (DRRA). Urgent need requires pre-approval by ODOC.

Additional information about National Objectives in the Voluntary Buyout Program:

Low-to-Moderate Buyout (LMB)	LMI Household receives buyout and participation incentive. It is not required that the sub-recipient confirms that the household finds replacement housing.
Urgent Need (UN)	Urgent Need Household receives buyout and participation incentive It is not required that the sub-recipient confirms that the household finds replacement housing.
Low-Moderate Housing Incentive (LMHI)	LMI Household may receive buyout, participation incentive and housing incentive. Sub-recipient must confirm that the household has acquired replacement housing.
Low-Mod Area (LMA)	Buyouts result in a benefit to primarily residential areas that are 51% LMI after the buyouts are complete. Requires a clear post buyout service/benefit area that would remain LMI regardless of who participates in the buyout. Requires enough participation to demonstrate a benefit.

ELIGIBLE BENEFICIARIES

Potential beneficiaries are property owners who can apply to the VBP through a Subrecipient. Subrecipients need to have a plan to document the eligibility of all criteria for the property and the beneficiary.

All the following property and property owner conditions must be met to qualify for the VBP:

1. The property must be in one of the 27 eligible counties. The eligible counties are described in Federal Register Notice 85 FR 4681.

2. The property must be located within either the 100-year floodplain or floodway per the most current Federal Emergency Management Agency (FEMA) flood maps. The property can also be in the Disaster Risk Reduction Area (DRRA), as defined later in this document and in the State's Voluntary Buyout Program Guidelines. The beneficiary must either be:

i. Low-to-Moderate income household as defined in the State's 2019 CDBG-DR Action Plan; or
ii. A non-LMI property owner. Non-LMI property owners may participate but can only access the participation incentive.

3. The property owner(s) must demonstrate a clear title of the housing structure and property. Failure to provide this information will result in VBP ineligibility.
    i. Note: Subrecipients are responsible for establishing property and property eligibility, including confirming the title of the subject property is clear. Subrecipients may wish to procure these services from a local title company that can perform title searches and produce a title commitment letter after the property owner applies to the VBP. Subrecipients may also propose to assist in clearing titles as a part of the local program if a need has been established.

The following conditions are required depending on the type of property:

1) **Manufactured Homes:** Oklahoma law allows a manufactured home to be classified as real or personal property. If the MHU is located on land owned by someone else, it is classified as personal property [68 O.S. § 2105] [OAC 710:60-3-132].
    i) MHUs are considered real property in the state of Oklahoma if the MHU owner owns the land on which the unit is located [68 O.S. § 2105] [OAC 710:60-3-132], the MHU meets the state standard for real property and is assessed as real property by the county.
    ii) MHU owners must provide documented proof that the manufactured home has been included in the property assessment. The proof required is a deed listing the manufactured home by VIN, year, make, and model [68 O.S. § 2105] [OAC 710:60-3-132].
    iii) Manufactured Homes (MHU) are eligible to receive a buyout award and incentives under the buyout program if the MHU is classified as real property
    iv) If an individual owns a MHU but does not own the land beneath their MHU and the owner of the land does not want to participate in the program, the MHU owner cannot receive a buyout or incentives since CDBG-DR cannot be used to purchase personal property. However, the actual, reasonable costs associated with moving the MHU and its contents may be eligible to be paid under

the Uniform Relocation Act. If the owner of a Manufactured Home Park (also known as a Mobile Home Park) chooses to participate in Voluntary Buyout Program, all MHU owners in the park will be eligible for relocation assistance under the URA, including the actual reasonable costs associated with moving the MHU and its contents.

2) Property that was used for housing at the time of the disaster, as indicated by a housing structure located on the property at the time of the disaster, is eligible. Homes that are uninhabitable or were demolished after the disaster but still legally owned by the beneficiary will qualify.
3) Properties that were vacant land before the disaster are eligible for a participation incentive and buyout award based on FMV but will not be eligible for the housing incentives regardless of income.
4) Secondary homes in the 100-year floodplain or the Disaster Risk Reduction Area are eligible to participate in the Voluntary Buyout Program. However, property owners are only eligible to receive the Fair Market Value of the property and the participation incentive, but not the housing incentive.
5) Property owners of rentals are eligible to participate under the Urgent Need National Objective on a limited basis. Property owners are limited to the participation incentive and the FMV of the housing structure. Tenants will be provided relocation assistance through the Uniform Relocation Act (URA) and will meet with HUD-Certified Housing Counselors.

THE EVOLUTION OF THE VBP IN THE 2019 CDBG-DR ACTION PLAN

The VBP offers financial incentives (a "buyout award") that will assist participants to find safer housing outside of the 100-year floodplain and the Disaster Risk Reduction Area (DRRA). The key difference between the initial Action Plan and all subsequent Substantial Amendments is that the State has made the decision to prohibit the use of CDBG-DR funds for rehabilitation or reconstruction in the 100-year floodplain. This means that rehabilitation, reconstruction, and new construction are prohibited activities in the 100-year floodplain through Oklahoma's 2019 CDBG-DR program. The following sections describe each iteration of the Action Plan, and eligible activities in the 100-year floodplain.

Initial Action Plan

This Plan permitted elevation in the 100-year floodplain. On page 73 of the Plan, the following is stated:

Nonresidential structures must be elevated, or floodproofed to two feet above the BFE. Critical Actions, as defined in 24 CFR Part 55.2(b)(3), within the 500-year floodplain must be elevated or floodproofed to the higher of the 500-year floodplain elevation or three feet above the 100-year floodplain elevation. If the 500-year floodplain or elevation is unavailable, and the Critical Action is in the 100-year floodplain, then the structure must be elevated, or floodproofed at least three feet above the 100-year floodplain elevation.

Action Plan Substantial Amendment 1

This Plan prohibited rehabilitation (including elevation) in the 100-year floodplain. On page 122 of the Plan, the following is stated:

All structures, as defined under 44 CFR 59.1, designed principally for residential use, and located in the 100-year (or 1 percent annual chance) floodplain, are ineligible for rehabilitation, elevation, or repair.

This decision by ODOC was reached after significant research into the implications of allowing continued residential land uses in the 100-year floodplain with CDBG-DR funds.

At the time of development of the Substantial Amendment 1, only the Town of Moffett, Oklahoma, was a potential applicant for the program. Many of the homes in Moffett are beyond repair and have been abandoned. There are approximately a dozen people who continue to live in Moffett. The following three photographs were taken by ODOC on April 1, 2021.

A home in Moffett that was destroyed by flood waters.

Many homes were abandoned.

Facing SE towards Arkansas. In the background, the Arkansas River.

The structure of the Voluntary Buyout Program in Substantial Amendment 1 allowed for a buyout award of up to $110,000. This amount was based on the median home value in the Fort Smith, Arkansas, Moffett, Oklahoma statistical area at the time of publication (August 2021).

After engaging other communities that were impacted by the disaster, it became apparent that Tulsa County could apply for the VBP if the program were re-designed to make it more effective in that county. ODOC remains committed to helping the Town of Moffett, Oklahoma. Eligible applicants are encouraged to apply if there is funding available.

Action Plan Substantial Amendment 2

The State's Action Plan Substantial Amendment 2 retains the prohibition of rehabilitation in the 100-year floodplain. ODOC remains committed to ensuring that life and safety are prioritized in its programming. Rehabilitation, reconstruction, or new construction in the floodplain is contrary to those goals.

The Voluntary Buyout Program in Substantial Amendment 2 changed significantly compared to Substantial Amendment 1. These changes occurred due to numerous discussions with Tulsa County and Meshek & Associates on what would make the program feasible in Tulsa County. Some of the more significant changes are described below:

1. **Vacant Lots are Eligible**
   Homeowners who were impacted by flooding, and who have subsequently demolished their homes, are now eligible to participate in the VBP. Property that was used for housing at the time of the disaster, as indicated by a housing structure located on the property at the time of the disaster, is eligible. Homes that are uninhabitable or were demolished after the disaster but still legally owned by the beneficiary will qualify. Properties that were vacant land before the disaster are eligible for a participation incentive and buyout award based on FMV but will not be eligible for the housing incentives regardless of income.

2. **Property Owners of Rentals are Eligible**
   Property owners of rentals are now eligible under the Urgent Need National Objective on a limited basis. Property owners are limited to the participation incentive and the FMV of the housing structure. Tenants will be provided relocation assistance through the Uniform Relocation Act (URA) and will meet with HUD-Certified Housing Counselors.

3. **Manufactured or Mobile Home Units are Eligible**
   Manufactured or Mobile Home Units (MHU) are eligible. Owners of MHU are eligible to receive a buyout award and incentives under the VBP if the MHU is considered real property and is assessed as real property by the county. MHUs are considered real property in the state of Oklahoma if the MHU owner also owns the land on which the unit is located [68 O.S. § 2105] [OAC 710:60-3-132]. MHU owners must provide documented proof that the manufactured home has been included in the property assessment. The proof required is a deed listing the manufactured home by VIN, year, make, and model [68 O.S. § 2105] [OAC 710:60-3-132]. MHUs that meet the state standard for real property

are eligible to be purchased at the FMV, and the owners will be eligible for additional incentives.

- If an individual that owns a MHU but does not own the land beneath their MHU, the MHU is considered personal property in accordance with State Law [68 O.S. § 2105] [OAC 710:60-3-132]. If the owner of the land does not want to participate in the program, the MHU owner cannot receive a buyout or incentives since CDBG-DR cannot be used to purchase personal property. If the manufactured home is considered personal property, the actual, reasonable costs associated with moving it and its contents are eligible to be paid.

4. **Owners of Manufactured or Mobile Home Parks**
   Owners of Manufactured or Mobile Home Parks may participate in the buyout program in the same manner that property owners of rental units may apply. These individuals, who are unlikely to be Low-to-Moderate Income (LMI), will be eligible under the Urgent Need National Objective. MHU owners in the park (tenants) will be eligible for relocation assistance under the URA, including the actual reasonable costs associated with moving the MHU and its contents.

Action Plan Proposed Non-Substantial Amendment #3

Non-Substantial Amendment #3 reallocates $2 million from Public Infrastructure to the Voluntary Buyout Program to address the continued unmet housing need.

Incentives and Awards by Property Type

Item	Notes
Single-family residential	Eligible for VBP and all incentives.
Multi-family residential	Eligible for VBP and all incentives.
Mobile or Manufactured Housing Units	Eligible for VBP and all incentives if the MHU is considered real property and is assessed as real property by the county. If the MHU owner does not own the land, the MHU owner would be treated as a tenant and would be eligible for relocation

	assistance if the landlord participates in the VBP.
Vacant land (pre-disaster)	Eligible for VBP; ineligible for incentives except for the incentive to participate.
Property with owed back taxes	Eligible for VBP and all incentives. Property taxes must be paid. A payment plan may be possible. Liens can be resolved at closing.
Tie back to DR-4438	Flooding disaster impact will be determined at the Voluntary Buyout Target Area (VBTA) and the Disaster Risk Reduction Area (DRRA). Individual housing structures do not need to have a direct impact of DR-4438 to qualify for the VBP.
Someone who purchased the property after DR-4438	Eligible for VBP and all incentives. Note: Incentives shall not exceed the purchase price of the vacant lot.
Second homes	Eligible for VBP; ineligible for incentives except for the incentive to participate.

Incentives by Beneficiary Type

For specific details, please refer to the 2019 CDBG-DR Voluntary Buyout Program Guidelines published on the website: https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery-2019-2/

Property owners who opt to participate in the Voluntary Buyout Program may be eligible for a participation incentive, the Fair Market Value of their property, and the Housing Incentive. All beneficiaries who participate in the Voluntary Buyout Program are required to meet with a HUD-Certified Housing Counselor to receive program benefits, regardless of income level, property type, or incentive received. These agents or counselors will be obtained by the subrecipient and will help beneficiaries navigate the buyout program and relocation where applicable.

All property owners are eligible to receive the participation incentive and the Fair Market Value of the property. Only Low- and Moderate-Income persons who receive a buyout are eligible for Housing Incentives.

Incentive to Participate	All beneficiaries are eligible.
Fair Market Value (FMV) of Property	All beneficiaries are eligible.
Housing Incentives Homeownership Assistance Rental Assistance	**Only available to LMI persons** who also receive a buyout.

Incentive to Participate:
A one-time incentive to participate is an allowable expense that subrecipients may offer to all participants and cannot exceed $5,000 per parcel. This may be an allowable expense for all individuals that participate in the VBP regardless of income.
All beneficiaries participating in the VBP will meet with a HUD-Certified housing counselor who will assist beneficiaries with the buyout program.

Property Valuation and Purchase Price
The State will determine whether pre or post disaster Fair Market Value (FMV) will be used and will publish this information in Voluntary Buyout Program Guidelines.
The FMV is determined through a market appraisal or through a waiver valuation, in accordance with the process defined in the Voluntary Program Buyout guidelines posted on ODOC's website.
All beneficiaries participating in the VBP will meet with a HUD-Certified Housing Counselor who will assist beneficiaries with the buyout program.

Housing Incentives (if applicable)
VBP provides two options to support beneficiaries to establish housing in areas of reduced risk; one for beneficiaries who will purchase homes, and one for beneficiaries who will rent. In some very specific household situations, it may be appropriate that the property owner participating in the buyout cannot maintain the long-term cost of owning a home and for their personal situation, renting is the most viable option.

All beneficiaries participating in the VBP will meet with a HUD-Certified Housing Counselor who will assist beneficiaries with the buyout program. The HUD-Certified housing counselor will provide housing counseling that ensures beneficiaries understand available housing opportunities, current housing costs, and financial requirements to purchase and maintain a home. The HUD-Certified housing counselor will analyze the household's finances and help determine how much the beneficiary can afford to spend on a home based on the beneficiary's current income. HUD-Certified housing

counselors will determine the beneficiary contribution to the cost of a new home, whether to own or rent, for the purposes of the incentive calculation. Beneficiaries will decide if they would rather rent or own a new home.

Homeownership Incentive:
The Homeownership Incentive will fill the gap between what a beneficiary can sustainably finance for replacement comparable housing and the currently available housing on the open market. Beneficiaries will be required to either fund or finance the remaining cost of the purchase. In some cases, beneficiaries may be unable to finance or fund any amount, in which case the actual award would equal the actual purchase price of a new home. The beneficiary contribution will be determined by the housing counselor, based on the beneficiary's current income. The maximum incentive will be determined using the median value of homes in the location of the replacement home. Subrecipients should provide beneficiaries a letter of intent certifying that they will receive an "up to" award amount.

> **Maximum Incentive** = Median Home Value of MSA or County – Beneficiary Contribution (which may be $0)
>
> **Actual Incentive** = Actual Purchase Price – Beneficiary Contribution (which may be $0)

For example, a program participant is paid $115,000 for their buyout. Based on an evaluation of their financial ability, their housing counselor determines their Beneficiary Contribution is $150,000. The selected relocation property, which is outside of the floodplain or DRRA, and is in the Tulsa, Oklahoma MSA costs $225,000. The median home value in the Tulsa MSA is $325,000. Because the actual purchase price is lower than the median home value for the MSA, the beneficiary will be within the maximum allowable incentive. The following calculation is used for the housing incentive:

> $225,000 - $150,000 = $75,000 Actual Incentive

Assistance must be escrowed for the closing sale of the new home and shall not be a direct payment to the beneficiary.

Additional formulas to determine financial capacity are outlined in the State's Voluntary Buyout Program Guidelines.

Rental Assistance Incentive:

Note: Existing tenants displaced through a voluntary buyout are assisted under URA rules and requirements. The Rental Assistance incentive is for owners who receive a buyout and then become renters of a new residence.

If a VBP beneficiary is eligible to receive rental assistance, the beneficiary may receive rental payments, paid directly to the landlord, for up to 12 months in an affordable housing unit. Subrecipients should check with the current year HUD fair market rent values for the specified area when formalizing rental payments. All beneficiaries participating in the VBP will meet with a HUD-certified Housing Counselor who will assist beneficiaries with the buyout program.

Disaster Risk Reduction Area

The Disaster Risk Reduction Area is the area that the subrecipient has found is necessary for the health and safety of residents to be offered a buyout option but is currently outside the 100-year floodplain. A Disaster Risk Reduction Area (DRRA) must adhere to the following criteria to be used for buyout programs:

The hazard must have been caused or exacerbated by the presidentially declared disaster for which the grantee is receiving its CDBG-DR allocation.
The hazard must be a predictable environmental threat to the safety and wellbeing of program beneficiaries using the latest data and science such as FEMA repetitive flood loss data
The Disaster Risk Reduction Area must be delineated so that HUD and the public know exactly which properties are located within the designated area.

The eligible Disaster Risk Reduction Areas are described and identified in the State's Voluntary Buyout Program Guidelines. In their application to ODOC, eligible subrecipients must show due diligence with the three criteria and justify in their Project Narrative that it is prudent to include a Disaster Risk Reduction Area and offer buyouts to homes that are not in the 100-year floodplain. Justification may include:

If these homes were damaged during the DR-4438 disaster
If their property was encroached during that disaster
If adjacent properties were impacted and inclusion will minimize checkerboard buyout patterns

To allows for greater citizen participation and supports overall risk reduction in targeted areas, consistent with prior impacts and projected risks

RATIONALE BEHIND THE PROHIBITION OF REHABILITATION AND RECONSTRUCTION IN THE 100-YEAR FLOODPLAIN

Reason Number 1: Communities in the 100-year floodplain will flood again. Floods may result in the loss of life and property. For ODOC, these are unacceptable risks. Homes will not be replaced one-for-one under the Section 104(d) waiver.

Reason Number 2: Prohibiting continued development in the 100-year floodplain leads to better land use over time. The 100-year floodplain should remain greenspace, flood management areas, parks, etc., into perpetuity.

Reason Number 3: Significant elevation is required in most cases.

Reason Number 4: Residents residing in the floodplain are required to maintain flood insurance or risk becoming ineligible for federal assistance (either from FEMA or CDBG-DR) in a future flood event. Flood insurance premiums are becoming more expensive over time and as more communities in the U.S. flood. The cost of flood insurance represents an unnecessary financial burden on households when homes outside of the floodplain are readily available.

Reason Number 5: Using taxpayer dollars for development in a floodplain is not a wise investment. Elevating structures two feet above the BFE is no guarantee that there will not be future property damage or loss of life.

BENEFICIARY PRIORITIZATION

Within the Voluntary Buyout Target Areas, as described in these guidelines, the following priorities should be used in scoring applications submitted by Eligible Beneficiaries. Once subrecipients receive funds to implement the VBP, beneficiaries should be prioritized in the following order:

1. Owner-occupied Low- to Moderate- Income households who own and occupy their home.

2. Low-to-Moderate Income households who own unoccupied, uninhabitable, or demolished homes (post-disaster vacant land). Households residing in temporary or transitional housing or who are considered homeless can participate.
3. Owners of occupied rental units who qualify under the Urgent Need National Objective
4. Households who own and occupy their home and qualify under the Urgent Need National Objective
5. Households who own unoccupied, uninhabitable, or demolished homes (post-disaster vacant land) and qualify under the Urgent Need National Objective.
6. Pre-disaster vacant land.

BUYOUT AWARD AND INCENTIVES

Please refer to the 2019 CDBG-DR Voluntary Buyout Guidelines for more detailed information. The guidelines are available on the State's disaster recovery website.

THE EFFECT OF THE VOLUNTARY BUYOUT PROGRAM ON HOUSING AVAILABILITY

There are two factors tied directly to beneficiaries that determine whether the VBP is successful.

First, low-to-moderate income (LMI) beneficiaries must be encouraged to participate in the VBP with financial incentives that are attractive enough to relocate to safer areas. After all, if the award is too low then nobody would relocate out of harm's way because the financial incentives will not be sufficient to acquire safer housing. On the other hand, the financial incentives cannot be so great that they are considered a windfall.

Second, relocation success out of the 100-year floodplain can only be achieved if participants can secure housing after they receive their buyout award. It does no participant any good if they receive a buyout award but there is nowhere to move to. To be successful in the first factor (receiving an

appropriate buyout award) and unsuccessful in the second factor (not being able to find housing after the fact) is not the definition of a successful VBP.

ODOC/CD takes this concern seriously and therefore has carefully evaluated what effect housing availability has on the Voluntary Buyout Program. As shown in the housing availability analysis below, Tulsa County has adequate housing available for sale and rent. Although the VBP cannot guarantee that every person will immediately find housing outside the 100-year floodplain, ODOC has identified numerous resources available that will mitigate this concern.

Data Overview

ODOC/CD researched to determine if prior VBP conducted elsewhere in the United States created homelessness. This proved inconclusive since no information was found on HUD's website, in news stories, or academic journal databases.

Numerous community partners were engaged in discussion about housing availability and the VBP. ODOC/CD is thankful for the support and data from:

- Realtor.com
- Greater Tulsa Association of Realtors
- DeBruler, Inc.
- Housing Solutions Tulsa
- Oklahoma Housing Finance Agency
- Zillow.com

Current Housing Availability in Muskogee, Sequoyah, and Tulsa Counties

Using Realtor.com data (https://www.realtor.com/research/data/), ODOC looked at housing inventory for all HUD-identified MID areas: Muskogee, Sequoyah, and Tulsa Counties. This data is presented on the following two pages. Metadata on field names, from the Realtor.com dataset, is provided below.

Median list price / Median days on market: This is the value right in the middle of the dataset.

Active listing count: The active listing count tracks the number of for-sale properties on the market, excluding pending listings where a pending status

is available. This is a snapshot measure of how many active listings can be expected on any given day of the specified month.

New listing count: The count of new listings added to the market within the specified geography. The new listing count represents a typical week's worth of new listings in each month. The new listing count can be multiplied by the number of weeks in a month to produce a monthly new listing count.

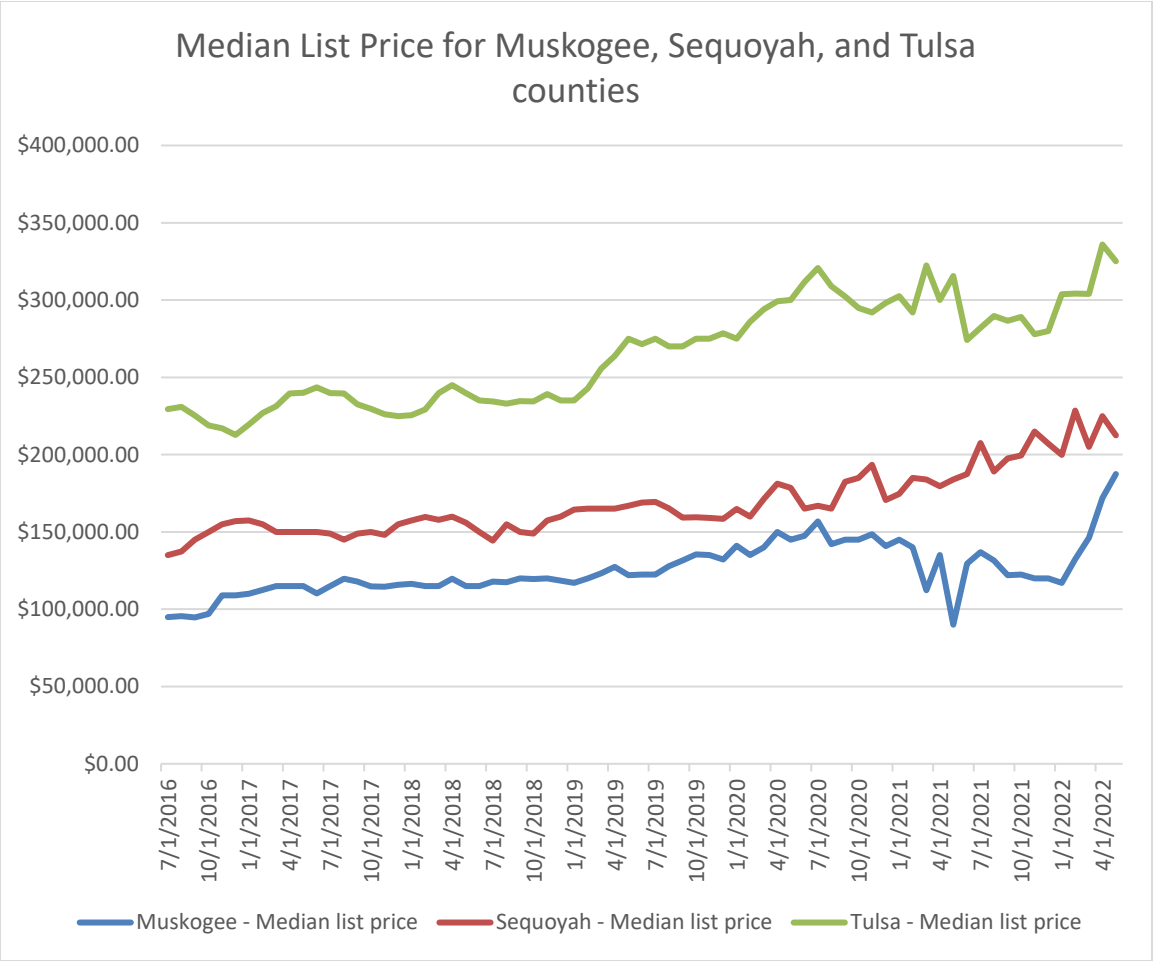
Monthly Housing Inventory (July 2016-May 2022) in Muskogee, Sequoyah, and Tulsa Counties

Data source: Realtor.com https://www.realtor.com/research/data/

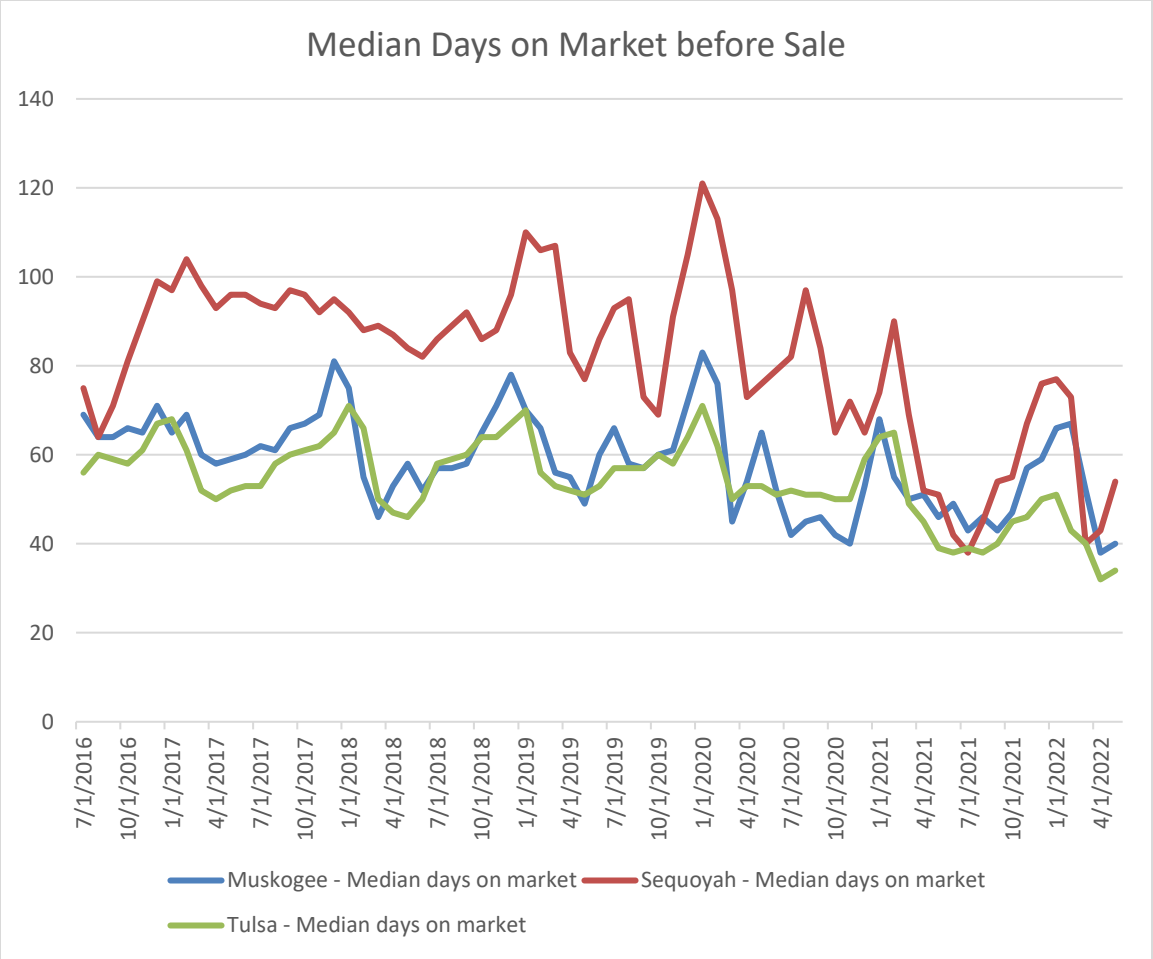
MM-YR	Muskogee - Median list price	Sequoyah - Median list price	Tulsa - Median list price	Muskogee - Active listing count	Sequoyah - Active listing count	Tulsa - Active listing count	Muskogee - Median days on market	Sequoyah - Median days on market	Tulsa - Median days on market	Muskogee - New listing count	Sequoyah - New listing count	Tulsa - New listing count
5/1/2022	$187,450.00	$212,500.00	$325,000.00	88	77	744	40	54	34	72	40	1044
4/1/2022	$172,000.00	$225,000.00	$335,951.00	70	74	573	38	43	32	68	28	1136
3/1/2022	$146,250.00	$204,950.00	$304,000.00	63	83	514	52	40	40	64	52	972
2/1/2022	$132,450.00	$228,500.00	$304,266.00	66	70	547	67	73	43	56	32	812
1/1/2022	$116,999.00	$199,900.00	$303,805.00	78	77	607	66	77	51	48	16	820
12/1/2021	$119,900.00	$207,000.00	$279,950.00	93	89	753	59	76	50	52	28	696
11/1/2021	$119,900.00	$214,950.00	$277,900.00	97	97	884	57	67	46	52	32	888
10/1/2021	$122,400.00	$199,500.00	$289,000.00	114	98	1003	47	55	45	60	32	1036
9/1/2021	$121,950.00	$197,500.00	$286,569.00	107	95	1039	43	54	40	68	40	1036
8/1/2021	$131,500.00	$189,000.00	$289,700.00	81	96	1065	46	45	38	72	52	1216
7/1/2021	$137,000.00	$207,450.00	$282,000.00	75	96	982	43	38	39	64	56	1248
6/1/2021	$129,550.00	$187,450.00	$274,225.00	64	73	887	49	42	38	80	40	1184
5/1/2021	$90,000.00	$184,000.00	$315,500.00	57	61	777	46	51	39	64	24	1244
4/1/2021	$135,000.00	$179,500.00	$299,999.00	64	73	792	51	52	45	52	32	1096
3/1/2021	$112,200.00	$183,950.00	$322,500.00	65	85	727	50	69	49	56	48	1052
2/1/2021	$140,000.00	$185,000.00	$292,000.00	75	86	842	55	90	65	56	20	700
1/1/2021	$145,000.00	$174,500.00	$302,500.00	88	100	982	68	74	64	48	20	856
12/1/2020	$140,750.00	$170,750.00	$298,250.00	96	108	1194	53	65	59	36	32	728
11/1/2020	$148,450.00	$193,500.00	$291,900.00	106	108	1393	40	72	50	48	28	904
10/1/2020	$145,000.00	$185,000.00	$294,900.00	90	111	1430	42	65	50	72	40	1100
9/1/2020	$144,950.00	$182,400.00	$302,298.00	81	114	1424	46	84	51	56	28	1112
8/1/2020	$142,000.00	$165,000.00	$309,000.00	83	128	1517	45	97	51	64	32	1140
7/1/2020	$156,700.00	$167,000.00	$320,750.00	92	148	1594	42	82	52	56	32	1176
6/1/2020	$147,500.00	$165,000.00	$311,700.00	97	156	1679	52	79	51	80	32	1156
5/1/2020	$145,000.00	$178,500.00	$300,000.00	95	157	1819	65	76	53	56	40	1196
4/1/2020	$149,999.00	$181,200.00	$299,200.00	112	163	1877	54	73	53	44	24	968
3/1/2020	$139,950.00	$171,200.00	$294,000.00	115	164	1904	45	97	50	60	48	1040
2/1/2020	$135,000.00	$159,900.00	$285,893.00	140	168	1911	76	113	62	72	36	1016
1/1/2020	$141,063.00	$164,825.00	$275,000.00	128	173	2029	83	121	71	36	36	916
12/1/2019	$132,250.00	$158,450.00	$278,450.00	158	187	2123	72	105	64	32	28	784
11/1/2019	$135,000.00	$159,000.00	$275,000.00	170	196	2317	61	91	58	60	16	872
10/1/2019	$135,403.00	$159,500.00	$274,950.00	171	207	2384	60	69	60	56	44	1016

9/1/2019	$131,557.00	$159,250.00	$269,943.00	172	204	2358	57	73	57	72	32	1052
8/1/2019	$127,857.00	$165,214.00	$269,943.00	196	204	2488	58	95	57	108	32	1172
7/1/2019	$122,500.00	$169,500.00	$274,950.00	190	204	2575	66	93	57	72	36	1184
6/1/2019	$122,500.00	$169,000.00	$271,439.00	192	209	2533	60	86	53	56	32	1240
5/1/2019	$122,000.00	$167,000.00	$274,900.00	196	215	2478	49	77	51	80	40	1272
4/1/2019	$127,329.00	$165,000.00	$263,800.00	185	211	2494	55	83	52	104	52	1360
3/1/2019	$123,329.00	$165,000.00	$255,800.00	195	209	2541	56	107	53	96	44	1236
2/1/2019	$119,950.00	$165,000.00	$242,971.00	201	224	2618	66	106	56	72	40	1156
1/1/2019	$116,950.00	$164,500.00	$235,000.00	199	230	2682	70	110	70	60	44	1076
12/1/2018	$118,500.00	$159,900.00	$235,000.00	195	242	2874	78	96	67	52	28	872
11/1/2018	$119,900.00	$157,450.00	$239,260.00	216	251	2980	71	88	64	52	44	924
10/1/2018	$119,450.00	$149,000.00	$234,450.00	227	250	3184	65	86	64	72	48	1052
9/1/2018	$120,000.00	$149,900.00	$234,620.00	217	251	3301	58	92	60	84	60	1016
8/1/2018	$117,450.00	$155,000.00	$233,000.00	205	249	3342	57	89	59	64	52	1264
7/1/2018	$117,950.00	$144,450.00	$234,350.00	205	255	3330	57	86	58	80	40	1288
6/1/2018	$115,000.00	$149,900.00	$235,000.00	201	259	3232	52	82	50	80	52	1340
5/1/2018	$115,000.00	$156,000.00	$239,900.00	194	247	3039	58	84	46	84	56	1268
4/1/2018	$119,750.00	$160,000.00	$245,000.00	186	240	2908	53	87	47	60	40	1284
3/1/2018	$114,900.00	$157,900.00	$239,900.00	188	235	2880	46	89	50	68	52	1188
2/1/2018	$114,950.00	$159,750.00	$229,350.00	184	243	2837	55	88	66	80	44	1088
1/1/2018	$116,450.00	$157,450.00	$225,450.00	196	239	2930	75	92	71	72	56	920
12/1/2017	$115,900.00	$154,900.00	$225,000.00	205	247	3092	81	95	65	48	44	728
11/1/2017	$114,500.00	$148,000.00	$226,218.00	220	245	3311	69	92	62	36	40	996
10/1/2017	$114,700.00	$149,900.00	$229,600.00	253	251	3339	67	96	61	72	32	1064
9/1/2017	$117,900.00	$149,000.00	$232,500.00	254	251	3361	66	97	60	72	48	1040
8/1/2017	$119,700.00	$145,000.00	$239,700.00	255	255	3389	61	93	58	72	44	1084
7/1/2017	$115,000.00	$149,000.00	$239,900.00	264	265	3426	62	94	53	88	44	1244
6/1/2017	$110,250.00	$150,000.00	$243,500.00	263	256	3231	60	96	53	96	52	1372
5/1/2017	$115,000.00	$150,000.00	$239,950.00	247	253	3058	59	96	52	88	44	1332
4/1/2017	$114,900.00	$149,900.00	$239,500.00	242	255	3012	58	93	50	76	48	1420
3/1/2017	$114,900.00	$150,000.00	$231,250.00	237	246	2873	60	98	52	100	52	1392
2/1/2017	$112,500.00	$155,000.00	$226,900.00	229	238	2803	69	104	61	72	40	1232
1/1/2017	$110,000.00	$157,500.00	$219,450.00	229	233	2827	65	97	68	68	36	1084
12/1/2016	$109,000.00	$156,900.00	$212,750.00	230	234	2911	71	99	67	72	32	668
11/1/2016	$109,000.00	$155,000.00	$217,000.00	236	237	3039	65	90	61	68	28	952
10/1/2016	$97,000.00	$149,900.00	$219,000.00	238	235	3156	66	81	58	80	52	1088
9/1/2016	$94,750.00	$145,000.00	$225,400.00	234	229	3140	64	71	59	68	52	1100
8/1/2016	$95,500.00	$137,250.00	$230,950.00	237	225	3090	64	64	60	76	48	1160
7/1/2016	$94,900.00	$135,000.00	$229,524.00	237	222	3159	69	75	56	72	52	1256

Using the data from Realtor.com, the following charts were created:

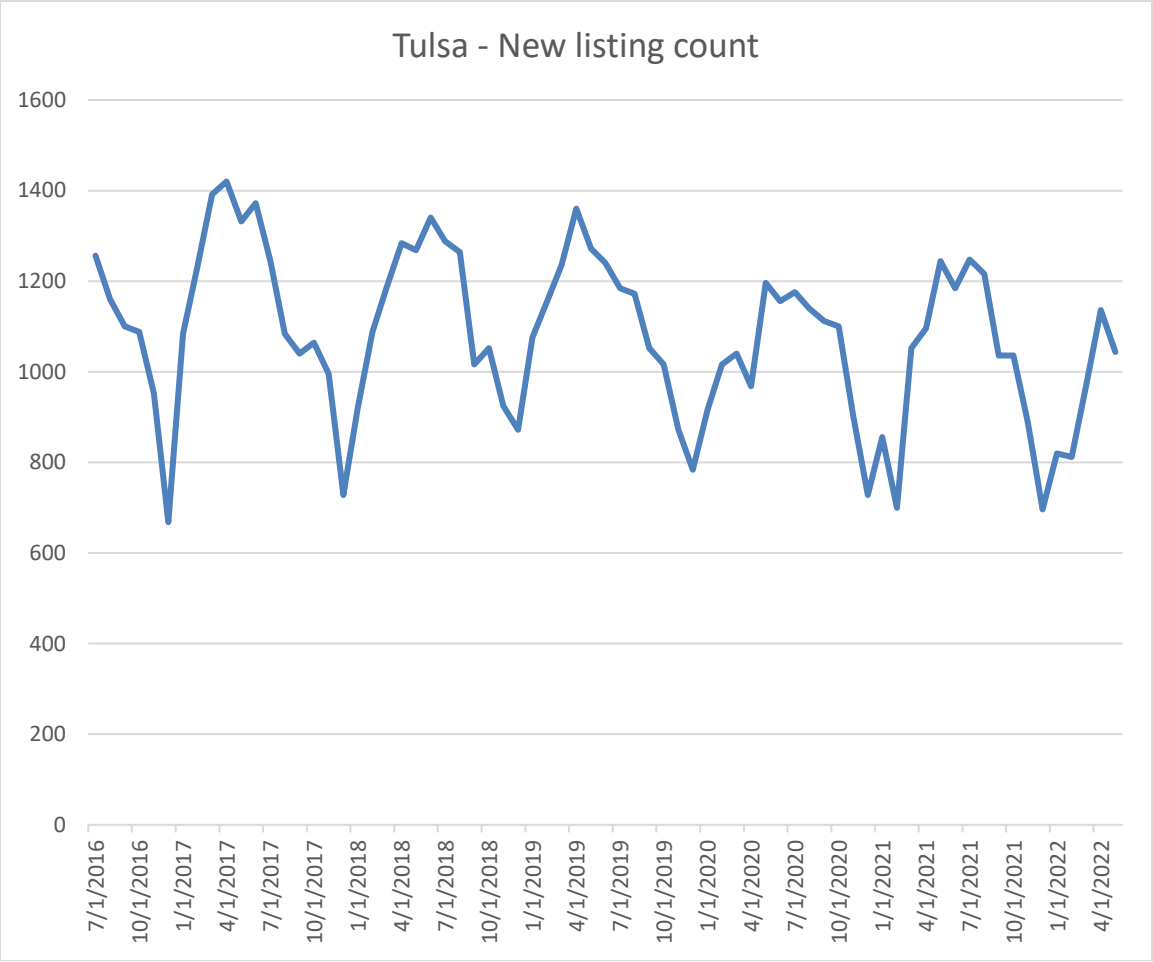


As anticipated, more rural counties tend to have lower-cost housing.



For the past six years, the median number of days on market before a sale has exceeded twenty days for all three HUD-identified MID areas.

This is evidence to suggest that the housing market in Tulsa County is not as tight as in other areas of the country.



As noted in the metadata from Realtor.com:

> "The count of new listings added to the market within the specified geography. The new listing count represents a typical week's worth of new listings in each month. The new listing count can be multiplied by the number of weeks in a month to produce a monthly new listing count."

There are over 1,000 properties in any given period that are available for sale in Tulsa County. Since the 2019 CDBG-DR Voluntary Buyout Program is expected to help 30-60 households, there are plenty of homes within Tulsa County for sale (not to mention any other county in Oklahoma or a different state that someone could move to).

There does not exist a comprehensive database of rental listings. Where one listing could appear on Zillow it may not appear on any of the dozens of other apartment websites and phone apps that are available such as, but not limited to, the following:

- Apartment List (website)
- Apartments.com (website)
- Craigslist (website)
- Homesnap (website)
- HotPads (website)
- Padmapper (website)
- Rent.com (website)
- Trulia Rentals (website)
- Zumper (website)

ODOC did a cursory review of the rental properties available on just Zillow.com. As of June 23, 2022, there are over 300 rental properties in the City of Tulsa for under $1500/month. There are 102 listings for under $1000/month.

Affordable Housing under Construction

The Oklahoma Housing Finance Agency (OHFA) finances the construction and revitalization of affordable rental housing across the State of Oklahoma.

As of June 29, 2022, OHFA has several affordable housing developments under construction in Tulsa County totaling 390 units.

Under Construction	Number of Units	Estimated Completion
RIVER WEST PHASE I 2100 S. Jackson Avenue Tulsa, OK 74107 Tulsa County (918) 492-4833	74	August 2022
RIVER WEST PHASE II	72	December 2023

21st Nogales & Olympia Ave Tulsa, OK 74107 Tulsa County (918) 492-4833		
RIVERBROOK APARTMENTS NW Of 5. Aspen And W. Shreveport Broken Arrow, OK 74011 Tulsa County	72	December 2022
THE VILLAGES -A PATH TO INDEPENDENCE 8535 N Memorial Dr Owosso, OK 74055 Tulsa County (918) 451-1491	62	Undetermined
TOWNSHIP21 SW Comer Of East 83rd St Owosso, OK 74055 Tulsa County	58	December 2023
Whitter Heights 68 North Lewis Tulsa, OK 74110 Tulsa County	52	December 2022

Resources for Homelessness

There are numerous resources available for the homeless in Tulsa County:

- The City of Tulsa – Website
- Family Promise of Tulsa County – Website
- Community Service Council – Website
- Mental Health Association of Tulsa – Website
- Oklahoma Department of Commerce ESG – Website
- Housing Solutions Tulsa – Website

CONCLUSION

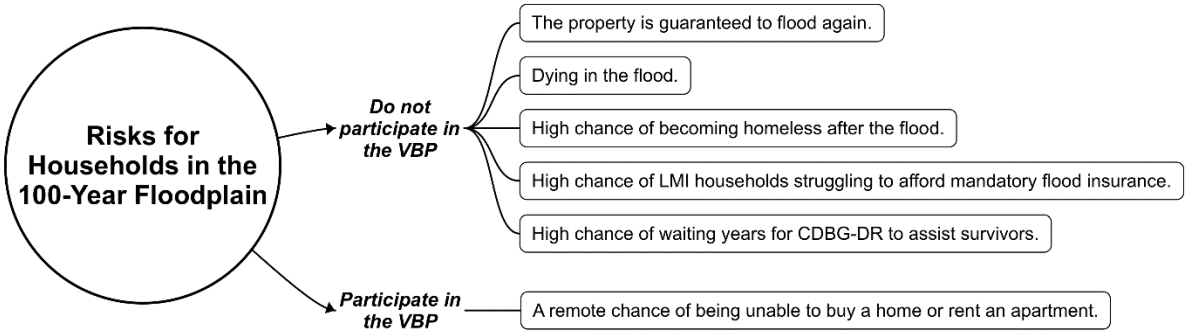
The Oklahoma Department of Commerce has engaged 27 counties impacted by DR-4438 since January of 2020. ODOC staff has worked tirelessly with dozens of stakeholders as described in the State's Citizen Participation Plan.

Tulsa County is the only eligible applicant, with an extremely viable application, for the Voluntary Buyout Program. Despite over two years of trying to find other communities to participate in the VBP, no others have come forward. ODOC/CD has no reason to believe that any other community is interested in applying for the VBP at this time.

Tulsa County has identified 158 interested applicants for the VBP. The need for this program exceeds $33,000,000. Since Oklahoma's 2019 CDBG-DR program restricts applicants to a maximum award amount of $14,750,000 (Substantial Amendment 2) only 30-60 households will be able to participate in the program.

In any given month in Tulsa County, there are over 1000 homes for sale and over 300 available rentals.

No CDBG or CDBG-DR program is without risk. This includes Oklahoma's 2019 CDBG-DR Voluntary Buyout Program. Beneficiaries impacted by DR-4438 face a variety of different risks. Consider the following:



To continue living in the 100-year floodplain carries substantially more risk than voluntarily participating in the VBP.

There is no evidence ODOC found on the HUD website, in news stories, or in academic journals that demonstrated a Voluntary Buyout Program created homelessness. This does not mean it could never occur. But what it does suggest is that well-designed programs have successfully mitigated this risk. ODOC/CD will mitigate any potential risks associated with the program.

ODOC/CD has evaluated the housing availability in Tulsa County and has determined that there is no shortage of housing to buy or rent. ODOC remains committed to ensuring that all participants in the VBP find replacement housing. ODOC and Tulsa County will take the following steps to ensure program success:

> All beneficiaries participating in the VBP will meet with a HUD-Certified Housing Counselor who will assist beneficiaries with the buyout program. HUD-Certified Housing Counselors will help participants of the VBP understand available housing opportunities, current housing costs, and the financial requirements to purchase and maintain a home. The Housing Counselors will analyze the household's finances and help determine the beneficiary's estimated contribution. In some cases, Housing Counselors may recommend that the beneficiary consider renting or may determine that the beneficiary's estimated contribution is $0.

Housing and Bedroom Size

According to the 2014—2018 ACS 5-Year Data Profile, 24% of Oklahoma's population is under the age of 18 (Refer to Appendix for table data). This means that housing activities must consider family unit size when addressing unmet need.

HUD guidelines provide occupancy policies that allow for two persons per bedroom as reasonable. Exceptions to this standard are based on the following factors:

A. No more than two persons are required to occupy a bedroom.
B. Persons of different generations (i.e., grandparents, parents, children), persons of the opposite sex (other than spouses/couples), and unrelated adults are not required to share a bedroom (An adult is a person 18 years old or older).
C. Couples living as spouses (whether or not legally married) must share the same bedroom for issuance size purposes.
D. A live-in aide who is not a member of the family is not required to share a bedroom with another member of the household. Note: The need for a full-time live-in aide must be documented. A waiver may be approved as outlined in the section on Issuance Size Exceptions.

E. Individual medical problems (e.g., chronic illness) sometimes require separate bedrooms for household members who would otherwise be required to share a bedroom. Documentation supporting the larger sized unit and related subsidy must be provided and verified as valid. A waiver may be approved as outlined in the section on Issuance Size Exceptions.
F. In most instances, a bedroom is not provided for a family member who will be absent most of the time, such as a member who is away in the military. If individual circumstances warrant special consideration, a waiver may be approved as outlined in the section on Issuance Size Exceptions.
G. When determining family issuance size, include all children expected to reside in the unit in the next year as members of the household. Examples include, but are not limited to, the following:
    A. Adoption: Children who are in the process of being adopted are included as members of the household.
    B. Pregnant women: Children expected to be born to pregnant women are included as members of the household.
    C. Foster Children: Foster children residing in the unit along with families who are certified for foster care and are awaiting placement of children are included as members of the household. If children are anticipated to occupy the unit within a reasonable period of time, they must be considered when determining the issuance size.
    D. Joint/Shared Custody Arrangements: In most instances children in joint/shared custody arrangements should occupy the unit at least 50% of the time. However, if individual circumstances merit special consideration, a waiver may be approved as outlined in the section on Issuance Size Exceptions. The custody arrangement may be verified by the divorce decree/legal documents or by self-certification.
H. Custody of Children in Process: Children whose custody is in the process of being obtained by an adult household member may be included as members of the household. Evidence that there is a reasonable likelihood that the child will be awarded to the adult (i.e., within three months) must be provided for such child to be included.
I. Children Temporarily Absent from Household:
    A. Children temporarily absent from the home due to placement in foster care may be included as members of the household. Evidence that there is a reasonable likelihood that the child will

return to the household (i.e., within three months) must be provided for such child to be included.

B. Children who are away at school but live with the family during school recesses are included as members of the household.

Conclusion of Housing Unmet Needs

Impacted Area	Data Source	Total Damage	Total Unmet Need
HUD MID	FEMA IA data	$15,830,942.38	$7,903,472.32
State MIDs	FEMA IA data	$10,121,670.20	$5,409,529.26
Total Unmet Housing Need		$25,952,612.58	$ 13,313,001.58

Homelessness, Transitional and Supportive Facilities, Units and Populations

To date, ODOC/CD has not received data supporting an unmet need for physical or structural homeless, transitional, and supportive facility repairs as a direct result of the FEMA DR 4438 identified disaster. No entity or Unit of General Local Government has identified a need for financial assistance to address an increase in homeless individuals or families or physical damage to homeless or transitional housing facilities for any of the events covered by the Federal Register Notice.

The State contacted 22 shelters in Survey I and Survey II. There were no responses received that indicated there are any unmet needs.

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

For the State to be prepared for the unmet needs of the pre-disaster homeless and nearly homeless, the State has allocated higher scoring for projects that help this vulnerable population.

Public Facilities & Public Improvements Needs Assessment

Based on data compiled from the Oklahoma Emergency Management, State's needs assessment survey, public outreach, and FEMA reports, unmet infrastructure needs rank very high due to sustained significant damage to infrastructure because of the FEMA DR 4438 disaster.

The primary method by which unmet needs were assessed for infrastructure impacts from the disaster are through the FEMA PA data[4]. PA funds a portion of recovery work to public infrastructure, such as bridges, roads, and public buildings. PA applicants may be the State, a local municipality, or other entity. FEMA processes PA grant funding according to the type of work the applicant plans to undertake. Work must be required because of the declared disaster DR 4438, be in the designated area, be the legal responsibility of the applicant, and be undertaken at a reasonable cost.

Eligible work is classified into the following categories:

- Emergency Work:
  - Category A: Debris removal
  - Category B: Emergency protective measures
- Permanent Work:
  - Category C: Roads and Bridges
  - Category D: Water control facilities
  - Category E: Public Buildings and contents
  - Category F: Public Utilities
  - Category G: Parks, recreational, and other facilities

The State suffered significant impacts which resulted in category A and B projects. However, due to the nature of such projects, funding already provided, and the time elapsed since the disaster, these no longer stand as an overlying priority. In total, 393 unique projects were identified across all impacted counties. The total approximate cost of the debris removal and emergency protective measures is $12,231,671.12 across all DR 4438 eligible counties. The cost of FEMA PA projects is split between federal and non-federal share, with the federal share contributing 75 percent of the cost and the non-federal share contributing 25 percent of the cost.

[4] https://www.fema.gov/openfema-data-page/public-assistance-funded-projects-details-v1

For assessing ongoing, long-term recovery needs, FEMA PA categories C – G are used as the foundation of the analysis. FEMA PA projects include a non-federal cost share or a percentage of total costs which must be paid by the applicant to fully fund the necessary work. For Categories C – G, the non-federal cost share is 25 percent. A total of $116,559,253.33 in PA projects in categories C – G had been identified and submitted to FEMA for DR 4438. This includes an approximate federal share of $87,419,540.81 and a non-federal share of $29,139,712.52. The following data was collected on PA applicants for DR 4438 for FEMA PA categories C – G, the anticipated total costs of those projects, and the total amount of federal and non-federal share. It is important to note that FEMA's priority is to restore damage structures to service, while CDBG-DR funds work to develop a long-term recovery need, including implementing resiliency measures where appropriate to safeguard against future losses.

Category	Category Type	Number of Projects
A	Debris Removal	51
B	Emergency Protective Measures	128
C	Roads and Bridges	508
D	Water Control Facilities	11
E	Public Buildings	79
F	Public Utilities	98
G	Recreational or Other	60
Z	State Management	97
Total		**1,032**

County	Estimated Cost	Federal Share (75%)	Local Share (25%) or Unmet Need
Alfalfa	**$1,479,029.26**	**$1,109,725.63**	**$369,757.32**
Protective Measures	$51,286.54	$37,797.04	$12,821.64
Public Utilities	$110,669.32	$83,002.00	$27,667.33
Roads & Bridges	$1,312,587.36	$984,440.55	$328,146.84
State Management	$4,486.04	$4,486.04	$1,121.51
Canadian	**$3,457,622.27**	**$2,634,378.91**	**$864,405.57**
Debris Removal	$15,670.42	$11,752.81	$3,917.61

Protective Measures	$173,386.50	$130,039.89	$43,346.63
Public Buildings	$194,188.09	$145,641.08	$48,547.02
Public Utilities	$514,478.22	$385,858.67	$128,619.56
Roads & Bridges	$2,277,421.99	$1,708,066.50	$569,355.50
State Management	$164,648.69	$164,648.69	$41,162.17
Water Control Facilities	$117,828.36	$88,371.27	$29,457.09
Craig	**$919,411.18**	**$696,791.66**	**$229,852.80**
Debris Removal	$38,965.80	$29,224.35	$9,741.45
Public Buildings	$5,000.00	$3,750.00	$1,250.00
Public Utilities	$23,705.53	$17,779.15	$5,926.38
Roads & Bridges	$822,806.87	$617,105.18	$205,701.72
State Management	$28,932.98	$28,932.98	$7,233.25
Creek	**$1,158,208.59**	**$871,727.56**	**$289,552.15**
Debris Removal	$456,480.93	$342,360.70	$114,120.23
Protective Measures	$65,212.83	$48,909.63	$16,303.21
Public Buildings	$124,023.81	$93,017.86	$31,005.95
Recreational or Other	$65,159.17	$48,869.38	$16,289.79
Roads & Bridges	$435,047.57	$326,285.71	$108,761.89
State Management	$12,284.28	$12,284.28	$3,071.07
Delaware	**$441,971.17**	**$331,749.72**	**$110,492.79**
Debris Removal	$25,963.64	$19,472.73	$6,490.91
Public Buildings	$59,391.21	$44,543.41	$14,847.80
Public Utilities	$21,706.87	$16,280.15	$5,426.72
Roads & Bridges	$333,824.10	$250,368.08	$83,456.03
State Management	$1,085.35	$1,085.35	$271.34
Garfield	**$722,518.68**	**$541,889.04**	**$180,629.67**
Debris Removal	$3,255.42	$2,441.57	$813.86
Protective Measures	$50,387.59	$37,790.70	$12,596.90
Public Utilities	$43,106.72	$32,330.04	$10,776.68
Recreational or Other	$5,096.35	$3,822.26	$1,274.09
Roads & Bridges	$620,672.60	$465,504.47	$155,168.15
Kay	**$3,714,426.22**	**$2,787,043.42**	**$928,606.56**
Debris Removal	$29,122.09	$21,841.57	$7,280.52
Protective Measures	$167,376.24	$125,532.18	$41,844.06
Public Buildings	$18,537.50	$13,903.13	$4,634.38
Public Utilities	$547,399.22	$410,549.42	$136,849.81
Recreational or Other	$145,842.85	$109,382.14	$36,460.71
Roads & Bridges	$2,562,052.49	$1,921,539.41	$640,513.12
Roads and Bridges	$239,201.05	$179,400.79	$59,800.26
State Management	$4,894.78	$4,894.78	$1,223.70
Kingfisher	**$1,744,425.55**	**$1,309,413.78**	**$436,106.39**

Debris Removal	$4,546.77	$3,410.08	$1,136.69
Protective Measures	$15,763.92	$11,822.94	$3,940.98
Public Buildings	$50,000.00	$37,500.00	$12,500.00
Recreational or Other	$21,280.89	$15,960.67	$5,320.22
Roads & Bridges	$1,648,455.58	$1,236,341.70	$412,113.90
State Management	$4,378.39	$4,378.39	$1,094.60
Le Flore	**$457,851.83**	**$348,190.24**	**$114,462.96**
Protective Measures	$42,174.09	$31,630.58	$10,543.52
Public Buildings	$26,047.60	$19,535.70	$6,511.90
Public Utilities	$170,921.66	$128,191.25	$42,730.42
Roads & Bridges	$199,503.09	$149,627.32	$49,875.77
State Management	$19,205.39	$19,205.39	$4,801.35
Logan	**$1,481,373.90**	**$1,126,234.22**	**$370,343.48**
Debris Removal	$67,118.92	$50,339.19	$16,779.73
Protective Measures	$70,997.89	$53,248.43	$17,749.47
Public Buildings	$72,513.70	$54,385.28	$18,128.43
Public Utilities	$30,162.44	$22,621.83	$7,540.61
Recreational or Other	$38,140.09	$28,605.07	$9,535.02
Roads & Bridges	$1,130,658.38	$847,993.82	$282,664.60
State Management	$60,814.96	$60,814.96	$15,203.74
Water Control Facilities	$10,967.52	$8,225.64	$2,741.88
Mayes	**$879,312.27**	**$663,159.25**	**$219,828.07**
Protective Measures	$15,418.05	$11,563.54	$3,854.51
Public Buildings	$10,000.00	$7,500.00	$2,500.00
Recreational or Other	$141,816.87	$106,362.65	$35,454.22
Roads & Bridges	$697,377.22	$523,032.93	$174,344.31
State Management	$14,700.13	$14,700.13	$3,675.03
Muskogee	**$2,373,471.44**	**$1,783,567.02**	**$593,367.86**
Debris Removal	$262,251.31	$196,688.49	$65,562.83
Protective Measures	$440,921.21	$330,690.91	$110,230.30
Public Buildings	$190,726.25	$143,044.69	$47,681.56
Public Utilities	$805,525.39	$604,144.05	$201,381.35
Recreational or Other	$416,594.72	$312,446.04	$104,148.68
Roads & Bridges	$243,598.95	$182,699.23	$60,899.74
State Management	$13,853.61	$13,853.61	$3,463.40
Noble	**$235,466.97**	**$177,247.11**	**$58,866.74**
Roads & Bridges	$232,879.52	$174,659.66	$58,219.88
State Management	$2,587.45	$2,587.45	$646.86
Nowata	**$2,254,354.17**	**$1,690,765.65**	**$563,588.54**
Protective Measures	$13,260.49	$9,945.37	$3,315.12
Roads & Bridges	$2,241,093.68	$1,680,820.28	$560,273.42

Okmulgee	**$757,414.39**	**$575,362.89**	**$189,353.60**
Debris Removal	$10,341.82	$7,756.37	$2,585.46
Protective Measures	$41,517.83	$31,138.37	$10,379.46
Public Buildings	$20,000.00	$15,000.00	$5,000.00
Public Utilities	$542,649.11	$406,986.83	$135,662.28
Roads & Bridges	$113,697.28	$85,272.97	$28,424.32
State Management	$29,208.35	$29,208.35	$7,302.09
Osage	**$1,724,444.62**	**$1,311,166.38**	**$431,111.16**
Debris Removal	$83,288.49	$62,466.37	$20,822.12
Protective Measures	$62,375.71	$46,781.80	$15,593.93
Public Buildings	$680,372.13	$510,279.10	$170,093.03
Public Utilities	$52,791.69	$39,593.77	$13,197.92
Recreational or Other	$126,581.11	$94,935.84	$31,645.28
Roads & Bridges	$647,704.08	$485,778.09	$161,926.02
State Management	$71,331.41	$71,331.41	$17,832.85
Ottawa	**$1,055,374.31**	**$791,530.76**	**$263,843.58**
Protective Measures	$16,361.33	$12,271.00	$4,090.33
Public Buildings	$115,858.85	$86,894.14	$28,964.71
Recreational or Other	$245,947.81	$184,460.86	$61,486.95
Roads & Bridges	$677,206.32	$507,904.76	$169,301.58
Pawnee	**$275,628.83**	**$209,052.59**	**$68,907.21**
Debris Removal	$12,394.72	$9,296.04	$3,098.68
Protective Measures	$9,205.71	$6,904.29	$2,301.43
Public Utilities	$97,564.92	$73,173.69	$24,391.23
Recreational or Other	$44,345.33	$33,259.00	$11,086.33
Roads & Bridges	$102,794.39	$77,095.81	$25,698.60
State Management	$9,323.76	$9,323.76	$2,330.94
Payne	**$1,583,965.36**	**$1,204,560.26**	**$395,991.34**
Protective Measures	$150,512.27	$112,884.21	$37,628.07
Public Buildings	$29,131.99	$21,849.00	$7,283.00
Recreational or Other	$18,096.37	$13,572.28	$4,524.09
Roads & Bridges	$1,319,879.87	$989,909.91	$329,969.97
State Management	$66,344.86	$66,344.86	$16,586.22
Pottawatomie	**$225,248.32**	**$171,617.78**	**$56,312.08**
Protective Measures	$63,512.37	$47,634.28	$15,878.09
Public Utilities	$91,479.85	$68,609.89	$22,869.96
State Management	$10,726.12	$10,726.12	$2,681.53
Water Control Facilities	$59,529.98	$44,647.49	$14,882.50
Rogers	**$1,888,092.92**	**$1,424,452.64**	**$472,023.23**
Debris Removal	$388,706.13	$291,529.60	$97,176.53
Protective Measures	$95,682.65	$71,761.99	$23,920.66

Public Buildings	$66,514.91	$49,886.19	$16,628.73
Public Utilities	$1,103,509.42	$827,632.06	$275,877.36
Roads & Bridges	$200,148.04	$150,111.03	$50,037.01
State Management	$33,531.77	$33,531.77	$8,382.94
Sequoyah	**$852,963.13**	**$640,741.20**	**$213,240.78**
Debris Removal	$87,892.25	$65,919.19	$21,973.06
Protective Measures	$5,468.88	$4,101.66	$1,367.22
Public Buildings	$81,545.11	$61,158.83	$20,386.28
Public Utilities	$37,787.79	$28,340.84	$9,446.95
Roads & Bridges	$636,193.70	$477,145.28	$159,048.43
State Management	$4,075.40	$4,075.40	$1,018.85
Tulsa	**$15,597,876.27**	**$11,823,590.24**	**$3,899,469.07**
Debris Removal	$1,337,431.92	$1,016,383.50	$334,357.98
Protective Measures	$2,238,706.21	$1,675,929.95	$559,676.55
Public Buildings	$84,153.16	$63,114.87	$21,038.29
Public Utilities	$5,645,486.21	$4,234,114.69	$1,411,371.55
Recreational or Other	$5,052,526.62	$3,789,394.99	$1,263,131.66
Roads & Bridges	$426,707.93	$320,030.96	$106,676.98
State Management	$459,892.44	$459,892.44	$114,973.11
Water Control Facilities	$352,971.78	$264,728.84	$88,242.95
Wagoner	**$707,560.65**	**$533,496.00**	**$176,890.16**
Debris Removal	$19,942.70	$14,957.03	$4,985.68
Protective Measures	$268,634.94	$201,476.21	$67,158.74
Public Buildings	$25,000.00	$18,750.00	$6,250.00
Public Utilities	$48,047.86	$36,035.90	$12,011.97
Roads & Bridges	$334,633.22	$250,974.93	$83,658.31
State Management	$11,301.93	$11,301.93	$2,825.48
Washington	**$113,418.78**	**$86,401.45**	**$28,354.70**
Debris Removal	$7,954.42	$5,965.82	$1,988.61
Protective Measures	$24,029.68	$18,022.27	$6,007.42
Roads & Bridges	$76,085.33	$57,064.01	$19,021.33
State Management	$5,349.35	$5,349.35	$1,337.34
Woods	**$611,839.71**	**$458,879.80**	**$152,959.93**
Debris Removal	$5,835.69	$4,376.77	$1,458.92
Protective Measures	$9,565.89	$7,174.42	$2,391.47
Roads & Bridges	$596,438.13	$447,328.61	$149,109.53
Grand Total	**$46,713,270.79**	**$35,302,735.20**	**$11,678,317.70**

Note: FEMA-PA does not explain which public infrastructure projects directly support housing. ODOC considers this satisfactory and will evaluate applications upon receipt; applicants of infrastructure projects are

encouraged to describe how, if applicable, the infrastructure project directly supports housing.

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

The State's 2019 CDBG-DR program is phased. This means that during Phase I only housing projects can be submitted. Once it has been determined that there is no longer an unmet housing need in any of the 27 eligible counties, the State will open Phase II to infrastructure projects. The State recognizes, however, that in certain instances infrastructure projects that *directly relate to damaged housing* may be submitted and funded during Phase I. Infrastructure activities will include the construction or reconstruction of drainage systems that advance long-term resilience to natural hazards. The State's needs assessment indicates a large unmet need for infrastructure repairs related to damaged drainage systems. Road repairs can be noted as following as a close second in terms of unmet infrastructure needs. Anticipated uses of infrastructure funds are expected to include a focus on road and drainage improvements.

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

The calculation of unmet needs in infrastructure and public facilities related activities is not intended to be final as much of the necessary data is currently not available.

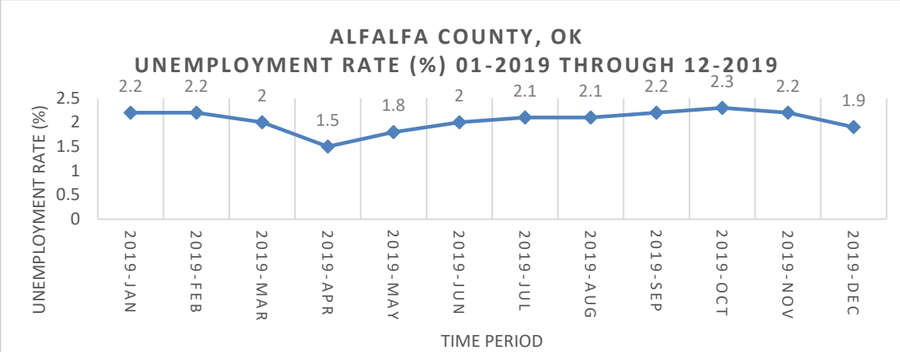
Economic Revitalization Needs Assessment

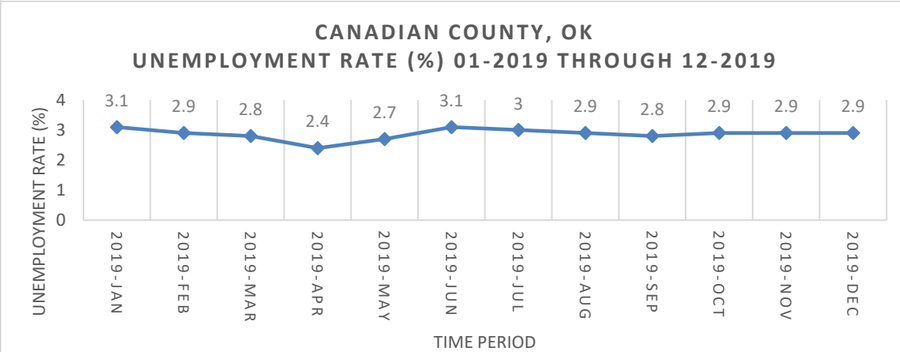
No CDBG-DR eligible Economic Revitalization related unmet needs survey responses were received. Multiple disasters impacted the State's economy either by temporarily or permanently impeding specific economic activity, including, for example, cancelled tourist visits, forgone business revenue due to shuttered offices, and wages not paid to workers who could not work during the storm and in its aftermath. Yet, ODOC chose to research further any unmet needs from the DR-4438 disaster in relation to Disaster Recovery.

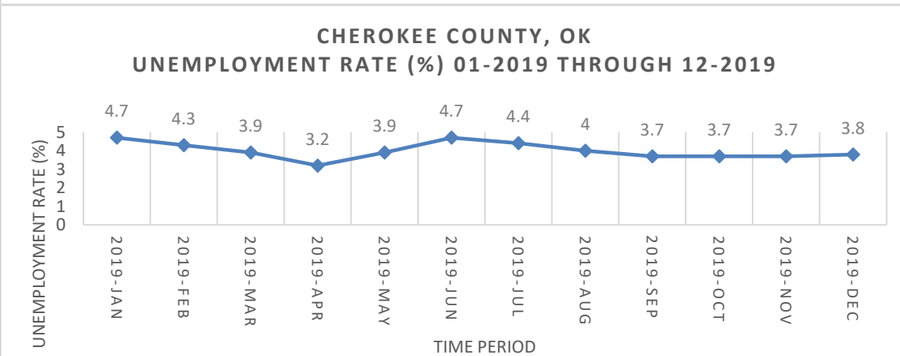
ODOC contacted the Oklahoma Employment Security Commission (OESC) to identify unemployment needs. The OESC only received 17 Disaster Unemployment Assistance (DUA) applications for DR-4438. 10 of these applications were approved for a total of $58,878.74, whereas 7 were denied based on eligibility criteria or failing to meet the application deadline. No UGLG, tribal nation, PHA, or non-profit has reported a further need of assistance in relation to unemployment.

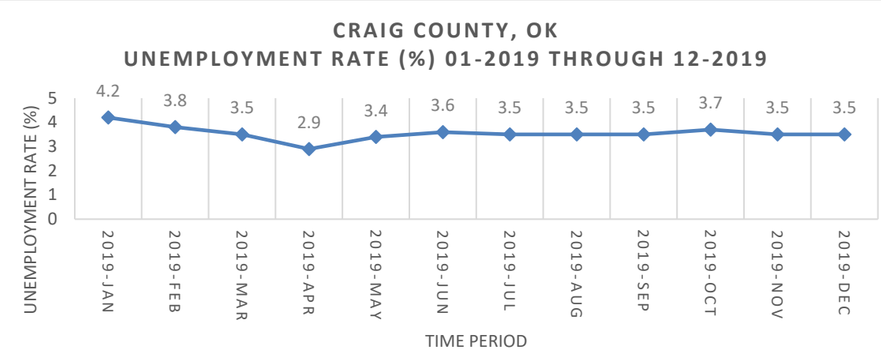
Data on the United States Department of Agriculture's (USDA) Emergency Conservation Program (ECP) provides further insight into possible crop or agricultural losses. 1,203 claims were made between the dates of May 7, 2019, and September 9, 2019 (3 months post the FEMA disaster declaration for DR-4438). A total of $2,578,517.00 was approved to applicants in 27 eligible counties. The USDA could not disclose what specific disaster led applicants to apply for such funds but noted that these claims were made due to either a tornado, severe storm, or flood. No UGLG, tribal nation, PHA, or non-profit has reported a further need of assistance in relation to crop or agricultural losses tied to the DR-4438 disaster during either needs survey.

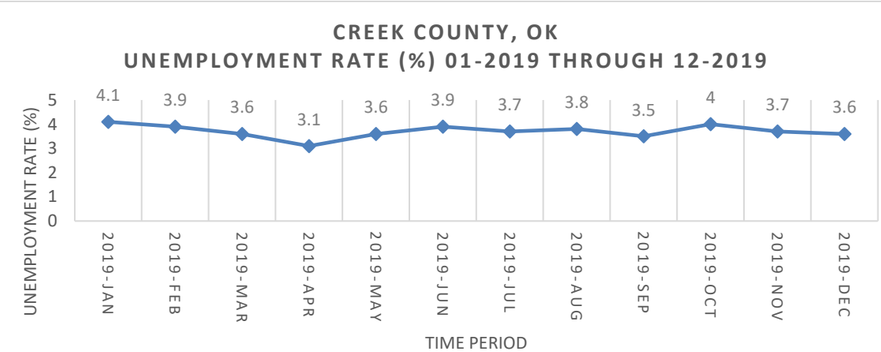
The State has analyzed unemployment rates for all 27 eligible counties using data from the U.S. Bureau of Labor Statistics (BLS). The BLS maintains the Local Area Unemployment Statistics (LAUS) program, which is a federal-state cooperative effort in which monthly estimates of total employment and unemployment are prepared for over 7,500 areas of the United States (Source: https://www.bls.gov/lau/lauov.htm). The unemployment analysis from January 2019 through December 2019 revealed that all 27 eligible counties had a slight increase in unemployment rates following the May 7 through June 1 incident period. Towards the end of the year, most counties experienced an unemployment rate similar to the unemployment rate prior to the disaster. While the State is committed to funding necessary projects for communities hit by the DR-4438 disaster, no UGLG, tribal nation, PHA, or non-profit has reported a further need of assistance in relation to unemployment trends or economic revitalization. The graphs below indicate minimal changes overall in the counties' unemployment trends.

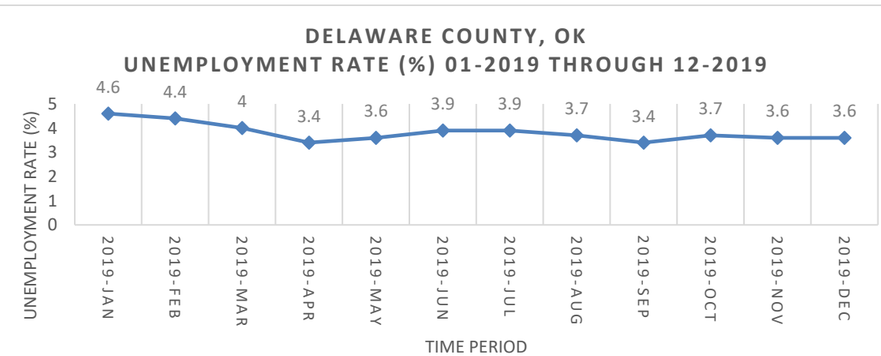

ALFALFA COUNTY, OK
UNEMPLOYMENT RATE (%) 01-2019 THROUGH 12-2019
UNEMPLOYMENT RATE (%)
2.2 2.2 2 1.5 1.8 2 2.1 2.1 2.2 2.3 2.2 1.9
2019-JAN 2019-FEB 2019-MAR 2019-APR 2019-MAY 2019-JUN 2019-JUL 2019-AUG 2019-SEP 2019-OCT 2019-NOV 2019-DEC
TIME PERIOD

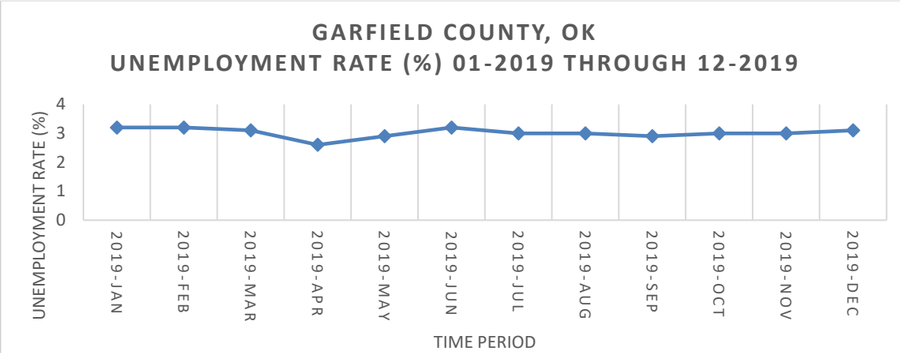

CANADIAN COUNTY, OK
UNEMPLOYMENT RATE (%) 01-2019 THROUGH 12-2019
UNEMPLOYMENT RATE (%)
3.1 2.9 2.8 2.4 2.7 3.1 3 2.9 2.8 2.9 2.9 2.9
2019-JAN 2019-FEB 2019-MAR 2019-APR 2019-MAY 2019-JUN 2019-JUL 2019-AUG 2019-SEP 2019-OCT 2019-NOV 2019-DEC
TIME PERIOD


CHEROKEE COUNTY, OK
UNEMPLOYMENT RATE (%) 01-2019 THROUGH 12-2019
UNEMPLOYMENT RATE (%)
4.7 4.3 3.9 3.2 3.9 4.7 4.4 4 3.7 3.7 3.7 3.8
2019-JAN 2019-FEB 2019-MAR 2019-APR 2019-MAY 2019-JUN 2019-JUL 2019-AUG 2019-SEP 2019-OCT 2019-NOV 2019-DEC
TIME PERIOD


CRAIG COUNTY, OK
UNEMPLOYMENT RATE (%) 01-2019 THROUGH 12-2019
UNEMPLOYMENT RATE (%)
4.2 3.8 3.5 2.9 3.4 3.6 3.5 3.5 3.5 3.7 3.5 3.5
2019-JAN 2019-FEB 2019-MAR 2019-APR 2019-MAY 2019-JUN 2019-JUL 2019-AUG 2019-SEP 2019-OCT 2019-NOV 2019-DEC
TIME PERIOD


CREEK COUNTY, OK
UNEMPLOYMENT RATE (%) 01-2019 THROUGH 12-2019
UNEMPLOYMENT RATE (%)
4.1 3.9 3.6 3.1 3.6 3.9 3.7 3.8 3.5 4 3.7 3.6
2019-JAN 2019-FEB 2019-MAR 2019-APR 2019-MAY 2019-JUN 2019-JUL 2019-AUG 2019-SEP 2019-OCT 2019-NOV 2019-DEC
TIME PERIOD


DELAWARE COUNTY, OK
UNEMPLOYMENT RATE (%) 01-2019 THROUGH 12-2019
UNEMPLOYMENT RATE (%)
4.6 4.4 4 3.4 3.6 3.9 3.9 3.7 3.4 3.7 3.6 3.6
2019-JAN 2019-FEB 2019-MAR 2019-APR 2019-MAY 2019-JUN 2019-JUL 2019-AUG 2019-SEP 2019-OCT 2019-NOV 2019-DEC
TIME PERIOD


GARFIELD COUNTY, OK
UNEMPLOYMENT RATE (%) 01-2019 THROUGH 12-2019
UNEMPLOYMENT RATE (%)
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2019-JAN
2019-FEB
2019-MAR
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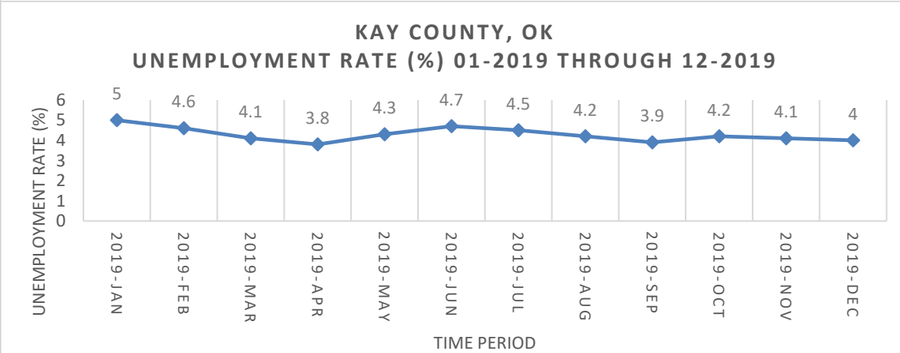
2019-DEC
TIME PERIOD


KAY COUNTY, OK
UNEMPLOYMENT RATE (%) 01-2019 THROUGH 12-2019
UNEMPLOYMENT RATE (%)
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5
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3
2
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4.6
4.1
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4
2019-JAN
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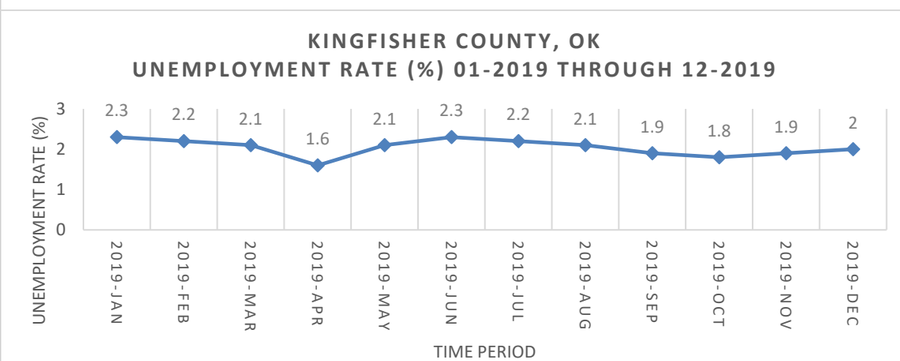
2019-NOV
2019-DEC
TIME PERIOD


KINGFISHER COUNTY, OK
UNEMPLOYMENT RATE (%) 01-2019 THROUGH 12-2019
UNEMPLOYMENT RATE (%)
3
2
1
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1.6
2.1
2.3
2.2
2.1
1.9
1.8
1.9
2
2019-JAN
2019-FEB
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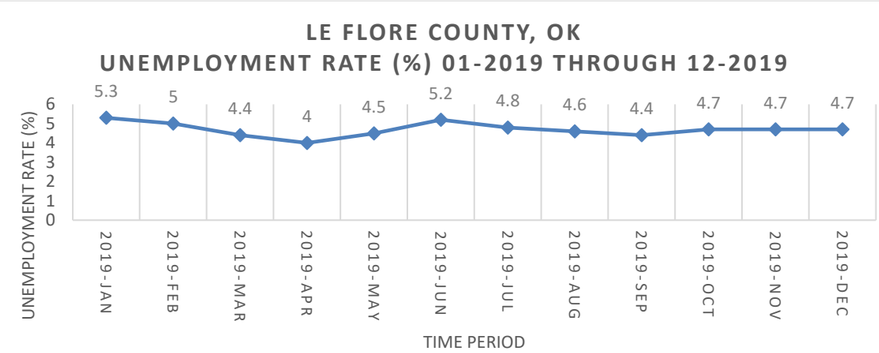
2019-DEC
TIME PERIOD


LE FLORE COUNTY, OK
UNEMPLOYMENT RATE (%) 01-2019 THROUGH 12-2019
UNEMPLOYMENT RATE (%)
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5
4.4
4
4.5
5.2
4.8
4.6
4.4
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4.7
2019-JAN
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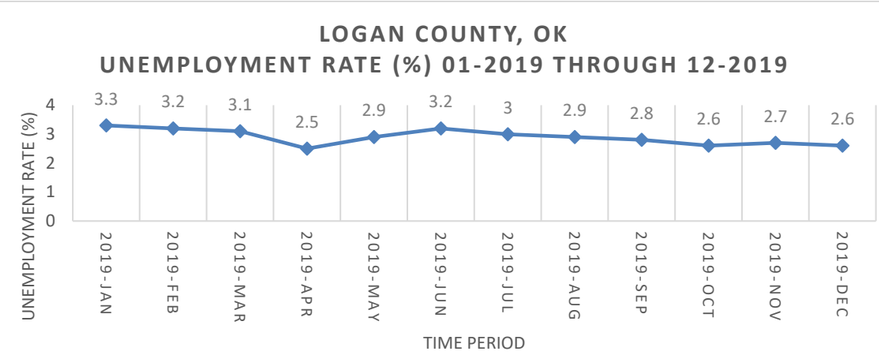
TIME PERIOD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UNEMPLOYMENT RATE (%)
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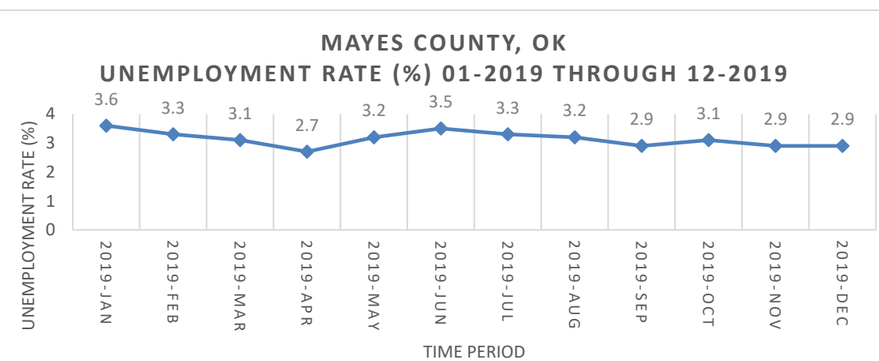
2019-DEC
TIME PERIOD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UNEMPLOYMENT RATE (%) 01-2019 THROUGH 12-2019
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3.5
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3.2
2.9
3.1
2.9
2.9
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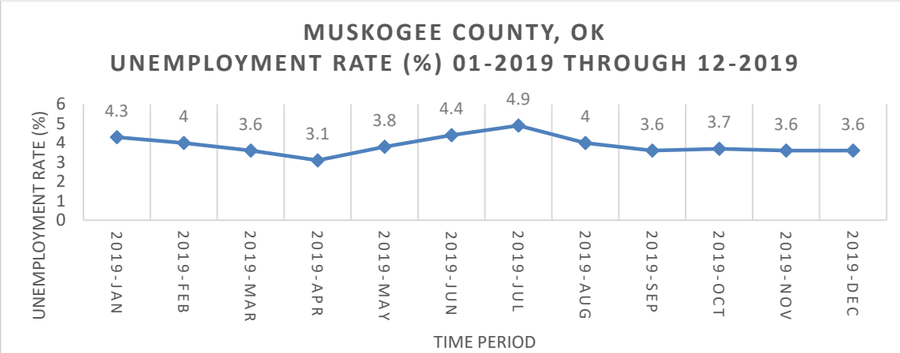
2019-DEC
TIME PERIOD


MUSKOGEE COUNTY, OK
UNEMPLOYMENT RATE (%) 01-2019 THROUGH 12-2019
UNEMPLOYMENT RATE (%)
4.3 4 3.6 3.1 3.8 4.4 4.9 4 3.6 3.7 3.6 3.6
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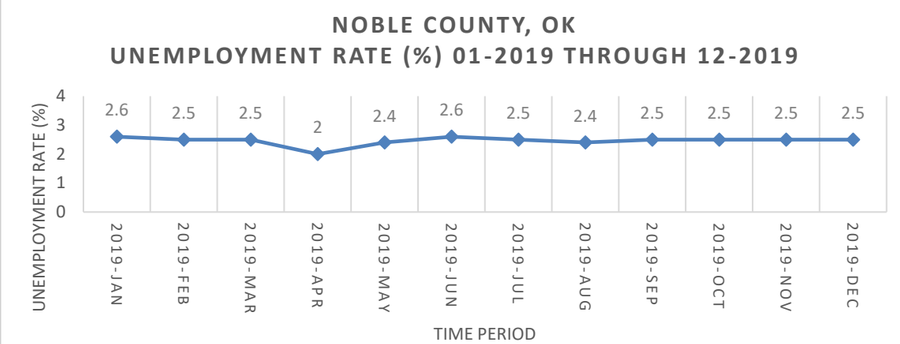
TIME PERIOD


NOBLE COUNTY, OK
UNEMPLOYMENT RATE (%) 01-2019 THROUGH 12-2019
UNEMPLOYMENT RATE (%)
2.6 2.5 2.5 2 2.4 2.6 2.5 2.4 2.5 2.5 2.5 2.5
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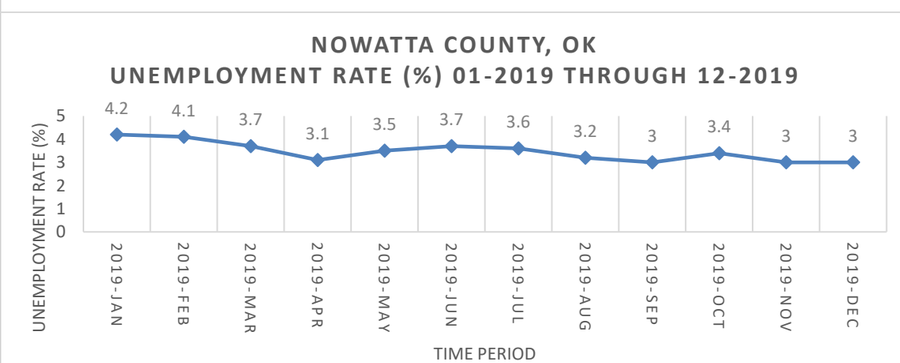
TIME PERIOD


NOWATTA COUNTY, OK
UNEMPLOYMENT RATE (%) 01-2019 THROUGH 12-2019
UNEMPLOYMENT RATE (%)
4.2 4.1 3.7 3.1 3.5 3.7 3.6 3.2 3 3.4 3 3
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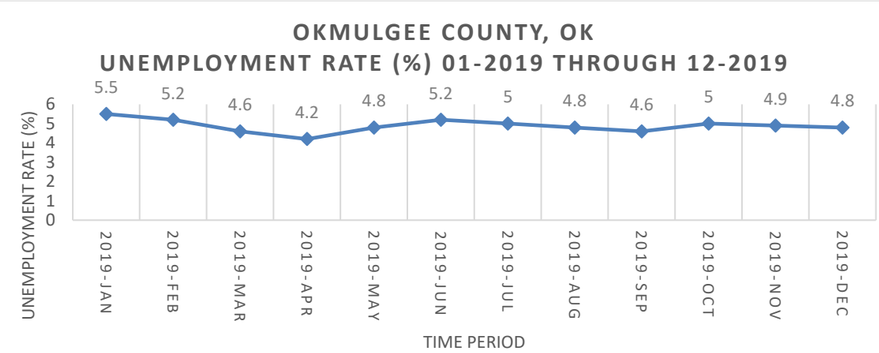
TIME PERIOD


OKMULGEE COUNTY, OK
UNEMPLOYMENT RATE (%) 01-2019 THROUGH 12-2019
UNEMPLOYMENT RATE (%)
5.5 5.2 4.6 4.2 4.8 5.2 5 4.8 4.6 5 4.9 4.8
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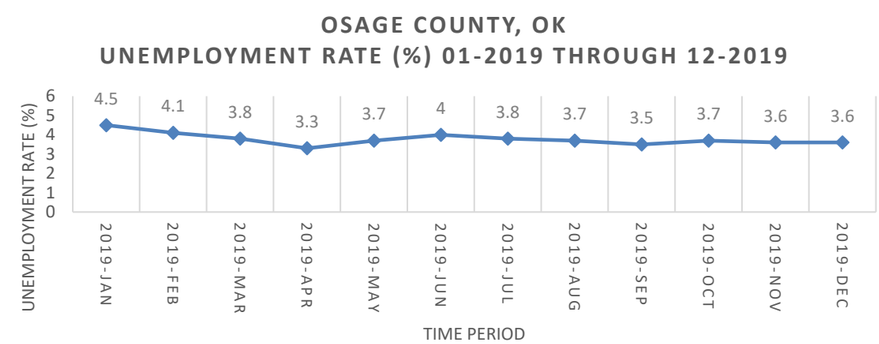
TIME PERIOD


OSAGE COUNTY, OK
UNEMPLOYMENT RATE (%) 01-2019 THROUGH 12-2019
UNEMPLOYMENT RATE (%)
4.5 4.1 3.8 3.3 3.7 4 3.8 3.7 3.5 3.7 3.6 3.6
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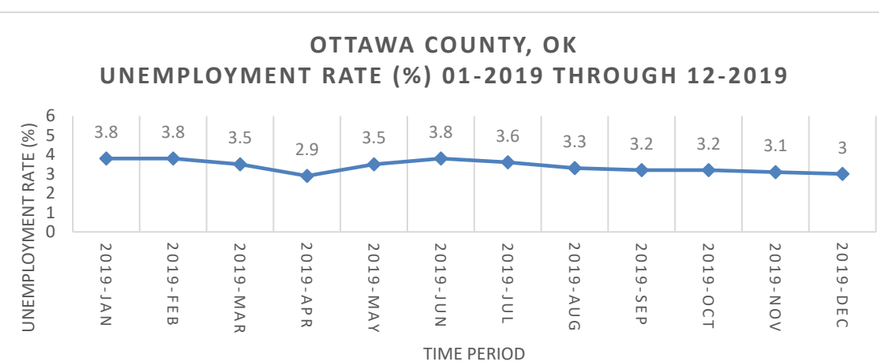
TIME PERIOD


OTTAWA COUNTY, OK
UNEMPLOYMENT RATE (%) 01-2019 THROUGH 12-2019
UNEMPLOYMENT RATE (%)
3.8 3.8 3.5 2.9 3.5 3.8 3.6 3.3 3.2 3.2 3.1 3
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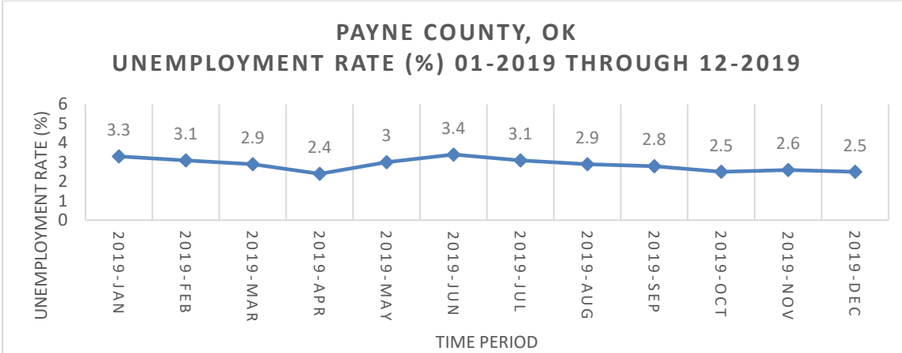
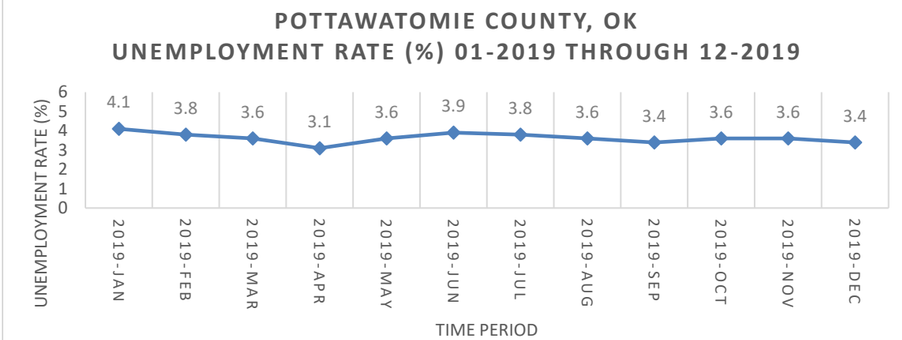
TIME PERIOD


PAYNE COUNTY, OK
UNEMPLOYMENT RATE (%) 01-2019 THROUGH 12-2019
UNEMPLOYMENT RATE (%)
3.3 3.1 2.9 2.4 3 3.4 3.1 2.9 2.8 2.5 2.6 2.5
2019-JAN 2019-FEB 2019-MAR 2019-APR 2019-MAY 2019-JUN 2019-JUL 2019-AUG 2019-SEP 2019-OCT 2019-NOV 2019-DEC
TIME PERIOD


POTTAWATOMIE COUNTY, OK
UNEMPLOYMENT RATE (%) 01-2019 THROUGH 12-2019
UNEMPLOYMENT RATE (%)
4.1 3.8 3.6 3.1 3.6 3.9 3.8 3.6 3.4 3.6 3.6 3.4
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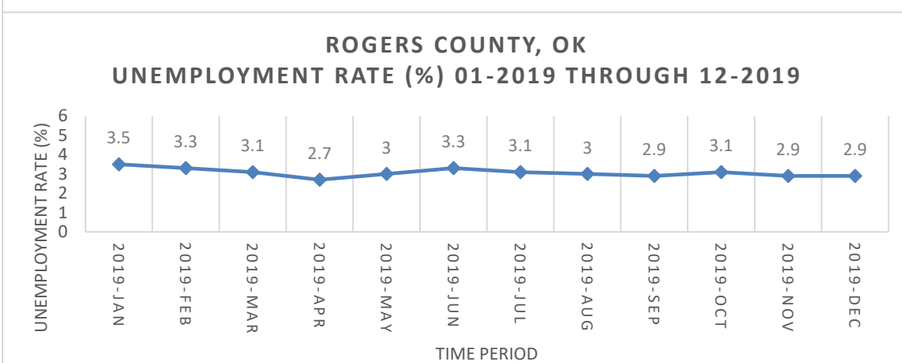
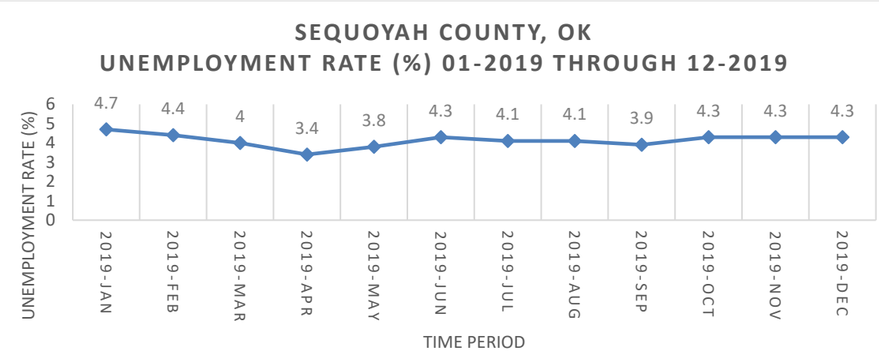
TIME PERIOD


ROGERS COUNTY, OK
UNEMPLOYMENT RATE (%) 01-2019 THROUGH 12-2019
UNEMPLOYMENT RATE (%)
3.5 3.3 3.1 2.7 3 3.3 3.1 3 2.9 3.1 2.9 2.9
2019-JAN 2019-FEB 2019-MAR 2019-APR 2019-MAY 2019-JUN 2019-JUL 2019-AUG 2019-SEP 2019-OCT 2019-NOV 2019-DEC
TIME PERIOD


SEQUOYAH COUNTY, OK
UNEMPLOYMENT RATE (%) 01-2019 THROUGH 12-2019
UNEMPLOYMENT RATE (%)
4.7 4.4 4 3.4 3.8 4.3 4.1 4.1 3.9 4.3 4.3 4.3
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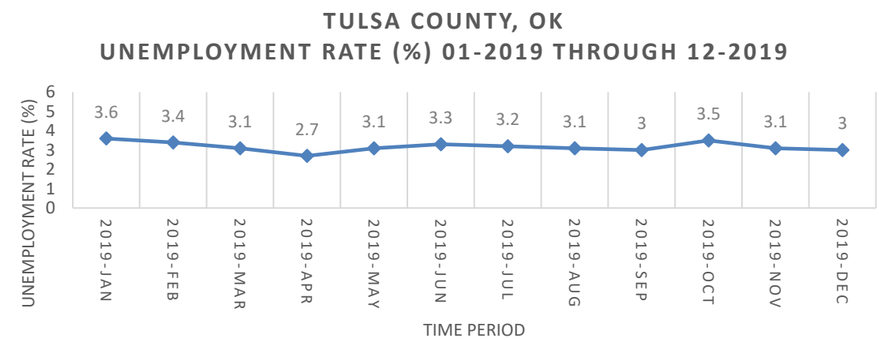
TIME PERIOD


TULSA COUNTY, OK
UNEMPLOYMENT RATE (%) 01-2019 THROUGH 12-2019
UNEMPLOYMENT RATE (%)
3.6 3.4 3.1 2.7 3.1 3.3 3.2 3.1 3 3.5 3.1 3
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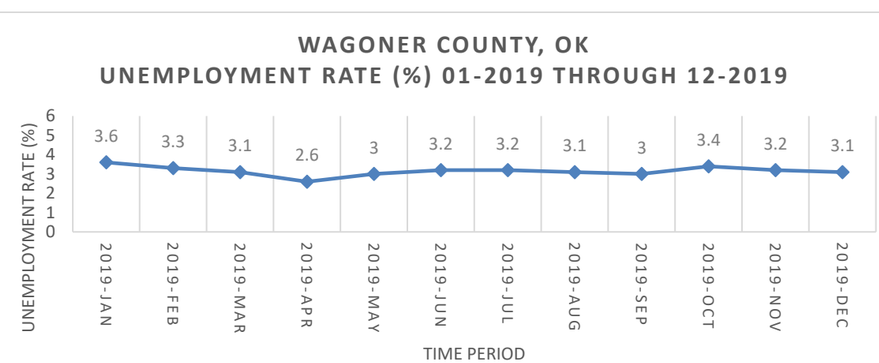
TIME PERIOD


WAGONER COUNTY, OK
UNEMPLOYMENT RATE (%) 01-2019 THROUGH 12-2019
UNEMPLOYMENT RATE (%)
3.6 3.3 3.1 2.6 3 3.2 3.2 3.1 3 3.4 3.2 3.1
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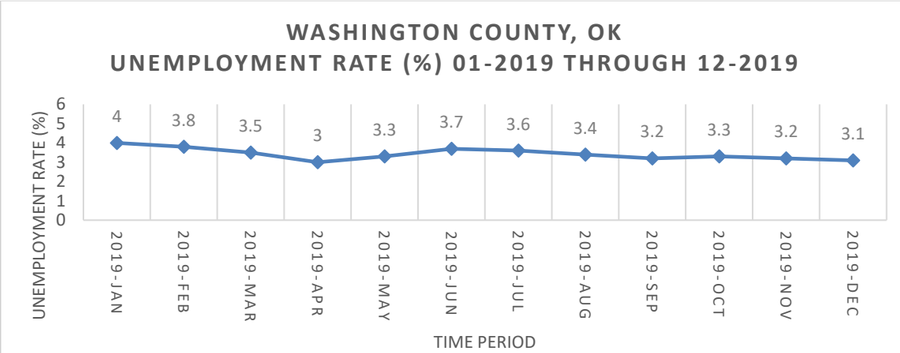
TIME PERIOD


WASHINGTON COUNTY, OK
UNEMPLOYMENT RATE (%) 01-2019 THROUGH 12-2019
UNEMPLOYMENT RATE (%)
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5
4
3
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3.8
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2019-JAN
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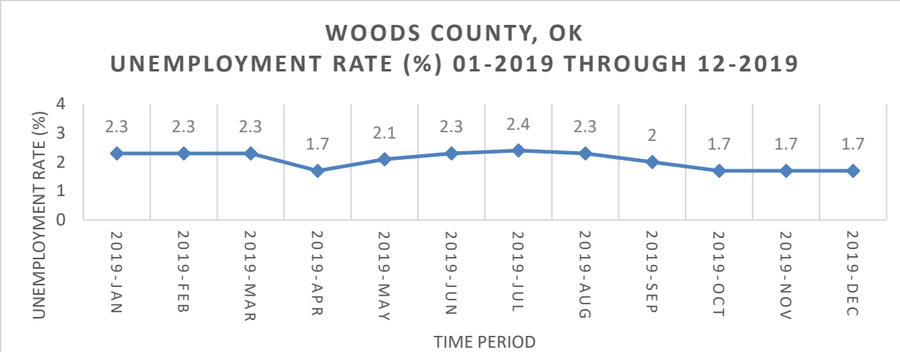
2019-DEC
TIME PERIOD


WOODS COUNTY, OK
UNEMPLOYMENT RATE (%) 01-2019 THROUGH 12-2019
UNEMPLOYMENT RATE (%)
4
3
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0
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2.3
1.7
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2019-JAN
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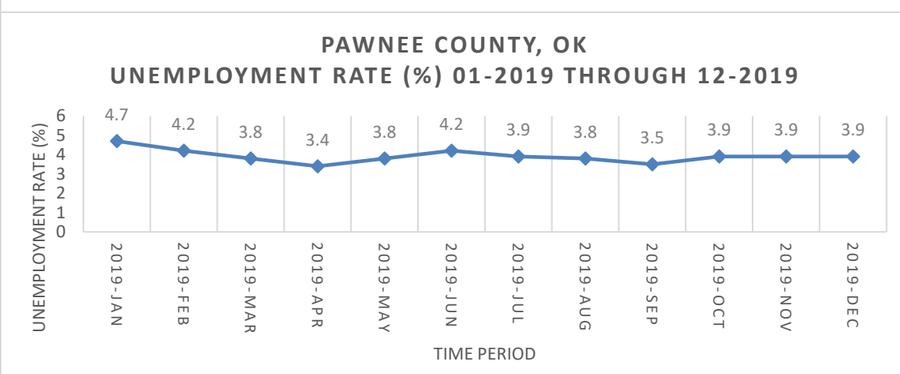
2019-DEC
TIME PERIOD


PAWNEE COUNTY, OK
UNEMPLOYMENT RATE (%) 01-2019 THROUGH 12-2019
UNEMPLOYMENT RATE (%)
6
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4.7
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2019-JAN
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2019-DEC
TIME PERIOD

While the unemployment trends above show minimal changes in unemployment due to the DR-4438 disaster and no entity has reported a need for economic recovery, the State is committed to supporting housing and infrastructural needs to indirectly support economic revitalization. The physical damage to residential housing, commercial buildings, public facilities, infrastructure, and business equipment affected communities and businesses. Many businesses likely required additional inventory due to unplanned expenditures during the disaster. Funds for other purposes were likely diverted to recovery relief rather than to other business needs such as savings and investment. Yet, while these issues could have affected businesses in the applicable counties, no unmet needs for economic revitalization were reported.

Overall, damages to public infrastructure such as roads, drainage systems, as well as compromised water and electrical utility systems caused significant interruption on the State's economy and have had a corresponding negative impact on businesses trying to recover after the storm. As indicated earlier, these issues will be addressed under the infrastructure category funding.

The calculation of unmet needs for economic revitalization is not intended to be final as the current data shows no need for economic revitalization. Should specific CDBG-DR categorical funding allocations need to be revised to meet any newly defined unmet needs, ODOC/CD has an established CDBG-DR amendment process in place to accomplish these necessary revisions, which is fully addressed within this CDBG-DR Action Plan. Based on the State's needs assessment and public outreach, demand exists for resiliency / mitigation investments, which could be specifically addressed via CDBG-DR Planning activities.

Planning: Needs Assessment

The disaster resiliency assessment conducted by the Oklahoma Housing Finance Agency (OHFA) as part of the Oklahoma Housing Needs Assessment found several notable recommendations as they relate to disaster resiliency that could be satisfied via CDBG-DR Planning related activities. Notably, recommendation number #1 and number #4 show particular merit in relation to tieback with this disaster event.

1. All jurisdictions should either continue to update, maintain, or create Hazard Mitigation Plans.

2. Particular attention should be paid to areas within the jurisdiction that, in addition to physical vulnerability, have compounding social vulnerability factors.
3. Efforts to strengthen building codes related to tornadoes and other natural disasters should be considered.
4. Continue to support regulations that prevent development in the floodplain and removing structures in the floodplain that experience repeated damages from floods.
5. Planning for shelters from disaster events for multifamily housing units (particularly including affordable housing), in addition to all housing in the community should be incorporated with any effort to increase housing.

As noted in the disaster resiliency assessment, there is an intimate relationship between droughts and flooding in Oklahoma. Soil that becomes parched from long-standing drought can act like impervious concrete when rains come. The penetration and saturation of the soil may take time resulting in flash floods before the soil can help to slow the flow of the water. Beyond issues of run-off from flash floods across parched land, we also have construction within the floodway or floodplain. Floodplain management is an important planning step in preventing risks to businesses and residences. Provisions within local codes should work to encourage open space near streams and rivers to allow for a healthy riparian area that can handle floodwaters and put fewer people at risk during storm events. Many counties and cities have learned from repeated floods that purchasing land and moving buildings (development) out of flood-prone areas is both for the health and safety as well as good economics for the community. Regulating buildings from being built in the floodplain from the beginning is essential as many communities find it difficult to purchase land or relocate individuals from land that experiences repetitive losses due to flooding.

Also, of relevance, Hazard Mitigation Plans (HMPs) at either the county or city level seek to document past events, past damages, and address proactive measures to improve the community's response to an event and efforts to have a more resilient community. Part of addressing hazards and risks in an area is understanding and planning as best as possible to be prepared to minimize damage and loss of life. Often one of the tools for communities to fully understand their risks and how they plan to address them when they occur is to prepare a Hazard Mitigation Plan or HMP. Those communities that lack an HMP, have an outdated plan, or expired plan should consider the

benefits of having both an HMP and Emergency Operation Plan (EOP) given natural events are a part of living in Oklahoma but how we respond and plan for these events can help minimize loss of life and property. Funding for working on HMPs can come from FEMA on an annual cycle basis. In many cases, counties and communities are eager to create or update their HMPs however lack funding for technical expertise in preparing the plan. Additionally, coordination with FEMA also can be a perceived or real barrier to final adoption of an HMP. Despite this, there are general principles that are covered in an HMP that are relevant for communities to employ related to creating safe, appropriate, and sustainable housing in the state.

Before many communities can create HMPs, they need adequate data to identify risks and opportunities within their communities. The State needs better comprehensive data sets and data sharing tools to allow communities across the state to have adequate information to create HMPs. During the needs assessment, the need for a floodplain study was identified to aggregate comprehensive data on Oklahoma floodplains including identifying buildings located in the floodplain and identifying communities that are the most vulnerable to disasters. The Oklahoma Water Resources Board (OWRB) identified this need for many communities across the state because of the lack of comprehensive data for Oklahoma. This comprehensive data would directly support planning efforts for affected communities and support resiliency for all of Oklahoma's cities and towns so they would be better prepared against disasters in the future.

In Substantial Amendment #2, the State has increased funding to the Planning Activity in the amount of $500,000. OWRB will use the additional funds to conduct a second phase of the State Flood Plan that includes developing hazard mitigation projects and alternatives within the Arkansas River watershed, which encompasses all three HUD identified Most Impacted and Distressed areas (Tulsa County, Muskogee County, and the Moffett Zip code).

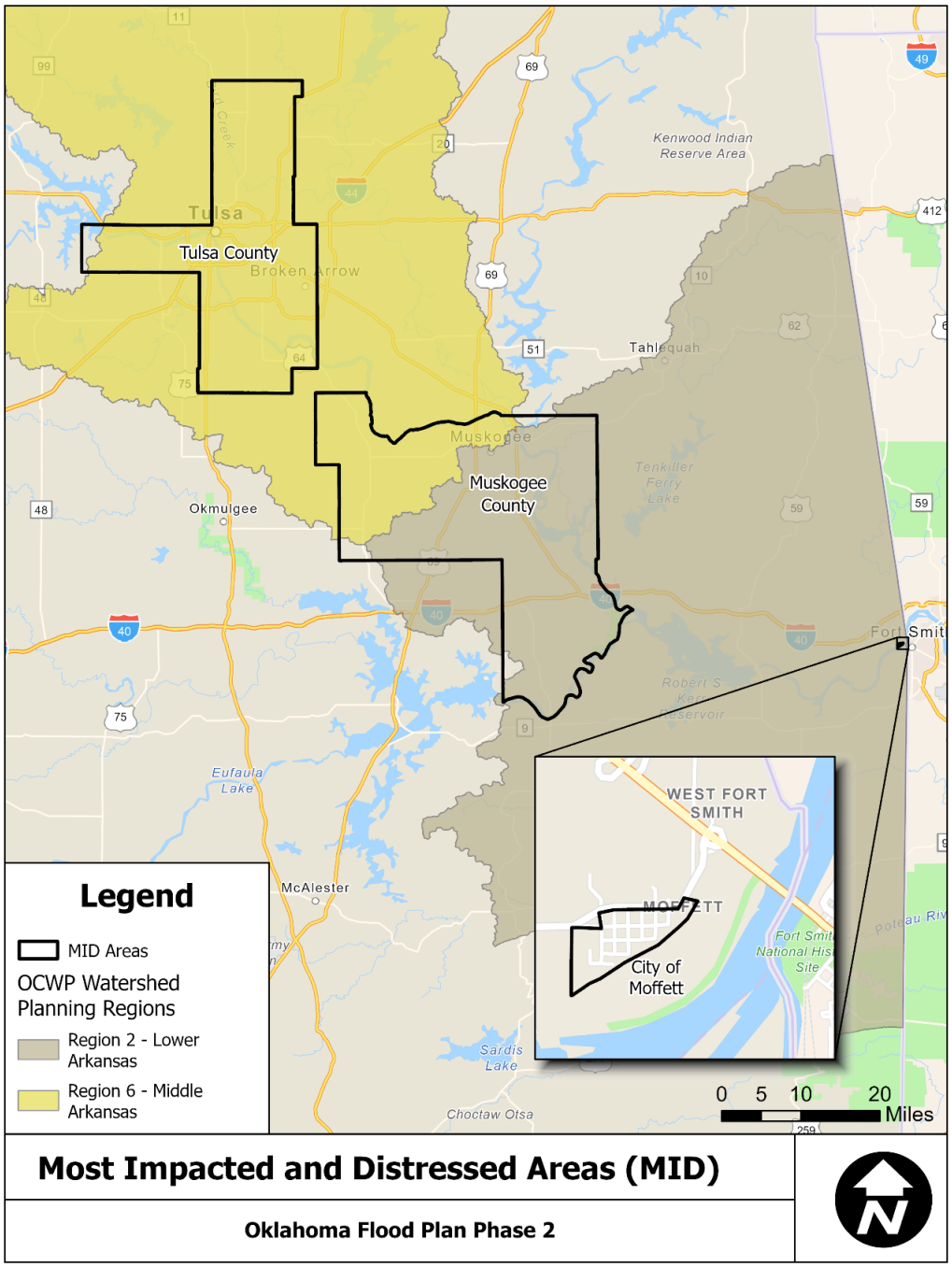
OWRB will prioritize projects for Phase 2 and include at least one project in each of the three MID areas. Depending on the projects prioritized for scoping in Phase 1, work in Phase 2 may include:

1. Scoping and developing hazard mitigation projects and alternatives, including engineering design and feasibility studies.
2. Conducting meetings, outreach, and coordination with potential sub-applicants and community residents.

3. Incorporating environmental planning and historic preservation considerations into project planning activities.
4. Collecting data for Benefit-Cost Analyses, environmental compliance, and other program requirements.
5. Conducting hydrologic and hydraulic studies for unmapped flood zones or other areas where communities propose to submit hazard mitigation projects.
6. Coordinating, scoping, and developing regional or multi-community hazard mitigation projects that require coordination to address resiliency and sustainability goals cohesively.
7. Utilizing third-party cost estimation services for project budgeting across sub-applications.

If additional funding becomes available through FEMA's Flood Mitigation Assistance (FMA) or Building Resilient Infrastructure and Communities (BRIC) Programs, OWRB will identify additional areas within the Arkansas River Watershed which encompasses all three HUD identified Most Impacted and Distressed areas.

OWRB plans to leverage CDBG-DR funds with FY22 FMA and BRIC project scoping money. A map showing the three MID areas of the 2019 flood event, and their location within the Arkansas River Watershed, is included below.



As the map shows, all three HUD identified Most Impacted and Distressed areas are contained within the Arkansas River watershed.

Public Services: Needs Assessment

Based on current unmet need assessment priorities combined with the current post disaster time lapse, public services are not a CDBG-DR priority at this time. As identified earlier, the initial disaster response from federal, state, non-profit and volunteer organizations have firmly addressed these issues at that this time, and it is not identified as a priority need for the 2019 CDBG-DR Action Plan.

The primary focus of CDBG-DR funds is to address the unmet housing recovery need. However, CDBG-DR funds may be used to fund public services which complement the housing need. Public services include activities which provide a benefit to employment, health, drug abuse, education, fair housing counseling, energy conservation, and certain welfare activities. The Housing and Community Development Act of 1974, as amended (HCDA) permits the use of CDBG funds for the purpose of public services under HCDA 105(a)(8). In accordance with HCDA 105(a)(8), no more than 15 percent of the allocation will be directed to the provision of public service.

Resiliency: Needs Assessment

Resiliency is considered a key component under the State's CDBG-DR Action Plan. As noted, resiliency is not seen as a single independent CDBG-DR activity but rather a sub-component of the eligible CDBG-DR activities. Building back better and creating resilient housing and infrastructure is important part of any eligible CDBG-DR activity. Resiliency / mitigation can represent a wide range of unmet need encompassing numerous types of activities. For example, resiliency / mitigation activities can include the clearance / demolition of houses in identified floodplain areas. The State's needs assessment also indicates an unmet need for repairs related to damaged drainage systems for which resiliency / measures will also play a significant role. As applicable, resiliency is to be considered in conjunction with all CDBG-DR activities.

As addressed earlier, the disaster resiliency assessment conducted by the Oklahoma Housing Finance Agency (OHFA) as part of the Oklahoma Housing Needs Assessment found several notable recommendations as they relate to disaster resiliency:

1. All jurisdictions should either continue to update, maintain, or create Hazard Mitigation Plans.

2. Particular attention should be paid to areas within the jurisdiction that, in addition to physical vulnerability, have compounding social vulnerability factors.
3. Efforts to strengthen building codes related to tornadoes and other natural disasters should be considered.
4. Continue to support regulations that prevent development in the floodplain and removing structures in the floodplain that experience repeated damages from floods.
5. Planning for shelters from disaster events for multifamily housing units (particularly including affordable housing), in addition to all housing in the community, should be incorporated with any effort to increase housing.

(N). UNMET NEEDS SUMMARY

Data Type	Data Source	Total Damage	Total Unmet Need
Housing	FEMA IA data	$25,952,612.58	$13,313,001.58*
Infrastructure	FEMA Public Assistance	$46,713,271.00	$11,678,317.00
Total Unmet Need		$72,665,883.58	$24,991,318.58 *

Note that the unmet need for housing is much greater than what is provided through FEMA Individual Assistance. This is due to drastic changes in raw materials and low assessed values for homes (Renter needs were also excluded from these numbers.) If applicants qualify and choose a voluntary buyout, applicants will need significantly more to purchase a home of equal value in a nearby town that is safe and affordable. As discussed in the Voluntary Buyout Program section in this Action Plan, ODOC has designed a more comprehensive recovery package for beneficiaries in the 100-year floodplain, floodway, and Disaster Risk Reduction Area (DRRA).

Consultation Efforts and Data Collection

As previously mentioned, the State has conducted extensive outreach efforts to develop the most accurate, up-to-date understanding about unmet needs in the 27 affected counties in Oklahoma. The first phase occurred from February 21, 2020, to March 13, 2020. The second phase occurred from October 8, 2020, to February 16, 2021. In both phases, ODOC sent out an

unmet needs survey to a variety of stakeholders in Oklahoma. This section of the Action Plan details these efforts.

COUNTIES

In Survey I, all 27 counties were contacted, either directly by ODOC or through partner agencies, in the State. Only the HUD declared MIDs (Muskogee, Sequoyah, and Tulsa County) predictably identified unmet needs in housing and infrastructure. That information is contained in the existing Action Plan. Under Survey II, ODOC reached out to all 27 counties again by e-mail. Zero (0) responses were received from the 27 counties. Of the 27 counties, all county commissioners were mailed a letter during Survey II because of the low response rate received via email. Zero (0) responses from counties were received from Survey II mailed letters. These letters are described in further sections.

Since direct contact with counties was less than satisfactory, ODOC/CD directly contacted the Oklahoma Emergency Management (OEM) division. ODOC/CD received a dataset "DCM4438" for county and city level data. This data, in conjunction with other datasets, directly formed the unmet needs analysis in this Action Plan.

PUBLIC HOUSING AUTHORITY (PHA)

ODOC contacted 37 Public Housing Authorities in the 27 eligible counties. No responses were received that indicated any unmet housing or infrastructure need.

County	Public Housing Authority	Response to ODOC received?		Unmet Housing Need?		
		Yes	No	Yes	No	No Response
Alfalfa	No PHA located					
Canadian	No PHA located					
Cherokee	Cherokee Housing Authority		X			X
Craig	Vinita Housing Authority		X			X
Creek	Bristow Housing Authority		X			X
Creek	Drumright Housing Authority		X			X

Creek	Oilton Housing Authority		X			X
Delaware	Grove Housing Authority		X			X
Garfield	No PHA located		X			X
Kay	Newkirk Housing Authority		X			X
	Ponca City Housing Authority	X			X	
	Tonkawa Tribal Housing		X			X
Kingfisher	No PHA located		X			
Le Flore	Heavener Housing Authority		X			X
	Talihina Housing Authority		X			X
	Wister Housing Authority		X			X
Logan	Guthrie Housing Authority		X			X
Mayes	Locust Grove Housing Authority		X			X
Muskogee	Ft Gibson Housing Authority		X			X
Noble	Missouri State Housing Authority		X			X
Nowata	Nowata Housing Authority		X			X
Okmulgee	Beggs Housing Authority		X			X
	Henryetta Housing Authority		X			X
Osage	Osage County Housing Authority		X			X
Ottawa	Afton Housing Authority	X			X	
	Commerce Housing Authority		X			X
	Wyandotte Housing Authority		X			X
Pawnee	Pawnee Housing Authority	X			X	
Payne	Stillwater Housing Authority		X			X
	Yale Housing Authority		X			X

Pottawatomie	Earlsboro Housing Authority		X			X
	McLoud Housing Authority		X			X
	Shawnee Housing Authority		X			X
	Tecumseh Housing Authority	X			X	
	Wanette Housing Authority		X			X
Rogers	Catoosa Housing Authority		X			X
	Chelsea Housing Authority		X			X
	Claremore Housing Authority		X			X
Sequoyah	Sallisaw Housing Authority		X			X
Tulsa	Collinsville Housing Authority		X			X
	Tulsa Housing Authority		X			X
Wagoner	No PHA located					
Washington	No PHA located					
Woods	No PHA located					

TRIBAL NATIONS

ODOC/CD Contacted the following Tribal Nations for Action Plan input:

Tribal Nation	Response to ODOC received?		Unmet Housing Need?			Unmet Infrastructure Need?		
	Yes	No	Yes	No	No Response	Yes	No	No Response
Absentee Shawnee		X			X			X
Alabama Quassarte Tribal Town		X			X			X
Apache Tribe of Oklahoma		X			X			X
Caddo Nation		X			X			X
Cherokee Nation		X			X			X
Cheyenne and Arapaho Tribes		X			X			X
Chickasaw Nation	X			X			X	
Choctaw Nation of Oklahoma	X				X			X
Citizen Potawatomi Nation	X			X			X	
Comanche Nation		X			X			X
Delaware Nation		X			X			X
Eastern Shawnee Tribe of Oklahoma		X			X			X
Euchee (Yuchi) Tribe		X			X			X
Iowa Tribe of Oklahoma		X			X			X

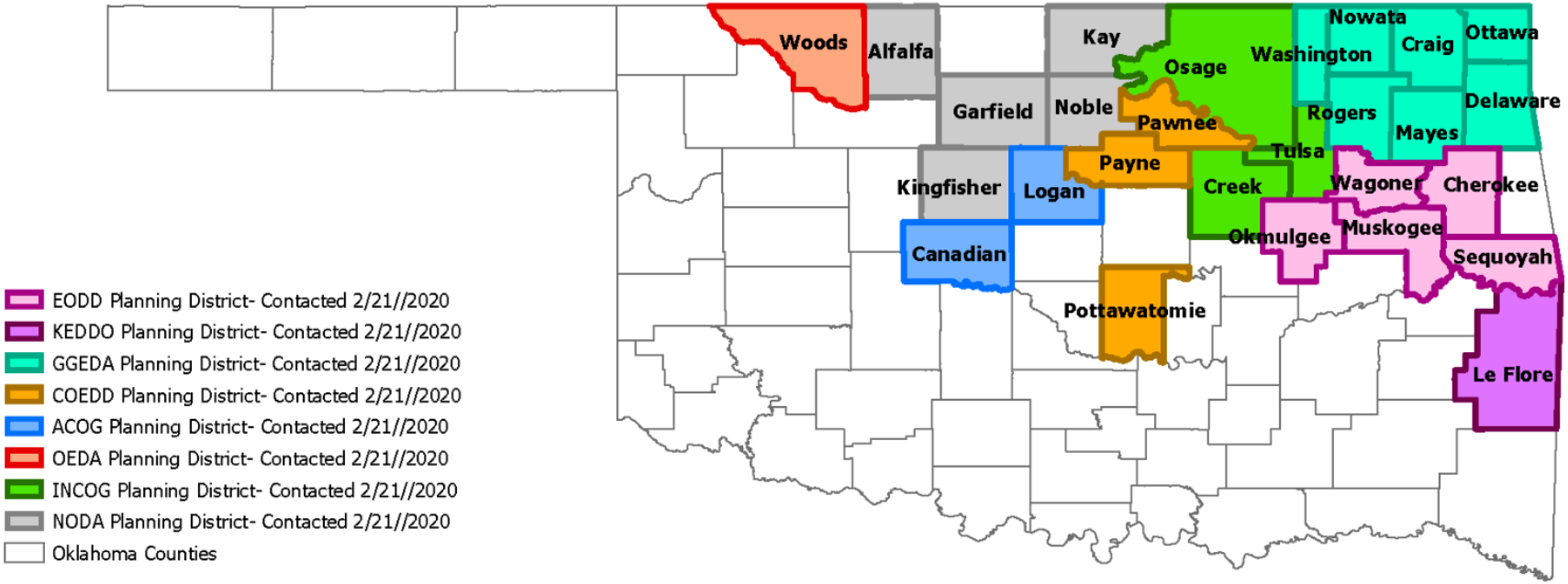
Kaw Nation of Oklahoma	X	X	X
Kialegee Tribal Town	X	X	X
Kickapoo Tribe of Oklahoma	X	X	X
Kiowa Indian Tribe of Oklahoma	X	X	X
Miami Tribe of Oklahoma	X	X	X
Modoc Tribe of Oklahoma	X	X	X
Muscogee (Creek) Nation	X	X	X
Osage Nation	X	X	X
Otoe-Missouria Tribe of Indians	X	X	X
Ottawa Tribe of Oklahoma	X	X	X
Pawnee Nation	X	X	X
Peoria Tribe	X	X	X
Ponca Tribe of Oklahoma	X	X	X
Quapaw Tribe	X	X	X
Sac and Fox Nation	X	X	X
Seminole Nation of Oklahoma	X	X	X
Seneca Cayuga Nation	X	X	X
Shawnee Tribe	X	X	X
Thlopthlocco Tribal Town	X	X	X
Tonkawa Tribe of Oklahoma	X	X	X
United Keetoowah Band of Cherokees	X	X	X
Wichita and Affiliated Tribes	X	X	X
Wyandotte Nation	X	X	X

No responses were received from tribal nations that indicated any unmet housing or infrastructure need.

COUNCILS OF GOVERNMENT

Substate Planning Districts (also known as Councils of Government) are interested in solving problems and planning needs that intersect multiple boundaries of local government. On February 21, 2020, emails were sent by ODOC/CD to Substate Planning Districts and eligible counties within the qualifying disaster zone requesting CDBG-DR disaster related information. The following Planning Districts were contacted on 2/21/2020 via e-mail: ACOG, COEDD, EODD, GGEDA, INCOG, KEDDO, NODA, and OEDA. All planning districts were contacted again via email on December 15th and again on December 18th of 2020. Only 1 COG, GGEDA, responded and directed ODOC to gather further information from the City of Miami within their district. No COG informed ODOC of any needs within their district. The map on the following page shows which DR-4388 eligible counties fall in each Planning District.

Contact of Planning Districts in the State of Oklahoma



CONTINUUM OF CARE

ODOC/CD reached out to over 20 Continuum of Care organizations on March 21, 2019, to determine whether any shelters or housing received damage. A follow-up e-mail was sent to these same organizations on February 25, 2021. No agency reported any unmet housing needs.

NUM	Shelter Name	Phone Number	Address	City	State	Zip Code
1	Ada Homeless Services	580-272-0211	317 W 12th Street	Ada	Oklahoma	74820
2	CARD CAA	918-341-5000	707 W Lowry Road	Claremore	Oklahoma	74018
3	CDSA	580-242-6131	114 S Independence Street	Enid	Oklahoma	73701
4	City of Norman Planning and Community Development		201-A West Gray	Norman	Oklahoma	73070
5	Community Services Council of Tulsa	918-585-5551	16 E 16th Street	Tulsa	Oklahoma	74119
6	Deep Fork CAF	918-756-2826	223 W Sixth Street	Okmulgee	Oklahoma	74447
7	Food and Shelter	405-360-4954	201 Reed Avenue	Norman	Oklahoma	73071
8	Great Plains Improvement Foundation	580-353-2364	2 SE Lee Boulevard	Lawton	Oklahoma	73502

9	Hope House Shelter	918-456-4673	1619 N Vinita Avenue	Tahlequah	Oklahoma	74464
10	INCA Community Action Agency	580-371-0277	202 S. Capitol Street, Suite 2	Tishomingo	Oklahoma	73460
11	KI BOIS CAF	918-967-3325	200 SE "A" Street	Stigler	Oklahoma	74462
12	Marie Detty YFS	580-250-1123	317 SW C Avenue	Lawton	Oklahoma	73501
13	Northeast Oklahoma CAA	918-253-4683	856 E Melton Drive, Ste C	Jay	Oklahoma	74346
14	Northern Oklahoma Youth Services	580-762-8341	2203 N Ash Street	Ponca City	Oklahoma	74601
15	Northwest Domestic Crisis Services	580-256-1215	1024 22nd Street	Woodward	Oklahoma	73801
16	Payne County Youth Services	405-377-3380	2224 W 12th Street	Stillwater	Oklahoma	74074
17	Safenet Services	918-341-1424	1219 W Dupont Street	Claremore	Oklahoma	74017
18	Stillwater Mission of Hope	405-332-5521	1804 S Perkins Road	Stillwater	Oklahoma	74074
19	Survivor Resource Network (DV Shelter)	580-762-2883	PO Box 85	Ponca City	Oklahoma	74602
20	Thunderbird Clubhouse	405-321-7331	1251 Triad Village Drive	Norman	Oklahoma	73071
21	Women's Resource Center	405-701-5540	222 E Eufaula Street	Norman	Oklahoma	73069

22	Youth Services of Tulsa	918-582-0061	311 S. Madison Ave	Tulsa	Oklahoma	74112

COORDINATION WITH MOFFETT, OKLAHOMA

The Town of Moffett was one of the communities with the highest depth of water damage to homes. The average water depth for Moffett citizens was 5.5 feet of flooding. With some of the greatest level of devastation and the high level of poverty in Moffett, there has been a clear need to aid the town and ensure residents receive adequate assistance. ODOC has been working with FEMA to address issues with residents being out of compliance with NFIP and FEMA. ODOC and FEMA are actively working together to offer the Town of Moffett assistance. During the time that FEMA sent Moffett residents a notice of noncompliance with NFIP, ODOC created a letter for residents to offer further options they have. The following letter was sent to 83 residents of Moffett, Oklahoma on February 3, 2021 (Please note that ODOC has since removed elevation of damaged structures lying within the 100-year floodplain):

Dear Resident of Moffett, Oklahoma:

Our job at the Oklahoma Department of Commerce is to help residents of Moffett obtain disaster recovery funding for the flood that happened in 2019. Working closely with us on this effort is MaryLynn Lufkin with Catholic Charities. We have heard concerns that residents of Moffett feel as though they have been forgotten. **Please note we want to help residents recover from this disaster, but we need your help to move forward in the process.**

The U.S. Department of Housing and Urban Development (HUD) can offer financial assistance to residents through the Community Development Block Grant Disaster Recovery (CDBG-DR) grant program for residents of Moffett whose homes were damaged or destroyed. The Oklahoma Department of Commerce administers the grant program.

We're writing you today because we need your help. We would like to hear from you about what you would like to see happen in Moffett. Was your home damaged or destroyed from the flood? Do you want to stay in Moffett, or do you want to relocate elsewhere?

FINANCIAL ASSISTANCE MAY BE AVAILABLE

We're also writing to inform you about the financial assistance that may be available through the CDBG-DR program. There are two options available to residents of Moffett:

OPTION 1: For residents that want to continue to live in Moffett

Moffett will certainly flood again in the future. Financial assistance may be available to elevate homes above the Base Flood Elevation (BFE). *The money for this option is limited and may not fully cover the cost of elevation*. The cost of elevation substantially increases the lower the home is below the Base Flood Elevation.

OPTION 2: For residents that want to relocate

Residents whose homes were damaged or destroyed can be **voluntarily** bought out through the grant program. The Department of Commerce is **NOT** invoking

imminent domain (the forced sale of home and lot). If residents choose the voluntary buyout, the land will be turned into a permanent greenspace and the rebuilding of dwelling structures is prohibited by federal law.

We would like to hear from you by March 1, 2021.
Your urgent response is greatly appreciated. Please give us a call or send us an e-mail.

NEXT STEPS

As mentioned above, we need to hear from residents of Moffett by March 1, 2021. Please review the Financial Assistance section of this letter and contact ODOC Staff using the contact information on the last page of this letter. **The Oklahoma Department of Commerce and our partners would like to meet with residents at Moffett Public School – 701 Belt Street Moffett, OK 74946.** The meeting date and time has not yet been scheduled. Our hope is that we can coordinate with residents of Moffett to determine the best day and time to meet in person. In order for this to happen, we need residents to contact us.

QUESTIONS?

We're here to help residents of Moffett. Please contact us if you have any questions about this letter, or to discuss whether Option 1 or Option 2 is best for you and your family.

Jade Shain | Programs Planner
Community Development (CDBG-DR)
Oklahoma Department of Commerce
jade.shain@okcommerce.gov
p. 405-250-1844
OKcommerce.gov

Taylor Huizenga | Programs Representative
Community Development (CDBG-DR)
Oklahoma Department of Commerce
taylor.huizenga@okcommerce.gov
p. 405-308-6691
OKcommerce.gov

Sincerely,

Jade Shain
Taylor Huizenga

This letter and the subsequent town hall meeting in Moffett generated a lot of community engagement.

FEMA-STATE AGREEMENT (FSA) FOR FEMA-IA

On February 8, 2021, ODOC received Amendment Number Ten FEMA-State Agreement (FSA) for FEMA Individual Assistance (IA) data. This Amendment added to the list of State officials or employees that are authorized to request disaster survivor information.

INFORMATION SHARING ACCESS AGREEMENT (ISAA) FOR NFIP REPETATIVE LOSS

On February 19, 2021, ODOC received an ISAA from the Department of Homeland Security (DHS) and Federal Emergency Management Agency (FEMA) for data related to National Flood Insurance Program (NFIP) repetitive losses. This data will be used by ODOC to analyze which properties in eligible counties have experienced repetitive flood losses, leverage additional financial resources that may be available for a voluntary buyout program, and strengthen the State's 2019 CDBG-DR Action Plan.

Allocation Methodology

Overview

The funding allocation is based upon several limiting factors and considerations. Some of these factors include Federal Register Notice CDBG-DR guidelines, damage analysis, surveys, and Census data.

Consistent with the Federal Register Notice, the primary purpose of the CDBG-DR funds is to address the immediate unmet needs of the most impacted and distressed counties. The State's allocation of the CDBG-DR funding is guided by several critical federal requirements set forth in the Federal Register Notice. All the programs to be administered in the activity categories identified in the allocation table, apart from Administration and Planning, are required to:

1. CDBG-DR applications will be scored competitively against one another.

2. The Federal Register Notice requires that funding consideration for eligible CDBG-DR housing related activities be prioritized over all other eligible CDBG-DR activities.

3. The Federal Register Notice requires that a minimum of 80% of the State's $36,353,000 CDBG-DR funding must be expended in Muskogee, Tulsa, and Sequoyah (74946 zip code) counties. The remaining funding will be available for remaining program eligible state disaster areas.

4. At least 70% of the funding must meet the Low/Moderate Income (LMI) Benefit National Objective. As a result, the State must be able to demonstrate that the funding is being expended to assist LMI persons. An activity, upon approval by ODOC, may use the Urgent Need National Objective.

5. All activities, apart from Administration and Planning, must meet at least one of the National Objectives. The state places priority on the low and moderate-income National Objective.

6. Only those funds used to serve households with up to 80% of AMI may qualify as meeting the low and moderate-income person benefit national objective. CDBG-DR funding cannot be used to assist secondary homes.

As demonstrated earlier in this Action Plan, unmet need cost estimates far exceed the current $36,353,000 in allocated CDBG-DR funding as identified in the Federal Register Notice. Clearly, given the unmet need assessment data, there is still a sufficient amount of unmet disaster need to be addressed within the state. Should any additional future rounds of funding result, the State will consider these additional unmet needs that could not be funded under this funding allocation.

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

Note that all funds must benefit at least 70% Low-to-Moderate Income Individuals. ODOC is proposing that all activities will be required to meet the LMI Housing/Area Benefit National Objective. An activity, in limited cases and upon approval by ODOC, may use the Urgent Need National Objective.

Proposed Non-Substantial Amendment #3			
STATE OF OKLAHOMA: CDBG-DR Allocation (PL 116-20)			
	Substantial Amendment #2 Amount	**Proposed Non-Substantial Amendment #3**	**Proposed Change by Activity**
Housing Programs			
Voluntary Buyout Program	$14,750,000.00	$16,750,000.00	**$2,000,000.00**
Single-Family Reconstruction and Rehabilitation Program (owner occupied)	$4,500,000.00	$4,500,000.00	No change
Housing Programs Total	**$19,250,000.00**	**$21,250,000.00**	**$2,000,000.00**
Infrastructure	$13,694,760.00	$11,694,760.00	**($2,000,000.00)**
Planning	$1,590,590.00	$1,590,590.00	No change
Administration	$1,817,650.00	$1,817,650.00	No change
GRAND TOTAL:	$36,353,000.00	$36,353,000.00	No change

CDBG-DR funded activities are required to meet one of the three National Objectives. The table below shows each eligible activity in addition to the corresponding National Objective requirement. **Activities that do not meet a National Objective cannot be funded through the 2019 CDBG-DR program.**

NATIONAL OBJECTIVE REQUIREMENT	
Activity	**Eligible National Objective**
Housing (Owner-Occupied and/or Multi-family Housing)	Low-to-moderate Income (LMI) Housing/Urgent Need
Owner-Occupied Single-Family Homes	Low-to-moderate Income (LMI) Housing/Urgent Need
Buyout Program	Low-to-moderate Income (LMI) Housing/Urgent Need
Reconstruction/Rehabilitation Program	Low-to-moderate Income (LMI) Housing/Urgent Need
Planning	N/A
Administration	N/A
Public Facilities & Improvements	Low-to-moderate Income (LMI) Area Benefit/Urgent Need

Reasoning for Budget Allocation

Based on the unmet needs analysis that was conducted, the budget above was created. Due to housing being a priority of the CDBG-DR program, the majority of funds have been dedicated to housing needs. To effectively allocate funding, ODOC is dedicating over 50% of 183 available funds to housing needs. This is due in part because of the serious unmet housing needs of the MID areas alone. The amount of funds required to meet all serious unmet housing needs for the 27 eligible counties is estimated at $13,313,001.58 based on FEMA's IA data collection. This number does not include need for renters (which made up 18.4% of all needs in HUD's MID Areas). This number also does not account for rising prices of lumber and other raw materials since the start of the COVID-19 pandemic. Overall, because of the incredible need for housing, ODOC is dedicating most of its CDBG-DR funds to housing programs.

The below chart, data obtained from the Sequoyah County Assessor's office, shows the Fair Cash Values for homes in the community example of Moffett that is located within the 100-year floodplain. Residents could not move outside of the 100-year floodplain with the Fair Cash Value of their homes and purchase a safe and affordable structure.

Home Values in Moffett, Oklahoma (All located within the 100-year floodplain)

Lowest Home Value	$800.00
Highest Home Value	$110,000.00
Average Home Value	$4,613.00
Median Home Value	$1,075.00
Total Value of all Structures	$978,150.00
Number of Structures Damaged	132
Possible Amount of funds needed for a buyout of all properties only within Moffett located within the 100-year floodplain	**$14,520,000.00**

Source: Sequoyah County Assessor

The amount of funds required to meet all serious unmet housing needs for the 27 eligible counties is estimated at $13,313,001.58 based on FEMA's IA data collection. This does not include funds for renters, as well as for any eligible beneficiaries that participate in the voluntary buyout program. For this reason, ODOC will allocate a significant amount of funding to be available to eligible beneficiaries of the voluntary buyout program and Single-Family Rehabilitation program.

Proposed Non-Substantial Amendment #3 reallocates $2 million from Public Infrastructure to the Voluntary Buyout Program. This reallocation is the result of continued outreach to potential subrecipients in the 74946 Zip Code of Sequoyah County, with the goal of offering relief and assistance to residents affected by the 2019 disaster in that area. There is still a large unmet housing need in this HUD-identified MID. ODOC has recently re-engaged with potential subrecipients and is hopeful that this additional funding will lead to a buyout program to address this unmet need.

While housing is ODOC's greatest priority for CDBG-DR funds, public facilities and improvements is also a great need for the affected communities. Based on data compiled from the Oklahoma Emergency Management, ODOC's needs assessment survey, public outreach, and FEMA reports, unmet infrastructure needs rank very high due to sustained significant damage to infrastructure because of the FEMA DR 4438 disaster. FEMA PA data identified a total over $40 million in need for

projects within Categories C-G with a 25% local match requirement (for more information, refer to section 7: Unmet Needs Assessment). Since FEMA identified this great of a need for eligible communities to recover from the disaster, ODOC is committed to ensuring that such public facilities are repaired and/or improved so that they can support disaster survivors' communities and growth.

While the 5% administration cap ($1,817,650.00) is set by Federal regulations, they allow for up to 15% of funds to fund planning projects and activities. Because of the previous unmet needs surveys done by ODOC, it was clear that limited funds needed to be distributed towards planning and most of the funding needed to focus on housing. ODOC is dedicating 4.4% ($1,590,590.00) of the CDBG-DR funds to planning because of certain requests during the needs survey to allocate funds to a floodplain study that would aggregate data points across the state to one central location. This could then provide local municipalities with further resources to make comprehensive and well-informed decisions, as well as have the necessary and available data to then create their own Hazard Mitigation Plans.

Priority Funding

The State's priority is to get CDBG-DR funding to as many affected residents as possible to assist them in repairing their homes and infrastructure that directly supports housing. The State is committed to residents residing in safe and affordable housing, and to help the economy recover to at least pre-disaster levels. With these priorities in mind, the State has developed additional factors to determine allocations of the funding down to the level of specificity required by HUD. Scoring criteria is outlined within the following sections to allow subrecipients to identify ODOC's priorities for funding if activities meet all eligibility criteria. These criteria include, but is not limited to, the following:

- Located within the HUD-identified MID;
- Project will support housing for vulnerable populations;
- Project contributes significantly to the long-term recovery and economic revitalization of the affected area;
- Project is capable of being undertaken (design and construction) immediately to provide outcomes to intended beneficiaries affected by the disaster; and
- Project will provide the availability of affordable housing in low-poverty, non-minority areas where appropriate and in response to natural hazard-related impacts for vulnerable populations.

Recovery needs change over time. As program needs evolve, programs may shift and change to meet the need. Changes to unmet needs, which result in a change in program benefit or eligibility criteria, the addition or deletion of an activity, or the allocation or reallocation of funds may result in either a non-substantial or substantial amendment to the Action Plan.

ODOC is committed to evaluating funding decisions and program planning to ensure such decisions do not negatively affect racial, ethnic, or low-income concentrations. ODOC will require all subrecipients to detail in their grant applications how racial, ethnic, and low-income concentrations have been and will be informed of public meetings and funding decisions, as well as how they could potentially be impacted.

Overview of CDBG-DR Housing Program Activity Budget

	SFH Rehabilitation	SFH Reconstruction	Buyout
Funding Category	Housing	Housing	Housing
Proposed Start/End Date	Per Contract	Per Contract	Per Contract
Eligible Applicants	UGLG, Tribal Nations, Non-profit organizations, or State entities	UGLG, Tribal Nations, Non-profit organizations, or State entities	UGLG, Tribal Nations, Non-profit organizations, or State entities
Geographic Area	FEMA DR-4438 Disaster declared counties	FEMA DR-4438 Disaster declared counties	FEMA DR-4438 Disaster declared counties
National Objective	LMI Housing/Urgent Need	LMI Housing/Urgent Need	LMI Housing/Urgent Need
Program Activity Budget	Total: $4,500,000 (Maximum threshold cap varies by activity. See row below)		Total: $10,466,422.30
Maximum Threshold Cap per Beneficiary	$70,000 per individual applicant for rehabilitation	$90,000 per individual applicant for reconstruction	Dependent on Individual formula
Maximum Threshold Cap per Subrecipient	$14,750,000 per grantee for total activities within application	$14,750,000 per grantee for total activities within application	$14,750,000 per grantee for total activities within application
Entity responsible for Implementation	ODOC Subrecipients	ODOC Subrecipients	ODOC Subrecipients

Housing (Rehabilitation, Reconstruction, Buyout)

Allocation: $21,250,000.00

Housing unmet need is considered a top priority as delineated in the Federal Register Notice (Vol. 85, No. 17 / Monday, January 27, 2020), "Pursuant to the Prior Notices, each grantee receiving an allocation for a 2018 or 2019 disaster is required to primarily consider and address its unmet housing recovery needs." Housing unmet need is to be addressed first. Based on this, along with the data and public outreach, ODOC/CD has allocated most of the CDBG-DR funding in support of eligible housing related activities and will open applications in phases with housing needs being prioritized in phase 1. Housing unmet need is considered a top priority for those who are in vulnerable populations, either minority or non-minority, at risk of becoming homeless.

This housing component of the CDBG-DR Program will aid in the form of grants to Units of General Local Governments (UGLG's), non-profits, tribal nations, or other State agencies benefitting homeowners that experienced damage to their homes identified in the eligible areas and timeframe established under DR 4438 and have remaining recovery needs, after accounting for other benefits received. Thus, the State will not be directly carrying out any of the following programs but will guide subrecipients in carrying out CDBG-DR activities. For further information, see the Method of Distribution later in this section.

There is a maximum award amount of $14,750,000 per individual applicant (UGLG or other entity) regardless of the number of activities being requested for said applicant. Exceptions may apply to provide reasonable accommodations in accordance with federal laws. The maximum award amount was established because of the entities that submitted data from the unmet needs surveys. ODOC used such data to identify a maximum award amount to ensure that if applicants such as counties applied for CDBG-DR funds, there would be an adequate threshold for entities that are supporting many beneficiaries.

SINGLE FAMILY

Single family housing related activities comprise most of the unmet housing needs (over 70%) from the unmet needs surveys. Regarding CDBG-DR housing support, ODOC/CD has partnered with the Oklahoma Housing Finance Agency. This partnership is not new. Currently, ODOC/CD and OHFA already partner under the State Consolidated Plan encompassing the Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), HOME Partnership Program (HOME), Housing Trust Fund (HTF), and Housing Opportunities (HOPWA) Programs. OHFA manages the State's HOME, HTF, and HOPWA Programs. OHFA has the expertise related to housing resources and will be supporting ODOC/CD's CDBG-DR housing activities by reviewing sub-grantee housing related proposals, providing

recommendations regarding proposed projects, and giving general guidance relating to housing issues.

Currently, housing rehabilitation and buyout have emerged as the primary unmet housing needs based on the unmet needs survey. ODOC will prioritize assisting vulnerable populations with their unmet housing needs. For homeowners who wish to remain in their homes or rebuild on their existing property, the program will provide grants for rehabilitation or reconstruction. Applicants eligible for rehabilitation assistance may reach a level of repair scope, cost, or other situation in which reconstruction, instead of rehabilitation, is more feasible. Reconstruction versus rehabilitation of a home will be dependent on cost reasonableness and assurance that all applicable guidelines are met per HUD and the State.

MULTI-FAMILY HOUSING

ODOC/CD had conducted extensive outreach to determine unmet need for multi-family housing. During the initial outreach effort, a reliable estimate for Multi-Family Rental Housing Rehabilitation (Eligible Rehabilitation and Preservation Activities 24 CFR 570.202 LMH/LMI) was not firmly established based on surveying potential applicants and FEMA data.

Subsequent outreach efforts during October 2020, which included contacts with Public Housing Authorities, tribal nations, and counties affected by the disaster, has revealed that at this time, ODOC/CD has not found any unmet needs related to Multifamily and rental housing.

During the initial development of this Action Plan (August 2020) through Substantial Amendment #1 (June 2022), there was the belief that there *was* an unmet need for Multifamily Housing. This belief was based on an analysis of FEMA-IA data which revealed 18.4% of residential structures that were negatively impacted by the severe storms were rental properties.

ODOC/CD launched the 2019 CDBG-DR program in October of 2021. From October of 2021 until July of 2022, ODOC/CD considered a MFH program necessary to address the rental properties that were impacted by DR-4438. After a lengthy period of outreach to eligible communities, and after a thorough examination of available data, ODOC believes this is no longer an unmet need. Eligible communities have informed ODOC/CD that there is no unmet need, and no eligible community has expressed any interest in administering a MFH program. ODOC/CD believes that the renter-occupied residential structures impacted by DR-4438 have been covered through insurance or some other program.

ODOC/CD will consider issuing another Substantial Amendment to re-add a MFH program if: (1) An unmet need exists using data that is not solely based on FEMA-IA data, (2) An eligible applicant has come forward with a serious desire to administer the program, and (3) Funds are still available.

HUD-ASSISTED HOUSING, MCKINNEY-VENTO FUNDED SHELTERS, OTHER HUD PROPERTIES

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

As noted previously, the State will continue to collect data regarding unmet housing needs regarding associated housing activities and consider any unmet need request should it be reported, and funding remain available.

HOMELESS PRE-DISASTER

The State does not have an accurate count of how many people were homeless in the 27 eligible counties before May of 2019.

Currently, a Point in Time (PIT) count is used to determine the number of homeless persons throughout the state. This count occurs once per year and is a count of those sheltered and unsheltered within the service boundaries of each Continuum of Care (CoC) network.

The State administers the Emergency Solutions Grant (ESG) for those individuals who are homeless. Additionally, numerous non-profit organizations and shelters exist to assist the homeless population.

ODOC is currently working with ESG and CoC partners to determine unmet need. The Action Plan will be updated with this information in a subsequent Substantial Amendment.

HOUSING GOALS

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

1. Reconstructing and rehabilitating homes, including identifying opportunities for mitigation enhancement measures.

2. Improving the resilience of their homes while restoring their buildings/residences.

3. As applicable, providing buyout assistance to move people out of harm's way.

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

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

ELIGIBILITY THRESHOLD REQUIREMENTS

- Pursuant to the Federal Register Notice, rehabilitation and reconstruction related activities must relate to direct physical damage inflicted because of the qualifying disaster.

- Unmet Needs – The funding is available solely to address unmet needs. Projects must show the damage that still needs to be addressed and the mitigation/resiliency measures to be taken to prevent or lessen the impacts of a future related disaster.

- Eligible/Fundable – Each property must be determined to be an eligible and fundable activity under the Housing and Community Development Act as modified by the Federal Register Notice and all other applicable regulations and guidance.

- Impacted and Distressed Area – All activities must be in a Presidentially declared county that is eligible for assistance as described in Federal Register Notice 85 FR 4681.

- National Objective – All Activities must meet a National Objective. All housing activities are required to meet the LMI housing, LMI Area Benefit National Objective (i.e., an area with household incomes at or below 80% of the area median income), or, in limited cases, the Urgent Need National Objective. The State will primarily consider housing activities to meet the LMI National Objective. That is, the State will prioritize LMI over Urgent Need in housing and infrastructure applications.

- Feasibility – Each project must be found to be financially feasible, sustainable, and likely to contribute to the long-term recovery of disaster

impacted communities. There are certain properties that are not suitable for rehabilitation or reconstruction. ODOC is defining a property as "not suitable for rehabilitation" if any of these conditions apply. (1) The property is declared a total loss. (2) Repairs would exceed 50% of the cost of reconstruction. (3) The home is in the 100-year floodplain or is part of the Disaster Risk Reduction Area as defined in the State's 2019 CDBG-DR Action Plan and Voluntary Buyout Program Guidelines.

Subrecipient applications will be scored based on the following criteria outlined by ODOC. Applications will be reviewed and scored by ODOC DR Staff.

FUNDING SCORING CRITERIA FOR HOUSING APPLICATIONS

Housing Application Scoring Guide	
Priority Type	**Scoring**
TOTAL AVAILABLE POINTS =	___ / 20
Housing Project is in the **HUD Most Impacted and Distressed Area**	Yes = 10 points; No = 0
Housing Project is in the **State Most Impacted and Distressed Area.**	Yes = 5 points; No = 0
Housing Project addresses the long-term recovery of **LMI beneficiaries.**	Under 10 LMI households = 0 points Over 10 LMI households = 1 point Over 20 LMI households = 2 points Over 30 LMI households = 3 points Over 40 LMI households = 4 points Over 50 LMI households = 5 points

Housing Project will **support housing for vulnerable populations**. This includes elderly persons, persons with disabilities, persons with alcohol or other drug addiction, and persons with HIV/AIDS and their families.	Yes = 3; No = 0
Housing Project will **support households that are Limited English Proficient (LEP)**	0 LEP households = 0 points 1-10 LEP households = 1 point 11 or more LEP households = 2 points

FUNDING SCORING CRITERIA FOR VOLUNTARY BUYOUT PROGRAM APPLICATIONS

For the Voluntary Buyout Program (VBP), there is a separate scoring guide that ODOC will use to score applications:

Criteria	Total Points: _____ / 30 possible

VBP Target Area(s) is in the **HUD Most Impacted and Distressed Area**	Yes = 10 points; No = 0
VBP Target Area(s)in the **ODOC Most Impacted and Distressed Area**	Yes = 1 point; No = Immediate Rejection of Application
VBP Target Area(s) population is predominantly LMI	More than 70% LMI = 5 points; No = 0 points
Project is capable of being undertaken immediately to provide outcomes to intended beneficiaries affected by the disaster. All projects must include a project timeline that allows ODOC to meet the six (6) year federal expenditure deadline. Additional details about timelines are included in the 2019 CDBG-DR Policies and Procedures Manual.	Yes = 1 point; No = 0 points
The subrecipient (applicant) has prior experience with Voluntary Buyout Programs.	Yes = 1 point; No = 0 points
Percentage of residential structures in Target Area below Base Flood Elevation	Less than 35% of structures = 1 points Between 35 – 75% of structures = 2 points More than 75% of structures = 3 points
The Voluntary Buyout Program target area includes a repetitive loss structure as defined by the NFIP.	Yes = 2 points; No = 0 points
Target area is primarily Low-to-moderate income owners AND owner-occupied	Yes = 3 Points; No = 0 points
Target area is primarily Low-to-moderate income owners and vacant land (house was demolished);	Yes = 2 Points; No = 0 points
Target area is primarily Occupied rental units (assumes owner falls under the Urgent Need National Objective);	Yes = 2 Points; No = 0 points
Target area is primarily non-LMI owners and Owner Occupied	Yes = 1 Points; No = 0 points
Target area is primarily non-LMI owners and vacant land (house was demolished)	Yes = 1 Points; No = 0 points

The scoring methodology was determined to address long-term resiliency, promoting sustainable development and viable communities, and serving vulnerable populations. ODOC/CD is required to prioritize HUD MID areas and LMI individuals, meaning that these criteria must be top funding priorities.

ODOC/CD is committed to prioritizing projects that address long-term recovery and mitigation efforts to ensure that future disasters will not cause substantial damage to a community. Thus, mitigation and resiliency efforts are a medium funding priority for ODOC/CD and will be prioritized for all proposed projects. While other criteria are considered, ODOC/CD will prioritize HUD requirements, as well as long-term resiliency and mitigation strategies to ensure Oklahoma's communities can sustain future disasters with minimal or no damage.

Definition of vulnerable populations (sometimes referred to as special needs populations): *Agricultural workers, individuals living with physical or sensory disabilities and transitioning from hospitals, nursing homes, development centers, or other care facilities; individuals living with developmental disabilities, serious mental illness or substance abuse disorders; individuals who are survivors of domestic violence, sexual assault, and human trafficking; individuals who are experiencing or at-risk of homelessness; individuals with HIV; homeless youth; families in the child welfare system for whom the absence of housing is a barrier to family reunification, as certified by a county; frequent users of public health or mental health services, as identified by a public health or mental health agency; frail elderly persons; or other specific groups with unique housing needs as determined by ODOC*.

MULTIFAMILY ASSISTANCE (REMOVED AS AN ELIGIBLE ACTIVITY UNDER SUBSTANTIAL AMENDMENT 2)

The Multifamily Assistance program was an activity offered in Substantial Amendment 1. This activity would have provided financial assistance to reimburse individuals and private entities related to multi-family residential structures, rehabilitate, or reconstruct LMI units in eligible multifamily properties with unmet need, including but not limited to public housing, HUD-assisted housing, McKinney-Vento funded shelters and housing for the homeless, which were damaged by the disaster.

During the initial development of this Action Plan (August 2020) through Substantial Amendment #1 (June 2022), there was the belief that there *was* an unmet need for Multifamily Assistance. This belief was based on an analysis of FEMA-IA data which revealed 18.4% of residential structures that were negatively impacted by the severe storms were rental properties.

ODOC/CD launched the 2019 CDBG-DR program in October of 2021. From October of 2021 until July of 2022, ODOC/CD considered a MFH program necessary to address the rental properties that were impacted by DR-4438. After a lengthy period of outreach to eligible communities, and after a thorough examination of available data, ODOC believes this is no longer an unmet need. Eligible communities have informed ODOC/CD that there is no unmet need, and no eligible community has expressed any interest in administering a MFH program. ODOC/CD

believes that the renter-occupied residential structures impacted by DR-4438 have been covered through insurance or some other program.

ODOC/CD will consider issuing another Substantial Amendment to re-add a MFH program if: (1) An unmet need exists using data that is not solely based on FEMA-IA data, (2) An eligible applicant has come forward with a serious desire to administer the program, and (3) Funds are still available.

ELIGIBLE ACTIVITIES

ODOC will be taking applications from eligible subrecipients for housing related projects for the following eligible activities that emerged as the greatest unmet needs from both Survey I and Survey II data. These housing activity options are intended either to:

1) Offer long-term solutions and mitigation of future disasters for residents in need of rehabilitation or reconstruction of their damaged homes, or
2) Buyout properties located in the 100-year floodplain or the Disaster Risk Reduction Area areas that were negatively affected during the 2019 storm events and are likely to be struck again by future flooding.

These activities are the only eligible housing activities through the CDBG-DR program. These programs are intended to both repair damages, restore livelihoods, and mitigate future disasters. While applicants have the choice in how they approach housing issues related to DR-4438, ODOC/CD is committed to allowing local communities the option to choose which programs best serve their long-term resiliency plans and strengthen their local areas by funding the following eligible activities:

Rehabilitation: CDBG funds may be used in a variety of ways to rehabilitate publicly and privately-owned buildings for residential purposes, including manufactured housing that is part of the community's permanent housing stock [24 CFR 570.202].

Rehabilitation does NOT include:

- Creation of a secondary housing unit attached to a primary unit;
- Installation of luxury items, such as a swimming pool;
- Costs of equipment, furnishings, or other personal property not an integral structural fixture, such as a window air conditioner; or
- The value of the homeowner's sweat equity to rehabilitate their own property.

Damaged structures located outside the 100-year floodplain will first be considered for rehabilitation. If a structure is found to need alterations to the original design due to cost-reasonableness, base-flood elevation (BFE), inadequacies in providing

for persons with disabilities, safety, or another unforeseen reason, only then will reconstruction be eligible.

ODOC/CD will apply the following elevation standards to new construction, repair of substantial damage, or substantial improvement of structures located in an area delineated as a flood hazard area or equivalent in FEMA's data source identified in 24 CFR 55.2(b)(1). **All structures, as defined under 44 CFR 59.1, designed principally for residential use, and located in the 100-year (or 1 percent annual chance) floodplain, are ineligible for rehabilitation, reconstruction, elevation, or repair.** Applicable state, local, and tribal building codes and standards for floodplain management that exceed these requirements, including elevation, setbacks, and cumulative substantial damage requirements, will be followed. ODOC/CD has established an elevation cost cap to $40,000. **NOTE:** The overall cap per dwelling unit for rehabilitation, including elevation, is set at $70,000.

Reconstruction: Reconstruction is a form of rehabilitation. "Reconstruction generally means the rebuilding of a structure on the same site in substantially the same manner." The number of dwelling units on a site may not be increased, but the number of rooms per unit may be increased or decreased. Reconstruction became explicitly eligible for CDBG assistance because of a legislative change under section 225 of the Omnibus Consolidated Rescissions and Appropriations Act of 1996 (P.L. 104-234, enacted April 26, 1996). This change [in section 105(a)(4) of the Housing and Community Development Act of 1974 as amended] broadens grantees' ability to use CDBG funds for "reconstruction" of properties. While this eligibility provision has not yet been codified in the CDBG regulations, it became effective upon enactment. Grantees have thus been able to make use of this provision since enacted.

> While the statute does not define the term "reconstruction," for CDBG purposes, it is generally defined as meaning the rebuilding of a structure on the same site in substantially the same manner. Deviations from the original design are permitted for reasons of safety or if otherwise impractical. The structure to be reconstructed may be residential or nonresidential, and either publicly- or privately-owned. For reconstruction involving housing, the number of housing units on a site may not be increased, but the number of rooms per unit may be increased or decreased. [Note that any decrease in the number of units on a site may require compliance with the one-for-one replacement of L/M income dwelling units at 24 CFR part 42, subpart C.] Reconstruction of residential structures would also permit replacing an existing substandard unit of manufactured housing with a new or standard unit of manufactured housing. Note that reconstruction is also permitted elsewhere in the regulations under Public Facilities and Improvements [§570.201(c)].

Note: For single unit housing, 100 percent of the units assisted must be occupied by low and moderate-income households. For a multi-unit structure, 51 percent of the units must be occupied by low and moderate-income households. (For duplexes, one of the two units must be occupied by low and moderate-income households.) For rental properties, where two or more rental buildings are located on the same or contiguous properties and the buildings are under common ownership and management, the grouped buildings may be considered a single structure, thus providing that not less than 51 percent of all such units must be occupied by low and moderate-income households [24 CFR 570.208(a)(3); 24 CFR 570.483(b)(3)].

The overall cap per dwelling unit for reconstruction, including elevation of the unit, is set at $90,000.

Buyouts: Grantees can use CDBG-DR funds to buy residential properties within the 100-year floodplain or the Disaster Risk Reduction Area (DRRA) with the intent to demolish the structures and create park amenities, open space, or flood storage/overflow areas. These areas will be prohibited from building residential, industrial, or commercial structures into perpetuity. Buyout programs are especially effective in communities that have endured multiple disasters in the same neighborhood in the recent past or sustained severe damage where there is high risk of additional disasters, such as a 100-year floodplain. These programs can help reduce the impact of future disasters while encouraging targeted revitalization efforts and public spaces. Only households located within the 100-year floodplain, floodway, and Disaster Risk Reduction Area will be eligible for the buyout program.

Reimbursement (No longer an eligible activity under Substantial Amendment 2)

During the initial development of this Action Plan (August 2020) through Substantial Amendment #1 (June 2022), there was the belief that there *was* an unmet need for reimbursements. This initial belief was not based on any data. ODOC requested data from the SBA, but the SBA declined.

ODOC/CD launched the 2019 CDBG-DR program in October of 2021. From October of 2021 until July of 2022, ODOC/CD has had no interest from eligible applicants in administering a Reimbursement program.

Public Facilities & Public Improvements

Allocation: $11,694,760.00

Neither the statute nor the regulations define the terms “public facilities” or “public improvements.” However, under the core CDBG program, these terms are broadly interpreted to include all improvements and facilities that are either publicly owned

or that are traditionally provided by the government, or owned by a nonprofit, and operated to be open to the general public. This would include neighborhood facilities, firehouses, public schools, and libraries. Public improvements include streets, sidewalks, curbs and gutters, parks, playgrounds, water and sewer lines, flood and drainage improvements, parking lots, and utility lines. With one notable exception, this category does not authorize expenditures for "buildings for the general conduct of government." The exception is that funds may be used to remove from such buildings material and architectural barriers that restrict the mobility and accessibility of elderly or severely disabled persons. Reference: §570.207(a)(1) As defined in the statute, the term "buildings for the general conduct of government" means "city halls, county administrative buildings, State capitol or office buildings or other facilities in which the legislative, judicial or general administrative affairs of government are conducted." The term includes court houses. It does not include buildings which are used to deliver services to the public such as police stations or fire stations.

Because of the nature of the 2019 disaster, ODOC/CD is allocating a portion of CDBG-DR funds to public infrastructure repairs. Public infrastructure supports community vitality by ensuring that citizens have safe and accessible roads and bridges to drive to work and adequate drainage systems for the public's health and safety. The State has identified several impacted areas that have proposed infrastructure related projects with unmet needs due mostly or in part to flooding and road deterioration brought about from the disaster and the debris clean-up following the disaster. The State's allocation for infrastructure repair and mitigation projects will focus on unmet needs that are urgent in nature and can be immediately addressed, including, but not limited to drainage repairs and improvements, as well as critical road and bridge repairs and improvements. There will be no new construction paid for by CDBG-DR funds, but only construction for the repair or rehabilitation of damaged structures such as roads, bridges, and drainage systems that support economic revitalization and long-term recovery, ultimately establishing and sustaining viable communities.

The infrastructure component of the CDBG-DR Program will aid in the form of grants to Units of General Local Governments (UGLG's), tribal nations, non-profit organizations, or other State entities benefitting communities that experienced damage to infrastructure identified in the eligible areas and timeframe established under DR 4438 and have remaining recovery needs, after accounting for other benefits received. **Thus, the State will not be directly carrying out any of the infrastructure programs but will administer funds through an application process that will allow locals to apply for infrastructure funds based on established criteria.**

PUBLIC FACILITIES AND PUBLIC IMPROVEMENT GOALS

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

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

The State will coordinate with federal, state, local, private, and nonprofit entities to assist subrecipients to align investments with other planned state or local capital improvements and infrastructure development efforts. The State has already taken steps to collaborate with several different entities including the State Hazard Mitigation Team, which includes various partners including the Oklahoma Office of Emergency Management, FEMA, local non-profit organizations, and private companies across the state working on resiliency projects and plans. Further, the State has gathered local planning data from several cities that were negatively affected by DR-4438 and have suffered losses to businesses and housing due to a lack of adequate infrastructure. The State will use plans at the state, county, and local level to address infrastructure needs and support resiliency measures against future disasters.

The State will also encourage subrecipients to consider the costs and benefits of each proposed infrastructure project and each project must demonstrate how it will contribute to the long-term recovery and resiliency of the area, as well as support economic revitalization. Subrecipients will be required to document their standards of procurement for all projects and abide by the State's guidelines outlined in the CDBG-DR PnP Manual.

The State will ensure that any infrastructure projects will avoid disproportionate impact on vulnerable communities and protected classes and will create, to the extent practicable, opportunities to address economic inequities facing local communities. Further, the State will utilize the Social Vulnerability Index, Census data, and FEMA data gathered to ensure that infrastructure projects do not place an unnecessary burden on vulnerable communities and limit economic resiliency. HUD-assisted programs are subject to the Uniform Relocation Assistance and Real Property Acquisitions Polices Act of 1970 and the State will utilize their plan to meet federal requirements for all infrastructure projects. The Uniform Relocation Assistance (URA) plan for the State of Oklahoma is further outlined in this

document and in the Policies and Procedures manual. An Anti-Displacement & Relocation Assistance Plan must be adopted by the applicant for any CDBG-DR program.

PUBLIC IMPROVEMENTS (INFRASTRUCTURE)

As previously noted, it is not expected that the amount is sufficient to address a large portion of the State's unmet infrastructure needs. There is hope that future CDBG-DR related funding will be intended primarily for unmet infrastructure, public facility, and mitigation "only" needs. The State will more fully address its infrastructure needs when such future funds are allocated. Infrastructure unmet needs are, for the purpose of this Action Plan, limited to the repair and replacement of existing infrastructure. This includes improving existing infrastructure damaged due to the subsequent disaster occurring in 2019 under FEMA DR 4438.

There is a maximum award amount of $14,750,000 per individual applicant (UGLG or other entity) regardless of the number of activities (activities may be from multiple programs) being requested for said applicant. Thus, while one applicant may apply to administer multiple programs, the total award amount cannot exceed the maximum award threshold. Exceptions may apply to provide reasonable accommodations in accordance with federal laws.

Eligible Activities

- The acquisition, construction, reconstruction, rehabilitation, or installation of public facilities and improvements are eligible activities under CDBG and can be carried out by the sub-recipient. Public facilities may only be owned by the state or sub-recipient. Note: If the assisted facility is owned by a nonprofit, core CDBG regulations stipulate that the facility must be open to the public during normal working hours.
- Eligible types of facilities and improvements include: – Infrastructure improvements (construction or installation) including, but not limited to streets, curbs, and water and sewer lines; – Neighborhood facilities including, but not limited to public schools, libraries, recreational facilities, parks, playgrounds; and – Facilities for persons with special needs such as facilities for the homeless or domestic violence shelters, nursing homes, or group homes for the disabled.
- Eligible costs associated with eligible activities may include Handicapped accessibility improvements (including improvements to buildings used for general conduct of government).

Ineligible Activities

- The maintenance and repair of public facilities and improvements is generally ineligible (e.g., filling potholes, repairing cracks in sidewalks, mowing grass at public recreational areas, or replacing streetlight bulbs).

- Operating costs associated with public facilities or improvements are ineligible unless part of a CDBG-DR assisted public service activity or eligible as an interim assistance activity.

Eligibility Threshold Requirements

- Disaster Tie Back – Pursuant to the Federal Register Notice, the requested activity must relate to direct physical damage inflicted to the infrastructure because of the qualifying disaster.
- Unmet Need – The funding is available solely to address unmet needs that are not fully addressed by other funding sources.
- Eligible/Fundable – Each project must be determined to be an eligible and fundable activity under the Housing and Community Development Act as modified by the Federal Register Notice and all other applicable regulations and guidance.
- Impacted and Distressed Area – All activities must be in a Presidentially declared county that is eligible for assistance covered under DR 4438.
- Feasibility – Each project must be found to be financially feasible, sustainable, and likely to contribute to the long-term recovery of disaster impacted communities.
- Consistency with Consolidated Plan/Action Plan – Each project must be reflective of the goals, priorities, and requirements of the State's 2019-2023 Consolidated Plan: and
- Funding for Prior Disasters – No portion of the funding may be used to reimburse the applicant for costs incurred prior to the 4438 Disaster Declaration.

Funding applications will be scored based on the following criteria outlined by ODOC. Applications will be reviewed and scored by ODOC DR Staff.

FUNDING SCORING CRITERIA

Priority Type	Scoring
TOTAL AVAILABLE POINTS =	___ / __26__
Project is in the **HUD Most Impacted and Distressed Area**	Yes = 10 points; No = 0

Project contributes significantly to the **long-term recovery and of the affected area**. This includes projects that are part of a community's larger plan to mitigate future disasters and create viable communities, achieving objectives outlined in local plans that reduce future risk to property and the public	Yes = 5; No = 0
Project is capable of being undertaken (design and construction) immediately to provide outcomes to intended beneficiaries affected by the disaster. All projects must include a project timeline that allows ODOC to meet the six (6) year federal expenditure deadline.	Yes = 5; No = 0
Project will **support housing/public facilities for vulnerable populations**. This includes, but is not limited to transitional housing, permanent supportive housing, permanent housing needs of individuals and families that are homeless or at-risk of homelessness, and persons who are not homeless but require supportive housing such as elderly, persons with disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, and public housing residents	Yes = 3; No = 0
Project will **support availability of affordable housing in low-poverty, non-minority areas where appropriate** and in response to natural hazard-related impacts for vulnerable populations	Yes = 3; No = 0

The scoring methodology was determined to address long-term resiliency, promoting sustainable development and viable communities, and serving vulnerable populations. ODOC/CD is required to prioritize HUD MID areas and LMI individuals, meaning that these criteria must be top funding priorities. ODOC/CD is committed to prioritizing projects that address long-term recovery and mitigation efforts to ensure that future disasters will not cause substantial damage to a community. Thus, mitigation and resiliency efforts are a medium funding priority for ODOC/CD and will be prioritized for all proposed projects. While other criteria are considered, ODOC/CD will prioritize HUD requirements, as well as long-term resiliency and mitigation strategies to ensure Oklahoma's communities can sustain future disasters with minimal or no damage.

Definition of vulnerable populations (sometimes referred to as special needs populations): *Agricultural workers, individuals living with physical or sensory disabilities and transitioning from hospitals, nursing homes, development centers, or other care facilities; individuals living with developmental disabilities, serious mental illness or substance abuse disorders; individuals who are survivors of domestic violence, sexual assault, and human trafficking; individuals who are experiencing or at-risk of homelessness; individuals with HIV; homeless youth; families in the child welfare system for whom the absence of housing is a barrier to family reunification, as certified by a county; frequent users of public health or mental health services, as identified by a public health or mental health agency; frail elderly persons; or other specific groups with unique housing needs as determined by ODOC.*

Under the core CDBG program, activities eligible under this category are broadly interpreted to include all improvements and facilities that are either publicly owned or that are traditionally provided by the government, or owned by a nonprofit, and operated to be open to the general public. Public facilities include neighborhood facilities, firehouses, public schools, and libraries.

Public improvements may include streets, sidewalks, curbs and gutters, parks, playgrounds, water and sewer lines, public flood and drainage improvements, parking lots, and utility lines.

Typical CDBG-DR funded activities in this category include the repair, replacement, or relocation of damaged public facilities or public improvements. If applicable, infrastructure projects located in a floodplain must meet the requirements of 24 CFR Part 55 "Floodplain Management and Protection of Wetlands."

As previously stated, all CDBG-DR disaster recovery activities must clearly address an impact of the disaster for which funding was appropriated. Given the standard CDBG requirements, this means each activity must: (1) be CDBG eligible (or receive a waiver), (2) meet a national objective, and (3) address a direct or indirect impact from the disaster in a presidentially declared county.

New infrastructure may be CDBG eligible as a public facility or improvement under Section 105 (b) of the HCD Act. In addition, it may be able to meet a national objective (e.g., benefit to an LMI area).

However, the critical issue becomes illustrating the connection between the construction of the infrastructure and the applicable disaster. Often, the new construction of infrastructure can easily be tied to mitigation (i.e., the prevention of future damage) but it must demonstrate a recovery need whereby mitigation alone is not the only unmet need served.

ECONOMIC REVITALIZATION

Allocation: $0

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

PLANNING

Allocation: $1,590,590

HUD guidelines allow the State to opt to expend up to 15% of its CDBG-DR Program funding allocation on planning activities. The State does not intend to expend its planning activity allocation to assist in the planning processes associated with the redevelopment of storm impacted areas during this allocation of disaster recovery funding. The Federal Register notice published February 9, 2018 (83 FR 5850), requires all grantees to describe how they plan to promote sound, sustainable long-term planning.

Planning Goals (Long-Term Recovery Planning)

It is important for Oklahoma to be proactive in anticipation of future natural disasters. Because of the extensive data collected on unmet needs, ODOC/CD, working in partnership with the Oklahoma Water Resource Board, will be conducting a statewide flood plan study. This Statewide flood plan will cover all 77 counties in Oklahoma, including HUD-identified MIDs. Many of the homes destroyed in the Most Impacted and Distressed areas from the disaster were Low-to-Moderate Income individuals living in vulnerable areas. Additionally, much of the housing that was destroyed in the disaster was uninsured because they were not required to have flood insurance due to their elevation level. Still, these homes suffered significant losses due to the 4438 disaster. An in-depth study of floods and flood risks in Oklahoma is necessary to keep Oklahomans safe. Without this study, Oklahoma policymakers lack the extensive information necessary to make informed policy decisions and Oklahomans may suffer future damage related to flooding because of it. A state flood map is necessary for Oklahoma's long-term recovery.

This plan will serve as a guide for municipalities to make informed decisions on future construction related to single and multi-family housing, as well as public infrastructure. This plan will be publicly available and allow Oklahoma Councils of

Government and elected officials to plan effectively for future disasters and mitigate future damages to private and public property. Accordingly, a study will assist in the long-term planning processes associated with improving resiliency and mitigation of housing statewide. As addressed earlier, the disaster resiliency assessment conducted by the Oklahoma Housing Finance Agency (OHFA), as part of the Oklahoma Housing Needs Assessment, found several notable recommendations as they relate to disaster resiliency. Areas related to planning were noted. Proper planning will allow the State to mitigate many potential disaster-related issues more readily in the future.

This plan, along with the Oklahoma Emergency Operations Plan (EOP) (2019) and the Standard Hazard Mitigation Plan (SHMP) for the Great State of Oklahoma (2019), will serve to guide the State in disaster recovery, resiliency, and future disaster mitigation. Utilizing the basic disaster recovery framework of the EOP and the long-term planning and partnerships across sectors outlined in the SHMP, the State will fill a necessary gap with the OWRB Flood Plan to identify future flood risks and serve as a guide to policy development for hazard mitigation. This plan will further develop partnerships across public and private entities and follow the guidelines set in the state's previous plans to address damages and restore systems to an improved and optimal state.

OWRB Flood Plan Study
ODOC/CD working in partnership with the Oklahoma Water Resource Board will be conducting a flood plan study.

Purpose:

1. The State Flood Plan shall provide for orderly preparation for and response to flood conditions to protect against the loss of life and property.
2. Be a guide to state and local flood control policy.
3. Contribute to comprehensive statewide data aimed to provide local municipalities with adequate flood mitigation measures.

The study will analyze Federal, State, and other flood-risk datasets for any current or historic flood hazard data gap analysis at the Hydrological Unit Code (HUC)-8 level. This data gathering includes, but is not limited to: Population growth and development, number of policies in versus out of Special Flood Hazard Areas (SFHA), number of claims in versus out of SFHA and claims made out of declared disaster areas within the last 10 years, critical infrastructure in versus out of SFHA and declared disaster areas in the last 10 years, an economic and social vulnerability analysis, consequence analysis of critical and non-critical infrastructure including flood control infrastructure (dams, levees, and other types of flood controls), flood risk hot spot analysis to find mitigation investments, and an

evaluation of insurance gaps and impacts of risk ratings on future policy counts and coverage.

Through this data gathering, OWRB can further evaluate structural flood risk reduction strategies per HUC-8, as well as local drainage improvements for roadways, bridges, culverts and pipes, local detention/retention basins, channel conveyance improvements, levees, and floodwalls. These recommendations will support long-term planning improvements across the state. OWRB will then evaluate and summarize existing Federal, State, and local financial programs and enabling legislation. Statewide data will be collected for Capital Improvement Plans (CIPs), budgets, and utility fees for flooding to identify local, city, and county-level funding needs. Data will also be collected through meetings with key stakeholders such as local officials, county and state-level staff, and tribal leaders. This will further inform the State on critical and urgent, as well as long-term needs across multiple levels of community leadership. All funding opportunities will be summarized and paired with Statewide needs that could be met through those specific sources. Overall, OWRB will use the data collected to create a flood plan by providing a list of mitigation projects in a digital environment with recommendations for future mitigation efforts including funding availability and technical assistance.

In addition to the statewide flood plan, OWRB will perform a more in-depth hydrology and floodplain analysis in the Arkansas River watershed, which will address data gaps identified by the Phase I portion of the statewide flood plan.

OWRB will use planning funds to identify the most significant flood risk areas in Muskogee County. During the planning process, OWRB, in partnership with Muskogee County, will analyze local flood risk reduction projects. This effort will resolve data gaps identified in the State Flood Plan. OWRB will work with the HUD identified Most Impacted and Distressed Areas to develop a flood mitigation strategy, and projects will be prioritized for funding and implementation within the Arkansas River watershed. The final plan will include resiliency projects that reduce flooding, and life and property threats.

Note: While the OWRB plan is intended to be comprehensive and thorough, ODOC/CD reserves the right to request minor alterations to the plan.

ADMINISTRATION

Allocation: $1,817,650.00

The State is entitled to a maximum of 5% of the total CDBG-DR allocation and will act as the lead agency for the overall administration of the CDBG Disaster Recovery funding. Together, Planning and Administration are capped at 20% of the total grant allocation. Of this, by regulation up to 5% of the grant can be used for administration. The State will administer and utilize sub-grantees to disburse the

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

It is important to define the difference between Activity, Activity Delivery, and Grant Administrative Costs. 24 CFR 570.206 covers grant administration.

1. Activity Costs: Actual costs to acquire, rehabilitate or construct projects, or provide assistance.
2. Activity Delivery Costs (ADC): Costs incurred by sub-recipients to facilitate the development of specific projects and programs (e.g., environmental review, work write up, applicant selection, rehab standards) and soft costs tied to specific projects reported within the project or program.
3. Grant Administrative Costs: Costs that the grantee (State) must incur to administer or manage the CDBG-DR grant (e.g., monitoring, financial management, reporting).

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

- Application Intake and Evaluation (specifically for Homeowner programs);
- Architectural and Engineering services;
- ODOC Internal CDBG-DR Program Auditing;
- Environmental Review services (including historic preservation review; environmental justice);
- Construction Management services; and
- General Contracting (including subcontracting).

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

ODOC/CD staff will also oversee the extensive federal requirements associated with programmatic compliance and monitoring. These staff members will be

responsible for ensuring the overall administration of the funding complies with all applicable federal requirements. They will monitor other ODOC/CD staff to ensure the proper implementation of consistent processes and procedures, particularly as they relate to the identification and prevention of the duplication of benefits. This compliance team will also be responsible for monitoring all ODOC contractors and service providers as detailed in the CDBG-DR Policy and Procedures Manual located on the ODOC/CD CDBG-DR website https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery-2019/. As previously noted, there will also be long-term compliance requirements associated with some of these program activities (i.e., liens on homeowner and multifamily properties for extended periods).

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

Leverage Resources

ODOC/CD commits to advancing recovery programs and activities that provide long-term benefits and improved resilience to current and future hazards. ODOC/CD also attempts to align its CDBG-DR programs or projects with other planned federal, state, regional, or local capital improvements, where feasible. The recovery effort for the State will be assisted through the provision of multiple funding sources. Primarily of interest to the recovery are funds received for FEMA Public Assistance (PA), FEMA Individual Assistance (IA), FEMA Hazard Mitigation Grant Program (HMGP), Small Business Administration (SBA) Disaster Loans, Department of Transportation (DOT) funds, and U.S. Army Corps of Engineers (USACE) funds. Although not required, sub-grantees are encouraged to make contributions to the disaster related projects through the expenditure of local general funds.

FEMA projects may present a leverage opportunity for CDBG-DR funds. As stated in the Federal Register, “funds may be used as a matching requirement, share, or contribution for any other Federal program when used to carry out an eligible CDBG–DR activity”. Traditionally, the State has provided the 25 percent match required to fund FEMA PA and FEMA HMGP projects. In addition to the required match, the commitment of additional CDBG-DR funds to FEMA-assisted projects may be beneficial to allow for improved resiliency, expand the geographic impact, or increase the long-term useful life of the improved project. ODOC/CD will accept applications for FEMA PA and HMGP projects through the application process and

may also accept proposals for related activities to determine if the use of CDBG-DR funds is eligible, non-duplicative, and provide a recovery benefit.

For affordable housing projects, ODOC/CD will identify funding from all available sources, including CDBG-DR grant funds, dedicated to addressing the unmet needs for affordable housing. In its project selection, ODOC/CD will evaluate the complete funding package and assess how other funds are leveraged to the fullest to maximize a return on investment with federal funds. Potential sources of leverage include other federal funds, such as SBA loans, Low Income Housing Tax Credits (LIHTC), private funding, and State or local funds. Favorable leverage opportunities will receive greater prioritization for CDBG-DR funding. ODOC/CD will evaluate proposer capacity as well as the individual projects proposed and may elect to enter into other sub-recipient or partner relationships to execute affordable housing that is advantageous to the program and to the impacted area.

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

Applicants are strongly encouraged to leverage all available funding resources, public and private, before utilizing disaster recovery dollars. **Yet, no specific dollar amount of leveraged funds is required.** Any dollar amount will be reported in HUD's Disaster Recovery Grant Reporting System (DRGR).

REUSE FUNDING

ODOC/CD anticipates that in some cases CDBG-DR funding could potentially be available later in the program due to unforeseen events such as the cancellation of projects; projects completed under budget; or from funds designated but not allocated. ODOC/CD reserves the right to adjust any of the remaining CDBG-DR funding to ensure maximum utilization of funds. Such CDBG-DR "Reuse" funding adjustments shall be the minimum amount necessary to fund projects efficiently. The CDBG-DR Reuse funding is also being made available to offset any unforeseen project eligible cost increases such as in the case of construction. All CDBG-DR Reuse funding will be subject to the same expenditure deadlines and compliance requirements set forth in the Federal Register Notice. Funding deemed Reuse will be evaluated and allocated according to the following considerations.

1. In addition to first meeting the core CDBG-DR Program eligibility requirements as outlined in this Action Plan, Reuse funding will be prioritized to allow the State to meet the minimum Federal Register specified objectives should these objectives remain unfulfilled at the time of the Reuse funding availability. Should this happen, the ODOC/CD may continue to fund down the officially scored list of submitted CDBG-DR applications for ELIGIBLE disaster recovery activities if funding and time restrictions permit. Any additional requested disaster activity funding will be subject to the same expenditure and compliance deadlines set forth in the Federal Register Notice and CDBG-DR program selection priorities established by the State.

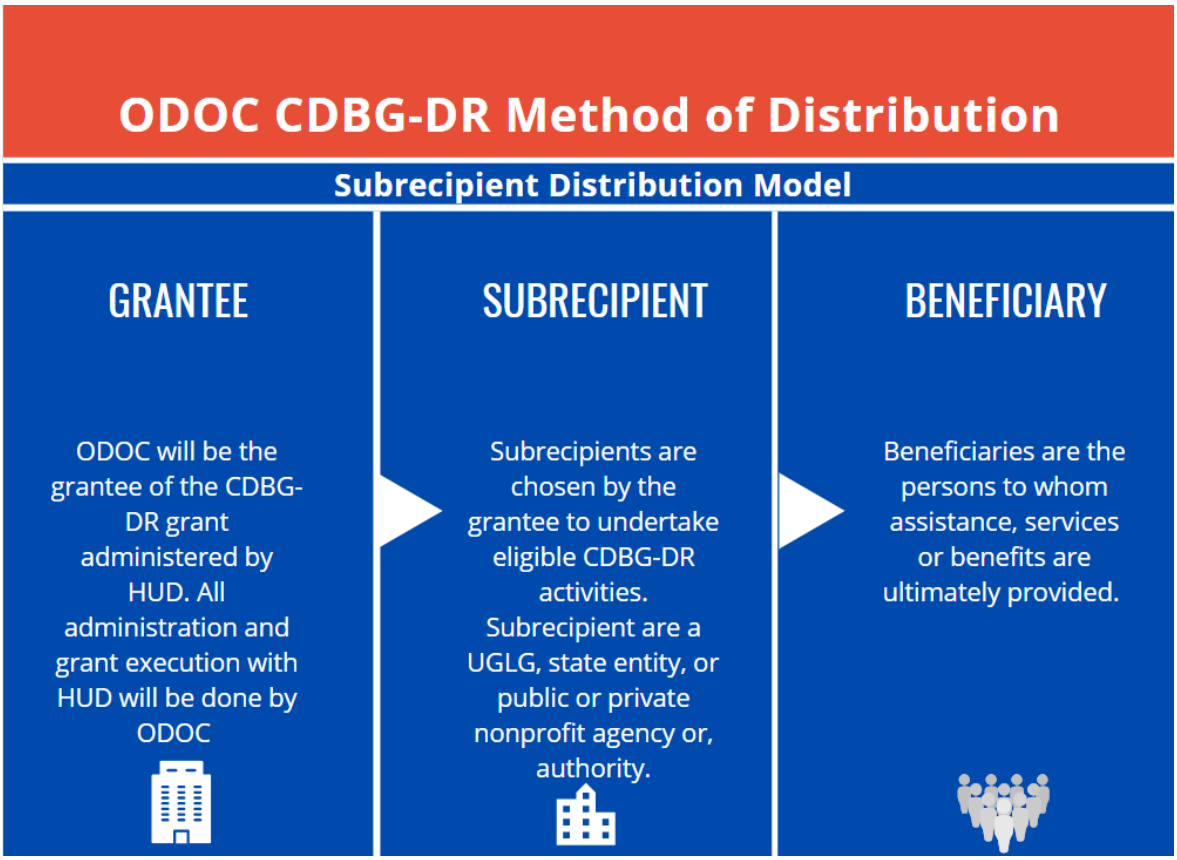
2. Reuse funding will be first considered for current grantees whose projects have been significantly impacted by unforeseen increased project completion costs and require additional funds to ensure timely completion of their eligible project.

3. Reuse funding consideration will depend on the amount required by the eligible CDBG-DR project in relation to the amount of limited remaining CDBG-DR funding available.

4. Reuse funding consideration will depend on the amount of time required for final project completion in relation to the amount of time remaining under the imposed Federal Register Notice deadlines.

5. Any remaining CDBG-DR funding that cannot meet the six (6) year expenditure deadline since the initial obligation of funds from HUD under PL 115-254 and PL 116-20, or any funding where the appropriation has been carried out and no disbursements have been made against the appropriation for two (2) fiscal years set forth in the Federal Register Notice (85 FR 4689), under 31 U.S.C. 1555 HUD will close the appropriation account and cancel any remaining obligated or unobligated funds.

METHOD OF DISTRIBUTION



Within each program, funds are going to be distributed using an objective methodology targeted towards the Most Impacted and Distressed areas. Distribution methods are sensitive to the needs of the affected population as well as the capacity of the units of local government that will engage in the recovery process. Proper distribution ensures that CDBG-DR funds will be used to maximum benefit to address unmet housing recovery and infrastructure repair. ODOC/CD assessed its internal capacity during the capacity assessment required by the Federal Register Notice and concluded that CDBG-DR funds would need to be administered by ODOC/CD but subrecipients will run all programs. An internal assessment concluded that local governments are best positioned to operate and manage project specific funding related to infrastructure repair and single and multifamily housing repair. Allowing subrecipients to carry out assistance to beneficiaries will best serve long-term recovery, ensuring that recovery coincides with local plans. Additionally, planning funds will be used to provide necessary tools and information that provide local municipalities with adequate resources to mitigate future disasters.

In both the housing and infrastructure portions of the CDBG-DR program, the funds will be administered by a subrecipient and not directly by the state. Thus, using this subrecipient distribution model, ODOC/CD will make all key decisions, but delegate all or some aspects of program management to the subrecipient. There is a maximum award amount of $14,750,000 per individual subrecipient applying (UGLG or other entity) regardless of the number of activities being requested for said applicant. Exceptions may apply to provide reasonable accommodations in accordance with federal laws.

Program Requirements

Along with the core CDBG-DR Program requirements outlined in the Federal Register Notices, CDBG-DR funding must comply all other applicable crosscutting federal requirements. These cross-cutting regulations must be addressed in the Action Plan and implemented throughout the grant process.

Federal Funding Accountability and Transparency Act (FFATA)

The Federal Funding Accountability and Transparency Act (FFATA) was signed on September 26, 2006. The intent is to empower every American with the ability to hold the government accountable for each spending decision. The result is to reduce wasteful spending in the government. The FFATA legislation requires information on federal awards (federal financial assistance and expenditures) be made available to the public via a single, searchable website, which is www.USASpending.gov.

The FFATA Subaward Reporting System (FSRS) is the reporting tool Federal prime awardees (i.e., prime contractors and prime grants recipients) use to capture and report subaward and executive compensation data regarding their first tier subawards to meet the FFATA reporting requirements. Prime contract awardees will report against sub-contracts awarded and prime grant awardees will report against sub-grants awarded. The sub-award information entered in FSRS will then be displayed on www.USASpending.gov associated with the prime award furthering Federal spending transparency.

The System for Award Management (SAM) is an official website of the U.S. government and supports the FFATA data contained on www.USASpending.gov. 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 www.SAM.gov. Units of General Local Government (UGLG's), contractors as well as recipients of federal financial assistance must be registered at www.SAM.gov. Active registration in SAM is required to apply for an award and for HUD to make a payment. ODOC/CD is required by HUD to check sub-grantees' debarment/exclusion status in the federal SAM database and place a record on file. Applicants can use this site for free to:

1. Register to do business with the U.S. government
2. Update or renew entity registration

3. Check status of an entity registration
4. Search for entity registration and exclusion records

Per the SAM User Guide, the No Active Exclusions field on the SAM entity summary indicates 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.

Protection of People and Property

To ensure protection of people and property, the State will use SAM.gov as a tool to ensure adequate contractor standards. The State will also establish standards for request for qualifications for contractors such as, but not limited to the contractor's ability to perform, any recent construction projects completed within the past 5 years, performance and payment capacity, financial statements for the past 2 years, evidence of insurance coverage, and business registrations, certifications, and licenses.

The State will require a period post-construction for all projects: all work performed by the
contractor will be guaranteed for a period of 1 year.

To further protect people and property, the State will also address any complaints or appeals in a timely manner. The State will respond within fifteen (15) business days, when practicable. The State's appeal process will apply to any appeal/complaint made by a homeowner, contractor, city, county, private organization, public housing authority, or other entity regarding a CDBG-DR funded program or project. The State will respond promptly and coordinate with the appellant to resolve issues. A record of each appeal/complaint will be kept by the State and email will be the primary method of contact to ensure a written record of all appeals/complaints and timely responses are recorded. This is further outlined in Section (T) 5.18 Citizen Complaint Procedures.

Environmental Review

An environmental review is the process of reviewing a project and its potential environmental impacts to determine whether it meets federal, state, and local environmental standards. The environmental review process is required for all HUD-assisted projects to ensure that the proposed project does not negatively impact the surrounding environment and that the property site itself will not have

an adverse environmental or health effect on end users. Not every project is subject to a full environmental review (i.e., every project's environmental impact must be examined, but the extent of this examination varies), but every project must follow the National Environmental Policy Act (NEPA), and other related Federal and state environmental laws.

Impacts by environmental hazards (environmental justice) on protected classes will be evaluated. Input from low-income, minority, and tribal populations on the impact of proposed uses of CDBG-DR funds for development will be evaluated.

ODOC/CD details a process for monitoring and maintaining environmental compliance for all CDBG-DR grant fund recipients in its CDBG-DR policies and procedures manual to ensure compliance with this requirement. Robin Slawson, Programs Manager for ODOC/CD, is the personnel responsible for environmental compliance.

Robin Slawson, Programs Manager
Robin.Slawson@okcommerce.gov
405-815-5341

The CDBG-DR Policy and Procedure Manual is available on the CDBG-DR disaster recovery website (https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery-2019).

Per 24 CFR 58.5(J), ODOC/CD encourages subgrantees to consider the intersection between protected classes and environmental hazards. Subgrantees are required to demonstrate that input from low-income, minority, and tribal populations have been consulted on the impact of proposed CDBG-DR funds for development.

Labor Standards

HUD programs require compliance with federal labor provisions. The Fair Labor Standards Act (FLSA) governs such matters as Federal minimum wage rates and overtime (O/T). These standards are generally applicable to any labor performed and may be pre-empted by other (often more stringent) federal standards. The authority to administer and enforce FLSA provisions resides solely with the Department of Labor (DOL).

The Davis-Bacon Act (DBA), enacted in 1931, applies to contracts more than $2,000, for construction, alteration and/or repair of public buildings or public works, including painting and decorating, to which the United States or the District of Columbia is a party. The DBA requires that the advertised specifications for such contracts contain a provision stating the minimum wages to be paid to various classes of laborers and mechanics be based upon the wages found to be prevailing

by the Secretary of Labor. The DBA includes provisions that:

1. Require the contractor or subcontractor to pay all mechanics and laborers not less often than once a week.
2. Prohibit deductions or rebates from wages earned by laborers and mechanics.
3. Require the contractor or subcontractor to pay Davis-Bacon wages to all laborers and mechanics employed on the site of the work regardless of any contractual relationship alleged to exist between the laborers and mechanics and the contractor or subcontractor.
4. Require that the scale of wages to be paid (i.e., the applicable Davis-Bacon wage decision) be posted in a prominent and accessible place at the work site.
5. Define prevailing wages to include fringe benefits.
6. Permit withholding from payments due to the contractor on account of wage restitution which may be found due to the laborers and mechanics.
7. Permit the payment of wage restitution from amounts withheld from contract payments.
8. Permit the termination of the contract where it is found that any laborer or mechanic is underpaid.
9. Permit the debarment of persons or firms found to have disregarded their obligations to employees and subcontractors.

The Copeland Act (Anti-Kickback) requirements are applicable only where Davis-Bacon prevailing wage provisions are applicable. The Copeland Act concerns three facets of prevailing wage compliance:

1. The “anti-kickback’ provision makes it a criminal offense for any person to induce, by any manner whatsoever, any person employed in the construction, prosecution, completion, or repair of any public building, public work, or building or work financed in whole or in part by loans or grants from the United States, to give up any part of the compensation to which he/she is entitled under his/her contract of employment. Violations of the anti-kickback provision are punishable by a fine or by imprisonment up to 5 years, or both.
2. Associated DOL regulations restrict payroll deductions to those that are permissible without DOL approval as explained at 29 CFR §3.5; deductions that require advance DOL approval are explained at 29 CFR §3.6.
3. The Act also requires the submission of weekly payroll reports and statements of compliance (certified payroll report = CPR) by all contractors and subcontractors engaged in such construction, prosecution, completion, or repair (29 C.F.R. § 5.5(a)(3)(ii)(A). The willful falsification of a payroll report or Statement of Compliance may subject the employer to civil or criminal

prosecution under §101 of Title 18 and §3729 of Title 31 of the U.S.C. and may also be a cause for debarment.

ODOC/CD details a process for monitoring and maintaining labor standards compliance for all CDBG-DR grant fund recipients in its CDBG-DR policies and procedures to ensure compliance with this requirement. The CDBG-DR Policy and Procedure Manual is available on the CDBG-DR disaster recovery website (https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery-2019).

Section 3, Minority, Women Owned Economic Opportunities

Section 3 is a provision of the Housing and Urban Development (HUD) Act of 1968 that helps foster local economic development, neighborhood economic improvement, and individual self-sufficiency. The Section 3 program requires that recipients of certain HUD financial assistance, to the greatest extent possible, provide training, employment, contracting and other economic opportunities to low and very low-income persons, especially recipients of government assistance for housing, and to businesses that provide economic opportunities to low and very low-income persons.

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

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

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

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

5. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority business, and women's business enterprises.

6. If any subcontracts are to be let, requiring the prime contractor to take affirmative steps in 1 through 5 above.

7. Grantees shall take similar appropriate affirmative action in support of women's business enterprises.

8. Grantees are encouraged to procure goods and services from labor surplus areas.

9. Grantor agencies may impose additional regulations and requirements in the foregoing areas only to the extent specifically mandated by statute or presidential direction.

Definitions

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

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

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

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

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

- *White, Not Hispanic Origin* - A person having origins in any of the original peoples of Europe, North Africa, or the Middle East, but not of Hispanic origin.
- *Black, Not Hispanic Origin* - A person having origins in any of the black racial groups of Africa, but not of Hispanic origin.
- *Hispanic* - A person of Mexican, Puerto Rican, Cuban, Central or South American or other Spanish culture or origin, regardless of race.
- *Asian and Pacific Islander* - A person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands.
- *American Indian or Alaskan Native Origin* - A person having origins in any of the original peoples of North America, and who maintains cultural identification through tribal affiliation.

ODOC/CD details a process for monitoring and maintaining Section 3 and minority compliance for all CDBG-DR grant fund recipients in its CDBG-DR policies and procedures to ensure compliance with this requirement. The CDBG-DR Policy and Procedure Manual is available on the CDBG-DR disaster recovery website (https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery-2019).

Fair Housing, Handicapped Accessibility, Equal Opportunity Requirements

The Fair Housing Act (Title VIII of the Civil Rights Act of 1968) introduced meaningful federal enforcement mechanisms. It outlaws the refusal to sell or rent a dwelling to any person because of race, color, disability, religion, sex, familial status, or national origin. The Fair Housing Act protects people from discrimination when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing-related activities.

Fair housing applies to the following actions in the sale and rental of housing because of race, color, religion, sex, disability, familial status, or national origin. ODOC/CD will review all applications to ensure no such actions will occur. These actions include, but are not limited to, the following:

- Refuse to rent or sell housing
- Refuse to negotiate for housing
- Otherwise make housing unavailable
- Set different terms, conditions or privileges for sale or rental of a dwelling
- Provide a person different housing services or facilities
- Falsely deny that housing is available for inspection, sale, or rental

- Make, print, or publish any notice, statement, or advertisement with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination
- Impose different sales prices or rental charges for the sale or rental of a dwelling
- Use different qualification criteria or applications, or sale or rental standards or procedures, such as income standards, application requirements, application fees, credit analyses, sale or rental approval procedures or other requirements
- Evict a tenant or a tenant's guest
- Harass a person
- Fail or delay performance of maintenance or repairs
- Limit privileges, services, or facilities of a dwelling
- Discourage the purchase or rental of a dwelling
- Assign a person to a particular building or neighborhood or section of a building or neighborhood
- For profit, persuade, or try to persuade, homeowners to sell their homes by suggesting that people of a particular protected characteristic are about to move into the neighborhood (blockbusting)
- Refuse to provide or discriminate in the terms or conditions of homeowners insurance because of the race, color, religion, sex, disability, familial status, or national origin of the owner and/or occupants of a dwelling
- Deny access to or membership in any multiple listing service or real estate brokers' organization

Fair housing applies to the following actions in mortgage lending because of race, color, religion, sex, disability, familial status, or national origin:

- Refuse to make a mortgage loan or provide other financial assistance for a dwelling
- Refuse to provide information regarding loans
- Impose different terms or conditions on a loan, such as different interest rates, points, or fees
- Discriminate in appraising a dwelling
- Condition the availability of a loan on a person's response to harassment
- Refuse to purchase a loan

In addition, the Fair Housing Act makes it illegal to harass persons because of race, color, religion, sex, disability, familial status, or national origin. Among other things, this forbids sexual harassment. It is considered as illegal discrimination to threaten, coerce, intimidate, or interfere with anyone exercising a fair housing right or assisting others who exercise the right or retaliate against a person who has filed a fair housing complaint or assisted in a fair housing investigation. Housing providers must make reasonable accommodations and allow reasonable modifications that may be necessary to allow persons with disabilities to reside in their housing.

ODOC/CD has an active Uniform Relocation Assistance Plan (URA) plan and process in place if URA were to be triggered by an ODOC/CD activity. URA is federally mandated, and ODOC/CD has increased its capacity to administer URA requirements.

In practice, when a tenant is displaced by a CDBG-DR activity, relocation case managers are assigned to both owners and tenants work with applicants to coordinate activities and communicate updates in real time concerning when to expect to move out of their residences, assist the displaced individuals with securing temporary housing arrangements, and all other aspects of moving belongings. One of the case manager's primary goals is to minimize the time that the tenant/owner will be impacted by coordinating the construction calendar in real time and during construction, keeping the displaced individual updated on the construction progress and communicating an expected timeline for construction completion and eventual move in.

To ensure accessibility for applicants, ODOC/CD has adopted a Section 504/Americans with Disabilities Act (ADA) policy which ensures the full right to reasonable accommodations by all program participants. Under this policy, case managers shall assess the specific needs of each program beneficiary and determine if a 504/ADA modification is required based on the family composition members. All public facilities that are federally assisted shall also exceed the minimum threshold for 504/ADA compliance. Multifamily and other housing development programs will also be required to have a certain set-aside of fully compliant 504/ADA units of varying sizes to accommodate eligible applicants. Along with single family programs, the multifamily rental programs will be required to have an architect's/engineer's signature on a form stating that the designed unit meets 504/ADA compliance. Failure to deliver the appropriately constructed ADA/504 compliant unit(s) will result in the construction firm not being paid and in breach of contract until the deficiencies are corrected.

ODOC/CD details a process for monitoring and maintaining Fair Housing, handicapped accessibility, and equal opportunity compliance for all CDBG-DR grant fund recipients in its CDBG-DR policies and procedures to ensure compliance with this requirement. The CDBG-DR Policy and Procedure Manual is available on the CDBG-DR disaster recovery website (https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery-2019).

Uniform Relocation Act

The Uniform Relocation Assistance and Real Property Acquisition Act of 1970 (URA) is a federal law that establishes minimum standards for federally funded programs and projects that require the acquisition of real property (real estate) or displace persons from their homes, businesses, or farms. The URA's protections and

assistance apply to the acquisition, rehabilitation, or demolition of real property for federal or federally funded projects. This law was enacted by Congress to ensure that people whose real property is acquired, or who move as a direct result of projects receiving Federal funds, are treated fairly and equitably and receive assistance in moving from the property they occupy.

- 49 CFR Part 24 is the government-wide regulation that implements the URA.
- HUD Handbook 1378 provides HUD policy and guidance on implementing the URA and 49 CFR Part 24 for HUD funded programs and projects.

What are the URA's objectives?

- To provide uniform, fair, and equitable treatment of persons whose real property is acquired or who are displaced in connection with federally funded projects
- To ensure relocation assistance is provided to displaced persons to lessen the emotional and financial impact of displacement
- To ensure that no individual or family is displaced unless decent, safe, and sanitary (DSS) housing is available within the displaced person's financial means
- To help improve the housing conditions of displaced persons living in substandard housing
- To encourage and expedite acquisition by agreement and without coercion

How do URA requirements impact your project?

Agencies conducting a program or project under the URA must carry out their legal responsibilities to affected property owners and displaced persons. Agencies should plan accordingly to ensure that adequate time, funding, and staffing are available to carry out their responsibilities.

Some of those responsibilities include:

For Real Property Acquisition

- Appraise property before negotiations
- Invite the property owner to accompany the appraiser during the property inspection
- Provide the owner with a written offer of just compensation and a summary of what is being acquired
- Pay for property before possession
- Reimburse expenses resulting from the transfer of title such as recording fees, prepaid real estate taxes, or other expenses

Please note that agency responsibilities for voluntary acquisitions differ. (Please see Voluntary Acquisition vs. Involuntary Acquisition in this training module for additional information.)

For Residential Displacements

- Provide relocation advisory services to displaced tenants and owner occupants

- Provide a minimum 90 days written notice to vacate prior to requiring possession
- Reimburse for moving expenses
- Provide payments for the added cost of renting or purchasing comparable replacement housing

For Nonresidential Displacements (businesses, farms, and nonprofit organizations)

- Provide relocation advisory services
- Provide a minimum 90 days written notice to vacate prior to requiring possession
- Reimburse for moving and reestablishment expenses

ODOC/CD details a process for monitoring and maintaining URA compliance for all CDBG-DR grant fund recipients in its CDBG-DR policies and procedures to ensure compliance with this requirement. The CDBG-DR Policy and Procedure Manual is available on the CDBG-DR disaster recovery website (https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery-2019).

Lead Based Paint

Congress passed the Residential Lead-Based Paint Hazard Reduction Act of 1992, also known as Title X, to protect families from exposure to lead from paint, dust, and soil. Title X Regulations (Residential Lead-Based Paint Hazard Reduction Act).

- Public Law 102-550 - Residential Lead-based Paint Hazard Reduction Act of 1992
- Title X, Sections 1012 and 1013 - Requirements for the Notification, Evaluation, and Reduction of Lead-Based Paint Hazards in Federally Owned Residential Property and Housing Receiving Federal Assistance.
- Title X, Section 1018 - Requirements for the Disclosure of Known Lead-Based Paint and/or Lead-Based Paint Hazards in Housing (HUD's Lead-Based Paint Disclosure Rule web site has more information). Congress passed the Residential Lead-Based Paint Hazard Reduction Act of 1992, also known as Title X, to protect families from exposure to lead from paint, dust, and soil.

On April 22, 2008, EPA issued a rule requiring the use of lead-safe practices and other actions aimed at preventing lead poisoning (40 CFR Part 745). Under the rule, beginning in April 2010, contractors performing renovation, repair and painting projects that disturb lead-based paint in homes, childcare facilities, and schools built before 1978 must be certified and must follow specific work practices to prevent lead contamination. Until that time, HUD and EPA recommend that anyone performing renovation, repair, and painting projects that disturb lead-based paint in pre-1978 homes, childcare facilities and schools follow lead-safe work practices.

Effective Dates of the Rule:

June 23, 2008	Unaccredited renovator or dust sampling technician training programs may not advertise or provide training leading to EPA certification States, Tribes, and Territories may begin to apply for authorization Persons performing renovations for compensation in pre-1978 child-occupied facilities (e.g., childcare facilities, kindergarten, and pre-kindergarten classrooms) must provide **either** Protect Your Family **or** Renovate Right to the owners and occupants before beginning renovations Modifications/exemptions to Pre-renovation Education Rule take effect: (1) Minor repair and maintenance exception changes to < 6 ft2 per room for interiors, 20 ft2 for exteriors. To qualify, the project cannot involve the use of high dust generating ('prohibited') practices or window replacement. (2) Emergency renovations specifically include interim controls performed in response to an elevated blood lead level in a child. (3) Persons performing renovations for compensation in pre-1978 housing **may use either** Protect Your Family **or** Renovate Right to comply with the existing requirement to provide a lead hazard information pamphlet to the owners and occupants of target (pre-1978) housing before beginning renovations
December 22, 2008	Persons performing renovations for compensation in target (pre-1978) housing or child-occupied facilities **must provide** Renovate Right to the owners and occupants before beginning renovations
April 22, 2009	Training providers may begin applying to EPA for accreditation to provide renovator or dust sampling technician training Persons seeking certification as renovators or dust sampling technicians may take accredited training as soon as it is available
October 22, 2009	Firms may begin applying to EPA for certification to conduct renovations

April 22, 2010	Renovations in target (pre-1978) housing and child-occupied facilities must be conducted by certified renovation firms, using renovators with accredited training, and following the work practice requirements of the rule

On January 13, 2017, HUD published an amendment to the Lead Safe Housing Rule on responding promptly to cases of children under age 6 living in certain categories of HUD-assisted housing who have elevated blood lead levels (2 CFR Part 35). The Lead Safe Housing Rule applies to all target housing that is federally owned and target housing receiving Federal assistance. Specific requirements depend on whether the housing is being disposed of or assisted by the federal government, and on the type and amount of financial assistance, the age of the structure, and whether the dwelling is rental or owner-occupied. You can consult the summary of requirements for specific information, or you can view which HUD Assisted Housing Programs are affected by the Lead Safe Housing Rule. There are some differences between the EPA RRP Rule and the HUD Lead Safe Housing Rule (LSHR). A major difference is that the LSHR requires clearance examinations. All housing receiving federal assistance must still comply with the LSHR.

ODOC/CD details a process for monitoring and maintaining lead-based paint compliance for all CDBG-DR grant fund recipients in its CDBG-DR policies and procedures to ensure compliance with this requirement. The CDBG-DR Policy and Procedure Manual is available on the CDBG-DR disaster recovery website (https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery-2019).

Mitigation Requirements

ODOC/CD will have activity wide standards developed to establish project-by-project reasonableness requirements when comparing elevation to other mitigation measures, such as buyout and acquisition or demolition and reconstruction of the structure. The method for determining cost reasonableness for elevation assistance is outlined in the Policy and Procedure Manual. The elevation assistance maximum for rehabilitation awards is a dollar- per-square foot ($/SF) cap and constrained to the actual cost of elevation. Elevation assistance costs are in addition to the program cap for rehabilitation, reconstruction, and Mobile/Modular Home Unit (MHU) replacement activities. The maximum amount for elevation assistance is $40,000.00. All elevated structures, both residential and nonresidential, must comply with all the accessibility requirements of the Americans with Disabilities Act.

ODOC/CD requires that new construction, reconstruction, or substantially damaged residential structures be elevated with the lowest flood, including the basement, by

at least 2 feet above the base flood elevation (BFE) or high-water mark if outside the floodplain. For new construction or reconstruction using CDBG-DR funds, ODOC/CD will remain consistent with this requirement and depending on the facts and circumstances of the construction project, may require additional freeboard or other mitigation technique to ensure that new construction is sufficiently protected from future flood risk. **All structures, as defined under 44 CFR 59.1, designed principally for residential use, and located in the 100-year (or 1 percent annual chance) floodplain, are ineligible for rehabilitation, elevation, or repair.**

Nonresidential structures must be elevated, or flood proofed to two feet above the BFE. Critical Actions, as defined at 24 CFR Part 55.2(b)(3), within the 500-year floodplain must be elevated or flood proofed to the higher of the 500-year floodplain elevation or three feet above the 100- year floodplain elevation. If the 500-year floodplain or elevation is unavailable, and the Critical Action is in the 100-year floodplain, then the structure must be elevated, or flood proofed at least three feet above the 100-year floodplain elevation.

Critical Actions are defined as an "activity for which even a slight chance of flooding would be too great, because such flooding might result in loss of life, injury to persons or damage to property." For example, Critical Actions include hospitals, nursing homes, police stations, fire stations and principal utility lines.

ODOC/CD will also encourage subrecipients to utilize other methods of mitigation throughout their programs such as buyout and relocation of homes and properties within historic floodplains when applicable. ODOC/CD will encourage subrecipients to create post-recovery communities that are safer, stronger, and cost-effective by preventing damage from future disasters.

DISASTER RISK REDUCTION AREAS

Buyouts can be in two different areas, the floodplain (includes floodway, located in either a floodway or the 100-year floodplain) or what is defined as a "disaster risk reduction area". This designation is intended to ensure the acquired property is maintained in perpetuity for a use that is compatible with open space, recreational, or wetlands management practices.
The Disaster Risk Reduction Area (DRRA) must meet the following criteria to be used for buyout programs:

1. The hazard must have been caused or exacerbated by the presidentially declared disaster for which the grantee is receiving it is CDBG-DR allocation.

2. The hazard must be a predictable environmental threat to the safety and wellbeing of program beneficiaries using the latest data and science such as FEMA repetitive flood loss data
3. The disaster risk reduction area must be clearly delineated so that HUD and the public know exactly which properties are located within the designated area.

ODOC will determine the DRRAs using the above criteria. The DRRA can be found in the Voluntary Buyout Program guidelines.

Flood Insurance Requirements

Requirements (Section 102(a) of the Flood Disaster Protection Act of 1973) [from HUD prohibit ODOC/CD from providing CDBG-DR assistance for the rehabilitation or reconstruction of a house if (a) the combined household income is greater than 120 percent area median income (AMI) or the national median, (b) the property was located in a floodplain at the time of the disaster, and (c) the property owner did not maintain flood insurance on the damaged property, even when the property owner was not required to obtain and maintain such insurance.

When a homeowner located in the floodplain allows their flood insurance policy to lapse, it is assumed that the homeowner is unable to afford insurance and/or is accepting responsibility for future flood damage to the home. HUD established this alternative requirement to ensure that adequate recovery resources are available to assist lower income homeowners who reside in a floodplain but who are unlikely to be able to afford flood insurance. Higher income homeowners who reside in a floodplain, but who failed to secure or decided to not maintain their flood insurance, should not be assisted at the expense of those lower income households. Therefore, ODOC/CD may only aid with the rehabilitation or reconstruction of a house located in a floodplain if: (a) the homeowner had flood insurance at the time of the eligible disaster and still has unmet recovery needs; or (b) the household earns less than the greater of 120 percent AMI or the national median and has unmet recovery needs.

With respect to flood insurance, CDBG-DR funded homeowners of a property located in a Special Flood Hazard Area (SFHA) must obtain and maintain flood insurance in the amount and for the duration prescribed in FEMA's National Flood Insurance Program. Section 102(a) of the Flood Disaster Protection Act of 1973 (42 U.S.C. 4012a) mandates the purchase of flood insurance protection for CDBG-DR (a HUD-assisted property) within a SFHA, when CDBG-DR is used to finance acquisition or construction, including rehabilitation. ODOC/CD will encourage the purchase of flood insurance outside of SFHA's but carrying flood insurance outside of SFHA's is not a requirement.

Section 582 of the National Flood Insurance Reform Act of 1994, as amended, (42 U.S.C. 5154a) prohibits flood disaster assistance in certain circumstances. In general, it provides that no Federal disaster relief assistance made available in a flood disaster area may be used to make a payment (including any loan assistance payment) to a person for "repair, replacement, or restoration" for damage to any personal, residential, or commercial property if that person at any time has received Federal flood disaster assistance that was conditioned on the person first having obtained flood insurance under applicable Federal law and the person has subsequently failed to obtain and maintain flood insurance as required under applicable Federal law on such property. This means that CDBG-DR assistance may not be provided for the repair, replacement, or restoration of a property to a person who has failed to meet this requirement.

Section 582 also imposes a responsibility on ODOC/CD and its sub-recipients to inform property owners receiving assistance that triggers the flood insurance purchase requirement that they have a statutory responsibility to notify any transferee within 60 days of the effective date of the transfer of service. Sub-recipients must obtain and maintain flood insurance in writing and maintain such written notification in the documents evidencing the transfer of the property, and that the transferring owner may be liable if he or she fails to do so.

According to federal regulations mandated under the National Flood Insurance Reform Act (NFIRA) of 1994, buildings and property which utilized financial assistance from the Federal Government following a Presidentially Declared disaster may have been required to have and maintain flood insurance coverage. If flood insurance lapsed or was no longer in effect at the time of the disaster impact, the owner of the building and/or property may not be eligible for additional federal assistance for rehabilitation or reconstruction.

ODOC/CD details a process for checking flood insurance compliance for CDBG-DR grant fund recipients in its policies and procedures to ensure compliance with this requirement. The CDBG-DR Policy and Procedure Manual is available on the CDBG-DR disaster recovery website (https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery-2019).

Green Building Standards

ODOC/CD acknowledges the emphasis in the Federal Register Notice to institute green building design, specifically when executing new construction or replacement of substantially damaged residential buildings and will follow the guidance located in 84 FR 4844 concerning green building design. For all new or replaced residential buildings, the project scope will incorporate Green Building materials to the extent feasible according to specific project scope. Materials must meet the established industry-recognized standard that have achieved certification under the following specified green building standards.

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

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

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

In terms of complying with the Green Building Standard established in the Federal Register Notice, the State will require all applicable construction for the replacement of residential properties, including rehabilitation and reconstruction of substantially damaged properties, meet and be certified under the Enterprise Green Communities Initiative Criteria, an industry-recognized standard that has achieved certification acceptable to HUD.

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

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

Green Infrastructure: All projects (as applicable) will incorporate green infrastructure in such a way to reduce overall impact on the environment and human health as it specifically relates to the type and scope the of requested CDBG-DR project.

Green Building, also known as green construction or sustainable building, is the practice of creating structures and using processes that are environmentally

responsible and resource-efficient throughout a building's life cycle: from siting to design, construction, operation, maintenance, renovation, and deconstruction.

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

Duplication of Benefits

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

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

The Federal Register Notice entitled "Clarification of Duplication of Benefits Requirements under the Stafford Act for Community Development Block Grant (CDBG) Disaster Recovery Grantees," published 11/16/2011, (76 FR 71060) clarifies the duplication of benefits requirements under the Stafford Act for all active CDBG-DR

grants, and all future CDBG-DR grants. However, a subsequent Federal Register Notice entitled "Updates to Duplication of Benefits Requirements under the Stafford Act for Community Development Block Grant (CDBG) Disaster Recovery Grantees" was published 6/20/2019, (84 FR 28836 and 28848) further clarifies requirements for disasters declared between 2015 and 2021.

2019 DOB Notice

The Federal Register Notice entitled "Updates to Duplication of Benefits Requirements Under the Stafford Act for Community Development Block Grant (CDBG) Disaster Recovery Grantees" on 6/20/19, (84 FR 28836 and 28848) supersedes the July 2013 declined loans memorandum: instead, "Grants are subject to the requirement under the tenth proviso following the Community Development Fund heading of Public Law 115-123 (Declined Loans Provision) and the requirements for its implementation in the 2019 DOB Notice."

The 2019 DOB notice covers the time period addressed by the Disaster Recovery Reform Act (DRRA) and the declined loan provision in PL 115-123. The notice provides clarification to duplication of benefits for disasters declared between January 1, 2015 –December 31, 2021.

The notice does not allow for a "blanket determination" in duplication of benefits, but rather the grantee must conduct an individualized review of each of the subrecipients' applicants to determine that the amount of assistance will not be a duplication of benefits by exceeding the unmet needs of an applicant. A review specific to each applicant is necessary because assistance available to each applicant varies depending on individual insurance coverage, eligibility for various sources of assistance, and other factors. Based on this notice, ODOC/CD will utilize a DOB consultant to ensure that every applicant and their available assistance is analyzed.

The following framework for DOB analysis was laid out in the 2019 DOB Notice (84 FR 28836):

1. Assess Applicant Need – The total need of an applicant is calculated based on need estimates at a set point in time. Thus, total need is most often the *current need*. Yet, reimbursement programs allow for past costs to be a part of the total need if they meet all the requirements for a reimbursement. Total need is initially calculated without regard to the program-specific caps on the amount of assistance.
2. Identify Total Assistance – Total assistance includes all reasonably identifiable financial assistance available to an applicant.
    a. Types of Resources Included in Total Assistance – The total assistance for an applicant includes funding in the form of cash awards, funds gained from insurance, grants, and loans received

by or available to each CDBG–DR applicant, including awards from local, State or Federal programs, and from private or nonprofit charity organizations, but *will not include* personal assets such as money in a checking/savings account (excluding insurance funds or disaster assistance deposited into the applicant's account); retirement accounts; credit cards or lines of credit; in-kind donations; and private loans. A private loan is considered a loan that is not offered by a governmental entity. Yet, subsidized loans for the same purpose are to be included in the DOB calculation unless an exception applies.

b. Availability of Resources Included in Total Assistance – Total assistance includes available assistance, which includes reasonably anticipated assistance that has been awarded and accepted but has not yet been received. Assistance is considered available if an applicant:
    1) Would have received it by acting in a reasonable manner or by taking the same practical steps toward funding recovery as would disaster survivors faced with the same situation but are not eligible to receive CDBG–DR assistance; or
    2) Has received the assistance and has legal authority over it.

3. Exclude Non-Duplicative Amounts – Once the total need and the total assistance have been determined, the sources should be excluded as non-duplicative for the DOB calculation should be identified. Those include funds for a different purpose or funds for the same purpose, but a different, allowable use:
    a. Funds for a Different Purpose – Any assistance provided for a different purpose than the CDBG–DR eligible activity, or a general, nonspecific purpose (e.g., "disaster relief/ recovery") and not used for the same purpose must be excluded from total assistance when calculating the DOB amount.
    b. Funds for Same Purpose, Different Allowable Use – Assistance provided for the same purpose as the CDBG–DR eligible activity must be excluded when calculating the DOB if the applicant can document that the specific use of the assistance was an allowable use and different than the use of the CDBG–DR assistance.
4. Identify the DOB Amount and Calculate the Total CDBG–DR Award– The total DOB is calculated by subtracting all non-duplicative amounts from the total assistance. To calculate the maximum possible amount of CDBG–DR funding assistance an applicant could receive, the grantee must: (1) Identify total need; (2) identify total assistance; (3) subtract non-duplicative amounts from total assistance to determine the amount of the DOB; and (4) subtract the amount of the DOB from

the amount of the total need to determine the maximum amount of the CDBG–DR award.

5. Reassess Unmet Need When Necessary – A change in an applicant's circumstances may affect the applicant's remaining unmet need, meaning the need that was not met by CDBG–DR and other sources of assistance. Unmet need can become apparent after CDBG–DR assistance has been provided such as: A subsequent disaster that causes further damage to a partially rehabilitated home or business; a recent increase in the cost of construction materials; vandalism; contractor fraud; or theft of materials. Unmet need may also change if other resources become available to pay for costs of the activity or reimburse certain costs already paid for (such as FEMA or US Army Corps of Engineers),

Overall, the framework for calculating DOB based on the 2019 Notice clarifies the types of resources included in the total assistance, as well as the availability. Likewise, non-duplicative funds can be excluded if they are altogether for a different purpose or if they are for the same purpose, but for a different, allowable use. The 2019 DOB Notice expands on the simple DOB framework outlined in earlier notices and provides further clarity to the duplication analysis.

Secondly, the 2019 DOB Notice outlines exceptions when subsidized loans are not a duplication such as:

1) Short-term subsidized loans for costs later reimbursed with CDBG-DR (if the activities paid for are CDBG-DR eligible activities and the loans were taken out prior to the availability of CDBG-DR funds);
2) Declined or cancelled subsidized loans (if there is documentation of the loan being declined or cancelled); or
3) The subsidized loan meets the requirements for a statutory exception under the Disaster Recovery Reform Act's Amendments to the Stafford Act for disbursed and undisbursed loan amounts.

CDBG–DR appropriations acts also include a statutory order of assistance for Federal agencies. CDBG-DR funds may not be used for activities that are reimbursable by or completely funded through FEMA or the US Army Corp of Engineers (USACE). Thus, it must be verified whether FEMA or USACE funds are either 1) available for an activity or 2) the activity can be reimbursable by FEMA or USACE. If the application window for FEMA or USACE funds are open, applicants should first apply for those funds before receiving CDBG-DR funds. However, when

there is a funding gap in a CDBG-DR eligible activity or a required local match, CDBG-DR funding may be an appropriate source to fill the gap and ensure the activity can be delivered.

FEMA regulations at 44 CFR 206.191 (Duplication of Benefits) have set forth a delivery sequence that defines which source of assistance is duplicative for certain programs. As stated in the regulation, “An agency's position in the sequence determines the order in which it should provide assistance and what other resources it must consider before it does so”. CDBG-DR funds are not listed in FEMA’s sequence, but CDBG-DR funds would be likely considered a duplication of benefits of FEMA funds. Therefore, if CDBG-DR funds are received after FEMA funds have been awarded, it is the requirement of the grantee (the State) to recapture funds. If the duplicative assistance is received after CDBG–DR, the State must collect the DOB or contact HUD for clarification on whether another Federal agency is responsible for collecting such funds.

Finally, per the 2019 DOB Notice, HUD has adopted a policy that applies when two disasters occur in the same area, and the applicant has not recovered from the first disaster when the second disaster occurs: Applicants are not required to maintain documentation related to the use of public disaster assistance (Federal, State, and local) beyond the period required by the agency that provided the assistance for the initial disaster if a second disaster affects such recordkeeping. When documentation cannot be provided, the grantee may accept a self-certification regarding how the applicant used local, State, and Federal assistance, if the applicant understands the criminal and civil penalties that apply in cases of false claims and fraud, and the State or its subrecipients can determine that the applicant’s total need is consistent with the data the State and its subrecipients have on the damage caused by the disasters.

NOTE: Applicants must continue to follow all requirements to obtain and maintain flood insurance as a condition of receiving Federal flood disaster assistance. No Federal disaster relief assistance made available in a flood disaster area may be used to make a payment to a person for repair, replacement, or restoration for damage to any personal, residential, or commercial property if that person at any time has received flood disaster assistance that was conditional on the person first having obtained flood insurance under applicable Federal law and subsequently having failed to obtain and maintain flood insurance as required under applicable Federal law on such property. See 42 U.S.C. 5154a.

This notice affects grantees in the following conditions:

1. Funds used for a different purpose other than the activity requested to be paid for by CDBG-DR funds are not considered a duplication of benefits.
2. Funds for the same purpose or activity, but a different allowable use as

CDBG-DR funds are not considered a duplication of benefits.

3. Subsidized loans, whether declined or cancelled, or a portion is declined or cancelled, are not a duplication of benefits if the applicant meets all other requirements of the CDBG-DR program.
4. Short-term subsidized loans can be later reimbursed with CDBG-DR, if the activities paid for are CDBG-DR eligible activities and the loans were taken out prior to the availability of CDBG-DR funds.
5. Sets a sequence of delivery that defines which Federal funding types would be considered duplicative. CDBG-DR funds would be considered the duplicative funding source of any FEMA or USACE funds that have been or will be paid for an activity.
6. Applicants that suffer from multiple disasters in the same area may accept a self-certification identifying funds they received for the first disaster to receive funds for the second disaster. The applicant must be advised of the criminal and civil penalties that apply in cases of false claims and fraud and the grantee must determine that the applicant's total need is consistent with data the grantee has about the nature of damage caused by the disasters.

Solicitation for Duplication of Benefits

To prevent DOB, the State will procure a DOB consultant to implement CDBG-DR DOB procedures. The DOB consultant will perform the initial DOB analysis on the subrecipients, perform a DOB analysis on each individual homeowner once the subrecipients' applicants are determined, establish a database for the collection of data on each resident/client receiving any portion of the Funding with quarterly updates to any changes in funding sources, and monitor all Duplication of Benefits information for the entirety of the CDBG-DR grant lifespan of six (6) years.

The awarded DOB consultant will perform a calculation based upon the 2019 DOB Notice framework for DOB analysis. This will be completed by: (1) Identifying total need; (2) identifying total assistance; (3) subtracting non-duplicative amounts from total assistance to determine the amount of the DOB; and (4) subtracting the amount of the DOB from the amount of the total need to determine the maximum amount of the CDBG–DR award. This activity will be monitored for accuracy and completeness by ODOC/CD. The DOB consultant will implement the following framework for its initial determination and prevention, as well as its quarterly updates to ODOC/CD, of Duplication of Benefits for the CDBG-DR Program:

1. Identify Total Need. The DOB consultant will first determine the applicant's total post disaster need in the absence of any duplicative benefits or program caps. This will be determined through a data sharing agreement with ODOC/CD, its DOB consultant, FEMA, SBA, insurance providers, and other sources. The DOB consultant will use this data gathered to identify total need for an applicant post disaster. (For housing and infrastructure programs, the State will require an applicant to obtain professional

construction cost estimates on all projects seeking assistance)

i. ODOC/CD has an informal agreement with the Oklahoma Housing Finance Agency (OHFA) to review construction costs, ensuring costs are reasonable and consistent with market costs at the time and place of construction.

2. Identify total assistance available to the person or entity.
   - The DOB consultant will then identify the total assistance received and available. Assistance includes all benefits available to a funding recipient; including cash and other resources such as insurance proceeds, grants, and SBA loans (private loans not guaranteed by SBA are exceptions and will not be included in accordance with guidance from HUD). The DOB consultant will identify all assistance received by each person, business concern, or other entity, via insurance, FEMA, SBA, other local, state, or federal programs, and private or nonprofit charity organizations. The homeowner, business and/or Unit of Local Government (ULG) will be required to sign a "Consent and Release Form". This form will allow ODOC/CD to share all the owner information and all owner non-public personal information with agencies and companies, such as Federal government entities and the State's DOB consultant, to process the application of CDBG-DR funds. Each individual "Consent and Release Form" will be used for the legal sharing of information required for completing the duplication of benefits check. In addition, each applicant for CDBG-DR funds will be required to complete an "Insurance and Other Fund Sources Affidavit". This form will be used to collect information on assistance received by the homeowner and/or entity for the same purpose. All collected information will be used by the DOB consultant to identify total assistance available.
   - Identify reasonably anticipated assistance, such as future insurance claims, approved SBA loan proceeds, or pending funding awards through other entities. This assistance will be provided through the data sharing agreement with ODOC/CD, FEMA, SBA, insurance providers, other sources, and its DOB consultant. Reasonably anticipated funds include assistance that has been awarded but has not yet been received. This information will be entered in the database for calculation of the CDBG-DR unmet need. This assistance will be subtracted from the total post disaster need for an applicant, as they are considered duplicative. To address any potential duplication, beneficiaries will be required to sign a "Subrogation and Assignment Agreement" to repay any assistance later received for the same purpose as the CDBG-DR funds. The signing of this document ensures that if the applicant receives additional funds, the applicant pays ODOC/CD back enough to prevent any duplication of benefit.

This also ensures that CDBG-DR funds are not being used to cover losses already covered by "any other source". (Ref. Sec. 312. Duplication of Benefits (42 U.S.C. 5155) Ensuring compliance of all DOB data and analysis will be carried out by the DOB consultant for the six (6) year grant agreement.

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

4. Subtract the amount of the DOB from the amount of the total need to determine the maximum amount of the CDBG–DR award. The DOB consultant can then subtract the total DOB calculated from the total need to determine the unmet need at a certain point in time. Based on the program cap amount, ODOC/CD can then determine how much assistance an applicant is eligible for based upon the current unmet need identified by the DOB consultant and the program assistance cap set by ODOC/CD.

Example: Basic DOB Framework Calculation

Basic Framework for Calculating CDBG DR Duplication of Benefits	
1. Identify Applicant's Total Need Prior to Any Assistance	$100,000
2. Identify All Potentially Duplicative Assistance	$35,000
3. Deduct Assistance Determined to be Duplicative	$35,000
4. Maximum Eligible Award (Item 1 less Item 3)	$65,000
5. Program Cap (if applicable)	$50,000
Final Award (lesser of Items 4 and 5)	**$50,000**

The Oklahoma Department of Commerce (ODOC/CD) working through the

Oklahoma Office of Management & Enterprise Services (OMES) will invite the submission of a Statement of Qualifications to provide Duplication of Benefits analysis and ensuring compliance services including the execution of Subrogation Agreements for the Community Development Block Grant Disaster Recovery program (CDBG-DR). Duplication of Benefit requirements are prescribed by Section 312 of the Robert T. Stafford Disaster Assistance and Emergency Relief Act (42 U.S.C 5155). A copy of the Amendment of Solicitation will be placed on ODOC/CD's Disaster Recovery website found at (https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery-2019/).

Duplication of Benefits – ODOC/CD Oversight and Contractor Responsibility
Substantial and meaningful involvement of the project lead of the Department is critical to the success of this engagement. The CDBG-DR Programs Planner (project lead) and Programs Representative will have an active participation in both the planning and execution of the DOB engagement. In Summary:

- The DOB consultant will not make any management decisions, perform any management functions, or assume any management responsibilities.
- Deliverables provided to ODOC/CD by the DOB consultant may be disclosed by the Department to the Department only for their informational purposes and solely in their capacity as Leadership of the Department.
- Deliverables provided to the Department hereunder by the DOB consultant may be disclosed by the Department to the Department's independent accountants to the extent required solely in connection with their audit of the Department's financial statements.
- The DOB consultant will retain copies of the deliverables and any information evidencing the DOB consultant's performance of the Services hereunder and any Department confidential information contained in such retained materials shall remain subject to our confidentiality obligations set forth in the General Business Terms.

During the term of this engagement, ODOC/CD may request that the DOB consultant perform additional services that are not encompassed by the DOB engagement letter. The DOB consultant may perform such additional services upon receipt of a separate signed engagement letter with terms and conditions that are acceptable to the DOB consultant and the Department.

ODOC/CD shall cooperate with the DOB consultant in the performance of the services, including providing the DOB consultant with reasonable facilities and timely access to data, information, and personnel. ODOC/CD shall be solely responsible for, among other things (a) the performance of its personnel and agents; (b) making all management decisions, performing all management functions, and assuming all management responsibilities; (c) designating a competent management member to oversee the Services; (d) evaluating the

adequacy and results of the services; (e) accepting responsibility for the results of the services; and (f) establishing and maintaining internal controls, including ongoing ensuring compliance activities. The DOB consultant shall be entitled to rely on all decisions and approvals of ODOC/CD.

Programs Planner, Jade Shain, and Programs Manager, Rebecca LaVictoire will assume oversight of the DOB process for the CDBG-DR grant and all other necessary duties as it pertains to DOB and the DOB consultant.

Jade Shain
jade.shain@okcommerce.gov
p. 405-250-1844

Rebecca LaVictoire
Rebecca.LaVictoire@okcommerce.gov
405-343-3622

Subrogation and Assignment Agreement
All respective CDBG DR awardees will be required to enter a "Subrogation and Assignment Agreement" with the Oklahoma Department of Commerce to provide for any repayment of CDBG DR Funds. The contract will read as follows:

This Subrogation and Assignment Agreement ("Agreement") is made and entered into on this day of _____, 20____, by and between _____ ("Recipient") and the _____ ("Grantor/Lender").

In consideration of the Recipient's receipt of funds or the commitment by Grantor/Lender to evaluate the Recipient's application for the receipt of funds (collectively, the "Grant/Loan Proceeds") under the Oklahoma Department of Commerce Disaster Recovery Program administered by Grantor/Lender, Recipient hereby assigns to Grantor/Lender all of the Recipient's future rights to reimbursement and all payments received from any grant, subsidized loan, or insurance policies of any type or coverage or under any reimbursement or relief program related to or administered by the Federal Emergency Management Agency ("FEMA") or the Small Business Administration ("SBA") (singularly, a "Disaster Program" and collectively, the "Disaster Programs") that was the basis of the calculation of the presidentially declared disaster 4438, the extent of Grant/Loan Proceeds paid or to be paid to the Recipient under the Program and that are determined in the sole discretion of Oklahoma Department of Commerce (ODOC) to be a duplication of benefits ("DOB") as provided in this Agreement.

The proceeds or payments referred to in the preceding paragraph, whether they are from insurance, FEMA or the SBA or any other source, and whether such

amounts are a DOB, shall be referred to herein as “Proceeds,” and any Proceeds that are a DOB shall be referred to herein as “DOB Proceeds.” Upon receiving any Proceeds not listed on the Duplication of Benefits Chart the Recipient agrees to immediately notify the Grantor/Lender who will notify US Department of Housing and Urban Development (HUD) of such additional amounts, and ODOC will determine in its sole discretion if such additional amounts constitute a DOB. If some or all the Proceeds are determined to be a DOB, the portion that is a DOB shall be paid to the Grantor/Lender, to be retained and/or disbursed as provided in this Agreement.

The Recipient agrees to assist and cooperate with the Grantor/Lender elect to pursue any of the claims the Recipient has against the insurers for reimbursement of DOB Proceeds under any such policies. The Recipient’s assistance and cooperation shall include but shall not be limited to allowing suit to be brought in the Recipient’s name(s) and providing any additional documentation with respect to such consent, giving depositions, providing documents, producing record and other evidence, testifying at trial and any other form of assistance and cooperation reasonably requested by the Grantor/Lender. The Recipient further agrees to assist and cooperate in the attainment and collection of any DOB Proceeds that the Recipient would be entitled to under any applicable Disaster Program.

If requested by the Grantor/Lender, the Recipient agrees to execute such further and additional documents and instruments as may be requested to further and better assign to the Grantor/Lender, to the extent of the Grant/Loan Proceeds paid to the Recipient under the Program, the Policies, any amounts received under the Disaster Programs that are DOB Proceeds and/or any rights thereunder, and to take, or cause to be taken, all actions and to do, or cause to be done, all things requested by the Grantor/Lender to consummate and make effective the purposes of this Agreement.

The Recipient explicitly allows the Grantor/Lender to request of any company with which the Recipient held insurance policies, or FEMA or the SBA or any other entity from which the Recipient has applied for or is receiving Proceeds, any non-public or confidential information determined to be reasonably necessary by the Grantor/Lender to monitor/enforce its interest in the rights assigned to it under this Agreement and give the Recipient’s consent to such company to release said information to the Grantor/Lender.

If the Recipient (or any lender to which DOB Proceeds are payable to such lender, to the extent permitted by superior loan documents) hereafter receives any DOB Proceeds, the Recipient agrees to promptly pay such amounts to the Grantor/Lender, if the Recipient received Grant/Loan Proceeds under the Program in an amount greater than the amount the Recipient would have received if such DOB Proceeds had been considered in the calculation of the Recipient’s award.

If the Recipient receives or is scheduled to receive any Proceeds not listed on its Duplication of Benefits Chart ("Subsequent Proceeds"), the Recipient shall pay such Subsequent Proceeds directly to the Grantor/Lender, and ODOC will determine the amount, if any, of such Subsequent Proceeds that are DOB Proceeds ("Subsequent DOB Proceeds"). Subsequent Proceeds more than Subsequent DOB Proceeds shall be returned to the Recipient. Subsequent DOB Proceeds shall be disbursed as follows:

1. If the Recipient has received full payment of the Grant/Loan Proceeds, any Subsequent DOB Proceeds shall be retained by the Grantor/Lender and remitted to ODOC.
2. If the Recipient has received no payment of the Grant/Loan Proceeds, any Subsequent DOB Proceeds shall be used by the Grantor/Lender to reduce payments of the Grant/Loan Proceeds to the Recipient, and all Subsequent DOB Proceeds shall be returned to the Recipient.
3. If the Recipient has received a portion of the Grant/Loan Proceeds, any Subsequent DOB Proceeds shall be used, retained and/or disbursed in the following order: (A) Subsequent DOB Proceeds shall first be used to reduce the remaining payments of the Grant/Loan Proceeds, and Subsequent DOB Proceeds in such amount shall be returned to the Business; and (B) any remaining Subsequent DOB Proceeds shall be retained by the Grantor/Lender and remitted to ODOC.
4. If the Grantor/Lender makes the determination that the Recipient does not qualify to participate in the Program or the Recipient determines not to participate in the Program, the Subsequent DOB Proceeds shall be returned to the Recipient, and this Agreement shall terminate.

Once the Grantor/Lender has recovered an amount equal to the Grant/Loan Proceeds paid to the Recipient, the Grantor/Lender will reassign to the Recipient any rights assigned to the Grantor/Lender pursuant to this Agreement.

The Recipient represents that all statements and representations made by the Recipient regarding Proceeds received by the Grantor/Lender shall be true and correct as of the date of Closing.

NOTICE: The Recipient and the person executing this Agreement on behalf of the Recipient are hereby notified that intentionally or knowingly making a materially false or misleading written statement to obtain property or credit, including a mortgage loan, is a violation of 18 U.S. Code § 1010 and, depending upon the amount of the Grant/Loan Proceeds, is punishable by fine, imprisonment for up to two years, or both.

The person executing this Agreement on behalf of the Recipient hereby represents

that he\she has received, read, and understands this notice of penalties for making a materially false or misleading written statement to obtain the Grant/Loan Proceeds.

In any proceeding to enforce this Agreement, the Grantor/Lender shall be entitled to recover all costs of enforcement, including actual attorney's fees. Furthermore, such proceedings shall take place in the State of Oklahoma in either the Western District of the State of Oklahoma or in the District Court of Oklahoma County

RECIPIENT
[insert recipient name]
By: _____
Name: _____
Title: _____

GRANTOR/LENDER:
[insert name of administrative entity]
By:
Name: _____
Title: _____

Duplication of Benefit Check
In accordance with the Robert T. Stafford Disaster Relief and Emergency Assistance Act, (42 U.S.C. §§ 5121 - 5207), applicants must disclose all financial assistance awarded and/or received in response to their storm-related damage, including the following sources:

- Federal Emergency Management Agency (FEMA)
- National Flood Insurance Program (NFIP) and Increased Cost of Compliance (ICC)
- Small Business Administration (SBA)
- Private insurance
- Private or nonprofit organizations or donations
- Disaster Recovery Act (DRA) funding
- Other state, local, or federal programs

Prior to the award of assistance, the DOB consultant will use the best, most recent available data from FEMA, the Small Business Administration (SBA), insurers, and any other sources of funding to prevent the duplication of benefits (For example, the use of data feeds from FEMA and SBA). ODOC/CD and the DOB consultant will engage in a sharing agreement with FEMA, SBA and as applicable with other Federal agencies to ensure the best available data.

More specifically, the following are sources of funding assistance provided for structural damage and loss that are considered a duplication of benefits and, under

federal law, must be deducted from any grant assistance amount.

FEMA Individual Assistance (IA)
FEMA Individual Assistance (IA) will be determined and verified through the FEMA NEMIS database. If the FEMA IA amount cannot be verified through the FEMA NEMIS database, the payment amount disclosed by the applicant at the time of application will be used. If an applicant can provide documentation demonstrating that the FEMA IA amount provided by the FEMA NEMIS database includes amounts not paid to cover structural loss, the documentation provided by the applicant to adjust the FEMA IA payout amount will be used. The documentation provided by the applicant must come from FEMA.

FEMA National Flood Insurance Program (NFIP) and Increased Cost of Compliance (ICC)
NFIP flood insurance and Increased Cost of Compliance (ICC) payment information from the applicant through the application process will be collected. ODOC/CD and the DOB consultant will work directly with NFIP to verify the information provided by the applicant

Exception: Insurance proceeds taken by a mortgage company as a forced mortgage payoff will not be counted as a duplication of benefits, if documentation from the mortgage company shows that the payoff was involuntary. The applicant will need to provide supporting documentation demonstrating that the mortgage payment was involuntary, and the DOB consultant will attempt to verify this information with the applicant's mortgage company. Voluntary mortgage payoff using insurance proceeds is a duplication of benefits that will be counted against an applicant's award.

Small Business Administration (SBA) Loans
Federal regulations deem SBA loans for repair to be a duplication of benefit for federally funded repair programs unless a waiver request is approved in accordance with the provisions of the Disaster Recovery Reform Act (H.R. 302 signed into law in October 2018) or an exception in the 2019 DOB Notice applies. ODOC/CD will obtain a data feed provided by SBA to verify all approved amounts for SBA loans. The Program will collect specific information from SBA that breaks out the approved SBA loan amounts into the different categories of assistance (e.g., real property, personal property, vehicles, etc.).

Duplication of benefit analysis for SBA loans shall follow the Federal Register Notice entitled "Updates to Duplication of Benefits Requirements Under the Stafford Act for Community Development Block Grant (CDBG) Disaster Recovery Grantees" published on 6/20/2019, (84 FR 28836) on guidance for exceptions when subsidized loans are not a duplication:

i. Short-term subsidized loans for costs later reimbursed with CDBG–DR will not be considered a DOB if the applicant obtained a subsidized short-term loan to pay for eligible costs before CDBG-DR funds were available.

ii. Cancelled loans or portions of cancelled SBA loans are not considered DOB if:
   (b) A written communication from the lender confirming that the loan has been cancelled and undisbursed amounts are no longer available to the applicant; or
   (c) A legally binding agreement between the CDBG–DR grantee (or local government or subrecipient administering the CDBG–DR assistance) and the applicant that indicates that the period of availability of the loan has passed and the applicant agrees not to take actions to reinstate the loan or draw any additional undisbursed loan amounts.

iii. The State will not treat declined SBA loans as a DOB (but can consider declined subsidized loans for other reasons, such as underwriting) per 84 FR 28842.

Private Insurance

All property or casualty insurance, including flood and settlement amounts for loss to dwellings, are deducted from the applicant's funding assistance award. Private insurance payments for contents or other expenses are not deducted from the applicant's award. Insurance proceeds are initially determined through applicant-provided information. Applicants must also authorize the DOB consultant to contact third-party private insurance providers to verify information provided by the applicants. Third-party re-verification will only occur if the applicant self-certifies that a claim has been filed and the applicant is unable to provide a claim summary.

*Exception***:** Insurance proceeds taken by a mortgage company as a forced mortgage payoff will not be counted as a duplication of benefits if the applicant provides adequate documentation. The applicant will need to provide supporting documentation demonstrating that the mortgage payment was involuntary, and the DOB consultant will attempt to verify this information with the applicant's mortgage company. Voluntary mortgage payoff using insurance proceeds is a duplication of benefits that will be counted against an applicant's award.

Other Assistance

Assistance received for the same purpose of a housing recovery grant, such as funding provided by a non-profit entity to assist applicants with rebuilding their home, must be reported by applicants through the application process and must be accounted for and verified by the DOB consultant. In addition, support documentation related to other duplicative funding sources must be provided by the applicant and verified and applied as a duplication of benefits by the DOB consultant.

Loan Definitions:

Private Loans:
A loan that is not provided by or guaranteed by a governmental entity, and that requires the CDBG–DR applicant (the borrower) to repay the full amount of the loan (principal and interest) under typical commercial lending terms, e.g., the loan is not forgivable.

Subsidized Loans:
Subsidized loans (including forgivable loans) are loans other than private loans. Both SBA and FEMA provide subsidized loans for disaster recovery.

Declined Loans:
Declined loan amounts are loan amounts that were approved or offered by a lender in response to a loan application, but were turned down by the applicant, meaning the applicant never signed loan documents to receive the loan proceeds.

Canceled Loans:
The borrower has entered a loan agreement, but for a variety of reasons, all or a portion of the loan amount was not disbursed and is no longer available to the applicant. Documentation is required. The loan cancellation may be due to default of the borrower, agreement by both parties to cancel the undisbursed portion of the loan, or expiration of the term for which the loan was available for disbursement.

Methods for Verifying Duplication of Benefits
To accurately document the amount of other assistance provided to the applicant, ODOC/CD and its DOB consultant will enter into data sharing agreements with FEMA, SBA, insurance providers and other sources, as necessary. These agreements will include all data pertaining to federal and private donation dollars received per client for the DR-4438 presidentially declared disaster, the timelines, and formats for providing the data, and updates at agreed upon intervals. This data will be used to identify funds provided for applicants post disaster and identify if any of those funds would be considered duplicative. If a data sharing agreement cannot be reached, or regular updates do not occur, ODOC/CD will require its subrecipients to submit this information during their application intake process to ODOC/CD and ODOC/CD's DOB consultant for verification and documentation of all benefits received.

Ensuring Compliance for Duplication of Benefits
All analyses of Duplication of Benefits over the entirety of the grant lifespan will be done by ODOC/CD's DOB consultant. An agreement of ensuring compliance of Duplication of Benefits for six (6) years will be made between the DOB consultant and ODOC/CD. This period of six (6) years was agreed upon because of the length of

the grant agreement with ODOC/CD and HUD, therefore requiring an agreement of at least the same length with ODOC/CD and the DOB consultant. A time period of greater than six (6) years was not appropriate based on funding availability.

The initial DOB analysis will be conducted by the DOB consultant on each subrecipient and their activities before ODOC/CD provides a "Release of Funds" to the subrecipients' activities. The DOB consultant will also perform a DOB analysis on each applicant per subrecipient, maintaining a detailed database of applicant funding information, and will continue to monitor and provide updates to ODOC/CD on a quarterly basis. The schedule for these updates will be every 10th of the months of January, April, July, and October for the contracted years. A final DOB analysis will be performed by the DOB consultant before the closeout of the CDBG-DR grant.

Disaster Recovery Reform Act of 2018 (PL 115-254, Division D) ("DRRA") Section 1210 of the Disaster Recovery Reform Act amended the DOB provision in the Stafford Act to add a new subsection 312(b)(4) (42 U.S.C. 5155(b)(4)).

"(4) WAIVER OF GENERAL PROHIBITION. —

(C) PROHIBITION ON DETERMINATION THAT A LOAN IS A DUPLICATION. Notwithstanding subsection (c), in carrying out subparagraph (A), the President may not determine that a loan is a duplication of assistance, provided that all Federal assistance is used toward a loss suffered because of the major disaster or emergency."

Based on the "Prohibition on determination that a loan is a duplication" subsection (C), the following is confirmed:

- Grantees shall not treat declined loans (including SBA loans) as a DOB or consider declined loans in the DOB analysis, but may consider declined loans for other reasons, such as underwriting.
- Documentation (applicant certification) for declined loans is required if the grantee has information/data showing that the applicant was offered subsidized loan assistance, but that information does not indicate that the applicant declined the loan.
- They can ignore cancelled amounts in the DOB analysis if the grantee has (a) a written communication from the lender that undisbursed amounts are not available; or (b) a legally binding agreement with the applicant that loan is no longer available for disbursement and the applicant agrees not to reinstate the loan or accept more disbursements.
- DRRA amendments apply so that a subsidized loan is not a prohibited DOB, provided that all Federal assistance is used toward a loss suffered because of a major disaster or emergency.
    - Accepted but undisbursed loan amounts are not considered a DOB.

    - Treatment of undisbursed loan amounts is similar to cancelled loans: Assistance for the same purpose as the undisbursed loan requires that the grantee notify the lender, obtain applicant's agreement not to draw loan funds without approval, and determine that all Federal assistance is used toward a loss resulting from a major disaster or emergency.
    - Updates to the action plan are required if assistance is inconsistent with grantee's plan.
- Subject to conditions in the 2019 DOB Notice, grantees may grant CDBG–DR funds to reimburse individuals and businesses (other than the grantee or sub-recipients) for some costs of CDBG–DR eligible activities that were paid with subsidized loans.
- The waiver excludes FEMA PA (Sec. 406) and IA (Sec. 408)
- No automatic requirement for the use of federal grant funds to repay loans. This will depend on the specific grant program requirements.

Certain rules apply if grantees wish to reimburse CDBG–DR eligible activities that were paid with subsidized loans. This affects grantees in the following conditions:

1. Document that all federal assistance is used toward a loss suffered because of the major disaster or emergency;
2. Meet all grant requirements for reimbursement of costs in Federal Register notices (84 FR 28841), including that the cost is not reimbursable by FEMA or Army Corps.
3. Complete a revised DOB analysis; reimburse before 2023 when the Disaster Recovery Reform Act sunsets;
4. Document that cost was for an activity that was eligible on the date of the 2019 DOB Notice.
5. If the payment is due to SBA, notify the SBA of the reimbursement and issue a joint payment to the SBA and the applicant. For all loans, require the applicant to comply with loan requirements related to reimbursement of costs.
6. Advise applicants that applying for CDBG–DR reimbursement assistance does not relieve the applicant of a duty to make payments on a subsidized loan; and
7. Document compliance with environmental requirements at 24 CFR part 58.

Affordability Requirements

In 83 FR 40314, HUD clarified affordability requirements for new construction and rehabilitation of units. ODOC/CD will require these affordability requirements for new construction for home ownership, rehabilitation, or reconstruction of multi-family rental projects with eight or more units, and new construction of multi-family projects with five or more units.

Affordability Periods

Project Type	Use	Affordability Period
New construction of single-family housing for LMI individuals and households	Ownership	5 years
Rehabilitation or Reconstruction of multi-family projects, 8 or more units	Rental	15 years
New construction of multi-family projects, 5 or more units	Rental	20 years

Rental units subject to these affordability requirements must be rented to LMI individuals and families at affordable rents. HOME Rents will be used to determine affordability. Rents will be adjusted upward annually with the publication of new AMI tables by the Federal government. Subgrantees are required to follow the most current HOME Rents for their project. For more details, please refer to the following page: https://www.hudexchange.info/programs/home/home-rent-limits/ Rental units that are rehabilitated or reconstructed with fewer than eight units, and rental units that are newly constructed with fewer than five units are not subject to these affordability requirements, although alternative requirements may be enforced by match funds or as a condition of participation in the Affordable Housing Development Fund. ODOC/CD will require a five-year affordability period on units served through the Small Rental Repair Program, which serves one-to-four-unit properties. Affordability periods do not otherwise apply to rehabilitation or reconstruction of single-family property.

ODOC/CD will ensure that affordability requirements are enforced through deed restriction, covenant, or similar mechanisms dependent on the type and scope of the funded project. Recapture terms of granted or loaned funds for projects subject to these affordability requirements will be provided to the applicant of the program prior to the construction start. ODOC/CD or a selected sub-recipient will be charged with ensuring that resale and recapture provisions for each funded project subject to these requirements are followed during project execution. The recapture provisions will be specific to each funded project, but at a minimum ODOC/CD will:

- Enforce recapture of grant or loan funds if the affordability period is determined to be broken.
- Perform occasional site monitoring or subgrant monitoring responsibilities to sub-recipients to ensure compliance.
- Place specific recapture provisions in deed restrictions, covenants, liens, or other mechanisms so that a change of use or ownership may require repayment of funds.

ODOC/CD or its sub-recipients will review the facts and circumstances of items triggering recapture, such as a change of ownership or sale, and determine if the deficiency can be cured prior to initiating funds recapture.

ODOC/CD details a process for monitoring and maintaining affordability compliance for all CDBG-DR grant fund recipients in its CDBG-DR policies and procedures to ensure compliance with this requirement. The CDBG-DR Policy and Procedure Manual is available on the CDBG-DR disaster recovery website (https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery-2019).

LMI Priority

ODOC/CD is committed to serving the low and moderate-income (LMI) population of the impacted areas of the State covered under DR 4438. As addressed in the Federal Register Notice, a minimum of 70 percent of all allocated funds must be used to the benefit of low and moderate-income individuals and households. Therefore, the affordable housing components, public facility and public improvements of the CDBG-DR allocation remain 100 percent allocated to the benefit of LMI individuals and households. This is to ensure that ODOC/CD can meet this program goal.

LMA (Low/mod area benefit): Activities providing benefits that are available to all the residents of a particular area, at least 51 percent of whom are low and moderate-income. The service area of a LMA activity is identified by the area in which the beneficiaries are served by the associated eligible CDBG-DR activity.

The HUD National Objective LMI criteria for CDBG-DR include the following:

- LMC (Low/mod limited clientele). Activities which benefit specific low and moderate-income individuals. LMC activities provide benefits to a specific group of persons rather than to all residents of a particular area.
- LMH (Low/Mod housing benefit). Activities undertaken which improve or provide permanent residential structures that will be occupied by low/mod income households.
- LMB (Low/Mod Buyout). Set by HUD in 82 FR 36825 to allow for meeting a National Objective when CDBG-DR funds are used for a buyout award to acquire housing owned by a qualifying LMI household, where the award amount (including optional relocation assistance) is greater than the post-disaster (current) fair market value of that property.
- LMHI (Low/Mod Housing Incentive). Set by HUD in 82 FR 36825 to allow for meeting a National Objective when CDBG-DR funds are used for a housing incentive award, tied to the voluntary buyout or other voluntary acquisition of housing owned by a qualifying LMI household, for which the housing

incentive is for the purpose of moving outside of the affected floodplain or to a lower-risk area; or when the housing incentive is for the purpose of providing or improving residential structures that, upon completion, will be occupied by an LMI household.

Urgent Need National Objective

While ODOC/CD is committed to serving the low and moderate-income (LMI) populations of the state, the Urgent Need National Objective may also be used in the case that the LMI threshold is unable to be met. Urgent Need can only include a buyout of a residential property located within the 100-year floodplain. If the LMI National Objective cannot be met for 100% of activities, ODOC/CD may use the Urgent Need National Objective for a buyout if it meets the criteria in 24 CFR § 570.483(d).

The HUD National Objective urgent need criteria for CDBG-DR includes the following based on the alternative requirement outlined in 83 FR 5856:

There must be documentation of how each program and/or activity funded under the urgent need national objective responds to a disaster-related impact. For each activity that will meet an urgent need national objective, there must be a reference in the subrecipient's application of the type, scale, and location of the disaster-related impacts that each program and/or activity is addressing over the course of the program or activity lifespan.

Compliance and Monitoring

As part of the State's ongoing responsibilities for the administration of HUD's federally funded programs, ODOC will conduct comprehensive monitoring reviews for all sub-grantees and their associated activities. The CDBG-DR funding must be used in accordance with the Federal Register Notice, which provides the regulatory framework established by HUD for the CDBG-DR Program and the CDBG-DR funding.

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

Program monitoring will follow the procedures described in the CDBG-DR Policy & Procedures Manual located on ODOC/CD's dedicated CDBG-DR website (https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery-2019/) with a particular emphasis on the accuracy of information provided by applicants, identification of the duplication of benefits, compliance with all applicable state and federal requirements associated with the CDBG-DR funding. Specifically, ODOC/CD will conduct a risk analysis on all recipients of any portion of the CDBG-DR funding to identify those programs that are most susceptible to fraud, abuse, or mismanagement. ODOC/CD staff and/or qualified procured vendor will monitor those programs that are identified as high risk as well as sample those deemed to be low risk programs.

On-site monitoring will be used to ensure the proper expenditure and management of funds. Monitoring will consist of an in-depth review of their financial and programmatic compliance of the ODOC/CD Block Grant-Disaster Recovery program to ensure full CDBG compliance with Federal Register Notice.

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

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

ODOC/CD details a process for monitoring compliance for all CDBG-DR grant fund recipients in its CDBG-DR policies and procedures to ensure compliance with this requirement. The CDBG-DR Policy and Procedure Manual is available on the CDBG-DR disaster recovery website (https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery-2019).

Program Income

Program income is defined as gross income generated from the use of CDBG-DR funds and received by a State or a subrecipient of a State. When income is generated by an activity that is only partially assisted with CDBG-DR funds, the income shall be prorated to reflect the percentage of CDBG-DR funds used. Program Income is also defined as the amount of revenue received in a single year which is greater than or equal to $35,000, as program income generated from a CDBG-DR federally funded project, it is subject to all federal requirements. (See 2 CFR 200.307, 24 CFR Part 570.489 & 570.504, Federal Register Notice Friday

February 9, 2018, Title I of the HCD Act and the CDBG regulations at 24 CFR Part 570).

The State will provide grants within several components of the CDBG-DR program. As applicable to housing and public facilities, liens will be filed on each property to ensure compliance requirements, with recapture of all or a portion of the grant in the event of any noncompliance during that period. The State does not intend to fund revenue generating activities as part of its administration of the funding. If any program income is generated in connection with a sub-grantee's administration of the CDBG-DR funding, such funds will remain with the sub-grantee and expended under the method of distribution annotated within the Action Plan. If the sub-grantee cannot successfully fulfill this program income obligation, the State will assume the program income and reallocate the funds based on its then current method of distribution as described in the applicable Action Plan.

Program Income that has been derived from the CDBG-DR activities may be used only for eligible CDBG-DR Program activities and in accordance with the provisions of Title I of the Housing and Community Development Act of 1974, as amended, 24 CFR Part 570.489(e), and the program income guidelines of the ODOC/CD CDBG-DR Policy & Procedure Manual. Program Income includes the following:

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

- Net income from the use or rental of real property owned by a State, a unit of general local government, or a subrecipient of a unit of general local government or State, that was constructed or improved with CDBG-DR Program funds; less the costs incidental to the generation of the income;
- Proceeds from the sale of liens made with CDBG-DR Program funds;
- Proceeds from the sale of obligations secured by liens made with CDBG-DR Program funds;
- Funds collected through special assessments made against properties owned and occupied by households not low-and moderate-income, where the special assessments are used to recover all or part of the CDBG-DR Program portion of a public improvement; and
- Gross income paid to a State, unit of local government, or paid to a sub recipient thereof from the ownership interest in a for-profit entity in which the income is returned for the provision of CDBG-DR assistance.

Subrecipients that retain program income prior to grant closeout must establish program income accounts in HUD's DRGR system. The DRGR system requires grantees to use program income before drawing additional grant funds and ensures that program income retained by one organization will not affect grant draw requests for other organizations per 83 FR 5853.

ODOC/CD details a process for monitoring and maintaining program income compliance for all CDBG-DR grant fund recipients in its CDBG-DR policies and procedures to ensure compliance with this requirement. The CDBG-DR Policy and Procedure Manual is available on the CDBG-DR disaster recovery website (https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery-2019).

Citizen Participation

INTRODUCTION

The Oklahoma Department of Commerce Community Development division (ODOC/CD) has developed a Citizen Participation Plan (CCP) for the 2019 Community Development Block Grant Disaster Recovery (CDBG-DR) program in compliance with the requirements set forth 24 CFR §91.110 (Consultation; States) and 24 CFR Part §91.115 (Citizen Participation Plan for States). The CCP provides citizens an opportunity to participate in an advisory role in the planning, implementation, and evaluation of the State's disaster recovery program.

ACCESSIBILITY STATEMENT FROM THE OKLAHOMA DEPARTMENT OF COMMERCE

The Oklahoma Department of Commerce is committed to making its electronic and information technologies accessible to individuals with disabilities in accordance with both Section 508 of the Rehabilitation Act (29 U.S.C. 794d), as well as Oklahoma's Oklahoma Electronic and Information Technology Accessibility law, or EITA.

Oklahoma works to make its government more transparent, available, and useful. Making State technology resources accessible to people with disabilities helps the State to meet its goal of creating a more transparent government. Complete information can be found at https://www.ok.gov/accessibility/.

Commerce posts many documents to our websites in Adobe PDF format to provide enhanced document features and preserve design. The ability to open PDF documents is built into most popular web browsers and Adobe Reader is provided for free by Adobe at adobe.com. Commerce posts PDFs in text format so that documents can be read by screen readers.

Commerce posts some documents to our websites in Microsoft Office formats including Word, Excel, and PowerPoint format. Microsoft provides viewer applications for these formats for free on their website at microsoft.com.

DISASTER RECOVERY WEBSITE

ODOC/CD maintains a website specifically for the 2019 CDBG-DR program. Please visit: https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery-2019/ and check back often because the website is frequently updated.

- Notifications for Public Hearings will be published in English and Spanish.
- Read the 2019 CDBG-DR Action Plan, Citizen Participation Plan, Quarterly Reporting, and more.
- The website can easily be translated by clicking the "Translate This Page" button at the top of the screen.

If you need assistance with the website, or encounter any technical difficulties with the website, please contact Kristin Goodale (kristin.goodale@okcommerce.gov).

STAFF CONTACTS FOR QUESTIONS, COMMENTS, OR ASSISTANCE

Please contact Jade Shain if you have any questions, comments, or if in need of assistance for disability accommodations, translation, or interpretation services.

Jade Shain | Programs Planner Community Development (CDBG-DR) Oklahoma Department of Commerce jade.shain@okcommerce.gov OKLAHOMA	

TRANSLATION AND INTERPRETATION FOR LIMITED ENGLISH PROFICIENCY

All Oklahomans are provided an opportunity to understand and participate in the 2019 CDBG-DR program CCP. ODOC/CD is prepared to aid those citizens who have Limited English Proficiency (LEP) upon request. The State is mindful that after a disaster, vulnerable populations, including those with limited English proficiency, may be most in need of resources and most difficult to reach. Such populations could include elderly, disabled, low or moderate income or those with limited English proficiency.

The State is committed to providing all citizens with equal access to information about the recovery program, including persons with disabilities and limited English proficiency (LEP). The State follows HUD regulation, 24 CFR Part 1, "Nondiscrimination in Federally Assisted Programs of the Department of Housing and Urban Development—Effectuation of Title VI of the Civil Rights Act of 1964," which requires all recipients of federal financial assistance from HUD to provide meaningful access to LEP persons. Additionally, per 24 CFR §91.115(b)(3)(iii), in order to comply with Title VI of Civil Rights Act of 1964 and avoid discrimination on the grounds of race, color, or national origin, all HUD funded programs (CDBG, ESG, HOME, HOPWA, HTF) and associated activities administered by the Oklahoma Department of Commerce / Community Development (ODOC/CD) and Oklahoma Housing Finance Agency (OHFA) will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in benefits and services for which such persons qualify. In certain situations, failure to ensure that persons who have limited English proficiency can effectively participate in, or benefit from, federally assisted programs may violate Title VI's prohibition against national origin discrimination.

FOUR-FACTOR ANALYSIS

The following Four-Factor Analysis serves as the guide for determining which, if any, language assistance measures the ODOC/CD will undertake to provide access to the covered programs for LEP persons.

1. **Number or proportion of LEP persons eligible to be served or likely to be encountered by ODOC/CD or their federally funded programs.**

COUNTY STATISTICS

Per the 2014-2018 5-year American Community Survey (ACS) table S1602, there are 1,474,620 households in Oklahoma. Of the total households in Oklahoma, Spanish is spoken in 97,353, other Indo-European languages are spoken in 19,331, Asian and Pacific Island languages are spoken in 23,510, and other languages are spoken in 14,845. In total, 30,995 or 2.1% of all households in Oklahoma are Limited English Proficient (LEP). Where Asian and Pacific Island Languages are spoken in Oklahoma households, 24.60% are considered LEP. For Spanish speaking households in Oklahoma, the percentage of LEP is 23.00%.

All households	1,474,620			
Households speaking:		**Total Households**	**LEP Households**	**% LEP**
	Spanish	97,353	22,353	23.00%
	Other Indo-European languages	19,331	1,463	7.60%
	Asian and Pacific Island languages	23,510	5,782	24.60%
	Other languages	14,845	1,397	9.40%

CITY STATISTICS

Per the 2015 5-year American Community Survey (ACS) table B16001, there are 48,522 Spanish speaking individuals in the City of Tulsa that speak English "less than very well". Besides English, Spanish is the second most common language spoken within the City of Tulsa in Tulsa County, Oklahoma. Note: Oklahoma County, Oklahoma, is not part of the impacted counties for DR-4438 and is therefore not eligible for the 2019 CDBG-DR program.

2. **The frequency with which the LEP persons encounter the program.**

To date, the CDBG-DR program has not received any requests for translation or interpretation into another language. As stated earlier, LEP related assistance will be provided upon request.

3. **The nature and importance of the program, activity, or service provided by the program.**

   The State's 2019 CDBG-DR grant program has a focus in 27 counties in Oklahoma. 2010 Census data indicates that of the state's 77 counties, Oklahoma county and Tulsa County exceed 5% of the population that speak English "less than very well[5]".

4. **The resources available to the recipient.**

   Though there are many free services available to aid in translation of documents[6], the State believes that core documentation related to the CDBG-DR program should be translated into Spanish by a professional translation service.

   Many of the common forms used in the project implementation are available in multiple languages on the HUD and DOL websites. Translation and interpretation services into other languages will be provided upon request. Translation activities are an eligible administrative expense.

Actions Taken Based on Four-Factor Analysis

After careful consideration of the four-factors identified above, ODOC/CD will take the following actions:

1. The State's 2019 CDBG-DR Action Plan, Substantial Amendments, and subsequent program related documentation will be published in Spanish. Other languages can be translated upon request as applicable.

2. ODOC/CD currently has two members on staff that speak, read, and write Spanish. These individuals will serve as a point of contact should Spanish related LEP assistance be needed. These staff members will serve as liaison between the LEP individual and department staff.

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[5] U.S. Census, People That Speak English Less Than "Very Well" in the United States https://www.census.gov/library/visualizations/interactive/people-that-speak-english-less-than-very-well.html

TIMELINE OF CITIZEN PARTICIPATION

This section of the CCP details the citizen participation efforts at the time of publication of the CCP and State's CDBG-DR Action Plan:

- **CDBG-DR Needs Assessment Surveys: Emailed February 21, 2020**
  Emails were sent by ODOC/CD to Substate Planning Districts and eligible counties within the qualifying disaster zone requesting CDBG-DR disaster related information. This was an informal outreach to gain preliminary insight and data to augment FEMA, SBA, and Oklahoma Emergency Management data and reports. Again, this data was not meant to replace official data or official citizen outreach but provide some additional insight into the general unmet needs remaining at the macro level.

  The email read as follows:

  As you may know, the Oklahoma Department of Commerce is scheduled to receive more than $36 million of *Community Development Block Grant (CDBG) funds from HUD for the purposes of disaster recovery, specifically to address damage that occurred because of the Presidentially declared disasters in 2019, FEMA code DR-4438*.

  The Oklahoma Department of Commerce will be drafting a state plan for the use of the forthcoming CDBG Disaster Recovery funds. ***The primary counties that are eligible to apply for these funds include: Muskogee, Tulsa, and Sequoyah****. All other eligible counties include Alfalfa, Canadian, Cherokee, Craig, Creek, Delaware, Garfield, Kay, Kingfisher, Le Flore, Logan, Mayes, Noble, Nowata, Okmulgee, Osage, Ottawa, Pawnee, Payne, Pottawatomie, Rogers, Wagoner, Washington, and Woods.*

  This message is to request your input in shaping that plan.

  This immediate opportunity to provide input into the draft state plan will not replace the official public input process required by HUD. That public input process will be formally announced and facilitated later.

  For now, our office would like the following information from you.

  Does your entity (city, town, county, COG, etc.) intend to apply for CDBG-DR funds?

If so, list all the types of projects you intend to apply for (e.g., housing buyouts; housing demolition, housing construction, housing rehab; public infrastructure; etc.).

For each type of project listed above, provide an estimated cost to address the unmet need.

For each type of project listed above, provide the estimated number of low to moderate income (LMI) beneficiaries who will benefit.

This information should be shared with the local government within the eligible counties listed above. Please have all information returned to Linda Goode at linda.goode@okcommerce.gov by close of business on March 13, 2020.

- June 29, 2020 - The CDBG-DR Public Hearing Notice was sent to ODOC Marketing for webpage and public media dissemination.
- July 10, 2020 - The Draft CDBG-DR Action Plan was posted to the CDBG-DR webpage for public review.

- **July 23, 2020 - Public Hearing (Formal): July 23, 2020, (1:00) via Zoom. Proposed CDBG-DR Action Plan Overview / Comments**

Notification was posted on State's CDBG Disaster Recovery webpage located on ODOC's dedicated CDBG-DR website (https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery-2019/). A meeting notification and program narrative was also posted on the ODOC/CD website's *EVENTS* webpage as well. The Public Hearing notice was also listed in the monthly ODOC *New Pioneer* Newsletter. ODOC's outreach was extended through Facebook and Twitter as well. The announcement also contained contact information for interested individuals who desired more direct discussion via telephone or contact via email.

NOTE: During the CDBG-DR Program development phase, the State of Oklahoma was under a state of emergency due to the Coronavirus pandemic. During which, the State amended the Oklahoma Open Meetings Act to fully include teleconferencing as a State sanctioned meeting alternative. Senate Bill 661, signed by the Governor, temporarily amends the Oklahoma Open Meetings Act to allow boards, commissions, and other groups the flexibility to conduct meetings by teleconference or videoconference to comply with the CDC recommendation that limits the number of people gathering.

Under the State's Citizen Participation Plan, each comment will be considered and personally addressed and attached in the Appendix of the CDBG Disaster Recovery Action Plan.

The State values the public's opinion by accepting citizen and other interested parties' comments throughout development and implementation of its CDBG Disaster Recovery program. Every effort is made to reach minorities, non-English speaking residents, as well as persons with disabilities. For all meetings, to facilitate comments, questions, and other information, a Spanish-speaking translator / Hearing Impaired Sign Language interpreter is made available upon request. As identified in the State's Consolidated Plan under the Citizen Participation component, special needs and translation services were available, as requested. No requests were made for Spanish speaking translators or other special needs.

- June 23, 2020 – Public comment period starts for CDBG-DR Action Plan. By regulation, a minimum of thirty (30) days is required to allow for public review of the proposed Action Plan.
- August 24, 2020 – Comment period ends for draft CDBG-DR Action Plan.
- August 31, 2020 – CDBG-DR Action Plan due for submission to HUD

UNMET NEEDS OUTREACH PHASE II

To address all possible mechanisms of accessibility to address unmet need, ODOC/CD performed a second round of citizen input to ensure that all unmet needs would be documented. ODOC/CD used phone, email, and mailed letters to ensure that all possible contacts were made, and all unmet needs identified. The following tribes were emailed to ensure any unmet needs were documented:

Cherokee Nation, Cheyenne and Arapaho Tribes, Choctaw Nation of Oklahoma, Citizen Potawatomi Nation, Delaware Nation, Eastern Shawnee Tribe of Oklahoma, Euchee (Yuchi) Tribe, Iowa Tribe of Oklahoma, Kaw Nation of Oklahoma, Kickapoo Tribe of Oklahoma, Kiowa Indian Tribe of Oklahoma, Miami Tribe of Oklahoma, Modoc Tribe of Oklahoma, Muscogee (Creek) Nation, Osage Nation, Ottawa Tribe of Oklahoma, Otoe-Missouria Tribe of Indians, Pawnee Nation, Peoria Tribe, Ponca Tribe of Oklahoma, Quapaw Tribe, Sac and Fox Nation, Seminole Nation of Oklahoma, Seneca-Cayuga Nation, Shawnee Tribe, Tonkawa Tribe, Thlopthlocco Tribal Town, Peoria Tribe Housing Authority, Cherokee Housing Authority, and Wichita & Affiliate Tribes.

The Chickasaw Nation, Choctaw Nation of Oklahoma, Ottawa Tribe of Oklahoma, and Otoe-Missouri Tribe (4 entities) responded that there were no identified needs due to DR-4438.

The following tribes did not have a working email (emails were "returned to sender) and were called to identify any unmet needs due to DR-4438:

The Eastern Shawnee Tribe of Oklahoma, Euchi (Yuchi) Tribe, Iowa Tribe of Oklahoma, Kaw Nation of Oklahoma, Peoria Tribe, Thlopthlocco Tribal Town, Tonkawa Tribe of Oklahoma, and Wichita and Affiliated Tribes.

Kaw Nation of Oklahoma and the Wichita Affiliated Tribes (2 entities) responded to the calls made and identified no need due to DR-4438.

The following counties were also emailed on October 21, 2020, to document any unmet needs:

Alfalfa, Canadian, Cherokee, Craig, Creek, Delaware, Garfield, Kay, Kingfisher, Le Flore, Logan, Mayes, Muskogee, Noble, Nowata, Okmulgee, Osage, Ottawa, Pawnee, Payne, Pottawatomie, Rogers, Sequoyah, Tulsa, Wagoner, Washington, and Woods.

Muskogee, Noble, Nowata, Payne, Pottawatomie, Tulsa, Wagoner, and Washington counties (8 entities) did not have working emails. Those counties were then called to survey possible needs in the county. No responses relating to an unmet need due to the DR-4438 were found.

The following Public Housing Authorities (PHAs) were also called on October 21, 2020, to document any unmet needs:

Cherokee Housing Authority, Vinita Housing Authority, Bristow Housing Authority, Drumright Housing Authority, Oilton Housing Authority, Grove Housing Authority, Newkirk Housing Authority, Ponca City Housing Authority, Tonkawa Tribal Housing, Heavener Housing Authority, Talihina Housing Authority, Wister Housing Authority, Guthrie Housing Authority, Locust Grove Housing Authority, Ft Gibson Housing Authority, Missouri State Housing Authority, Nowata Housing Authority, Beggs Housing Authority, Henryetta Housing Authority, Osage County Housing Authority, Afton Housing Authority, Commerce Housing Authority, Wyandotte Housing Authority, Pawnee Housing Authority, Stillwater Housing Authority, Yale Housing Authority, Earlsboro Housing Authority, McLoud Housing Authority, Shawnee Housing Authority, Tecumseh Housing Authority, Wanette Housing Authority, Catoosa Housing Authority, Chelsea Housing Authority, Claremore Housing Authority, Sallisaw Housing Authority, Collinsville Housing Authority, and Tulsa Housing Authority.

The following organizations that did not have either a working email, phone number, or did not respond to such methods of communication were sent mailed letters on November 9, 2020, to ensure that all possible unmet needs could be documented. In total, 76 letters were sent. Of those sent, only 1 responded to the letter – the Peoria Tribe of Oklahoma. This tribe did not indicate a need for their organization due to the DR-4438 disaster:

Absentee Shawnee Tribe, Alabama Quassarte Tribal Town, Apache Tribe of Oklahoma, Caddo Nation of Oklahoma, Cherokee Nation, Cheyenne and Arapaho Tribes, Citizen Potawatomi Nation, Comanche Nation Housing Authority, Comanche Nation of Oklahoma, Delaware Nation, Delaware Tribe of Indians, Eastern Shawnee Tribe of Oklahoma, Euchee (Yuchi) Tribe, Fort Sill Apache Tribe, Iowa Tribe of Oklahoma, Iron Horse Industrial Park, Kaw Nation of Oklahoma, Kialegee Tribal Town, Kickapoo Tribe of Oklahoma, Kiowa Indian Tribe of Oklahoma, Miami Tribe of Oklahoma, Modoc Tribe of Oklahoma, Muscogee (Creek) Nation, Osage Nation, Ottawa Tribe of Oklahoma, Pawnee Nation, Pawnee Tribal Development Corporation, Peoria Tribe, Ponca Tribe of Oklahoma, Quapaw Tribe, Sac and Fox Nation, Seminole Nation of Oklahoma, Seneca-Cayuga Nation, Shawnee Tribe, Thlopthlocco Tribal Town, Tonkawa Tribe of Oklahoma, United Keetoowah Band of Cherokees, Wichita and Affiliated Tribes, Wyandotte Nation, Muskogee County Commissioner, Noble County Commissioner, Nowata County Commissioner, Cherokee County Commissioner, Craig County Commissioner Manager, Alfalfa County Commissioner, Kingfisher County Commissioner, LeFlore County Commissioner, Okmulgee County Commissioner, Payne County Commissioner, Pottawatomie County Commissioner, Wagoner County Commissioner, Washington County Commissioner, Tulsa County Commissioner, Drumright Housing Authority, Oilton Housing Authority, Heavener Housing Authority, Talihina Housing Authority, Wister Housing Authority, Guthrie Housing Authority, Nowata Housing Authority, Beggs Housing Authority, Henryetta Housing Authority, Osage County Housing Authority, Afton Housing Authority, Commerce Housing Authority, Stillwater Housing Authority, Yale Housing Authority, Earlsboro Housing Authority, Shawnee Housing Authority, Tecumseh Housing Authority, Cherokee Housing Authority, and Collinsville Housing Authority.

The abovementioned entities received the following letter:

November 9, 2020

To whom these questions are most appropriate,

My name is Taylor Huizenga, and I am the Programs Representative for the CDBG-DR grant program with the Oklahoma Department of Commerce. If necessary, please forward this letter to the person(s) most capable of responding.

The State's 2019 CDBG-DR Action Plan has been approved by HUD with conditions. One of those conditions is that we improve upon the unmet needs assessment in that plan. It is for this reason we're reaching out to you in order to obtain new data for the Action Plan. For more details on our Action Plan, please refer to our website here: https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery-2019/

We want to be sure that we have not missed anyone in the initial needs assessment. **The primary focus for disaster recovery funds is on unmet housing needs related to the straight-line winds, tornadoes, and flooding that occurred from May 7, 2019 through June 1, 2019 in the following counties:** Alfalfa, Canadian, Cherokee, Craig, Creek, Delaware, Garfield, Kay, Kingfisher, Le Flore, Logan, Mayes, Muskogee, Noble, Nowata, Okmulgee, Osage, Ottawa, Pawnee, Payne, Pottawatomie, Rogers, Sequoyah, Tulsa, Wagoner, Washington, and Woods. Applications for CDBG-DR funding must tie back to the 05-07-19 through 06-01-19 reporting period *and* be in one of the abovementioned eligible counties. The disaster declaration is here: https://www.fema.gov/disaster/4438.

My hope is that you can answer some questions about whether there are any unmet housing needs and provide any supporting data, documentation, or evidence supporting the claim. The Oklahoma Department of Commerce would be very appreciative of any information you can provide while you consider the following questions for DD-4438:

1. Are you aware of *any damages that are still unresolved to multifamily housing* (apartments, duplexes, triplexes, quadruplexes, townhouses, mixed-use buildings, or any other type) or rental homes/townhouses/other housing types?
2. We are also trying to identify if any homeless populations or any *nearly* homeless families or individuals were negatively affected by this disaster and forced to relocate or bear an unnecessary burden due to the disaster.
3. Are there any non-white minority groups that were adversely affected by this disaster or suffered any long-term affects due to environmental degradation or have any unmet needs that they continue to bear unnecessarily?
4. Are there any neighborhoods or larger communities within your area that experienced issues relating to storm water drainage systems?

In addition to the questions above, we would be appreciative of more detail such as:
1. Whether the homeowner contacted and registered with FEMA.
2. The location of the unmet need
3. Number of units affected
4. Number of units damaged at or below 80% of area median income
5. Relocations or displacement caused by the disaster
6. Estimated costs of rehabilitation
7. Is the project located in the floodplain?

Feel free to use the list below to identify numerically any known issues in your area. Any additional information would be greatly appreciated such as type of home, income level, how individuals are currently sheltering or have moved elsewhere, number of individuals affected, etc.

Multi-family housing (any type):

Rental Housing (any type):
Homeless persons or families:
Nearly homeless persons or families:
Non-white minority groups experiencing unnecessary burdens:
Storm water drainage systems:
We hope to fund any unmet needs that have come about from the disaster and have yet to be addressed. We want to make sure we prioritize any housing unmet needs first and then infrastructure.
Thank you for taking the time to read this letter, and for any information you can provide for unmet housing needs in your community. Feel free to reach out by email, mail, or phone. If by phone, please leave a voicemail if there is no one to respond to your call immediately.

Sincerely,

Taylor Huizenga | Programs Representative
Community Development | Oklahoma Department of Commerce
taylor.huizenga@okcommerce.gov
p. 405-308-6691
900 N Stiles Ave, Oklahoma City, OK 73104

- June 22, 2021 – A public hearing was held via Zoom for the first substantial amendment to the CDBG-DR Action Plan. Closed Captioning, a Spanish-speaking translator, and a Hearing-Impaired Sign Language interpreter were made available upon request for the meeting. Access to an online free screen reading program was made available upon request as well.

**In order to ensure that citizens with disabilities are able to provide feedback on the Action Plan and other online documents, the document posted on the ODOC/CD website was converted in such a way that a screen reader could be used. A free screen reading tool to read PDFs can be found here through Adobe: https://www.adobe.com/accessibility/products/reader.html*

Action Plan Amendments

Substantial Amendments to the Action Plan

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

1. A change in program benefit or eligibility criteria;
2. The addition or deletion of an activity; or
3. The allocation or reallocation of more than $3.6 million.

Only those amendments that meet the definition of a Substantial Amendment are subject to the public notification and public comment procedures. Specifically, a public notice will be published online at the ODOC/CD CDBG Disaster Recovery webpage (https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-

recovery-2019/) and comment will be sought when assistance programs are further defined (i.e. change in program benefit or eligibility criteria) or when funding allocations are further refined by type of activity and location, if applicable. Per the Federal Register Notice guidelines, all amendments (Non-Substantial and Substantial) to the Action Plan will be posted online at the ODOC/CD CDBG Disaster Recovery webpage. Additionally, the CDBG Disaster Recovery Action Plan will be revised to reflect the amendments (Non-Substantial and Substantial) to the Action Plan. As with the amendments, the CDBG Disaster Recovery Action Plan is posted online at the ODOC/CD CDBG Disaster Recovery webpage. Hard copies will also be made available upon request. Citizens, units of local government, and community partners will be provided notice and the opportunity to comment on proposed Substantial Amendments to the Action Plan. No less than thirty (30) days will be provided for review and comment on the Substantial Amendment. Comments will be accepted electronically or in writing and will be posted online at the ODOC/CD CDBG Disaster Recovery webpage. A summary of all comments received, and responses will be included in the Substantial Amendment that is submitted to HUD for approval. Each amendment submitted to HUD for approval will be numbered sequentially and is meant to supersede the earlier amendments in the published Action Plan.

Non-Substantial Amendments to the Action Plan

Non-Substantial Amendments Non-Substantial Amendments to the Action Plan are defined as minor, one that does not materially change the activities or eligible beneficiaries. This provision should not be construed as allowing the general administrative budget to exceed the allowable limit. Additionally, a Substantial Amendment is not required in the case where the State is simply requesting additional funding from HUD. HUD must be notified in advance of a Non-Substantial Amendment becoming effective. Non-Substantial Amendments are NOT subject to the public notification and public comment procedures such as a thirty (30) day review and comment period. Per the Federal Register Notice guidelines, all amendments (Non-Substantial and Substantial) to the Action Plan will be posted online at the ODOC/CD CDBG-DR website (https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery-2019/). Additionally, the CDBG Disaster Recovery Action Plan will be revised to reflect the amendments (Non-Substantial and Substantial) to the Action Plan. As with the amendments, the CDBG Disaster Recovery Action Plan is posted online at the ODOC/CD CDBG Disaster Recovery webpage. Hard copies will also be made available upon request. Each amendment submitted to HUD for approval will be numbered sequentially and is meant to supersede the earlier amendments in the published Action Plan.

Citizen Complaint Procedures

The State will accept written citizen complaints from citizens related to the disaster recovery programs, Action Plans, Substantial Amendments, or quarterly

performance reports. Written complaints should be submitted via email marshall.vogts@okcommerce.gov or be mailed to:

Oklahoma Department of Commerce

Attn: Marshall Vogts, Director, Community Development / Community Infrastructure

900 N. Stiles Ave.

Oklahoma City, OK 73104

The State will make every effort to provide a timely written response to every citizen compliant within fifteen (15) working days of the receipt of the complaint, where practical.

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

Metropolitan Fair Housing Council of Oklahoma, Inc.

1500 Northeast 4th Street, Suite 204, Oklahoma City, OK 73117

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

Oklahoma Office of the Attorney General

313 NE 21st Street, Oklahoma City, OK 73105

Limited English Proficiency

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

- Via telephone: (405) 250-1844 Toll Free: (800)-879-6552
- Vía email: jade.shain@okcommerce.gov
- Online at: https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery-2019/
- In writing at:

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

Oklahoma City, OK 73104
ODOC/CD will provide both oral interpretation and written translation services to persons at no cost and these services are available upon request.

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

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

- Por el telefono: (405) 250-1844
- Por el correo electrónico: jade.shain@okcommerce.gov
- En línea a: https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery-2019/
- Por escrito en
  Oklahoma Department of Commerce
  Attn: Community Development: CDBG Disaster Recovery
  900 N. Stiles Ave.
  Oklahoma City, OK 73104

Broadband

As required by the Federal Register, Vol. 83, No. 28, Friday, February 9, 2018, any new construction or substantial rehabilitation, as defined by 24 CFR 5.100, of a building with more than four rental units will include installation of broadband infrastructure, as defined in 24 CFR 5.100, except where the grantee documents that: (1) the location of the new construction or substantial rehabilitation makes

installation of broadband infrastructure infeasible; (2) the cost of installing broadband infrastructure would result in a fundamental alteration in the nature of its program or activity or in an undue financial burden; or (3) the structure of the housing to be substantially rehabilitated makes installation of broadband infrastructure infeasible.

CDBG-DR Application Submission / Application Status

All funding opportunities require applicants to complete and submit their respective application and applicable attachments online using the OKGrants Grant Management System. **Paper applications will not be accepted.**

OKGrants is a grant management software system used to electronically capture all grant information from application to closeout. OKGrants launched in 2012 for the ODOC/CD, followed by many other agencies. Any county, community or organization applying for a grant through the Oklahoma Department of Commerce must do so through OKGrants. OKGrants offers a variety of benefits to include, reduction in application processing time, ability for grantees to monitor the status of their grants, centralized record keeping, and a reduction in paper usage.

The first step for new grant administrators is to contact the grantee's "Agency Administrator". The AA is the Grantee's designated person assigned to manage associated accounts. If you do not have an account, the AA will create one for you. If you already have an account, notify the AA so that it can be associated. New and returning users can access the web based OKGrants system at the following web address. https://grants.ok.gov/Login2.aspx?APPTHEME=OKOSF

The OKGrants system governs the level of access by the user's assigned role. The common roles used by grantees in the OKGrants system are:

- Agency Administrator (AA) – handles user accounts only
- Viewer – Cannot edit or save. Used for auditors.
- Writer – Can edit and save. Cannot submit.
- Financial Officer (FO) – Can edit, save, and submit.
- Authorized Official (AO) – Full permissions. Senior Elected Official. Submits Applications.

The application writer or AO will have a link on their Home Page called "Available Opportunities" This link will provide information on all open grant opportunities, official guidelines on the program, and links to generate applications for these

grants. The Writer, AO or FO will have the ability to edit and save the application's various documents. Once the application is complete, the AO must submit the document to ODOC/CD through the OKGrants system.

Additional information regarding the OKGrants system can be found on the Oklahoma Department of Commerce website: http://okcommerce.gov/community/okgrants/ The website contains an array of OKGrants resourceful documentation such as module walk-throughs, FAQ's, troubleshooting guides, status glossary, and important contact information. OKGrants training modules can be found here: https://www.youtube.com/playlist?list=PLusaOBBy_O6orS39hbWRoFBYeBVYZu6lf

OKGrants Logon & Password Assistance
For questions regarding login and password issue, users may contact Cody Butler at (405) 815-5305 or cody.butler@okcommerce.gov.

OKGrants Technical & Training Assistance
For questions regarding technical or training issues with the OKGrants Grant Management System, contact Cody Butler at (405) 815-5305 or cody.butler@okcommerce.gov.

CDBG-DR Application Assistance / Status Verification
For questions regarding to the CDBG-DR Application Guidelines contact Jade Shain (CDBG-DR Planner) at (405) 250-1844 or jade.shain@okcommerce.gov.

Application status is available to applicants via the OKGrants Grant Management System. Additionally, applicants may contact the CDBG-DR Planner as noted above. Once CDBG-DR awards are finalized by ODOC, an award listing will be published and posted on ODOC/CD's CDBG-DR website (https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery-2019/).

For programs administered by subgrantees or subrecipients, ODOC work with subgrantees to ensure they have a system in place to provide timely updates on application status to program applicants.

CDBG-DR Reporting & Website Composition

As required by HUD and outlined in the Federal Register notice, ODOC/CD will enter its Action Plan for Disaster Recovery, including performance measures, into HUD's DRGR system. Throughout the CDBG-DR program lifecycle, ODOC/CD will continuously enter updated performance-based information to meet both current and future reporting requirements.

A quarterly performance report will be submitted to HUD no later than 30 days following the end of each quarter after grant award and continuing until all funds have been expended and all expenditures have been reported. Each quarterly report will include information about the uses of funds during the applicable quarter including (but not limited to) the project name, activity, location, and national objective; funds budgeted, obligated, drawn down and expended; the funding source and total amount of any non-CDBG Disaster Recovery funds to be expended on each activity; beginning and completion dates of activities; achieved performance outcomes; and the race and ethnic status of persons assisted under direct-benefit activities. Quarterly reports to HUD will be submitted using the DRGR system. ODOC/CD will post the submitted report to its official website within three (3) business days.

In accordance with CDBG-DR requirements, ODOC/CD has developed and will maintain a comprehensive website regarding all disaster recovery activities assisted with these funds. The dedicated disaster recovery web page will inform the public and any other interested parties on how the ODOC/CD is managing the CDBG-DR funds. ODOC/CD will post all Action Plans and amendments on the ODOC/CD's CDBG-DR website at https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery-2019/.

The website includes:

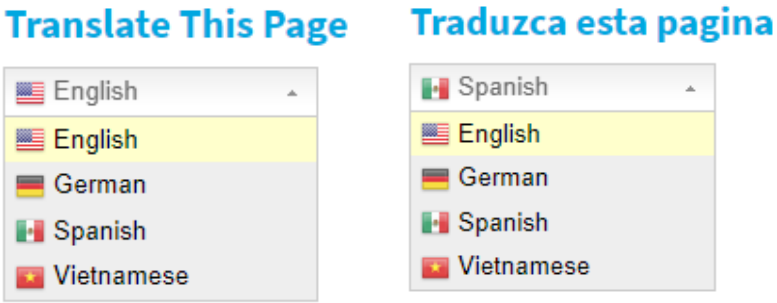
- The current approved CDBG-DR Action Plan.
- All Action Plan amendments.
- CDBG-DR Policy & Procedure Manual.
- Citizen participation comments and related postings.
- Procurement policies and procedures.
- Current procurements for goods and services.
- Current contract agreements.
- A summary of all procurements.
- Internal Audit reports.

The website gives citizens an opportunity to read the plan and to submit comments. This website is featured prominently on, and is easily navigable from, ODOC/CD's homepage contact and comment section. Paper copies of the Action Plan and any subsequent Amendments will be available upon request.

ODOC/CD will manage the website as well as all other forms of media to maintain public transparency. The website will be updated monthly as required with the last current date of the update noted on the document. All required updates to ODOC/CD's dedicated CDBG-DR program recovery website will be completed within three (3) business days.

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

Additionally, the ODOC/CD CDBG-DR website contains a "translator" box on the page offering several languages to include Spanish. Once the desired translator box text is selected, all text on the webpage is converted to the selected language for better reading comprehension.



The following CDBG-DR Spanish language related outreach and contact information narrative will be placed on the webpage translated as follows.

Individuos con Discapacidades o Impedimentos de Lenguaje

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

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Por el telefono: (405) 250-1844
Por el correo electrónico: jade.shain@okcommerce.gov
Por escrito en
Oklahoma Department of Commerce
Attn: Community Development: CDBG Disaster Recovery
900 N. Stiles Ave.
Oklahoma City, OK 73104

CDBG-DR Re-Use Funds

ODOC/CD anticipates that in some cases CDBG-DR funding could potentially be available later in the program due to unforeseen events such as the cancellation of projects; projects completed under budget; or from funds designated but not allocated. ODOC/CD reserves the right to adjust any of the remaining CDBG-DR funding to ensure maximum utilization of funds. Such CDBG-DR "Reuse" funding adjustments shall be the minimum amount necessary to fund projects efficiently. The CDBG-DR Reuse funding is also being made available to offset any unforeseen project eligible cost increases such as in the case of construction. All CDBG-DR Reuse funding will be subject to the same expenditure deadlines and compliance requirements set forth in the Federal Register Notice. Funding deemed Reuse will be evaluated and allocated according to the following considerations.

1. In addition to first meeting the core CDBG-DR program eligibility requirements as outlined in this Action Plan, Reuse funding will be prioritized to allow the State to meet the minimum Federal Register specified objectives should these objectives remain unfulfilled at the time of the Reuse funding availability.

2. Reuse funding will be first considered for current grantees whose infrastructure projects have been significantly impacted by unforeseen increased project completion costs and require additional funds to ensure timely completion of their eligible project.

3. Reuse funding consideration will depend on the amount required by the eligible CDBG-DR project in relation to the amount of limited remaining CDBG-DR funding available.

4. Reuse funding consideration will depend on the amount of time required for final project completion in relation to the amount of time remaining under the imposed Federal Register Notice deadlines.

5. Any remaining CDBG-DR funding that cannot meet the expenditure deadlines and compliance requirements set forth in the Federal Register Notice will be returned to HUD as required under federal guidelines.

Appendices

CDBG-DR ACTION PLAN REVISION HISTORY

Date	Version	Substantial Amendment	Description
08-27-2020	1		Initial Action Plan Submission to HUD.
08-11-2021	2	1	Substantial Amendment No. 1 was triggered because ODOC made a change in beneficiary (removing rehabilitation or elevation of residential structures located in the 100-year floodplain) and added a program activity under housing (reimbursement program for subsidized loans, e.g., SBA). Other changes made under this revision include additional information to the unmet needs assessment (housing, infrastructure, economic revitalization, and hazard mitigation), consultation and data collection efforts, and crosscutting requirements.
08-19-2021	2	1	HUD approved Substantial Amendment #1
07-07-2022	3	2	Substantial Amendment #2 - The following changes were made to this document: 1. Significant changes were made to this document per the requirements of the Oklahoma Department of Commerce's Style Guide. For example, Headings and Subheadings are now using Arial instead of Times New Roman. The typeface used in the body text is now Google's Montserrat instead of Times New

Roman. All colors in the Headings and Subheadings were chosen from the Style Guide. The following Colors are used in this document.

a. Heading 1 = HEX #464646
b. Heading 2 = HEX #0066A6
c. Heading 3 = HEX #000000
d. Body/Normal = HEX #000000

2. Changes to the Voluntary Buyout Program which affected eligibility, award determination, and other details. Refer to the section "The Voluntary Buyout Program" for more details.

Citizen Participation Comments

This section of the Action Plan documents all public comments, written or oral, that were received during public comment periods. The table below summarizes how many comments were received:

Summary of Public Comments Received for the Action Plan and/or Substantial Amendments				
Comment Period	**Written Comment**	**ODOC Response(s)**	**Verbal Comment**	**ODOC Response(s)**
07/2020-08/2020	1	1	0	0
06/2021-07/2021	0	0	0	0
04/01/2022-05/10/2022	0	0	0	0

PUBLIC COMMENT PERIOD #1 (07/27/2020-08/26/2020)

Comment 1

ODOC/CD received one public comment on August 24th, 2020. This letter has been copied below:

August 24, 2020

Oklahoma Department of Commerce
900 N. Stiles Ave. Oklahoma City, OK 73104
Attn.: Linda Goode
Via email: linda.goode@okcommerce.gov

Dear Oklahoma Department of Commerce,

I am writing on behalf of the International Code Council (Code Council) to provide comments on the State of Oklahoma's Community Development Block Grant Disaster Recovery Program Action Plan (CDBG-DR Plan).

The Code Council is a member-focused non-profit association dedicated to building safety and sustainability and we are proud to count Oklahoma and its local jurisdictions among our Governmental Members. The Code Council develops the model building codes, the I-Codes, used in the design, build and compliance process to construct safe, sustainable, affordable, and resilient structures. The I-Codes, including the International Residential Code (IRC), the International Building Code (IBC), the International Fire Code (IFC), and the International Energy Conservation Code (IECC) are the most widely used and adopted set of building codes in the U.S. and around the world. Developed through a consensus-based process, the I-Codes incorporate the latest technology and provide the safest, most resilient structures for our families and communities.

We commend the Oklahoma Department of Commerce (ODOC) on the CDBG-DR Plan's goals to provide for greater resiliency statewide, to institute green building design as well as to consider strengthening building codes related to tornadoes and other natural disasters.1

To this end, we encourage ODOC to promote the adoption, enforcement, and broad application of modern, resilient, building codes as the first and most impactful step towards statewide resiliency and to address Oklahoma's unmet needs around mitigation.2 For this reason, our comments focus on the importance of incorporating code adoption and enforcement into the CDBG-DR Plan

implementation. Oklahoma should take steps to advance long-term resilience and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property by adopting and applying the most recent editions of the national model codes that address existing natural hazards.

STUDIES SHOW BENEFITS OF MODERN BUILDING CODES AGAINST DISASTERS

Numerous studies confirm that the adoption and implementation of current model building codes is one of the nation's best defenses against the natural hazards Oklahoma's CDBG-DR Plan identifies as presenting the greatest risks to the State, including severe storms, winds, tornadoes, and flooding.3 For example:

The 2019 FEMA Mitigation Assessment Team (MAT) report found that National Flood Insurance Program (NFIP) regulations reduced average claim payments by almost half and following modern code requirements reduced the average claim payments by an additional 90%.4 In addition, the National Institute for Building Sciences' Natural Hazard Mitigation Saves report found that adhering to current codes' flood mitigation requirements in the floodplain saves $6 for every $1 invested.5

Although building code adoption alone generates enormous mitigation benefits, code enforcement is equally important. FEMA has previously quantified the cost of inadequate code enforcement as a quarter of insured losses.6 Researchers found similar results about 15 years later: that implementing building codes at the local level by ensuring proper staffing, training, and certification provides an additional loss reduction value on the order of 15 to 25 percent.7

Recognizing the life safety and mitigation benefits that current building codes provide for communities, the U.S. Department of Housing and Urban Development (HUD) has both required applicants for disaster recovery funding commit to adopt resilient codes and made available significant sums for codes' adoption and implementation. For the past seven years, and across multiple allocations, HUD has required Community Development Block Grants for Disaster Recovery (CDBG-DR) applicants demonstrate in their action plans how they will support the adoption of resilient building codes.8

FEMA has similarly prioritized code adoption and enforcement, concluding in its most recent five-year strategic plan that current building code adoption and enforcement are two of the most effective mitigation measures a jurisdiction can undertake by stating: "[d]isaster resilience starts with building codes, because they enhance public safety and property protection."9 In the Plan's very first objective, FEMA highlighted the importance of the Agency's "advocate[ing] for the adoption and enforcement of modern building and property codes."10

In August of this year, the Mitigation Framework Leadership Group (MitFLG)— chaired by FEMA and made up of another 13 federal agencies and departments as well as state, tribal, and local officials— released the National Mitigation Investment Strategy (NMIS). The Strategy makes several recommendations concerning the use, enforcement, and adoption of building codes: "[a]rchitects, engineers, builders, and regulators should use the latest building codes for the most up-to-date requirements for structural integrity, mechanical integrity, fire prevention, and energy conservation," "trained, certified professionals [should] handle building inspections and code administration," and "[u]p-to-date building codes and standard criteria should be required in federal and state grants and programs."11

Lastly, FEMA's "Required Minimum Standards" for all FEMA funded construction require the latest I-Codes.12 For post-disaster recovery, FEMA requires construction meet the latest editions of the IBC, IRC, IECC, IFC, International Existing Building Code (IEBC); International Wildland-Urban Interface Code (IWUIC); International Plumbing Code (IPC); International Mechanical Code (IMC); International Fuel Gas Code (IFGC); ICC 500-14, ICC/NSSA Standard on the Design and Construction of Storm Shelters; ICC 600-14, Standard for Residential Construction in High-wind Regions.13 The Agency has deemed adherence to the current versions of these codes to be so important that it will not fund rebuilding of public facilities post-disaster if that construction deviates.

THE BENEFITS OF CODE ADOPTION FOR OKLAHOMA

Section 3.6 of the CDBG-DR Plan identifies that demand exists for resiliency / mitigation investments, which can be specifically addressed through efforts to strengthen building codes related to tornadoes and other natural disasters in Oklahoma.14 As demonstrated above, adopting current codes is one of the most effective means a State can take to become better prepared and to take mitigating steps to build stronger for the future.

The Oklahoma Uniform Building Codes Commission's (OUBCC) currently adopted building codes are the 2015 editions of the IBC, IRC, IFC, IEBC, IPC, IMC, IFGC as well as the 2009 edition of the IECC for Residential structures and the 2006 IECC for Commercial structures. The OUBCC has reviewed the 2018 editions of the IBC, IFC, IEBC, IPC, IMC, and IFGC for possible adoption. The OUBCC review of the 2018 IRC is planned. There is no 2018 IECC review scheduled to date.15 The 2018 editions of these building codes include numerous provisions that mitigate the hazards ODOC has identified as presenting the greatest risk to Oklahoma. For this reason, we strongly encourage ODOC to consider supporting the adoption of the 2018 editions at both the State and local level through its CDBG-DR allocation.

For example, updating to the 2018 IRC will require enhanced protections for openings in windborne debris regions; stronger foundations; floor, ceiling, and roof

strengthening; improved wood fastening; updated wind maps, which significantly increase design wind loads for Oklahoma; strengthened header support for high wind regions; and improved flood safety provisions for stairways, ramps, and decks.

Updating to the 2018 IBC will require storm shelters for critical emergency operations facilities and in educational facilities in high-risk tornado areas. FEMA's hazard mitigation grant programs recommend funding storm shelter construction, which also generates some of the greatest benefit-cost analyses (BCAs) under the Agency's BCA tool. There have been no fatalities in properly designed and constructed safe rooms. Additionally, updating to the 2018 IBC will also require structural observation for high rise and critical buildings to ensure that complex, critical design elements are reviewed and done to exact specifications. Thus, the 2018 IBC supports the
CDBG-DR Plan's goal to promote cost effective resiliency that will help minimize reoccurrence of storm damage and protect households from future disasters by providing safe rooms or storm shelters.16

In addition, updating to the 2018 IFC will require provisions to ensure fire service and occupant evacuation elevators are able to continue to function and serve their intended purposes in an emergency; evacuation plans for factory/industrial buildings and additional crowd managers for larger events; and a provision to ensure water from automatic sprinklers is prevented from entering into fire service and occupant elevators.

Updating to the 2018 IEBC will effectively support the CDBG-DR Plan's goals and Oklahoma's rehabilitation and reconstruction needs and as it covers repair, alteration, addition and change of occupancy for existing buildings, while achieving appropriate levels of safety without requiring full compliance with the new construction requirements contained in the other I-Codes. For example, to protect occupants inside and around rebuilt structures from seismic events, which have become increasingly frequent in Oklahoma, the 2018 IEBC ensures that during large alterations sufficient anchorage is provided for concrete and reinforced masonry walls, and sufficient bracing and anchorage is provided for unreinforced masonry parapets and partitions.

Furthermore, updating to the 2018 IECC will boost building energy efficiency, ensuring that buildings can be conditioned using less energy, which means that they can also be habitable for longer periods of time after loss of power in both hot and cold exterior conditions.1

ODOC CDBG-DR PLAN RECOMMENDATIONS

The following recommendations urge ODOC to recognize as eligible for funding within the CDBG-DR Plan, the adoption of building codes that update Oklahoma's

existing codes and improved code enforcement. These recommendations also encourage ODOC to require FEMA's Minimum Standards as construction standards for mitigation projects and to require appropriate training and certifications for officials supporting those projects. Finally, our recommendations suggest funding for post-disaster damage assessment training.

ODOC's Plan Should Make Funds Available for Updated Code Adoption

The Code Council supports the OUBCC's ongoing work to consider updating its codes, but respectfully believes that the State should commit, through its CDBG-DR Plan, to updating its building codes to the 2018 editions, and leave itself the option of leveraging CDBG-DR funding to do so. We believe this approach is particularly prudent given code updates will provide significant wind and flood mitigation benefits to Oklahoma which has suffered recurring disaster events as documented by the CDBG-DR Plan and FEMA.18

The State Plan Should Specify the Availability of Funds for Code Official Training

Building code application is most commonly measured through a community's Building Code Effectiveness Grading Schedule (BCEGS) score, an evaluation conducted by ISO, an analytics provider for the property/casualty insurance industry. Among other measures, BCEGS scores evaluate communities on code official training, continuing education, and certification. Better BCEGS scores (i.e., lower scores out of 10) typically translate into lower insurance premiums for communities. According to ISO, Oklahoma's average department employee training expenditure per capita of population served is roughly half the national average.19

FEMA also uses BCEGS scores in determining recipients of competitive grant awards. The Agency's current $500 million Building Resilient Infrastructure and Communities (BRIC) grant program gives applications more weighting that have achieved a BCEGS score of 5 or better for commercial and residential buildings. As a state, Oklahoma is rating 6 for both commercial and residential. Investing in training and certification, and adopting up to date codes, would improve the state and its communities' BCEGS scores.

The Code Council encourages ODOC's CDBG-DR Plan to include code official training and certification under its proposed allocation for mitigation given these investments help increase loss avoidance, can lead to insurance savings, and can make jurisdictions in the state more competitive for FEMA grants.

We also recommend Oklahoma partner with the Code Council and the Oklahoma Building Inspectors Association (OBIA) to promote and alert communities about post disaster damage assessment training programs and to provide funding for

these programs. After a disaster, an affected community is often left on its own to struggle with assessing its damage and determining whether structures can be re-inhabited. Local government officials may not be instructed on how to perform rapid safety evaluations or what data to collect. When assessments are not conducted quickly, a community's residents may potentially reoccupy unsafe structures. Effective post-disaster building damage assessment can minimize the possibility for additional bodily injury by advising residents and aiding providers of eminent hazards at specific locations.

To this end, we recommend ODOC promote participation in existing post-disaster damage assessment training programs like the "When Disaster Strikes Institute."20 This institute provides hands-on instruction on assessing damage through activities, case studies and interactive simulations that walk participants through various disaster scenarios. The institute stimulates discussion between participants and describes how paperwork should be completed. Participants learn techniques on how to become a properly trained second responder and, on completion, can be relied on to assist with performing post-disaster building assessments.21 As an indication of its support for When Disaster Strikes, FEMA mitigation grants under BRIC can be used specifically to provide this training.22

ODOC Should Require FEMA's Minimum Standards for Mitigation Projects

The Code Council recommends ODOC require adherence to the codes specified in FEMA's
Consensus-Based Codes, Specifications and Standards for Public Assistance funding to the construction projects proposed in its CBDG-DR Plan. Utilizing the 2018 I-Code editions, as required by the Public Assistance program,23 aligns with FEMA's position on the adoption of current codes and the Agency's prioritization in grant allocation:

"***FEMA supports the adoption and use of the latest published editions of the I-Codes as a minimum standard for hazard resistance***, including flood hazards, high winds, and earthquake hazards. FEMA encourages states and communities to adopt the most recent edition of the I-Codes to ensure enforcement of the latest hazard-resistant provisions. This will increase safety and reduce financial losses for individuals, supporting more rapid recovery after disasters. For the purposes of evaluating whether a community is deemed hazard-resistant, FEMA considers the two latest published editions of the I-Codes to be adequate. Additionally, ***new federal law and emerging policies tie some pre- and post-disaster federal assistance to the latest editions of codes and standards***."24

SUMMARY

We believe it is crucial for the CDBG-DR Plan to support efforts to enhance Oklahoma's building codes and their enforcement. Studies prove that the adoption and enforcement of up-to-date building codes increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property.

Sincerely,

Kelly D. Sadler
Kelly D. Sadler, J.D.
International Code Council
Government Relations Manager, OK

Response 1

August 25, 2020

Background

On January 27, 2020, a new CDBG-DR allocation notice was released by the U.S. Department of Housing and Urban Development (HUD) in Federal Register Notice (Vol. 85, No. 17, Page 4683 Public Law 116-20). Under this Federal Register Notice, Oklahoma is eligible to receive an allocation of $36,353,000 in disaster recovery funds for necessary expenses for activities authorized under Title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et seq.) to address long-term recovery needs, particularly in the area of housing recovery focusing on low and moderate-income beneficiaries.

Public Comment from the International Code Council

The ODOC/CD received one public comment regarding the 2019 CDBG-DR Action Plan during the comment period of July 23, 2020, through August 24, 2020. The comment, from the International Code Council, encouraged ODOC/CD "*to promote the adoption, enforcement and broad application of modern, resilient, building codes as the first and most impactful step towards statewide resiliency and to address Oklahoma's unmet needs in the area of mitigation*". These building codes are the I-Codes (IRC, IBC, IFC, and IECC) and are the most widely used and adopted set of building codes in the United States and around the world. The International Code Council encouraged ODOC/CD to consider budgeting within the 2019 CDBG-DR Action Plan for the adoption and enforcement of the I-Codes.

ODOC/CD Determination

After careful consideration, ODOC/CD is not prepared to budget in the 2019 CDBG-DR Action Plan for the creation, adoption, and enforcement of I-Codes for the following reasons:

- The creation, adoption, and enforcement of I-Codes would be expensive and create a disproportionate hardship on rural communities. Many communities impacted by DR-4438 are less capable of implementing such a requirement.
- As noted in the Federal Register Notice, the primary purpose of Disaster Recovery funding is to address the long-term recovery needs for housing. ODOC/CD has received initial surveys that suggest nearly all the allocation can be used for housing;
- Many cities within Oklahoma have already adopted the I-Codes; and
- The adoption and enforcement of I-Codes using CDBG-DR funds does not comply with the National Objective to help low to moderate income beneficiaries.

If you have any questions or comments, please don't hesitate to contact me.

Sincerely,

Jade Shain | Programs Planner
Community Development (CDBG-DR)
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OKLAHOMA

PUBLIC COMMENT PERIOD #2 (06/09/2021-07/08/2021)

ODOC did not receive any written or verbal public comments for the 2019 CDBG-DR Substantial Amendment No. 1.

PUBLIC COMMENT PERIOD #3 (04/01/2022-05/10/2022)

ODOC did not receive any written or verbal public comments for the 2019 CDBG-DR Substantial Amendment No. 2.

Certifications – State of Oklahoma

Each grantee receiving a direct allocation under this notice must make the following certifications with its action plan:

A. The grantee certifies that it has in effect and is following a residential anti-displacement and

relocation assistance plan in connection with any activity assisted with funding under the CDBG

program.

B. The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87,

together with disclosure forms, if required by part 87.

C. The grantee certifies that the action plan for disaster recovery is authorized under State and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations and this notice. The grantee certifies that activities to be undertaken with funds under this notice are consistent with its Action Plan.

D. The grantee certifies that it will comply with the acquisition and relocation requirements of the URA, as amended, and implementing regulations at 49 CFR part 24, except where waivers or

alternative requirements are provided for in this notice.

E. The grantee certifies that it will comply with section 3 of the Housing and Urban Development

Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 135.

F. The grantee certifies that it is following a detailed citizen participation plan that satisfies the

requirements of 24 CFR 91.115 or 91.105 (except as provided for by HUD in Federal Register

notices providing waivers and alternative requirements for this grant). Also, each local government receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in notices providing waivers and alternative requirements for this grant).

G. State grantee certifies that it has consulted with affected local governments in counties

designated in covered major disaster declarations in the non-entitlement, entitlement, and tribal

areas of the state in determining the uses of funds, including the of funding, or activities carried

out directly by the state.

H. The grantee certifies that it is complying with each of the following criteria:

1. Funds will be used solely for necessary expenses related to disaster relief, long-term

recovery, restoration of infrastructure and housing and economic revitalization in the most impacted and distressed areas for which the President declared a major disaster in 2019 for the State of Oklahoma (84 FR 32760) pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).

2. With respect to activities expected to be assisted with CDBG-DR funds, the Action Plan

has been developed to give the maximum feasible priority to activities that will benefit

low- and moderate-income families.

3. The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-

income families in a manner that ensures that at least 70 percent (or another percentage

permitted by HUD in a waiver published in an applicable Federal Register notice) of the

grant amount is expended for activities that benefit such persons.

4. The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless:

(a) Disaster recovery grant funds are used to pay the proportion of such fee or

assessment that relates to the capital costs of such public improvements that are

financed from revenue sources other than under this title; or

(b) For purposes of assessing any amount against properties owned and occupied

by persons of moderate income, the grantee certifies to the Secretary that it lacks

enough CDBG funds (in any form) to comply with the requirements of clause (a).

I. The grantee certifies that the grant will be conducted and administered in conformity with title

VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601–

3619), and implementing regulations, and that it will affirmatively further fair housing.

J. The grantee certifies that it has adopted and is enforcing the following policies, and, in addition,

must certify that they will require local governments that receive grant funds to certify that they

have adopted and are enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its

jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and

2. A policy of enforcing applicable state and local laws against physically barring entrance

to or exit from a facility or location that is the subject of such nonviolent civil rights

demonstrations within its jurisdiction.

K. The grantee certifies that it (and any subrecipient or administering entity) currently has or will

develop and maintain the capacity to carry out disaster recovery activities in a timely manner and

that the grantee has reviewed the requirements of this notice. The grantee certifies to the accuracy State of Texas 2019 Disasters CDBG-DR Action Plan Page 133 of 152 of its Public Law 115-56 Financial Management and Grant Compliance certification checklist, or other recent certification submission, if approved by HUD, and related supporting documentation referenced at A.1.a. under section VI and its Implementation Plan and Capacity Assessment and related submissions to HUD referenced at A.1.b. under section VI.

L. The grantee certifies that it will not use CDBG-DR funds for any activity in an area identified as

flood prone for land use or hazard mitigation planning purposes by the state, local, or tribal

government or delineated as a Special Flood Hazard Area (or 100-year floodplain) in FEMA's

most current flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the state, local, and tribal government land use regulations and hazard mitigation plans and the latest issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.

M. The grantee certifies that its activities concerning lead-based paint will comply with the

requirements of 24 CFR part 35, subparts A, B, J, K, and R.

N. The grantee certifies that it will comply with environmental requirements at 24 CFR part 58.

O. The grantee certifies that it will comply with applicable laws.

NOTE: Any person who knowingly makes a false claim or statement to ODC/CD or HUD may be subject to civil or criminal penalties under 18 U.S.C. 287, 1001 and 31 U.S.C. 3729.

Affordable Rents: 2020 Home Program Rents

Substantial Amendment #1 (no longer current) had HOME Rents for the year 2020. However, Substantial Amendment #2 removed these values since it could leave the impression that the criteria were only for the year 2020 values. This is not the case. HOME Rents will be used to determine affordability. Rents will be adjusted upward annually with the publication of new AMI tables by the Federal government. Subgrantees are required to follow the most current HOME Rents for their project. For more details, please refer to the following page: https://www.hudexchange.info/programs/home/home-rent-limits/

Homeowners and Renters in 27 Affected Counties

The following table shows the number of damaged structures by structure type (e.g., House, Apartment, Townhouse) in each of the 27 eligible counties. Additionally, it shows how many owners or renters experienced damaged by structure type. Data source: FEMA-IA.

County / Structure Type / O = "Owned"; R = "Rent")	**Count of Own/Rent**
Alfalfa	37
House/Duplex	28
O	26
R	2
(blank)	
Mobile Home	4

O	2
R	2
Other	4
O	3
R	1
Townhouse	1
O	1
Canadian	203
Apartment	3
R	3
House/Duplex	122
O	105
R	17
Mobile Home	59
O	50
R	9
Other	17
O	11
R	6
Townhouse	1
R	1
Travel Trailer	1
O	1
Cherokee	99
House/Duplex	57
O	48
R	9
(blank)	
Mobile Home	27
O	25
R	2
(blank)	
Other	11
O	11
Travel Trailer	4
O	4

Craig	72
Apartment	1
R	1
House/Duplex	56
O	54
R	2
Mobile Home	9
O	8
R	1
Other	5
O	3
R	2
Travel Trailer	1
O	1
Creek	366
Apartment	2
R	2
House/Duplex	302
O	262
R	40
(blank)	
Mobile Home	31
O	28
R	3
Other	25
O	19
R	6
Townhouse	1
O	1
Travel Trailer	5
O	4
R	1
Delaware	225
House/Duplex	121
O	108
R	13

(blank)	
Mobile Home	77
O	72
R	5
Other	20
O	15
R	5
Townhouse	1
O	1
Travel Trailer	6
O	5
R	1
Garfield	63
House/Duplex	62
O	54
R	8
Other	1
O	1
Kay	263
Apartment	1
R	1
Condo	1
O	1
House/Duplex	215
O	189
R	26
(blank)	
Mobile Home	14
O	11
R	3
Other	30
O	20
R	10
Townhouse	1
O	1
Travel Trailer	1

R	1
Mayes	167
House/Duplex	95
O	84
R	11
(blank)	
Mobile Home	51
O	49
R	2
(blank)	
Other	11
O	11
Travel Trailer	10
O	9
R	1
(blank)	
Muskogee	555
Apartment	30
R	30
House/Duplex	284
O	232
R	52
(blank)	
Mobile Home	157
O	103
R	54
(blank)	
Other	75
O	47
R	28
(blank)	
Travel Trailer	9
O	8
R	1
Noble	46
House/Duplex	33

O	33
Mobile Home	7
O	7
Other	6
O	5
R	1
Nowata	102
Condo	1
O	1
House/Duplex	79
O	74
R	5
Mobile Home	9
O	8
R	1
Other	11
O	10
R	1
Travel Trailer	2
O	2
Okmulgee	110
Apartment	1
R	1
House/Duplex	86
O	67
R	19
(blank)	
Mobile Home	20
O	19
R	1
Other	3
O	3
Osage	275
Apartment	1
R	1
House/Duplex	193

O	175
R	18
(blank)	
Mobile Home	58
O	52
R	6
(blank)	
Other	15
O	12
R	3
Travel Trailer	8
O	6
R	2
(blank)	
Ottawa	193
Apartment	11
O	1
R	10
House/Duplex	129
O	107
R	22
(blank)	
Mobile Home	21
O	19
R	2
Other	25
O	18
R	7
(blank)	
Townhouse	1
O	1
Travel Trailer	6
O	5
R	1
Pawnee	63
House/Duplex	36

O	28
R	8
Mobile Home	21
O	19
R	2
Other	4
O	3
R	1
Travel Trailer	2
O	2
Payne	150
Apartment	6
R	6
House/Duplex	115
O	100
R	15
(blank)	
Mobile Home	14
O	12
R	2
Other	14
O	11
R	3
Travel Trailer	1
O	1
Pottawatomie	65
Apartment	1
R	1
House/Duplex	33
O	30
R	3
Mobile Home	24
O	22
R	2
Other	7
O	7

Rogers	230
House/Duplex	156
O	144
R	12
(blank)	
Mobile Home	50
O	44
R	6
(blank)	
Other	22
O	19
R	3
Travel Trailer	2
O	2
Sequoyah	129
Apartment	24
R	24
House/Duplex	60
O	48
R	12
(blank)	
Mobile Home	21
O	10
R	11
(blank)	
Other	22
O	19
R	3
Travel Trailer	2
O	1
R	1
Tulsa	1284
Apartment	59
R	59
Condo	3
O	2

R	1
House/Duplex	954
O	743
R	211
(blank)	
Mobile Home	144
O	106
R	38
(blank)	
Other	103
O	52
R	51
Townhouse	4
O	1
R	3
(blank)	
Travel Trailer	17
O	15
R	2
Wagoner	222
House/Duplex	151
O	130
R	21
(blank)	
Mobile Home	54
O	48
R	6
Other	10
O	9
R	1
Townhouse	1
R	1
Travel Trailer	6
O	5
R	1
Washington	134

Apartment	1
O	1
House/Duplex	102
O	82
R	20
Mobile Home	18
O	13
R	5
(blank)	
Other	9
O	7
R	2
Travel Trailer	4
O	3
R	1
Woods	41
House/Duplex	39
O	37
R	2
Other	2
O	2
O Sum	0
R Sum	0

FEMA-IA Unmet Need Analysis by County, City, and Residence Type

This table analyzes the FEMA-IA dataset sent to ODOC on May 8th, 2021. It describes the unmet need in each county and city for every residential structure type.

County / CITY / Residence Type	Count of Residence Type	Sum of Total FEMA Verified Loss	Sum of Insurance Settlement	Sum of Repair Assistance Amount	Sum of Replacement Assistance Amount	Sum of SBA Received Amount	Sum of Unmet Need
Alfalfa	**38**	**$ 62,965.39**		**$ 46,565.95**		**$ -**	**$ 16,399.44**
ALINE	8	$ 8,476.34		$ 5,852.35		$ -	$ 2,623.99
House/Duplex	8	$ 8,476.34		$ 5,852.35		$ -	$ 2,623.99
ALVA	1	$ -				$ -	$ -
House/Duplex	1	$ -				$ -	$ -
AMORITA	2	$ -				$ -	$ -
House/Duplex	1	$ -				$ -	$ -
Mobile Home	1	$ -				$ -	$ -
BURLINGTON	5	$ 7,093.98		$ 3,439.84		$ -	$ 3,654.14
House/Duplex	3	$ 7,093.98		$ 3,439.84		$ -	$ 3,654.14
Mobile Home	1	$ -				$ -	$ -
Other	1	$ -				$ -	$ -
CHEROKEE	14	$ 4,476.92		$ 3,336.14		$ -	$ 1,140.78
House/Duplex	10	$ 4,204.13		$ 3,063.35		$ -	$ 1,140.78
Mobile Home	1	$ 272.79		$ 272.79		$ -	$ -
Other	2	$ -				$ -	$ -
Townhouse	1	$ -				$ -	$ -
CLEO SPRINGS	1	$ -				$ -	$ -
House/Duplex	1	$ -				$ -	$ -
DACOMA	1	$ -				$ -	$ -
House/Duplex	1	$ -				$ -	$ -
HELENA	2	$ 3,420.24				$ -	$ 3,420.24
House/Duplex	2	$ 3,420.24				$ -	$ 3,420.24
JET	4	$ 39,497.91		$ 33,937.62		$ -	$ 5,560.29
House/Duplex	2	$ 23,281.32		$ 19,233.23		$ -	$ 4,048.09
Mobile Home	1	$ 16,216.59		$ 14,704.39		$ -	$ 1,512.20
Other	1	$ -				$ -	$ -
Canadian	**203**	**$ 819,986.22**	**$ 171,222.86**	**$ 184,322.83**	**$ 202,800.00**	**$ -**	**$ 382,498.71**
CALUMET	3	$ 4,719.41		$ 3,661.27		$ -	$ 1,058.14
House/Duplex	1	$ 2,077.12		$ 1,851.89		$ -	$ 225.23
Mobile Home	2	$ 2,642.29		$ 1,809.38		$ -	$ 832.91
EL RENO	125	$ 706,200.59	$ 164,513.18	$ 114,316.73	$ 202,800.00	$ -	$ 330,133.47
Apartment	2	$ 1,424.61				$ -	$ 1,424.61
House/Duplex	65	$ 193,804.81	$ 85,013.18	$ 97,882.70		$ -	$ 87,108.36
Mobile Home	43	$ 510,793.69	$ 79,500.00	$ 16,434.03	$ 202,800.00	$ -	$ 241,423.02
Other	13	$ -				$ -	$ -
Townhouse	1	$ -				$ -	$ -
Travel Trailer	1	$ 177.48				$ -	$ 177.48
GEARY	1	$ 741.18		$ 741.18		$ -	$ -
House/Duplex	1	$ 741.18		$ 741.18		$ -	$ -
HINTON	13	$ 20,932.49		$ 15,005.59		$ -	$ 5,926.90
House/Duplex	13	$ 20,932.49		$ 15,005.59		$ -	$ 5,926.90
MUSTANG	11	$ 9,139.66		$ 17,785.79		$ -	$ 531.41
House/Duplex	8	$ 4,565.59		$ 13,211.72		$ -	$ 531.41
Mobile Home	1	$ 4,574.07		$ 4,574.07		$ -	$ -
Other	2	$ -				$ -	$ -
OKLAHOMA CITY	5	$ 3,751.93		$ 340.28		$ -	$ 3,411.65
House/Duplex	3	$ 3,565.10		$ 340.28		$ -	$ 3,224.82
Mobile Home	1	$ 186.83				$ -	$ 186.83
Other	1	$ -				$ -	$ -
PIEDMONT	8	$ 13,382.42		$ 4,028.01		$ -	$ 9,354.41
House/Duplex	7	$ 13,382.42		$ 4,028.01		$ -	$ 9,354.41
Mobile Home	1	$ -				$ -	$ -
UNION CITY	1	$ -				$ -	$ -
Mobile Home	1	$ -				$ -	$ -
YUKON	36	$ 61,118.54	$ 6,709.68	$ 28,443.98		$ -	$ 32,082.73
Apartment	1	$ -				$ -	$ -
House/Duplex	24	$ 51,990.01	$ 4,709.68	$ 23,804.07		$ -	$ 28,136.74
Mobile Home	10	$ 9,128.53	$ 2,000.00	$ 4,639.91		$ -	$ 3,945.99
Other	1	$ -				$ -	$ -
Cherokee	**103**	**$ 152,311.32**	**$ 307,221.90**	**$ 56,409.61**		**$ -**	**$ 90,875.79**
CHEROKEE	1	$ -				$ -	$ -
House/Duplex	1	$ -				$ -	$ -
COOKSON	6	$ -				$ -	$ -
House/Duplex	3	$ -				$ -	$ -
Mobile Home	1	$ -				$ -	$ -
Other	2	$ -				$ -	$ -
FORT GIBSON	5	$ 35,174.94		$ 26,859.11		$ -	$ 8,315.83
Mobile Home	3	$ 35,174.94		$ 26,859.11		$ -	$ 8,315.83
Other	2	$ -				$ -	$ -
HULBERT	18	$ 7,388.58	$ 190,523.81	$ 4,182.22		$ -	$ 3,206.36
House/Duplex	12	$ 5,898.98	$ 190,523.81	$ 4,182.22		$ -	$ 1,716.76
Mobile Home	5	$ 1,489.60				$ -	$ 1,489.60
Travel Trailer	1	$ -				$ -	$ -
LOCUST GROVE	4	$ 4,741.81	$ 53,587.86			$ -	$ 212.32
House/Duplex	4	$ 4,741.81	$ 53,587.86			$ -	$ 212.32
PARK HILL	3	$ 279.68				$ -	$ 279.68
House/Duplex	2	$ -				$ -	$ -
Mobile Home	1	$ 279.68				$ -	$ 279.68
PEGGS	25	$ 20,476.16		$ 5,280.58		$ -	$ 15,195.58
House/Duplex	14	$ 5,517.81		$ 1,481.90		$ -	$ 4,035.91

County / CITY / Residence Type	Count of Residence Type	Sum of Total FEMA Verified Loss	Sum of Insurance Settlement	Sum of Repair Assistance Amount	Sum of Replacement Assistance Amount	Sum of SBA Received Amount	Sum of Unmet Need
Mobile Home	5	$ 5,844.17		$ 3,798.68		$ -	$ 2,045.49
Other	5	$ -				$ -	$ -
Travel Trailer	1	$ 9,114.18				$ -	$ 9,114.18
PROCTOR	1	$ -				$ -	$ -
House/Duplex	1	$ -				$ -	$ -
ROSE	27	$ 82,162.30	$ 63,110.23	$ 19,120.81		$ -	$ 62,545.06
House/Duplex	12	$ 12,387.17	$ 63,110.23	$ 11,890.74		$ -	$ -
Mobile Home	13	$ 68,282.34		$ 7,230.07		$ -	$ 61,052.27
Travel Trailer	2	$ 1,492.79				$ -	$ 1,492.79
TAHLEQUAH	13	$ 2,087.85		$ 966.89		$ -	$ 1,120.96
House/Duplex	11	$ 2,087.85		$ 966.89		$ -	$ 1,120.96
Other	2	$ -				$ -	$ -
Craig	**72**	**$ 146,885.95**	**$ 127,733.70**	**$ 20,408.21**		**$ -**	**$ 95,419.92**
AFTON	3	$ 1,021.23				$ -	$ 1,021.23
House/Duplex	1	$ 846.63				$ -	$ 846.63
Mobile Home	1	$ 174.60				$ -	$ 174.60
Other	1	$ -				$ -	$ -
BIG CABIN	2	$ 844.71				$ -	$ 844.71
House/Duplex	2	$ 844.71				$ -	$ 844.71
BLUEJACKET	5	$ 2,764.48				$ -	$ 2,764.48
House/Duplex	3	$ 2,345.29				$ -	$ 2,345.29
Mobile Home	2	$ 419.19				$ -	$ 419.19
VINITA	58	$ 139,022.76	$ 127,733.70	$ 18,419.73		$ -	$ 89,545.21
Apartment	1	$ -				$ -	$ -
House/Duplex	48	$ 127,326.23	$ 124,443.10	$ 17,219.08		$ -	$ 80,724.43
Mobile Home	5	$ 11,696.53	$ 3,290.60	$ 1,200.65		$ -	$ 8,820.78
Other	4	$ -				$ -	$ -
WELCH	4	$ 3,232.77		$ 1,988.48		$ -	$ 1,244.29
House/Duplex	2	$ 2,447.52		$ 1,988.48		$ -	$ 459.04
Mobile Home	1	$ 763.81				$ -	$ 763.81
Travel Trailer	1	$ 21.44				$ -	$ 21.44
Creek	**370**	**$ 192,973.32**	**$ 174,960.71**	**$ 93,015.43**		**$ -**	**$ 98,624.36**
ADAIR	1	$ -				$ -	$ -
House/Duplex	1	$ -				$ -	$ -
BRISTOW	16	$ 29,914.39		$ 13,056.03		$ -	$ 22,608.36
House/Duplex	7	$ 9,701.92		$ 8,792.55		$ -	$ 6,659.37
Mobile Home	8	$ 20,212.47		$ 4,263.48		$ -	$ 15,948.99
Other	1	$ -				$ -	$ -
DRUMRIGHT	3	$ 1,035.66				$ -	$ 1,035.66
House/Duplex	2	$ 1,035.66				$ -	$ 1,035.66
Other	1	$ -				$ -	$ -
JENNINGS	3	$ 55,120.30		$ 34,900.00		$ -	$ 20,220.30
House/Duplex	2	$ -				$ -	$ -
Mobile Home	1	$ 55,120.30		$ 34,900.00		$ -	$ 20,220.30
KELLYVILLE	10	$ 5,405.35	$ 4,358.27	$ 2,908.44		$ -	$ 2,496.91
House/Duplex	9	$ 5,405.35	$ 4,358.27	$ 2,908.44		$ -	$ 2,496.91
Other	1	$ -				$ -	$ -
KIEFER	2	$ -				$ -	$ -
House/Duplex	2	$ -				$ -	$ -
MANNFORD	11	$ 7,044.70		$ 4,893.93		$ -	$ 2,150.77
House/Duplex	5	$ 5,963.68		$ 4,069.83		$ -	$ 1,893.85
Mobile Home	4	$ 1,081.02		$ 824.10		$ -	$ 256.92
Other	2	$ -				$ -	$ -
MOUNDS	4	$ 1,124.13				$ -	$ 1,124.13
House/Duplex	3	$ 908.61				$ -	$ 908.61
Mobile Home	1	$ 215.52				$ -	$ 215.52
SAND SPRINGS	2	$ -				$ -	$ -
House/Duplex	1	$ -				$ -	$ -
Other	1	$ -				$ -	$ -
SAPULPA	315	$ 92,172.28	$ 170,602.44	$ 36,100.52		$ -	$ 48,988.23
Apartment	2	$ -				$ -	$ -
House/Duplex	272	$ 86,226.97	$ 170,602.44	$ 35,657.49		$ -	$ 43,485.95
Mobile Home	16	$ 5,012.44		$ 443.03		$ -	$ 4,569.41
Other	19	$ 113.91				$ -	$ 113.91
Townhouse	1	$ -				$ -	$ -
Travel Trailer	5	$ 818.96				$ -	$ 818.96
TULSA	3	$ 1,156.51		$ 1,156.51		$ -	$ -
House/Duplex	2	$ -				$ -	$ -
Mobile Home	1	$ 1,156.51		$ 1,156.51		$ -	$ -
Delaware	**228**	**$ 683,941.30**	**$ 85,437.46**	**$ 76,321.16**	**$ 110,048.57**	**$ -**	**$ 446,262.58**
AFTON	32	$ 8,874.26		$ 3,577.07		$ -	$ 5,297.19
House/Duplex	20	$ 7,014.36		$ 3,291.13		$ -	$ 3,723.23
Mobile Home	10	$ 1,859.90		$ 285.94		$ -	$ 1,573.96
Other	1	$ -				$ -	$ -
Travel Trailer	1	$ -				$ -	$ -
BERNICE	13	$ 14,211.88		$ 6,291.29		$ -	$ 7,920.59
House/Duplex	4	$ 5,101.21		$ 664.26		$ -	$ 4,436.95
Mobile Home	7	$ 7,712.03		$ 4,228.39		$ -	$ 3,483.64
Travel Trailer	2	$ 1,398.64		$ 1,398.64		$ -	$ -
COLCORD	2	$ 1,875.62		$ 1,875.62		$ -	$ -
House/Duplex	1	$ 1,875.62		$ 1,875.62		$ -	$ -
Other	1	$ -				$ -	$ -
EUCHA	12	$ 2,521.46				$ -	$ 2,521.46
House/Duplex	3	$ 442.00				$ -	$ 442.00
Mobile Home	5	$ 1,778.73				$ -	$ 1,778.73
Other	3	$ 87.53				$ -	$ 87.53
Travel Trailer	1	$ 213.20				$ -	$ 213.20
GROVE	109	$ 112,912.44	$ 8,137.46	$ 53,300.78		$ -	$ 59,638.51
House/Duplex	55	$ 35,770.53	$ 5,134.92	$ 15,655.00		$ -	$ 18,902.10
Mobile Home	42	$ 77,141.91	$ 3,002.54	$ 37,645.78		$ -	$ 40,736.41

County / CITY / Residence Type	Count of Residence Type	Sum of Total FEMA Verified Loss	Sum of Insurance Settlement	Sum of Repair Assistance Amount	Sum of Replacement Assistance Amount	Sum of SBA Received Amount	Sum of Unmet Need
Other	10	$ -				$ -	$ -
Townhouse	1	$ -				$ -	$ -
Travel Trailer	1	$ -				$ -	$ -
JAY	54	$ 540,772.39	$ 77,300.00	$ 9,932.23	$ 110,048.57	$ -	$ 369,455.75
House/Duplex	35	$ 359,073.96		$ 7,034.05		$ -	$ 352,039.91
Mobile Home	13	$ 159,390.48	$ 77,300.00	$ 2,898.18	$ 90,460.00	$ -	$ 14,696.46
Other	5	$ -				$ -	$ -
Travel Trailer	1	$ 22,307.95			$ 19,588.57	$ -	$ 2,719.38
KANSAS	1	$ -				$ -	$ -
House/Duplex	1	$ -				$ -	$ -
ROSE	2	$ 2,773.25		$ 1,344.17		$ -	$ 1,429.08
House/Duplex	2	$ 2,773.25		$ 1,344.17		$ -	$ 1,429.08
SALINA	2	$ -				$ -	$ -
House/Duplex	2	$ -				$ -	$ -
WYANDOTTE	1	$ -				$ -	$ -
House/Duplex	1	$ -				$ -	$ -
Kay	**264**	**$ 224,217.69**	**$ 40,568.07**	**$ 117,197.27**		**$ -**	**$ 110,158.28**
BLACKWELL	60	$ 56,566.98	$ 2,568.07	$ 29,108.90		$ -	$ 26,221.74
House/Duplex	53	$ 49,115.16	$ 2,568.07	$ 22,134.46		$ -	$ 25,744.36
Mobile Home	2	$ 7,451.82		$ 6,974.44		$ -	$ 477.38
Other	5	$ -				$ -	$ -
BRAMAN	8	$ 9,508.02		$ 5,433.87		$ -	$ 4,074.15
House/Duplex	6	$ 9,508.02		$ 5,433.87		$ -	$ 4,074.15
Other	1	$ -				$ -	$ -
Travel Trailer	1	$ -				$ -	$ -
KAW CITY	5	$ 2,711.77		$ 2,711.77		$ -	$ -
House/Duplex	3	$ 833.08		$ 833.08		$ -	$ -
Mobile Home	1	$ 1,878.69		$ 1,878.69		$ -	$ -
Other	1	$ -				$ -	$ -
LAMONT	1	$ -				$ -	$ -
House/Duplex	1	$ -				$ -	$ -
NEWKIRK	21	$ 16,041.07		$ 6,903.98		$ -	$ 9,137.09
House/Duplex	13	$ 7,191.56		$ 6,903.98		$ -	$ 287.58
Mobile Home	3	$ 8,849.51				$ -	$ 8,849.51
Other	4	$ -				$ -	$ -
Townhouse	1	$ -				$ -	$ -
PONCA CITY	126	$ 114,949.57	$ 38,000.00	$ 56,231.27		$ -	$ 61,077.59
Apartment	1	$ -				$ -	$ -
Condo	1	$ -				$ -	$ -
House/Duplex	103	$ 110,647.18	$ 38,000.00	$ 56,231.27		$ -	$ 56,775.20
Mobile Home	7	$ 3,339.11				$ -	$ 3,339.11
Other	14	$ 963.28				$ -	$ 963.28
TONKAWA	43	$ 24,440.28	$ -	$ 16,807.48		$ -	$ 9,647.71
House/Duplex	37	$ 23,595.13	$ -	$ 15,962.33		$ -	$ 9,647.71
Mobile Home	1	$ 845.15		$ 845.15		$ -	$ -
Other	5	$ -				$ -	$ -
Kingfisher	**59**	**$ 174,870.68**		**$ 53,480.27**		**$ -**	**$ 121,564.37**
CASHION	2	$ 1,114.95				$ -	$ 1,114.95
House/Duplex	1	$ -				$ -	$ -
Mobile Home	1	$ 1,114.95				$ -	$ 1,114.95
CRESCENT	1	$ 963.54				$ -	$ 963.54
House/Duplex	1	$ 963.54				$ -	$ 963.54
DOVER	13	$ 35,417.30		$ 2,714.04		$ -	$ 32,877.22
House/Duplex	12	$ 35,417.30		$ 2,714.04		$ -	$ 32,877.22
Mobile Home	1	$ -				$ -	$ -
HENNESSEY	2	$ 858.25				$ -	$ 858.25
House/Duplex	1	$ 690.43				$ -	$ 690.43
Mobile Home	1	$ 167.82				$ -	$ 167.82
KINGFISHER	38	$ 135,892.70		$ 50,766.23		$ -	$ 85,126.47
House/Duplex	31	$ 124,473.99		$ 47,780.62		$ -	$ 76,693.37
Mobile Home	6	$ 11,418.71		$ 2,985.61		$ -	$ 8,433.10
Other	1	$ -				$ -	$ -
OKARCHE	2	$ 623.94				$ -	$ 623.94
House/Duplex	2	$ 623.94				$ -	$ 623.94
OKEENE	1	$ -				$ -	$ -
House/Duplex	1	$ -				$ -	$ -
Le Flore	**50**	**$ 85,161.19**		**$ 24,500.83**		**$ -**	**$ 60,660.36**
ARKOMA	4	$ 1,305.07				$ -	$ 1,305.07
House/Duplex	3	$ 1,305.07				$ -	$ 1,305.07
Other	1	$ -				$ -	$ -
BOKOSHE	1	$ -				$ -	$ -
Mobile Home	1	$ -				$ -	$ -
CAMERON	2	$ -				$ -	$ -
Other	2	$ -				$ -	$ -
HEAVENER	4	$ 229.14				$ -	$ 229.14
House/Duplex	3	$ 229.14				$ -	$ 229.14
Travel Trailer	1	$ -				$ -	$ -
HOWE	4	$ 159.90				$ -	$ 159.90
House/Duplex	3	$ -				$ -	$ -
Mobile Home	1	$ 159.90				$ -	$ 159.90
LEFLORE	1	$ -				$ -	$ -
Other	1	$ -				$ -	$ -
POCOLA	8	$ 9,985.83				$ -	$ 9,985.83
House/Duplex	7	$ 9,985.83				$ -	$ 9,985.83
Other	1	$ -				$ -	$ -
POTEAU	7	$ 7,101.75		$ 6,154.06		$ -	$ 947.69
House/Duplex	6	$ 7,101.75		$ 6,154.06		$ -	$ 947.69
Other	1	$ -				$ -	$ -
SPIRO	17	$ 65,096.05		$ 17,063.32		$ -	$ 48,032.73

County / CITY / Residence Type	Count of Residence Type	Sum of Total FEMA Verified Loss	Sum of Insurance Settlement	Sum of Repair Assistance Amount	Sum of Replacement Assistance Amount	Sum of SBA Received Amount	Sum of Unmet Need
House/Duplex	6	$ 2,130.63				$ -	$ 2,130.63
Mobile Home	9	$ 62,965.42		$ 17,063.32		$ -	$ 45,902.10
Other	1	$ -				$ -	$ -
Travel Trailer	1	$ -				$ -	$ -
WISTER	2	$ 1,283.45		$ 1,283.45		$ -	$ -
House/Duplex	2	$ 1,283.45		$ 1,283.45		$ -	$ -
Logan	**130**	**$ 719,424.51**	**$ -**	**$ 94,221.94**	**$ 104,600.00**	**$ -**	**$ 530,186.97**
CASHION	2	$ -				$ -	$ -
Mobile Home	1	$ -				$ -	$ -
Other	1	$ -				$ -	$ -
COYLE	3	$ 725.60		$ 725.60		$ -	$ -
House/Duplex	1	$ -				$ -	$ -
Mobile Home	2	$ 725.60		$ 725.60		$ -	$ -
CRESCENT	47	$ 660,444.00		$ 60,474.51	$ 104,600.00	$ -	$ 504,953.89
House/Duplex	36	$ 614,565.75		$ 57,620.42	$ 69,800.00	$ -	$ 496,729.73
Mobile Home	10	$ 45,878.25		$ 2,854.09	$ 34,800.00	$ -	$ 8,224.16
Travel Trailer	1	$ -				$ -	$ -
EDMOND	16	$ 7,752.66				$ -	$ 7,752.66
House/Duplex	10	$ 6,912.59				$ -	$ 6,912.59
Mobile Home	6	$ 840.07				$ -	$ 840.07
GUTHRIE	56	$ 48,264.08	$ -	$ 31,891.02		$ -	$ 16,373.06
Apartment	1	$ -				$ -	$ -
House/Duplex	38	$ 44,851.38	$ -	$ 29,685.93		$ -	$ 15,165.45
Mobile Home	8	$ 2,816.62		$ 2,205.09		$ -	$ 611.53
Other	7	$ -				$ -	$ -
Travel Trailer	2	$ 596.08				$ -	$ 596.08
LANGSTON	5	$ 2,238.17		$ 1,130.81		$ -	$ 1,107.36
House/Duplex	4	$ 2,238.17		$ 1,130.81		$ -	$ 1,107.36
Mobile Home	1	$ -				$ -	$ -
STILLWATER	1	$ -				$ -	$ -
House/Duplex	1	$ -				$ -	$ -
Mayes	**171**	**$ 544,651.51**	**$ 139,324.85**	**$ 264,996.01**	**$ 33,640.00**	**$ -**	**$ 197,529.88**
ADAIR	21	$ 84,989.81		$ 59,690.60		$ -	$ 25,782.50
House/Duplex	11	$ 68,125.69		$ 44,578.88		$ -	$ 24,030.10
Mobile Home	6	$ 16,864.12		$ 15,111.72		$ -	$ 1,752.40
Other	3	$ -				$ -	$ -
Travel Trailer	1	$ -				$ -	$ -
AFTON	1	$ -				$ -	$ -
House/Duplex	1	$ -				$ -	$ -
BIG CABIN	7	$ 23,936.62		$ 8,855.35		$ -	$ 15,081.27
House/Duplex	5	$ 23,936.62		$ 8,855.35		$ -	$ 15,081.27
Mobile Home	2	$ -				$ -	$ -
CHELSEA	7	$ 63,200.65		$ 22,344.24	$ 33,640.00	$ -	$ 7,216.41
House/Duplex	4	$ 2,719.08		$ 2,567.72		$ -	$ 151.36
Mobile Home	3	$ 60,481.57		$ 19,776.52	$ 33,640.00	$ -	$ 7,065.05
CHOUTEAU	26	$ 41,784.17		$ 17,275.98		$ -	$ 24,508.19
House/Duplex	10	$ 5,659.50		$ 4,291.50		$ -	$ 1,368.00
Mobile Home	7	$ 36,124.67		$ 12,984.48		$ -	$ 23,140.19
Other	3	$ -				$ -	$ -
Travel Trailer	6	$ -				$ -	$ -
DISNEY	3	$ 7,980.35		$ 7,417.82		$ -	$ 562.53
House/Duplex	3	$ 7,980.35		$ 7,417.82		$ -	$ 562.53
INOLA	1	$ -				$ -	$ -
House/Duplex	1	$ -				$ -	$ -
LANGLEY	4	$ 3,929.19	$ 19,339.88			$ -	$ 669.08
House/Duplex	4	$ 3,929.19	$ 19,339.88			$ -	$ 669.08
LOCUST GROVE	16	$ 6,995.72		$ 3,795.52		$ -	$ 3,200.20
House/Duplex	9	$ 6,567.28		$ 3,795.52		$ -	$ 2,771.76
Mobile Home	5	$ 353.40				$ -	$ 353.40
Other	1	$ -				$ -	$ -
Travel Trailer	1	$ 75.04				$ -	$ 75.04
PRYOR	30	$ 70,790.00		$ 20,436.67		$ -	$ 50,353.33
House/Duplex	22	$ 70,651.52		$ 20,436.67		$ -	$ 50,214.85
Mobile Home	5	$ 138.48				$ -	$ 138.48
Other	3	$ -				$ -	$ -
ROSE	2	$ 5,601.41		$ 5,572.71		$ -	$ 28.70
House/Duplex	2	$ 5,601.41		$ 5,572.71		$ -	$ 28.70
SALINA	20	$ 20,662.60		$ 9,906.67		$ -	$ 10,755.93
House/Duplex	10	$ 12,316.66		$ 4,323.61		$ -	$ 7,993.05
Mobile Home	6	$ 7,379.66		$ 4,903.98		$ -	$ 2,475.68
Other	1	$ -				$ -	$ -
Travel Trailer	3	$ 966.28		$ 679.08		$ -	$ 287.20
SPAVINAW	8	$ 16,797.82	$ 1,401.88	$ 6,414.88		$ -	$ 9,675.75
House/Duplex	6	$ 4,541.95				$ -	$ 4,541.95
Mobile Home	2	$ 12,255.87	$ 1,401.88	$ 6,414.88		$ -	$ 5,133.80
STRANG	19	$ 191,117.23	$ 118,583.09	$ 98,352.80		$ -	$ 47,762.82
House/Duplex	4	$ 31,248.64		$ 20,183.11		$ -	$ 11,065.53
Mobile Home	15	$ 159,868.59	$ 118,583.09	$ 78,169.69		$ -	$ 36,697.29
VINITA	6	$ 6,865.94		$ 4,932.77		$ -	$ 1,933.17
House/Duplex	4	$ 1,104.64				$ -	$ 1,104.64
Mobile Home	2	$ 5,761.30		$ 4,932.77		$ -	$ 828.53
Muskogee	**567**	**$ 7,245,119.08**	**$ 1,033,590.47**	**$ 2,934,049.41**	**$ 274,960.00**	**$ -**	**$ 3,710,950.53**
BOYNTON	2	$ -				$ -	$ -
House/Duplex	1	$ -				$ -	$ -
Mobile Home	1	$ -				$ -	$ -
BRAGGS	13	$ 2,598.44		$ 782.72		$ -	$ 1,815.72
Apartment	1	$ -				$ -	$ -
House/Duplex	4	$ 1,575.00				$ -	$ 1,575.00
Mobile Home	4	$ 1,023.44		$ 782.72		$ -	$ 240.72
Other	4	$ -				$ -	$ -
FORT GIBSON	219	$ 5,316,123.94	$ 451,200.00	$ 1,890,714.17	$ 241,120.00	$ -	$ 2,925,603.28

County / CITY / Residence Type	Count of Residence Type	Sum of Total FEMA Verified Loss	Sum of Insurance Settlement	Sum of Repair Assistance Amount	Sum of Replacement Assistance Amount	Sum of SBA Received Amount	Sum of Unmet Need
Apartment	4	$ 902.67				$ -	$ 902.67
House/Duplex	121	$ 4,235,896.93	$ 429,200.00	$ 1,274,989.84	$ 139,600.00	$ -	$ 2,582,014.87
Mobile Home	57	$ 1,052,226.72	$ 22,000.00	$ 596,485.72	$ 101,520.00	$ -	$ 334,826.73
Other	34	$ 1,251.80				$ -	$ 1,251.80
Travel Trailer	3	$ 25,845.82		$ 19,238.61		$ -	$ 6,607.21
GORE	2	$ -				$ -	$ -
Mobile Home	1	$ -				$ -	$ -
Other	1	$ -				$ -	$ -
HASKELL	9	$ 4,974.97		$ 4,774.87		$ -	$ 200.10
House/Duplex	5	$ 961.51		$ 761.41		$ -	$ 200.10
Mobile Home	2	$ 4,013.46		$ 4,013.46		$ -	$ -
Other	2	$ -				$ -	$ -
MUSKOGEE	134	$ 691,857.58	$ 516,275.76	$ 338,719.16	$ 33,840.00	$ -	$ 252,239.27
Apartment	1	$ -				$ -	$ -
House/Duplex	67	$ 372,414.88	$ 473,207.78	$ 200,568.57		$ -	$ 108,638.49
Mobile Home	52	$ 319,262.50	$ 43,067.98	$ 138,150.59	$ 33,840.00	$ -	$ 143,420.58
Other	13	$ 180.20				$ -	$ 180.20
Travel Trailer	1	$ -				$ -	$ -
PORTER	1	$ -				$ -	$ -
Other	1	$ -				$ -	$ -
PORUM	3	$ -				$ -	$ -
House/Duplex	1	$ -				$ -	$ -
Mobile Home	2	$ -				$ -	$ -
TAFT	2	$ 251.87				$ -	$ 251.87
House/Duplex	1	$ 251.87				$ -	$ 251.87
Other	1	$ -				$ -	$ -
TULSA	1	$ -				$ -	$ -
Apartment	1	$ -				$ -	$ -
WARNER	1	$ -				$ -	$ -
Other	1	$ -				$ -	$ -
WEBBERS FALLS	178	$ 1,229,312.28	$ 66,114.71	$ 686,407.17		$ -	$ 530,840.29
Apartment	23	$ 95,483.43				$ -	$ 95,483.43
House/Duplex	93	$ 732,926.62	$ 66,114.71	$ 418,765.69		$ -	$ 302,096.11
Mobile Home	39	$ 396,125.53		$ 267,641.48		$ -	$ 128,484.05
Other	19	$ -				$ -	$ -
Travel Trailer	4	$ 4,776.70				$ -	$ 4,776.70
WELLSTON	2	$ -		$ 12,651.32		$ -	$ -
Mobile Home	1	$ -		$ 12,651.32		$ -	$ -
Travel Trailer	1	$ -				$ -	$ -
Noble	**46**	**$ 226,795.91**	**$ 2,468.77**	**$ 29,371.22**		**$ -**	**$ 197,002.94**
BILLINGS	3	$ 1,209.04		$ 856.64		$ -	$ 352.40
House/Duplex	2	$ 1,209.04		$ 856.64		$ -	$ 352.40
Other	1	$ -				$ -	$ -
LUCIEN	2	$ 101.50				$ -	$ 101.50
House/Duplex	1	$ -				$ -	$ -
Mobile Home	1	$ 101.50				$ -	$ 101.50
MARLAND	1	$ 263.97		$ 263.97		$ -	$ -
Mobile Home	1	$ 263.97		$ 263.97		$ -	$ -
MORRISON	1	$ 2,920.13		$ 2,559.48		$ -	$ 360.65
House/Duplex	1	$ 2,920.13		$ 2,559.48		$ -	$ 360.65
PERRY	30	$ 203,851.36		$ 10,449.43		$ -	$ 193,401.93
House/Duplex	24	$ 197,116.68		$ 9,443.29		$ -	$ 187,673.39
Mobile Home	4	$ 6,734.68		$ 1,006.14		$ -	$ 5,728.54
Other	2	$ -				$ -	$ -
PONCA CITY	2	$ -				$ -	$ -
Other	2	$ -				$ -	$ -
RED ROCK	6	$ 17,764.19		$ 14,977.73		$ -	$ 2,786.46
House/Duplex	5	$ 17,764.19		$ 14,977.73		$ -	$ 2,786.46
Other	1	$ -				$ -	$ -
STILLWATER	1	$ 685.72	$ 2,468.77	$ 263.97		$ -	$ -
Mobile Home	1	$ 685.72	$ 2,468.77	$ 263.97		$ -	$ -
Nowata	**102**	**$ 218,246.15**		**$ 112,483.60**		**$ -**	**$ 112,639.90**
CHELSEA	1	$ -				$ -	$ -
House/Duplex	1	$ -				$ -	$ -
DELAWARE	8	$ 6,521.15		$ 9,480.63		$ -	$ 3,917.87
House/Duplex	3	$ 3,209.80				$ -	$ 3,209.80
Mobile Home	3	$ 3,311.35		$ 9,480.63		$ -	$ 708.07
Other	2	$ -				$ -	$ -
LENAPAH	5	$ 1,070.00				$ -	$ 1,070.00
House/Duplex	3	$ 1,070.00				$ -	$ 1,070.00
Other	2	$ -				$ -	$ -
NOWATA	84	$ 196,219.72		$ 102,112.32		$ -	$ 94,107.40
Condo	1	$ 743.46				$ -	$ 743.46
House/Duplex	68	$ 182,639.95		$ 91,755.77		$ -	$ 90,884.18
Mobile Home	6	$ 12,274.08		$ 10,356.55		$ -	$ 1,917.53
Other	7	$ -				$ -	$ -
Travel Trailer	2	$ 562.23				$ -	$ 562.23
S COFFEYVILLE	4	$ 14,435.28		$ 890.65		$ -	$ 13,544.63
House/Duplex	4	$ 14,435.28		$ 890.65		$ -	$ 13,544.63
Okmulgee	**112**	**$ 75,243.25**	**$ 7,867.81**	**$ 43,231.73**		**$ -**	**$ 31,510.69**
BEGGS	6	$ 1,032.74	$ -	$ 738.73		$ -	$ 294.01
House/Duplex	5	$ 890.62	$ -	$ 738.73		$ -	$ 151.89
Mobile Home	1	$ 142.12				$ -	$ 142.12
BOYNTON	2	$ 10.98				$ -	$ 10.98
House/Duplex	1	$ 10.98				$ -	$ 10.98
Mobile Home	1	$ -				$ -	$ -
DEWAR	1	$ -				$ -	$ -
House/Duplex	1	$ -				$ -	$ -
HENRYETTA	31	$ 7,143.74	$ 3,917.81	$ 4,692.36		$ -	$ 2,279.87

County / CITY / Residence Type	Count of Residence Type	Sum of Total FEMA Verified Loss	Sum of Insurance Settlement	Sum of Repair Assistance Amount	Sum of Replacement Assistance Amount	Sum of SBA Received Amount	Sum of Unmet Need
House/Duplex	19	$ 666.18	$ 3,917.81	$ 179.13		$ -	$ 315.54
Mobile Home	11	$ 6,477.56		$ 4,513.23		$ -	$ 1,964.33
Other	1	$ -				$ -	$ -
HOFFMAN	2	$ 216.65				$ -	$ 216.65
House/Duplex	1	$ -				$ -	$ -
Mobile Home	1	$ 216.65				$ -	$ 216.65
MORRIS	6	$ 469.61				$ -	$ 469.61
House/Duplex	5	$ 124.50				$ -	$ 124.50
Mobile Home	1	$ 345.11				$ -	$ 345.11
MOUNDS	7	$ 19,050.55		$ 2,030.05		$ -	$ 17,020.50
House/Duplex	4	$ 15,623.99				$ -	$ 15,623.99
Mobile Home	3	$ 3,426.56		$ 2,030.05		$ -	$ 1,396.51
OKMULGEE	53	$ 39,410.42	$ 3,950.00	$ 28,522.08		$ -	$ 10,559.02
Apartment	1	$ 437.55				$ -	$ 437.55
House/Duplex	49	$ 33,506.38		$ 23,822.46		$ -	$ 9,683.92
Mobile Home	2	$ 5,466.49	$ 3,950.00	$ 4,699.62		$ -	$ 437.55
Other	1	$ -				$ -	$ -
PRESTON	1	$ -				$ -	$ -
Other	1	$ -				$ -	$ -
SCHULTER	3	$ 7,908.56		$ 7,248.51		$ -	$ 660.05
House/Duplex	3	$ 7,908.56		$ 7,248.51		$ -	$ 660.05
Osage	**280**	**$ 1,280,287.27**	**$ 279,949.91**	**$ 743,162.55**		**$ -**	**$ 431,313.11**
AVANT	67	$ 348,913.35	$ 6,020.39	$ 233,190.51		$ -	$ 115,172.84
House/Duplex	38	$ 189,485.93	$ 6,020.39	$ 124,980.66		$ -	$ 63,955.27
Mobile Home	25	$ 155,918.61		$ 104,919.82		$ -	$ 50,998.79
Other	3	$ -				$ -	$ -
Travel Trailer	1	$ 3,508.81		$ 3,290.03		$ -	$ 218.78
BARNSDALL	12	$ 1,656.93				$ -	$ 1,656.93
House/Duplex	6	$ 962.32				$ -	$ 962.32
Mobile Home	5	$ 694.61				$ -	$ 694.61
Other	1	$ -				$ -	$ -
BARTLESVILLE	16	$ 165,031.64	$ 88,867.51	$ 23,747.47		$ -	$ 91,936.24
House/Duplex	13	$ 129,430.55	$ 88,867.51	$ 23,747.47		$ -	$ 56,335.15
Mobile Home	1	$ 35,601.09				$ -	$ 35,601.09
Other	2	$ -				$ -	$ -
BURBANK	5	$ 3,931.85		$ 271.85		$ -	$ 3,660.00
House/Duplex	4	$ 3,831.85		$ 271.85		$ -	$ 3,560.00
Mobile Home	1	$ 100.00				$ -	$ 100.00
FAIRFAX	20	$ 13,550.16	$ 7,774.85	$ 5,832.20		$ -	$ 7,717.96
House/Duplex	18	$ 7,943.49	$ 7,774.85	$ 1,904.46		$ -	$ 6,039.03
Mobile Home	1	$ 4,510.79		$ 3,927.74		$ -	$ 583.05
Travel Trailer	1	$ 1,095.88				$ -	$ 1,095.88
HOMINY	61	$ 325,311.66	$ 14,361.32	$ 226,368.41		$ -	$ 101,966.95
Apartment	1	$ 639.91				$ -	$ 639.91
House/Duplex	54	$ 324,242.73	$ 14,361.32	$ 226,368.41		$ -	$ 100,898.02
Mobile Home	3	$ 429.02				$ -	$ 429.02
Other	2	$ -				$ -	$ -
Travel Trailer	1	$ -				$ -	$ -
OSAGE	7	$ 62,690.94		$ 49,229.35		$ -	$ 13,461.59
House/Duplex	4	$ 42,809.49		$ 30,690.18		$ -	$ 12,119.31
Mobile Home	3	$ 19,881.45		$ 18,539.17		$ -	$ 1,342.28
PAWHUSKA	10	$ 9,166.73		$ 5,445.26		$ -	$ 3,721.47
House/Duplex	9	$ 9,166.73		$ 5,445.26		$ -	$ 3,721.47
Mobile Home	1	$ -				$ -	$ -
PONCA CITY	21	$ 72,755.18	$ -	$ 53,769.48		$ -	$ 18,985.70
House/Duplex	14	$ 69,786.95	$ -	$ 51,240.61		$ -	$ 18,546.34
Mobile Home	2	$ 21.96				$ -	$ 21.96
Other	4	$ -				$ -	$ -
Travel Trailer	1	$ 2,946.27		$ 2,528.87		$ -	$ 417.40
PRUE	3	$ 9,553.70		$ 8,775.59		$ -	$ 778.11
House/Duplex	2	$ 778.11				$ -	$ 778.11
Mobile Home	1	$ 8,775.59		$ 8,775.59		$ -	$ -
RALSTON	2	$ -				$ -	$ -
House/Duplex	2	$ -				$ -	$ -
SAND SPRINGS	7	$ 19,741.76		$ 17,876.52		$ -	$ 1,865.24
House/Duplex	2	$ 19,368.29		$ 17,876.52		$ -	$ 1,491.77
Mobile Home	5	$ 373.47				$ -	$ 373.47
SKIATOOK	33	$ 242,895.83	$ 162,925.84	$ 117,974.15		$ -	$ 65,984.30
House/Duplex	19	$ 182,359.15	$ 162,925.84	$ 72,963.67		$ -	$ 50,458.10
Mobile Home	8	$ 46,899.39		$ 38,666.58		$ -	$ 8,232.81
Other	2	$ -				$ -	$ -
Travel Trailer	4	$ 13,637.29		$ 6,343.90		$ -	$ 7,293.39
SPERRY	6	$ 2,847.62				$ -	$ 2,847.62
House/Duplex	3	$ 939.60				$ -	$ 939.60
Mobile Home	1	$ 405.50				$ -	$ 405.50
Other	1	$ -				$ -	$ -
Travel Trailer	1	$ 1,502.52				$ -	$ 1,502.52
TULSA	8	$ 2,239.92		$ 681.76		$ -	$ 1,558.16
House/Duplex	7	$ 1,558.16				$ -	$ 1,558.16
Mobile Home	1	$ 681.76		$ 681.76		$ -	$ -
WYNONA	2	$ -				$ -	$ -
House/Duplex	1	$ -				$ -	$ -
Mobile Home	1	$ -				$ -	$ -
Ottawa	**197**	**$ 637,978.67**	**$ 343,284.48**	**$ 128,603.19**		**$ -**	**$ 448,060.26**
AFTON	11	$ 18,435.22		$ 1,795.97		$ -	$ 16,639.25
House/Duplex	4	$ 15,975.57				$ -	$ 15,975.57
Mobile Home	3	$ 1,795.97		$ 1,795.97		$ -	$ -
Other	3	$ -				$ -	$ -
Travel Trailer	1	$ 663.68				$ -	$ 663.68
COMMERCE	2	$ -				$ -	$ -
House/Duplex	2	$ -				$ -	$ -

County / CITY / Residence Type	Count of Residence Type	Sum of Total FEMA Verified Loss	Sum of Insurance Settlement	Sum of Repair Assistance Amount	Sum of Replacement Assistance Amount	Sum of SBA Received Amount	Sum of Unmet Need
FAIRLAND	23	$ 95,927.12	$ 7,673.37	$ 2,263.85		$ -	$ 92,493.11
House/Duplex	16	$ 60,709.85	$ 7,673.37	$ 1,512.88		$ -	$ 58,026.81
Mobile Home	5	$ 34,238.94		$ 750.97		$ -	$ 33,487.97
Other	1	$ -				$ -	$ -
Travel Trailer	1	$ 978.33				$ -	$ 978.33
MIAMI	141	$ 420,902.88	$ 289,913.77	$ 87,726.61		$ -	$ 280,498.47
Apartment	11	$ 31,244.59				$ -	$ 31,244.59
House/Duplex	99	$ 324,467.88	$ 289,030.54	$ 57,455.07		$ -	$ 214,729.88
Mobile Home	6	$ 52,226.44	$ 883.23	$ 30,271.54		$ -	$ 21,560.03
Other	21	$ -				$ -	$ -
Townhouse	1	$ -				$ -	$ -
Travel Trailer	3	$ 12,963.97				$ -	$ 12,963.97
NORTH MIAMI	1	$ 1,314.58				$ -	$ 1,314.58
House/Duplex	1	$ 1,314.58				$ -	$ 1,314.58
QUAPAW	2	$ 1,348.90		$ 2,235.30		$ -	$ -
House/Duplex	2	$ 1,348.90		$ 2,235.30		$ -	$ -
WYANDOTTE	17	$ 100,049.97	$ 45,697.34	$ 34,581.46		$ -	$ 57,114.85
House/Duplex	8	$ 51,748.84	$ 45,697.34	$ 20,015.09		$ -	$ 23,380.09
Mobile Home	7	$ 48,301.13		$ 14,566.37		$ -	$ 33,734.76
Other	1	$ -				$ -	$ -
Travel Trailer	1	$ -				$ -	$ -
Pawnee	**63**	**$ 168,633.05**		**$ 75,715.46**		**$ -**	**$ 92,917.59**
BLACKBURN	1	$ -				$ -	$ -
House/Duplex	1	$ -				$ -	$ -
CLEVELAND	21	$ 68,422.02		$ 40,663.16		$ -	$ 27,758.86
House/Duplex	10	$ 26,505.41		$ 14,148.05		$ -	$ 12,357.36
Mobile Home	7	$ 41,916.61		$ 26,515.11		$ -	$ 15,401.50
Other	2	$ -				$ -	$ -
Travel Trailer	2	$ -				$ -	$ -
JENNINGS	1	$ 338.10				$ -	$ 338.10
House/Duplex	1	$ 338.10				$ -	$ 338.10
MANNFORD	3	$ 22,102.20		$ 274.05		$ -	$ 21,828.15
House/Duplex	2	$ 274.05		$ 274.05		$ -	$ -
Mobile Home	1	$ 21,828.15				$ -	$ 21,828.15
MARAMEC	1	$ -				$ -	$ -
House/Duplex	1	$ -				$ -	$ -
MORRISON	1	$ 88.64				$ -	$ 88.64
Mobile Home	1	$ 88.64				$ -	$ 88.64
PAWNEE	24	$ 59,801.33		$ 31,879.06		$ -	$ 27,922.27
House/Duplex	18	$ 51,929.09		$ 25,299.01		$ -	$ 26,630.08
Mobile Home	5	$ 7,872.24		$ 6,580.05		$ -	$ 1,292.19
Other	1	$ -				$ -	$ -
RALSTON	1	$ -				$ -	$ -
Other	1	$ -				$ -	$ -
TERLTON	10	$ 17,880.76		$ 2,899.19		$ -	$ 14,981.57
House/Duplex	3	$ 4,531.61				$ -	$ 4,531.61
Mobile Home	7	$ 13,349.15		$ 2,899.19		$ -	$ 10,449.96
Payne	**153**	**$ 203,801.84**	**$ 139,164.83**	**$ 83,069.87**		**$ -**	**$ 89,774.19**
COYLE	1	$ -				$ -	$ -
House/Duplex	1	$ -				$ -	$ -
CUSHING	5	$ 19,240.09		$ 13,086.54		$ -	$ 6,153.55
House/Duplex	3	$ 19,240.09		$ 13,086.54		$ -	$ 6,153.55
Mobile Home	1	$ -				$ -	$ -
Other	1	$ -				$ -	$ -
GLENCOE	6	$ 34,466.72		$ 28,390.82		$ -	$ 6,075.90
House/Duplex	6	$ 34,466.72		$ 28,390.82		$ -	$ 6,075.90
OKLAHOMA CITY	1	$ -				$ -	$ -
Other	1	$ -				$ -	$ -
PERKINS	5	$ 968.60				$ -	$ 968.60
House/Duplex	3	$ 968.60				$ -	$ 968.60
Other	1	$ -				$ -	$ -
Travel Trailer	1	$ -				$ -	$ -
RIPLEY	1	$ 1,248.68		$ 1,248.68		$ -	$ -
Mobile Home	1	$ 1,248.68		$ 1,248.68		$ -	$ -
STILLWATER	132	$ 123,701.81	$ 139,164.83	$ 14,161.58		$ -	$ 76,576.14
Apartment	6	$ -				$ -	$ -
House/Duplex	103	$ 109,705.62	$ 139,164.83	$ 13,446.88		$ -	$ 63,294.65
Mobile Home	12	$ 13,996.19		$ 714.70		$ -	$ 13,281.49
Other	11	$ -				$ -	$ -
YALE	2	$ 24,175.94		$ 26,182.25		$ -	$ -
House/Duplex	2	$ 24,175.94		$ 26,182.25		$ -	$ -
Pottawatomie	**65**	**$ 20,378.87**	**$ 30,452.29**	**$ 10,609.25**		**$ -**	**$ 12,167.62**
DALE	2	$ 14.70				$ -	$ 14.70
House/Duplex	1	$ -				$ -	$ -
Mobile Home	1	$ 14.70				$ -	$ 14.70
HARRAH	2	$ -				$ -	$ -
House/Duplex	1	$ -				$ -	$ -
Other	1	$ -				$ -	$ -
KONAWA	1	$ 12.25				$ -	$ 12.25
House/Duplex	1	$ 12.25				$ -	$ 12.25
MAUD	1	$ -				$ -	$ -
Other	1	$ -				$ -	$ -
MCLOUD	7	$ 701.52				$ -	$ 701.52
House/Duplex	3	$ 66.15				$ -	$ 66.15
Mobile Home	4	$ 635.37				$ -	$ 635.37
MEEKER	1	$ -				$ -	$ -
Mobile Home	1	$ -				$ -	$ -
PRAGUE	1	$ 709.72		$ 709.72		$ -	$ -
House/Duplex	1	$ 709.72		$ 709.72		$ -	$ -
SHAWNEE	31	$ 15,635.15	$ 30,452.29	$ 8,188.46		$ -	$ 9,844.69

County / CITY / Residence Type	Count of Residence Type	Sum of Total FEMA Verified Loss	Sum of Insurance Settlement	Sum of Repair Assistance Amount	Sum of Replacement Assistance Amount	Sum of SBA Received Amount	Sum of Unmet Need
Apartment	1	$ -				$ -	$ -
House/Duplex	20	$ 5,889.77	$ 14,065.40	$ 268.07		$ -	$ 4,768.70
Mobile Home	7	$ 9,745.38	$ 16,386.89	$ 7,920.39		$ -	$ 5,075.99
Other	3	$ -				$ -	$ -
TECUMSEH	17	$ 3,113.94		$ 1,711.07		$ -	$ 1,402.87
House/Duplex	5	$ 714.06		$ 672.28		$ -	$ 41.78
Mobile Home	10	$ 2,399.88		$ 1,038.79		$ -	$ 1,361.09
Other	2	$ -				$ -	$ -
WANETTE	2	$ 191.59				$ -	$ 191.59
House/Duplex	1	$ 108.40				$ -	$ 108.40
Mobile Home	1	$ 83.19				$ -	$ 83.19
Rogers	**234**	**$ 1,187,924.60**	**$ 154,949.49**	**$ 471,171.51**	**$ 34,900.00**	**$ -**	**$ 618,437.48**
BIG CABIN	4	$ 8,057.05		$ 5,634.64		$ -	$ 2,422.41
House/Duplex	2	$ 97.80				$ -	$ 97.80
Mobile Home	2	$ 7,959.25		$ 5,634.64		$ -	$ 2,324.61
CATOOSA	12	$ 7,267.66		$ 4,087.65		$ -	$ 3,180.01
House/Duplex	9	$ 7,267.66		$ 4,087.65		$ -	$ 3,180.01
Mobile Home	1	$ -				$ -	$ -
Other	2	$ -				$ -	$ -
CHELSEA	38	$ 105,819.75	$ 22,000.00	$ 40,833.01		$ -	$ 42,986.74
House/Duplex	22	$ 90,754.78	$ 22,000.00	$ 35,683.89		$ -	$ 33,070.89
Mobile Home	11	$ 7,716.96		$ 5,149.12		$ -	$ 2,567.84
Other	4	$ -				$ -	$ -
Travel Trailer	1	$ 7,348.01				$ -	$ 7,348.01
CLAREMORE	103	$ 644,858.88	$ 130,765.00	$ 257,304.23	$ 34,900.00	$ -	$ 309,935.69
House/Duplex	76	$ 498,702.77	$ -	$ 181,870.07	$ 34,900.00	$ -	$ 282,997.93
Mobile Home	20	$ 146,156.11	$ 130,765.00	$ 75,434.16		$ -	$ 26,937.76
Other	7	$ -				$ -	$ -
COLLINSVILLE	13	$ 42,188.41		$ 5,438.07		$ -	$ 36,750.34
House/Duplex	13	$ 42,188.41		$ 5,438.07		$ -	$ 36,750.34
INOLA	25	$ 150,122.84		$ 70,829.81		$ -	$ 80,676.18
House/Duplex	18	$ 138,866.61		$ 67,798.44		$ -	$ 71,068.17
Mobile Home	6	$ 11,256.23		$ 3,031.37		$ -	$ 9,608.01
Other	1	$ -				$ -	$ -
OOLOGAH	18	$ 147,408.59	$ 2,184.49	$ 54,030.32		$ -	$ 93,298.47
House/Duplex	8	$ 87,915.94	$ 2,184.49	$ 35,987.47		$ -	$ 51,848.67
Mobile Home	5	$ 59,492.65		$ 18,042.85		$ -	$ 41,449.80
Other	4	$ -				$ -	$ -
Travel Trailer	1	$ -				$ -	$ -
OWASSO	4	$ 23,846.02		$ 16,037.24		$ -	$ 7,808.78
House/Duplex	4	$ 23,846.02		$ 16,037.24		$ -	$ 7,808.78
SKIATOOK	1	$ -				$ -	$ -
Other	1	$ -				$ -	$ -
TALALA	13	$ 41,255.96		$ 2,256.90		$ -	$ 38,999.06
House/Duplex	7	$ 38,620.50		$ 1,921.19		$ -	$ 36,699.31
Mobile Home	3	$ 2,635.46		$ 335.71		$ -	$ 2,299.75
Other	3	$ -				$ -	$ -
TULSA	1	$ 5,334.05		$ 4,054.24		$ -	$ 1,279.81
Mobile Home	1	$ 5,334.05		$ 4,054.24		$ -	$ 1,279.81
VALLEY PARK	2	$ 11,765.39		$ 10,665.40		$ -	$ 1,099.99
Mobile Home	2	$ 11,765.39		$ 10,665.40		$ -	$ 1,099.99
Sequoyah	**132**	**$ 996,457.99**		**$ 545,044.08**		**$ -**	**$ 451,413.91**
GANS	1	$ -				$ -	$ -
Mobile Home	1	$ -				$ -	$ -
GORE	5	$ 3,371.39				$ -	$ 3,371.39
House/Duplex	3	$ 538.53				$ -	$ 538.53
Mobile Home	2	$ 2,832.86				$ -	$ 2,832.86
MARBLE CITY	1	$ -				$ -	$ -
Other	1	$ -				$ -	$ -
MOFFETT	84	$ 900,884.28		$ 479,472.93		$ -	$ 421,411.35
Apartment	23	$ 87,742.27				$ -	$ 87,742.27
House/Duplex	34	$ 632,679.93		$ 427,188.62		$ -	$ 205,491.31
Mobile Home	13	$ 165,953.68		$ 42,616.81		$ -	$ 123,336.87
Other	13	$ 14,508.40		$ 9,667.50		$ -	$ 4,840.90
Travel Trailer	1	$ -				$ -	$ -
MULDROW	19	$ 85,593.81		$ 63,704.92		$ -	$ 21,888.89
House/Duplex	15	$ 85,385.25		$ 63,704.92		$ -	$ 21,680.33
Mobile Home	2	$ 208.56				$ -	$ 208.56
Other	2	$ -				$ -	$ -
ROLAND	10	$ 3,939.94				$ -	$ 3,939.94
Apartment	1	$ -				$ -	$ -
House/Duplex	3	$ -				$ -	$ -
Mobile Home	2	$ 3,939.94				$ -	$ 3,939.94
Other	4	$ -				$ -	$ -
SALLISAW	4	$ 444.96				$ -	$ 444.96
House/Duplex	3	$ 444.96				$ -	$ 444.96
Other	1	$ -				$ -	$ -
VIAN	7	$ 357.38				$ -	$ 357.38
House/Duplex	3	$ 293.42				$ -	$ 293.42
Mobile Home	2	$ -				$ -	$ -
Other	1	$ -				$ -	$ -
Travel Trailer	1	$ 63.96				$ -	$ 63.96
WEBBERS FALLS	1	$ 1,866.23		$ 1,866.23		$ -	$ -
House/Duplex	1	$ 1,866.23		$ 1,866.23		$ -	$ -
Tulsa	**1301**	**$ 7,589,365.31**	**$ 3,562,873.32**	**$ 3,151,808.04**		**$ -**	**$ 3,741,107.88**
AVANT	1	$ -				$ -	$ -
Mobile Home	1	$ -				$ -	$ -
BIXBY	39	$ 141,712.40	$ 19,872.91	$ 66,043.55		$ -	$ 75,668.85
Apartment	3	$ 992.02				$ -	$ 992.02

County / CITY / Residence Type	Count of Residence Type	Sum of Total FEMA Verified Loss	Sum of Insurance Settlement	Sum of Repair Assistance Amount	Sum of Replacement Assistance Amount	Sum of SBA Received Amount	Sum of Unmet Need
House/Duplex	27	$ 106,879.55	$ 19,872.91	$ 61,050.77		$ -	$ 45,828.78
Mobile Home	6	$ 30,997.30		$ 4,992.78		$ -	$ 26,004.52
Other	3	$ 2,843.53				$ -	$ 2,843.53
BROKEN ARROW	62	$ 41,983.13	$ 7,138.00	$ 32,893.47		$ -	$ 9,089.66
House/Duplex	56	$ 41,983.13	$ 7,138.00	$ 32,893.47		$ -	$ 9,089.66
Other	4	$ -				$ -	$ -
Townhouse	2	$ -				$ -	$ -
COLLINSVILLE	29	$ 186,494.55	$ 4,683.93	$ 82,458.47		$ -	$ 103,911.58
House/Duplex	16	$ 120,637.54	$ 4,683.93	$ 41,738.80		$ -	$ 78,774.24
Mobile Home	11	$ 65,857.01		$ 40,719.67		$ -	$ 25,137.34
Other	2	$ -				$ -	$ -
GLENPOOL	3	$ 1,996.47		$ 1,619.62		$ -	$ 376.85
House/Duplex	1	$ 1,619.62		$ 1,619.62		$ -	$ -
Mobile Home	2	$ 376.85				$ -	$ 376.85
JENKS	34	$ 28,576.93	$ 62,719.86	$ 834.87		$ -	$ 2,649.54
Condo	1	$ -				$ -	$ -
House/Duplex	32	$ 28,576.93	$ 62,719.86	$ 834.87		$ -	$ 2,649.54
Travel Trailer	1	$ -				$ -	$ -
MOUNDS	1	$ -				$ -	$ -
Mobile Home	1	$ -				$ -	$ -
OOLOGAH	2	$ -				$ -	$ -
House/Duplex	1	$ -				$ -	$ -
Other	1	$ -				$ -	$ -
OWASSO	16	$ 55,177.71	$ 107,840.00	$ 9,569.00		$ -	$ 6,063.77
House/Duplex	11	$ 4,135.61		$ 751.62		$ -	$ 3,383.99
Mobile Home	3	$ 51,042.10	$ 107,840.00	$ 8,817.38		$ -	$ 2,679.78
Other	2	$ -				$ -	$ -
SAND SPRINGS	369	$ 5,805,410.20	$ 3,226,330.62	$ 2,329,876.69		$ -	$ 2,880,353.42
Apartment	2	$ -				$ -	$ -
House/Duplex	300	$ 5,163,291.80	$ 3,213,557.73	$ 2,111,407.98		$ -	$ 2,468,117.54
Mobile Home	52	$ 642,118.40	$ 12,772.89	$ 218,468.71		$ -	$ 412,235.88
Other	15	$ -				$ -	$ -
SKIATOOK	128	$ 558,377.72	$ 50,711.36	$ 220,751.53		$ -	$ 318,852.13
House/Duplex	76	$ 423,526.09	$ 50,711.36	$ 118,949.95		$ -	$ 285,802.08
Mobile Home	34	$ 107,779.61		$ 84,912.52		$ -	$ 22,867.09
Other	9	$ -				$ -	$ -
Travel Trailer	9	$ 27,072.02		$ 16,889.06		$ -	$ 10,182.96
SPERRY	63	$ 287,494.53	$ 58,468.84	$ 134,753.20		$ -	$ 136,114.05
House/Duplex	40	$ 182,255.94	$ 58,468.84	$ 90,795.28		$ -	$ 74,833.38
Mobile Home	14	$ 95,568.91		$ 41,357.01		$ -	$ 54,211.90
Other	6	$ -				$ -	$ -
Travel Trailer	3	$ 9,669.68		$ 2,600.91		$ -	$ 7,068.77
TULSA	554	$ 482,141.67	$ 25,107.80	$ 273,007.64		$ -	$ 208,028.03
Apartment	54	$ 3,517.94				$ -	$ 3,517.94
Condo	2	$ 2,541.63				$ -	$ 2,541.63
House/Duplex	408	$ 446,595.75	$ 25,107.80	$ 251,374.60		$ -	$ 194,115.15
Mobile Home	22	$ 29,396.53		$ 21,633.04		$ -	$ 7,763.49
Other	61	$ 89.82				$ -	$ 89.82
Townhouse	3	$ -				$ -	$ -
Travel Trailer	4	$ -				$ -	$ -
Wagoner	**227**	**$ 1,547,025.19**	**$ 848,761.71**	**$ 592,936.83**	**$ 33,840.00**	**$ -**	**$ 792,499.22**
BROKEN ARROW	54	$ 170,731.80	$ 280,488.01	$ 43,488.20		$ -	$ 95,735.19
House/Duplex	46	$ 169,516.36	$ 280,488.01	$ 43,488.20		$ -	$ 94,519.75
Mobile Home	6	$ 1,215.44				$ -	$ 1,215.44
Other	2	$ -				$ -	$ -
CATOOSA	4	$ 47,270.77	$ 75,585.92	$ 980.02		$ -	$ 24,900.34
House/Duplex	2	$ 27,364.62	$ 75,585.92			$ -	$ 5,974.21
Mobile Home	2	$ 19,906.15		$ 980.02		$ -	$ 18,926.13
COWETA	51	$ 122,840.33	$ 38,251.39	$ 18,303.05		$ -	$ 91,301.13
House/Duplex	39	$ 102,723.90	$ 38,251.39	$ 17,363.08		$ -	$ 72,124.67
Mobile Home	9	$ 20,116.43		$ 939.97		$ -	$ 19,176.46
Other	2	$ -				$ -	$ -
Townhouse	1	$ -				$ -	$ -
FORT GIBSON	11	$ 166,126.73	$ 79,200.00	$ 78,048.82		$ -	$ 56,672.72
House/Duplex	5	$ 72,758.39		$ 33,711.94		$ -	$ 39,046.45
Mobile Home	4	$ 85,489.89	$ 79,200.00	$ 44,336.88		$ -	$ 9,747.82
Other	1	$ -				$ -	$ -
Travel Trailer	1	$ 7,878.45				$ -	$ 7,878.45
HASKELL	28	$ 256,692.32	$ 254,830.73	$ 163,641.50	$ 33,840.00	$ -	$ 56,659.53
House/Duplex	16	$ 202,886.13	$ 254,830.73	$ 140,345.61		$ -	$ 50,632.87
Mobile Home	10	$ 53,806.19		$ 23,295.89	$ 33,840.00	$ -	$ 6,026.66
Other	2	$ -				$ -	$ -
MUSKOGEE	5	$ 243,940.85		$ 704.10		$ -	$ 243,236.75
House/Duplex	3	$ 243,940.85		$ 704.10		$ -	$ 243,236.75
Mobile Home	1	$ -				$ -	$ -
Travel Trailer	1	$ -				$ -	$ -
OKAY	13	$ 24,062.64		$ 23,064.61		$ -	$ 5,913.32
House/Duplex	7	$ 23,661.41		$ 23,064.61		$ -	$ 5,512.09
Mobile Home	5	$ 401.23				$ -	$ 401.23
Travel Trailer	1	$ -				$ -	$ -
PORTER	32	$ 374,557.68	$ 120,405.66	$ 193,217.50		$ -	$ 148,767.20
House/Duplex	17	$ 131,775.76	$ 25,729.66	$ 86,876.11		$ -	$ 44,661.61
Mobile Home	13	$ 242,781.92	$ 94,676.00	$ 106,341.39		$ -	$ 104,105.59
Other	1	$ -				$ -	$ -
Travel Trailer	1	$ -				$ -	$ -
TULSA	1	$ -				$ -	$ -

County / CITY / Residence Type	Count of Residence Type	Sum of Total FEMA Verified Loss	Sum of Insurance Settlement	Sum of Repair Assistance Amount	Sum of Replacement Assistance Amount	Sum of SBA Received Amount	Sum of Unmet Need
House/Duplex	1	$ -				$ -	$ -
WAGONER	28	$ 140,802.07		$ 71,489.03		$ -	$ 69,313.04
House/Duplex	20	$ 136,586.52		$ 67,900.78		$ -	$ 68,685.74
Mobile Home	4	$ 1,242.87		$ 1,242.87		$ -	$ -
Other	2	$ -				$ -	$ -
Travel Trailer	2	$ 2,972.68		$ 2,345.38		$ -	$ 627.30
Washington	**136**	**$ 703,957.23**	**$ 419,732.09**	**$ 118,163.26**		**$ -**	**$ 417,565.87**
BARTLESVILLE	95	$ 564,340.78	$ 370,281.09	$ 67,288.06		$ -	$ 341,678.05
Apartment	1	$ 2,348.39				$ -	$ 2,348.39
House/Duplex	75	$ 540,758.98	$ 370,281.09	$ 66,099.16		$ -	$ 319,285.15
Mobile Home	13	$ 20,068.79		$ 1,188.90		$ -	$ 18,879.89
Other	4	$ -				$ -	$ -
Travel Trailer	2	$ 1,164.62				$ -	$ 1,164.62
COLLINSVILLE	7	$ 39,943.01	$ 11,473.00	$ 543.70		$ -	$ 27,926.31
House/Duplex	3	$ 18,539.41		$ 543.70		$ -	$ 17,995.71
Mobile Home	3	$ 21,403.60	$ 11,473.00			$ -	$ 9,930.60
Other	1	$ -				$ -	$ -
COPAN	4	$ 13,688.39				$ -	$ 13,688.39
House/Duplex	2	$ 12,531.61				$ -	$ 12,531.61
Other	1	$ 894.08				$ -	$ 894.08
Travel Trailer	1	$ 262.70				$ -	$ 262.70
DEWEY	11	$ 14,394.90		$ 296.27		$ -	$ 14,098.63
House/Duplex	8	$ 14,087.84		$ 296.27		$ -	$ 13,791.57
Mobile Home	1	$ -				$ -	$ -
Other	1	$ -				$ -	$ -
Travel Trailer	1	$ 307.06				$ -	$ 307.06
OCHELATA	2	$ 3,801.24				$ -	$ 3,801.24
House/Duplex	1	$ 3,005.65				$ -	$ 3,005.65
Mobile Home	1	$ 795.59				$ -	$ 795.59
RAMONA	9	$ 32,180.52	$ 37,978.00	$ 17,906.67		$ -	$ 12,893.42
House/Duplex	9	$ 32,180.52	$ 37,978.00	$ 17,906.67		$ -	$ 12,893.42
SKIATOOK	5	$ 17,059.77		$ 13,579.94		$ -	$ 3,479.83
House/Duplex	3	$ 17,059.77		$ 13,579.94		$ -	$ 3,479.83
Mobile Home	1	$ -				$ -	$ -
Other	1	$ -				$ -	$ -
TALALA	2	$ 18,548.62		$ 18,548.62		$ -	$ -
House/Duplex	1	$ 1,306.05		$ 1,306.05		$ -	$ -
Mobile Home	1	$ 17,242.57		$ 17,242.57		$ -	$ -
VERA	1	$ -				$ -	$ -
Other	1	$ -				$ -	$ -
Woods	**41**	**$ 44,009.09**		**$ 31,404.40**		**$ -**	**$ 15,459.73**
ALVA	37	$ 41,913.41		$ 30,486.92		$ -	$ 14,281.53
House/Duplex	36	$ 41,913.41		$ 30,486.92		$ -	$ 14,281.53
Other	1	$ -				$ -	$ -
CARMEN	1	$ -				$ -	$ -
House/Duplex	1	$ -				$ -	$ -
DACOMA	1	$ 917.48		$ 917.48		$ -	$ -
House/Duplex	1	$ 917.48		$ 917.48		$ -	$ -
HOPETON	1	$ 1,178.20				$ -	$ 1,178.20
House/Duplex	1	$ 1,178.20				$ -	$ 1,178.20
WAYNOKA	1	$ -				$ -	$ -
Other	1	$ -				$ -	$ -
Apartment Count	142	$ 142.00				$ 142.00	$ 142.00
Condo Count	5	$ 5.00				$ 5.00	$ 5.00
House/Duplex Count	3672	$ 3,672.00	$ 127.00	$ 844.00	$ 7.00	$ 3,672.00	$ 3,672.00
Mobile Home Count	950	$ 950.00	$ 25.00	$ 249.00	$ 17.00	$ 950.00	$ 950.00
Other Count	469	$ 469.00		$ 1.00		$ 469.00	$ 469.00
Townhouse Count	12	$ 12.00				$ 12.00	$ 12.00
Travel Trailer Count	94	$ 94.00		$ 14.00	$ 1.00	$ 94.00	$ 94.00
Grand Total	**-**	**$ 25,952,612.58**	**$ 7,869,564.72**	**$ 10,102,263.91**	**$ 794,788.57**	**$ -**	**$ 13,313,001.58**

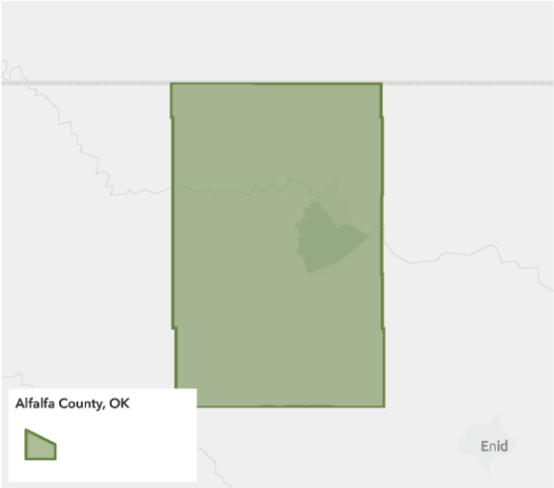
Population Characteristics of the 27 eligible counties

The State of Oklahoma submitted the 2019 CDBG-DR Action Plan initially with a Social Vulnerability Index to analyze population characteristics of the disaster affected counties. The State has replaced this analysis with ACS 5-year demographic estimates.

Population Trends

Alfalfa County, OK
Alfalfa County, OK (40003)
Geography: County

Prepared by Esri



POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

5,800
Population

47.1
Median Age

2.3
Average Household Size

$61,208
Median Household Income

2,086
Households

654
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

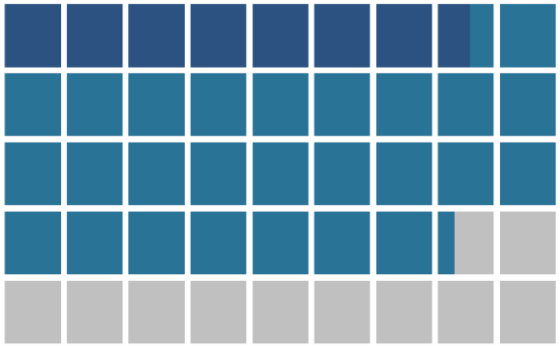
Race and Ethnicity

The largest group: White Alone (85.9)
The smallest group: Pacific Islander Alone (0)

Indicator ▲	Value	Diff
White Alone	85.9	+17.3
Black Alone	4.78	-2.8
American Indian/Alaska Native Alone	4.16	-4.68
Asian Alone	0.33	-2.12
Pacific Islander Alone	0	-0.19
Other Race	2.6	-2.83
Two or More Races	2.24	-4.67
Hispanic Origin (Any Race)	6.38	-5.35

Bars show deviation from Oklahoma

POPULATION BY AGE



Under 18 (17%) Ages 18 to 64 (60%) Aged 65+ (24%)

EDUCATION

14%
No High School Diploma

38%
High School Graduate

25%
Some College

22%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

60%
Use Computer

69%
Use Cell Phone

Languages

3,372
2019 Pop 18-64 Speak only English (ACS 5-Yr)

26
2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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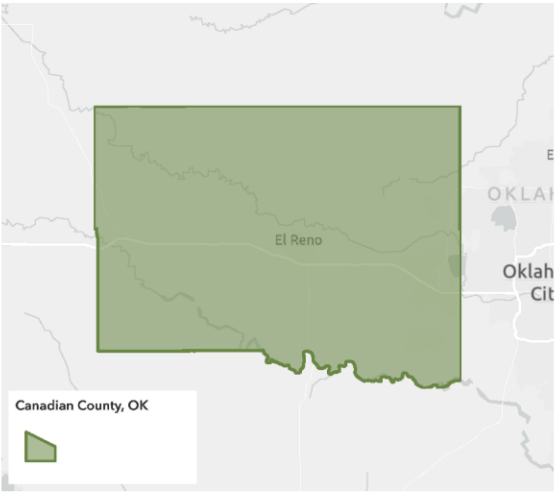
Population Trends

Canadian County, OK
Canadian County, OK (40017)
Geography: County

Prepared by Esri



POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

148,906
Population

37.6
Median Age

2.7
Average Household Size

$74,345
Median Household Income

55,045
Households

12,563
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

Race and Ethnicity

The largest group: White Alone (78.83)
The smallest group: Pacific Islander Alone (0.09)

Indicator ▲	Value	Diff
White Alone	78.83	+10.23
Black Alone	3.67	-3.91
American Indian/Alaska Native Alone	4.76	-4.08
Asian Alone	3.29	+0.84
Pacific Islander Alone	0.09	-0.1
Other Race	3.72	-1.71
Two or More Races	5.63	-1.28
Hispanic Origin (Any Race)	10.73	-1

Bars show deviation from Oklahoma

POPULATION BY AGE

Under 18 (25%) Ages 18 to 64 (61%) Aged 65+ (15%)

EDUCATION

8%
No High School Diploma

30%
High School Graduate

33%
Some College

29%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

72%
Use Computer

83%
Use Cell Phone

Languages

77,339
2019 Pop 18-64 Speak only English (ACS 5-Yr)

188
2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)

51
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

33
2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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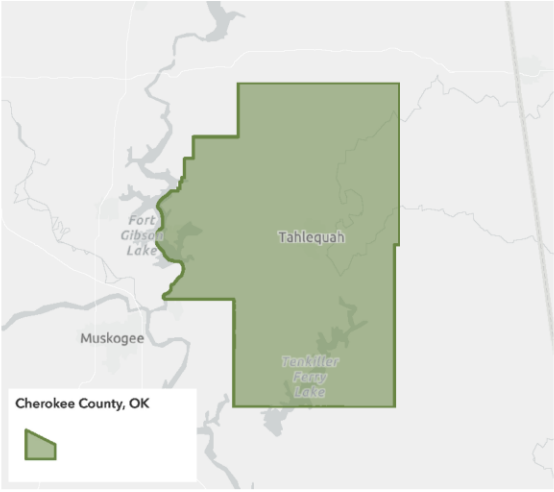
Population Trends

Cherokee County, OK
Cherokee County, OK (40021)
Geography: County

Prepared by Esri



POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

48,621
Population

36.8
Median Age

2.5
Average Household Size

$43,092
Median Household Income

18,402
Households

5,968
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

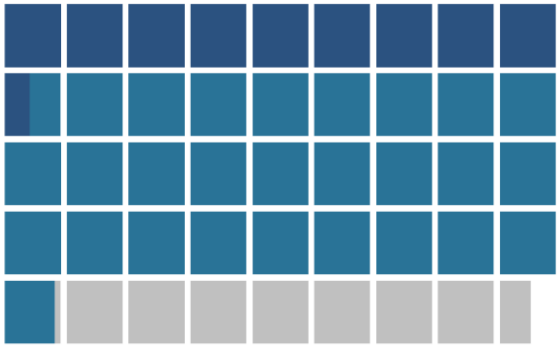
Race and Ethnicity

The largest group: White Alone (48.93)
The smallest group: Pacific Islander Alone (0.06)

Indicator ▲	Value	Diff
White Alone	48.93	-19.67
Black Alone	1.38	-6.2
American Indian/Alaska Native Alone	35.34	+26.5
Asian Alone	1.04	-1.41
Pacific Islander Alone	0.06	-0.13
Other Race	3.26	-2.17
Two or More Races	9.99	+3.08
Hispanic Origin (Any Race)	7.76	-3.97

Bars show deviation from Oklahoma

POPULATION BY AGE



Under 18 (21%) Ages 18 to 64 (61%) Aged 65+ (17%)

EDUCATION

13%
No High School Diploma

32%
High School Graduate

28%
Some College

28%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

62%
Use Computer

77%
Use Cell Phone

Languages

27,282
2019 Pop 18-64 Speak only English (ACS 5-Yr)

93
2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)

3
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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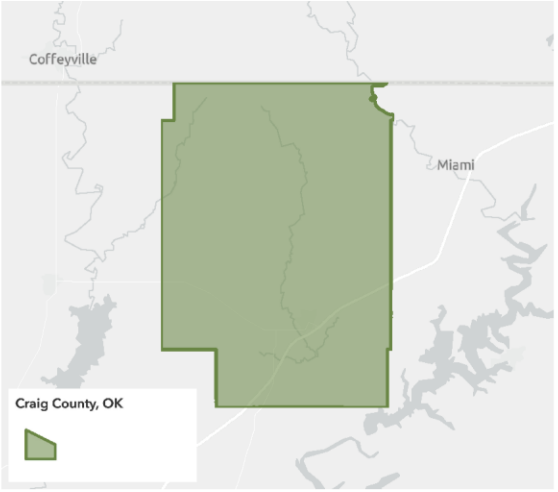
Population Trends

Craig County, OK
Craig County, OK (40035)
Geography: County

Prepared by Esri



POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

14,335
Population

43.4
Median Age

2.5
Average Household Size

$42,497
Median Household Income

5,354
Households

2,141
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

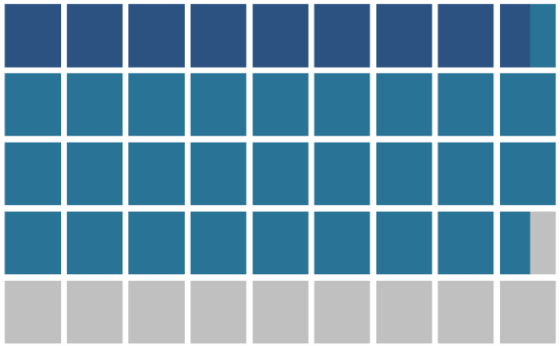
Race and Ethnicity

The largest group: White Alone (63.94)
The smallest group: Pacific Islander Alone (0.12)

Indicator ▲	Value	Diff
White Alone	63.94	-4.66
Black Alone	3.14	-4.44
American Indian/Alaska Native Alone	21.11	+12.27
Asian Alone	0.77	-1.68
Pacific Islander Alone	0.12	-0.07
Other Race	1.28	-4.15
Two or More Races	9.65	+2.74
Hispanic Origin (Any Race)	4.38	-7.35

Bars show deviation from Oklahoma

POPULATION BY AGE



Under 18 (19%) Ages 18 to 64 (60%) Aged 65+ (21%)

EDUCATION

13%
No High School Diploma

40%
High School Graduate

32%
Some College

15%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

57%
Use Computer

73%
Use Cell Phone

Languages

8,071
2019 Pop 18-64 Speak only English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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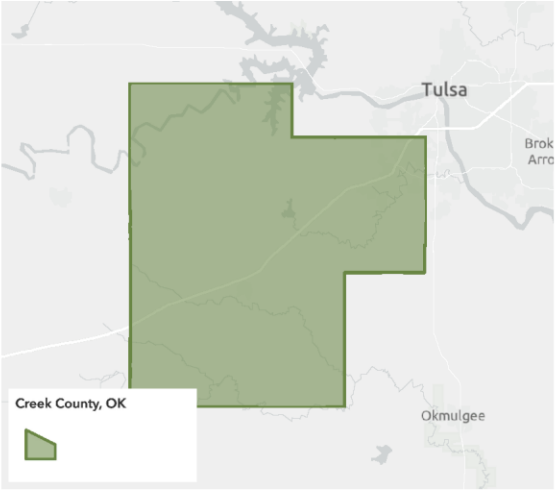
Population Trends

Creek County, OK
Creek County, OK (40037)
Geography: County

Prepared by Esri



POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

73,980
Population

42.0
Median Age

2.6
Average Household Size

$54,590
Median Household Income

27,826
Households

7,105
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

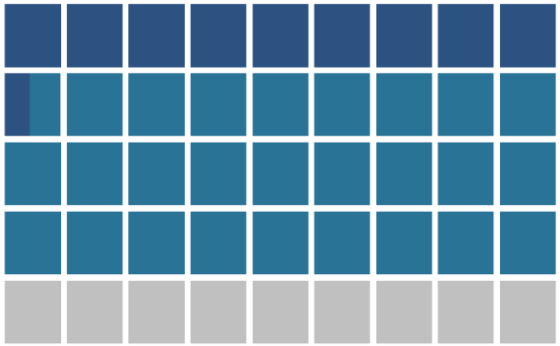
Race and Ethnicity

The largest group: White Alone (76.99)
The smallest group: Pacific Islander Alone (0.1)

Indicator ▲	Value	Diff
White Alone	76.99	+8.39
Black Alone	2.27	-5.31
American Indian/Alaska Native Alone	10.45	+1.61
Asian Alone	0.81	-1.64
Pacific Islander Alone	0.1	-0.09
Other Race	1.67	-3.76
Two or More Races	7.72	+0.81
Hispanic Origin (Any Race)	5.06	-6.67

Bars show deviation from Oklahoma

POPULATION BY AGE



Under 18 (21%) Ages 18 to 64 (59%) Aged 65+ (20%)

EDUCATION

12%
No High School Diploma

40%
High School Graduate

30%
Some College

18%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

59%
Use Computer

77%
Use Cell Phone

Languages

40,448
2019 Pop 18-64 Speak only English (ACS 5-Yr)

47
2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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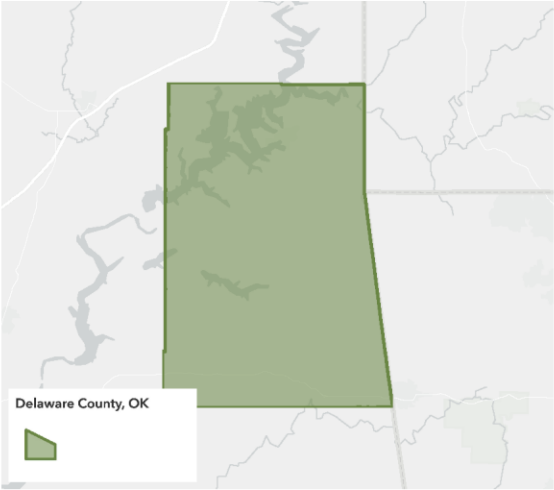
August 10, 2021

Population Trends

Delaware County, OK
Delaware County, OK (40041)
Geography: County

Prepared by Esri



POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

46,700
Population

48.1
Median Age

2.4
Average Household Size

$42,412
Median Household Income

19,216
Households

6,941
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

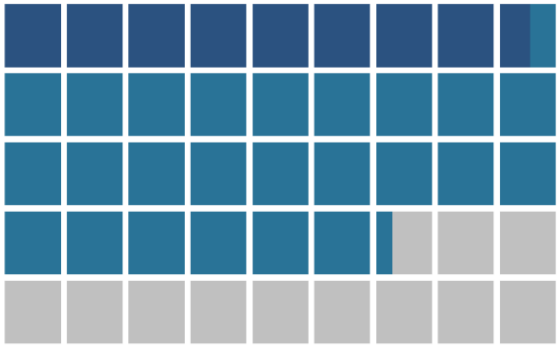
Race and Ethnicity

The largest group: White Alone (64.71)
The smallest group: Pacific Islander Alone (0.15)

Indicator ▲	Value	Diff
White Alone	64.71	-3.89
Black Alone	0.51	-7.07
American Indian/Alaska Native Alone	23.56	+14.72
Asian Alone	1.22	-1.23
Pacific Islander Alone	0.15	-0.04
Other Race	1.47	-3.96
Two or More Races	8.38	+1.47
Hispanic Origin (Any Race)	4.08	-7.65

Bars show deviation from Oklahoma

POPULATION BY AGE



Under 18 (19%) Ages 18 to 64 (55%) Aged 65+ (26%)

EDUCATION

14%
No High School Diploma

36%
High School Graduate

30%
Some College

19%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

62%
Use Computer

73%
Use Cell Phone

Languages

21,970
2019 Pop 18-64 Speak only English (ACS 5-Yr)

12
2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)

3
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)

5
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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Population Trends

Garfield County, OK
Garfield County, OK (40047)
Geography: County

Prepared by Esri

POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

61,070
Population

38.8
Median Age

2.4
Average Household Size

$56,040
Median Household Income

24,244
Households

6,876
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

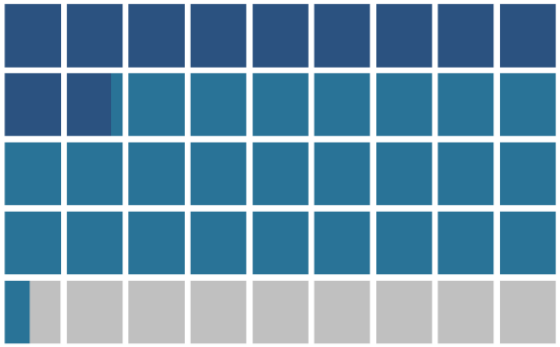
Race and Ethnicity

The largest group: White Alone (76.27)
The smallest group: Asian Alone (1.22)

Indicator ▲	Value	Diff
White Alone	76.27	+7.67
Black Alone	3.06	-4.52
American Indian/Alaska Native Alone	2.64	-6.2
Asian Alone	1.22	-1.23
Pacific Islander Alone	4.43	+4.24
Other Race	7.46	+2.03
Two or More Races	4.91	-2
Hispanic Origin (Any Race)	14.44	+2.71

Bars show deviation from Oklahoma

POPULATION BY AGE



Under 18 (24%) Ages 18 to 64 (57%) Aged 65+ (19%)

EDUCATION

12%
No High School Diploma

36%
High School Graduate

28%
Some College

24%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

61%
Use Computer

76%
Use Cell Phone

Languages

31,441
2019 Pop 18-64 Speak only English (ACS 5-Yr)

274
2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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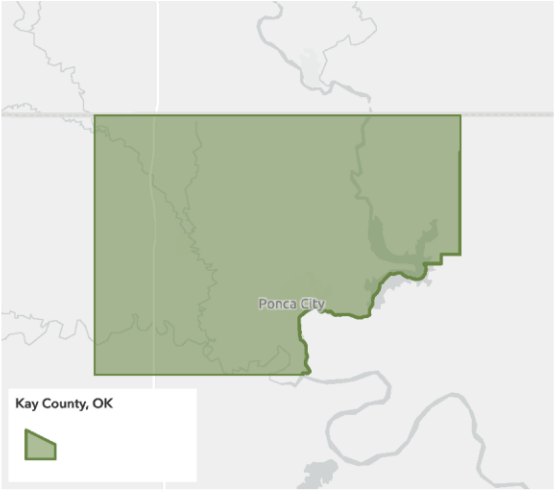
Population Trends

Kay County, OK
Kay County, OK (40071)
Geography: County

Prepared by Esri



POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

44,675
Population

40.2
Median Age

2.4
Average Household Size

$48,493
Median Household Income

17,763
Households

6,751
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

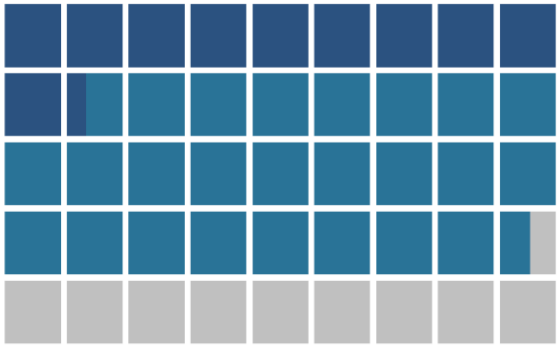
Race and Ethnicity

The largest group: White Alone (76.53)
The smallest group: Pacific Islander Alone (0.04)

Indicator ▲	Value	Diff
White Alone	76.53	+7.93
Black Alone	2.24	-5.34
American Indian/Alaska Native Alone	10.69	+1.85
Asian Alone	0.63	-1.82
Pacific Islander Alone	0.04	-0.15
Other Race	3.56	-1.87
Two or More Races	6.31	-0.6
Hispanic Origin (Any Race)	8.96	-2.77

Bars show deviation from Oklahoma

POPULATION BY AGE



Under 18 (23%) Ages 18 to 64 (56%) Aged 65+ (21%)

EDUCATION

13%
No High School Diploma

33%
High School Graduate

35%
Some College

20%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

58%
Use Computer

77%
Use Cell Phone

Languages

23,182
2019 Pop 18-64 Speak only English (ACS 5-Yr)

44
2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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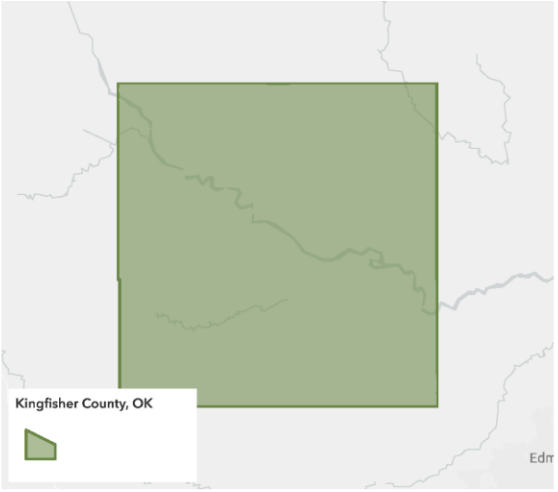
Population Trends

Kingfisher County, OK
Kingfisher County, OK (40073)
Geography: County

Prepared by Esri



POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

15,735
Population

40.1
Median Age

2.6
Average Household Size

$58,648
Median Household Income

5,957
Households

1,686
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

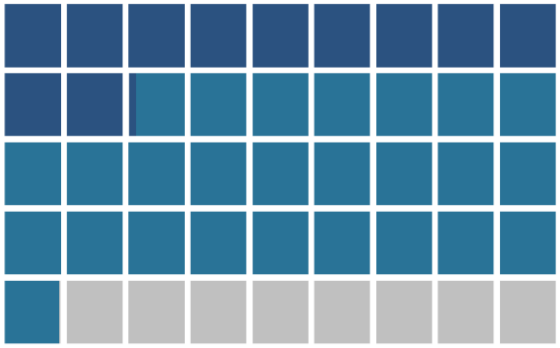
Race and Ethnicity

The largest group: White Alone (79.76)
The smallest group: Pacific Islander Alone (0)

Indicator ▲	Value	Diff
White Alone	79.76	+11.16
Black Alone	1.68	-5.9
American Indian/Alaska Native Alone	3.44	-5.4
Asian Alone	0.39	-2.06
Pacific Islander Alone	0	-0.19
Other Race	10.14	+4.71
Two or More Races	4.58	-2.33
Hispanic Origin (Any Race)	17.36	+5.63

Bars show deviation from Oklahoma

POPULATION BY AGE



Under 18 (25%) Ages 18 to 64 (58%) Aged 65+ (18%)

EDUCATION

11%
No High School Diploma

38%
High School Graduate

27%
Some College

23%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

59%
Use Computer

73%
Use Cell Phone

Languages

7,440
2019 Pop 18-64 Speak only English (ACS 5-Yr)

184
2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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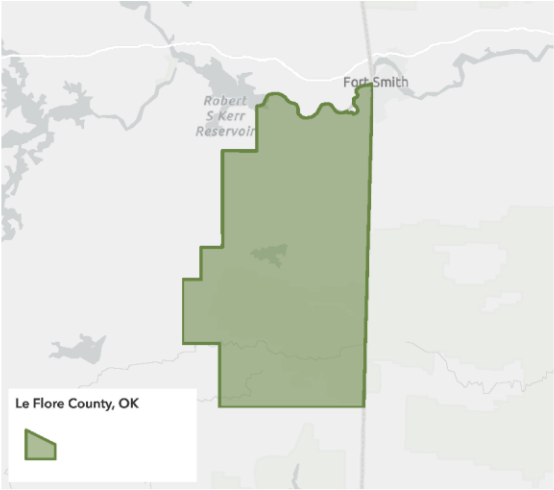
Population Trends

Le Flore County, OK
Le Flore County, OK (40079)
Geography: County

Prepared by Esri



POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

52,280
Population

40.1
Median Age

2.6
Average Household Size

$41,120
Median Household Income

19,425
Households

7,728
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

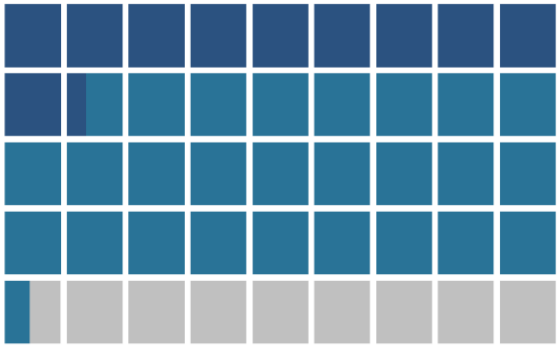
Race and Ethnicity

The largest group: White Alone (72.71)
The smallest group: Pacific Islander Alone (0.05)

Indicator ▲	Value	Diff
White Alone	72.71	+4.11
Black Alone	1.99	-5.59
American Indian/Alaska Native Alone	13.64	+4.8
Asian Alone	0.69	-1.76
Pacific Islander Alone	0.05	-0.14
Other Race	4.41	-1.02
Two or More Races	6.52	-0.39
Hispanic Origin (Any Race)	7.44	-4.29

Bars show deviation from Oklahoma

POPULATION BY AGE



Under 18 (23%) Ages 18 to 64 (58%) Aged 65+ (19%)

EDUCATION

16%
No High School Diploma

42%
High School Graduate

27%
Some College

15%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

55%
Use Computer

77%
Use Cell Phone

Languages

27,184
2019 Pop 18-64 Speak only English (ACS 5-Yr)

261
2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)

5
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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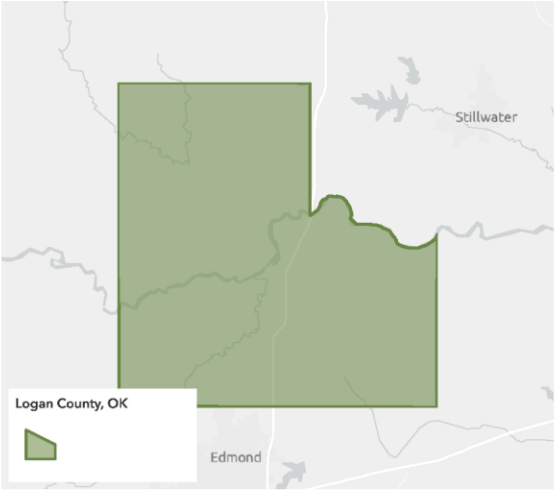
Population Trends

Logan County, OK
Logan County, OK (40083)
Geography: County

Prepared by Esri



POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

48,166
Population

39.4
Median Age

2.6
Average Household Size

$66,747
Median Household Income

17,609
Households

4,587
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

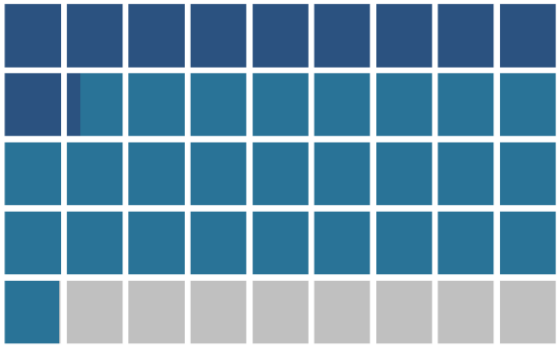
Race and Ethnicity

The largest group: White Alone (79.88)
The smallest group: Pacific Islander Alone (0.05)

Indicator ▲	Value	Diff
White Alone	79.88	+11.28
Black Alone	7.8	+0.22
American Indian/Alaska Native Alone	3.63	-5.21
Asian Alone	0.65	-1.8
Pacific Islander Alone	0.05	-0.14
Other Race	2.81	-2.62
Two or More Races	5.18	-1.73
Hispanic Origin (Any Race)	7.3	-4.43

Bars show deviation from Oklahoma

POPULATION BY AGE



Under 18 (23%) Ages 18 to 64 (60%) Aged 65+ (18%)

EDUCATION

9%
No High School Diploma

33%
High School Graduate

29%
Some College

29%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

64%
Use Computer

79%
Use Cell Phone

Languages

27,184
2019 Pop 18-64 Speak only English (ACS 5-Yr)

27
2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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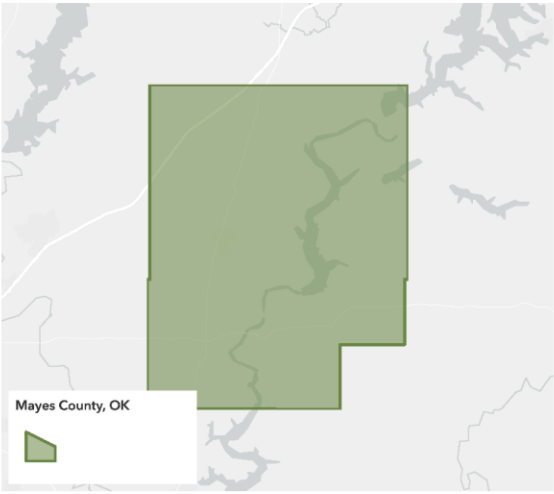
Population Trends

Mayes County, OK
Mayes County, OK (40097)
Geography: County

Prepared by Esri



POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

43,119
Population

41.2
Median Age

2.6
Average Household Size

$51,025
Median Household Income

16,628
Households

6,809
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

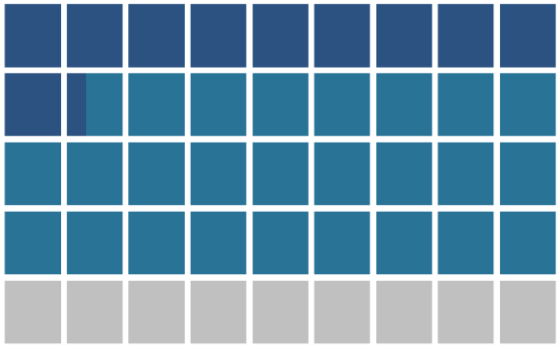
Race and Ethnicity

The largest group: White Alone (65.57)
The smallest group: Pacific Islander Alone (0.07)

Indicator ▲	Value	Diff
White Alone	65.57	-3.03
Black Alone	0.74	-6.84
American Indian/Alaska Native Alone	21.93	+13.09
Asian Alone	0.46	-1.99
Pacific Islander Alone	0.07	-0.12
Other Race	1.21	-4.22
Two or More Races	10.02	+3.11
Hispanic Origin (Any Race)	4.1	-7.63

Bars show deviation from Oklahoma

POPULATION BY AGE



Under 18 (23%) Ages 18 to 64 (57%) Aged 65+ (20%)

EDUCATION

13%
No High School Diploma

40%
High School Graduate

32%
Some College

15%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

61%
Use Computer

75%
Use Cell Phone

Languages

22,745
2019 Pop 18-64 Speak only English (ACS 5-Yr)

12
2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)

10
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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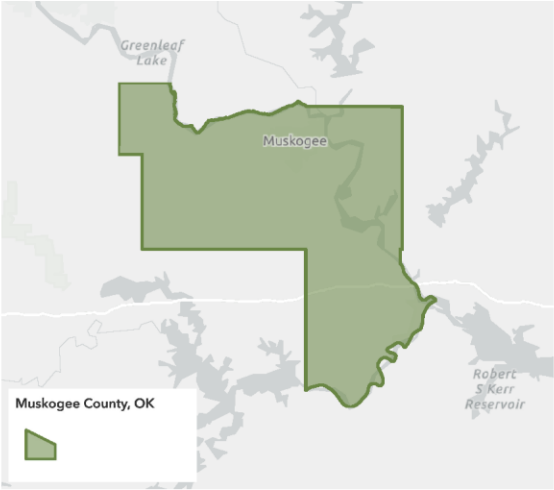
Population Trends

Muskogee County, OK
Muskogee County, OK (40101)
Geography: County

Prepared by Esri



POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

69,852
Population

39.6
Median Age

2.5
Average Household Size

$42,691
Median Household Income

26,388
Households

9,308
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

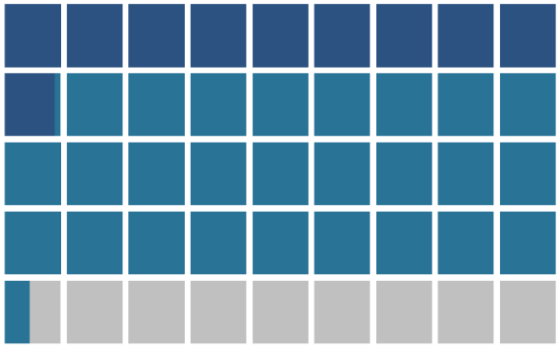
Race and Ethnicity

The largest group: White Alone (56.91)
The smallest group: Pacific Islander Alone (0.1)

Indicator ▲	Value	Diff
White Alone	56.91	-11.69
Black Alone	10.65	+3.07
American Indian/Alaska Native Alone	18.78	+9.94
Asian Alone	0.69	-1.76
Pacific Islander Alone	0.1	-0.09
Other Race	3.52	-1.91
Two or More Races	9.35	+2.44
Hispanic Origin (Any Race)	7.06	-4.67

Bars show deviation from Oklahoma

POPULATION BY AGE



Under 18 (22%) Ages 18 to 64 (59%) Aged 65+ (19%)

EDUCATION

14%
No High School Diploma

35%
High School Graduate

30%
Some College

21%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

59%
Use Computer

75%
Use Cell Phone

Languages

38,211
2019 Pop 18-64 Speak only English (ACS 5-Yr)

41
2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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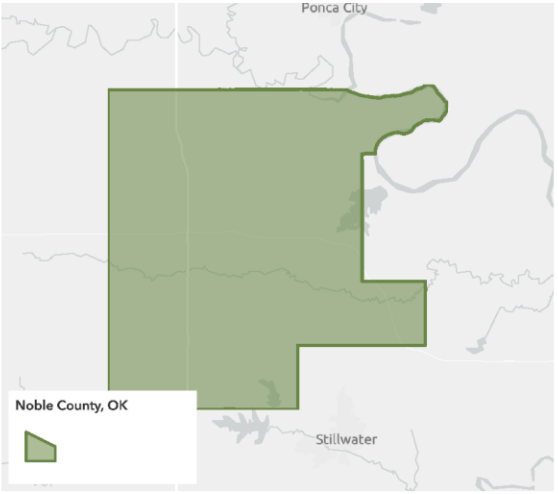
Population Trends

Noble County, OK
Noble County, OK (40103)
Geography: County

Prepared by Esri



POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

11,535
Population

42.7
Median Age

2.5
Average Household Size

$56,455
Median Household Income

4,592
Households

1,536
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

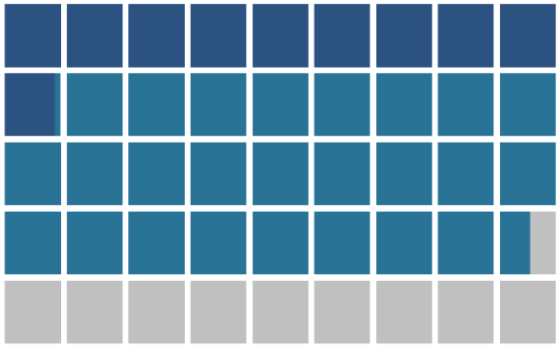
Race and Ethnicity

The largest group: White Alone (81.02)
The smallest group: Pacific Islander Alone (0.07)

Indicator ▲	Value	Diff
White Alone	81.02	+12.42
Black Alone	1.95	-5.63
American Indian/Alaska Native Alone	9.13	+0.29
Asian Alone	0.68	-1.77
Pacific Islander Alone	0.07	-0.12
Other Race	1.63	-3.8
Two or More Races	5.51	-1.4
Hispanic Origin (Any Race)	4.58	-7.15

Bars show deviation from Oklahoma

POPULATION BY AGE



Under 18 (22%) Ages 18 to 64 (57%) Aged 65+ (21%)

EDUCATION

9%
No High School Diploma

42%
High School Graduate

25%
Some College

24%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

61%
Use Computer

75%
Use Cell Phone

Languages

6,271
2019 Pop 18-64 Speak only English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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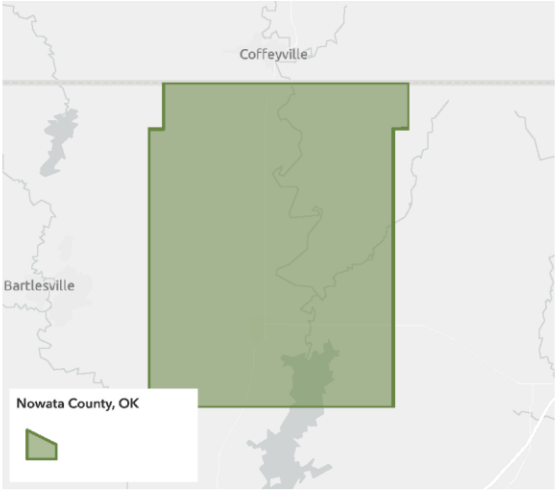
Population Trends

Nowata County, OK
Nowata County, OK (40105)
Geography: County

Prepared by Esri



POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

10,472
Population

44.3
Median Age

2.5
Average Household Size

$44,332
Median Household Income

4,207
Households

1,263
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

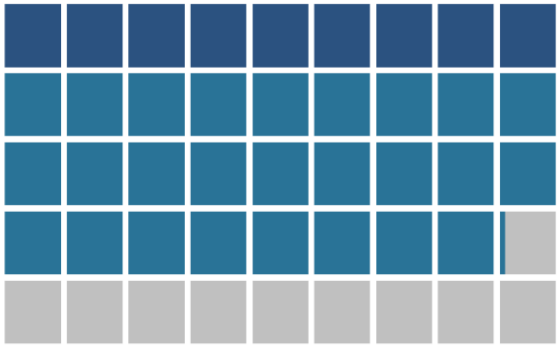
Race and Ethnicity

The largest group: White Alone (67.6)
The smallest group: Pacific Islander Alone (0.03)

Indicator ▲	Value	Diff
White Alone	67.6	-1
Black Alone	2.31	-5.27
American Indian/Alaska Native Alone	19.01	+10.17
Asian Alone	0.07	-2.38
Pacific Islander Alone	0.03	-0.16
Other Race	0.84	-4.59
Two or More Races	10.14	+3.23
Hispanic Origin (Any Race)	3.53	-8.2

Bars show deviation from Oklahoma

POPULATION BY AGE



Under 18 (20%) Ages 18 to 64 (58%) Aged 65+ (22%)

EDUCATION

11%
No High School Diploma

44%
High School Graduate

33%
Some College

12%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

55%
Use Computer

76%
Use Cell Phone

Languages

5,830
2019 Pop 18-64 Speak only English (ACS 5-Yr)

10
2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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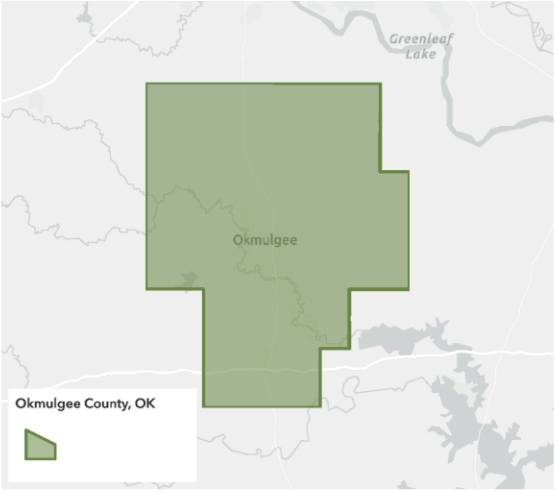
Population Trends

Okmulgee County, OK
Okmulgee County, OK (40111)
Geography: County

Prepared by Esri



POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

38,805
Population

40.7
Median Age

2.5
Average Household Size

$44,013
Median Household Income

14,774
Households

6,017
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

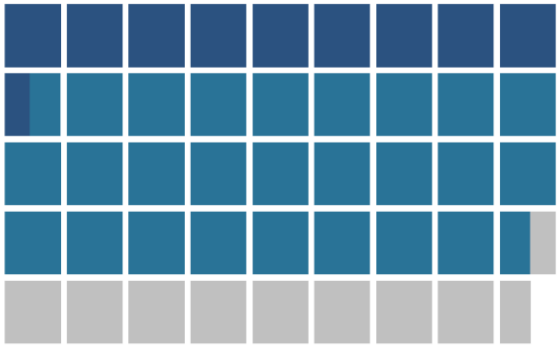
Race and Ethnicity

The largest group: White Alone (63.59)
The smallest group: Pacific Islander Alone (0.02)

Indicator ▲	Value	Diff
White Alone	63.59	-5.01
Black Alone	8.04	+0.46
American Indian/Alaska Native Alone	17.15	+8.31
Asian Alone	0.49	-1.96
Pacific Islander Alone	0.02	-0.17
Other Race	1.16	-4.27
Two or More Races	9.56	+2.65
Hispanic Origin (Any Race)	4.82	-6.91

Bars show deviation from Oklahoma

POPULATION BY AGE



Under 18 (21%) Ages 18 to 64 (58%) Aged 65+ (20%)

EDUCATION

13%
No High School Diploma

36%
High School Graduate

36%
Some College

15%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

55%
Use Computer

75%
Use Cell Phone

Languages

21,535
2019 Pop 18-64 Speak only English (ACS 5-Yr)

2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)
0

0
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)
0

0
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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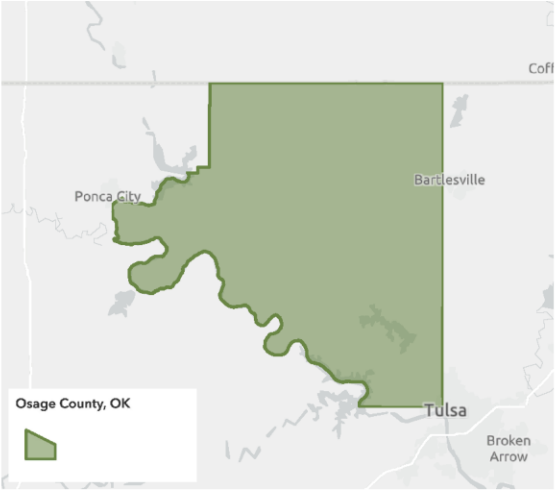
Population Trends

Osage County, OK
Osage County, OK (40113)
Geography: County

Prepared by Esri



POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

48,364
Population

42.9
Median Age

2.5
Average Household Size

$51,715
Median Household Income

18,553
Households

6,447
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

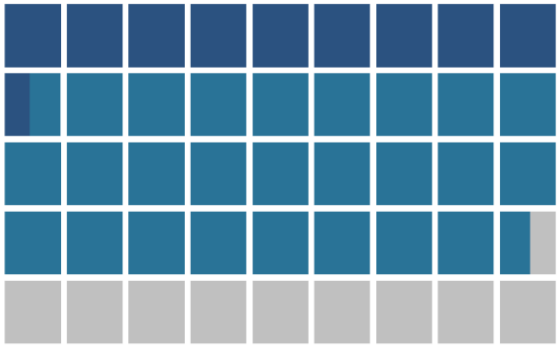
Race and Ethnicity

The largest group: White Alone (64.6)
The smallest group: Pacific Islander Alone (0.03)

Indicator ▲	Value	Diff
White Alone	64.6	-4
Black Alone	11.45	+3.87
American Indian/Alaska Native Alone	14.5	+5.66
Asian Alone	0.45	-2
Pacific Islander Alone	0.03	-0.16
Other Race	1.12	-4.31
Two or More Races	7.85	+0.94
Hispanic Origin (Any Race)	4.16	-7.57

Bars show deviation from Oklahoma

POPULATION BY AGE



Under 18 (21%) Ages 18 to 64 (58%) Aged 65+ (21%)

EDUCATION

11%
No High School Diploma

38%
High School Graduate

31%
Some College

19%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

62%
Use Computer

77%
Use Cell Phone

Languages

26,690
2019 Pop 18-64 Speak only English (ACS 5-Yr)

41
2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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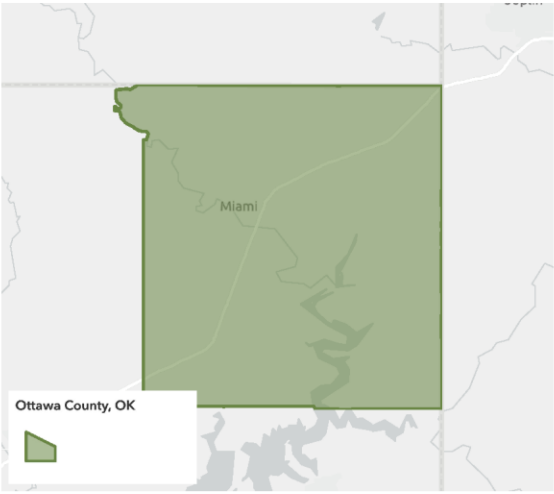
Population Trends

Ottawa County, OK
Ottawa County, OK (40115)
Geography: County

Prepared by Esri



POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

31,549
Population

40.1
Median Age

2.5
Average Household Size

$40,193
Median Household Income

12,159
Households

4,730
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

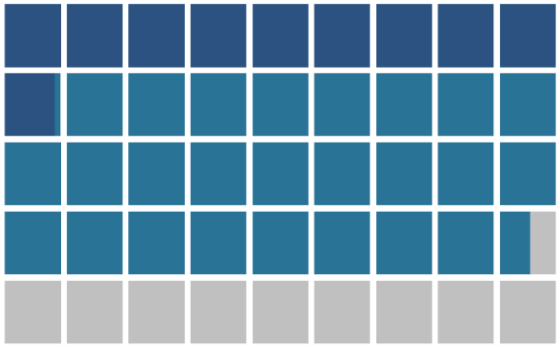
Race and Ethnicity

The largest group: White Alone (66.22)
The smallest group: Asian Alone (0.72)

Indicator ▲	Value	Diff
White Alone	66.22	-2.38
Black Alone	1.2	-6.38
American Indian/Alaska Native Alone	19.56	+10.72
Asian Alone	0.72	-1.73
Pacific Islander Alone	0.8	+0.61
Other Race	3.15	-2.28
Two or More Races	8.35	+1.44
Hispanic Origin (Any Race)	6.32	-5.41

Bars show deviation from Oklahoma

POPULATION BY AGE



Under 18 (22%) Ages 18 to 64 (57%) Aged 65+ (21%)

EDUCATION

14%
No High School Diploma

37%
High School Graduate

34%
Some College

15%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

58%
Use Computer

75%
Use Cell Phone

Languages

16,725
2019 Pop 18-64 Speak only English (ACS 5-Yr)

42
2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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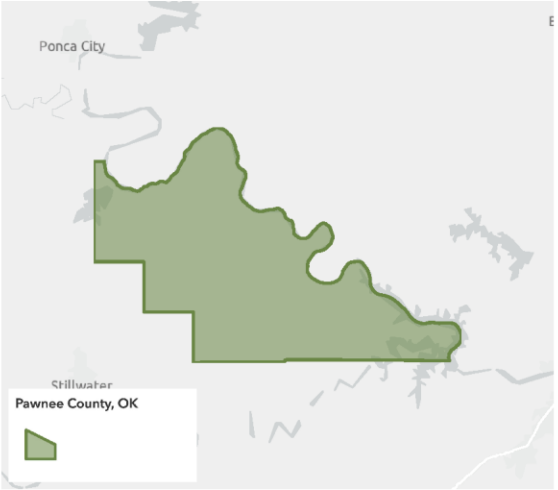
Population Trends

Pawnee County, OK
Pawnee County, OK (40117)
Geography: County

Prepared by Esri



POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

17,241
Population

43.6
Median Age

2.5
Average Household Size

$50,818
Median Household Income

6,783
Households

1,892
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

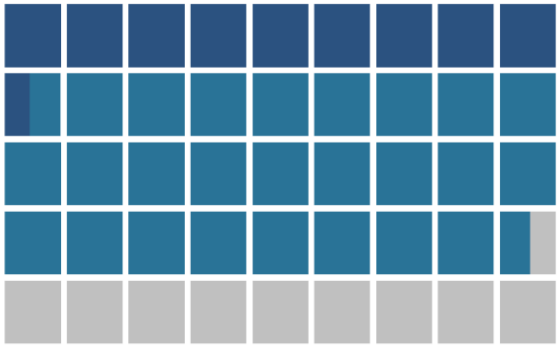
Race and Ethnicity

The largest group: White Alone (76.79)
The smallest group: Pacific Islander Alone (0.03)

Indicator ▲	Value	Diff
White Alone	76.79	+8.19
Black Alone	0.87	-6.71
American Indian/Alaska Native Alone	13.76	+4.92
Asian Alone	0.63	-1.82
Pacific Islander Alone	0.03	-0.16
Other Race	0.95	-4.48
Two or More Races	6.97	+0.06
Hispanic Origin (Any Race)	3.2	-8.53

Bars show deviation from Oklahoma

POPULATION BY AGE



Under 18 (21%) Ages 18 to 64 (58%) Aged 65+ (21%)

EDUCATION

11%
No High School Diploma

45%
High School Graduate

27%
Some College

17%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

56%
Use Computer

75%
Use Cell Phone

Languages

9,245
2019 Pop 18-64 Speak only English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)

5
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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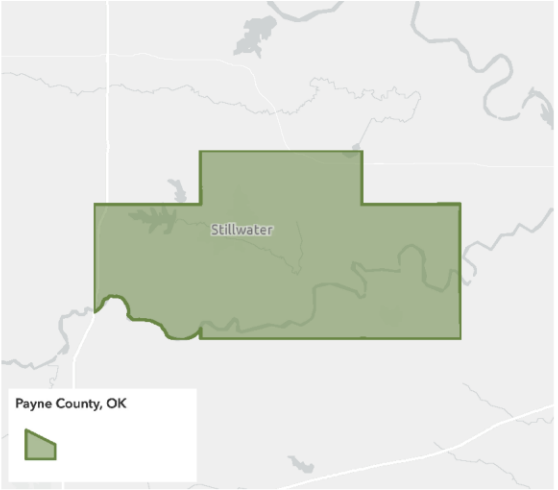
Population Trends

Payne County, OK
Payne County, OK (40119)
Geography: County

Prepared by Esri



POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

82,648
Population

30.0
Median Age

2.3
Average Household Size

$40,349
Median Household Income

32,255
Households

7,814
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

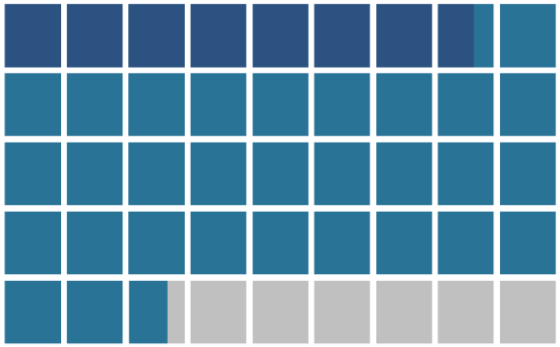
Race and Ethnicity

The largest group: White Alone (79)
The smallest group: Pacific Islander Alone (0.08)

Indicator ▲	Value	Diff
White Alone	79	+10.4
Black Alone	3.87	-3.71
American Indian/Alaska Native Alone	5.22	-3.62
Asian Alone	4.42	+1.97
Pacific Islander Alone	0.08	-0.11
Other Race	1.39	-4.04
Two or More Races	6.02	-0.89
Hispanic Origin (Any Race)	5.11	-6.62

Bars show deviation from Oklahoma

POPULATION BY AGE



Under 18 (17%) Ages 18 to 64 (69%) Aged 65+ (14%)

EDUCATION

7%
No High School Diploma

27%
High School Graduate

27%
Some College

38%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

77%
Use Computer

86%
Use Cell Phone

Languages

50,469
2019 Pop 18-64 Speak only English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)

13
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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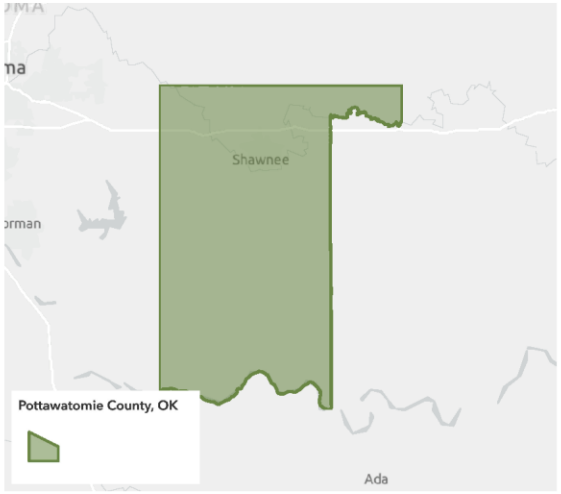
Population Trends

Pottawatomie County, OK
Pottawatomie County, OK (40125)
Geography: County

Prepared by Esri



POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

73,537
Population

39.0
Median Age

2.6
Average Household Size

$53,653
Median Household Income

27,403
Households

9,297
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

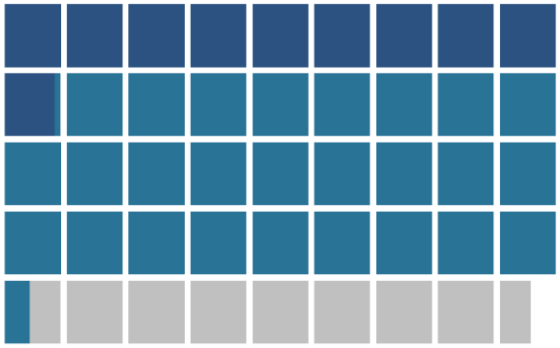
Race and Ethnicity

The largest group: White Alone (73.85)
The smallest group: Pacific Islander Alone (0.1)

Indicator ▲	Value	Diff
White Alone	73.85	+5.25
Black Alone	3.1	-4.48
American Indian/Alaska Native Alone	13.33	+4.49
Asian Alone	0.71	-1.74
Pacific Islander Alone	0.1	-0.09
Other Race	1.35	-4.08
Two or More Races	7.55	+0.64
Hispanic Origin (Any Race)	5.81	-5.92

Bars show deviation from Oklahoma

POPULATION BY AGE



Under 18 (22%) Ages 18 to 64 (59%) Aged 65+ (18%)

EDUCATION

11%
No High School Diploma

37%
High School Graduate

32%
Some College

19%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

61%
Use Computer

77%
Use Cell Phone

Languages

41,138
2019 Pop 18-64 Speak only English (ACS 5-Yr)

18
2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)

9
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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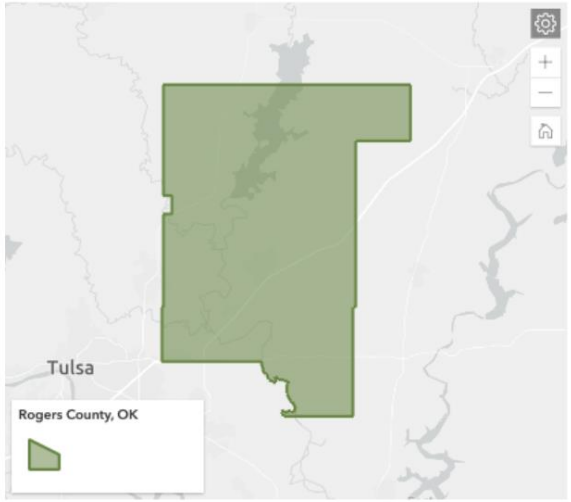


POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

96,717
Population

40.0
Median Age

2.7
Average Household Size

$65,344
Median Household Income

35,448
Households

10,880
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

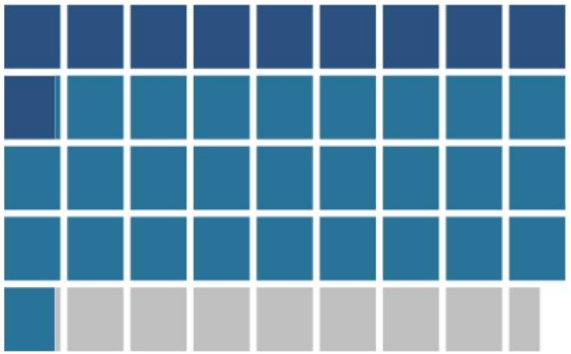
Race and Ethnicity

The largest group: White Alone (72.98)
The smallest group: Pacific Islander Alone (0.1)

Indicator ▲	Value	Diff
White Alone	72.98	+4.38
Black Alone	1.28	-6.3
American Indian/Alaska Native Alone	13.07	+4.23
Asian Alone	1.59	-0.86
Pacific Islander Alone	0.1	-0.09
Other Race	2.04	-3.39
Two or More Races	8.94	+2.03
Hispanic Origin (Any Race)	5.5	-6.23

Bars show deviation from Oklahoma

POPULATION BY AGE



Under 18 (22%) Ages 18 to 64 (60%) Aged 65+ (17%)

EDUCATION

8%
No High School Diploma

32%
High School Graduate

34%
Some College

26%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

69%
Use Computer

80%
Use Cell Phone

Languages

52,002
2019 Pop 18-64 Speak only English (ACS 5-Yr)

74
2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)

11
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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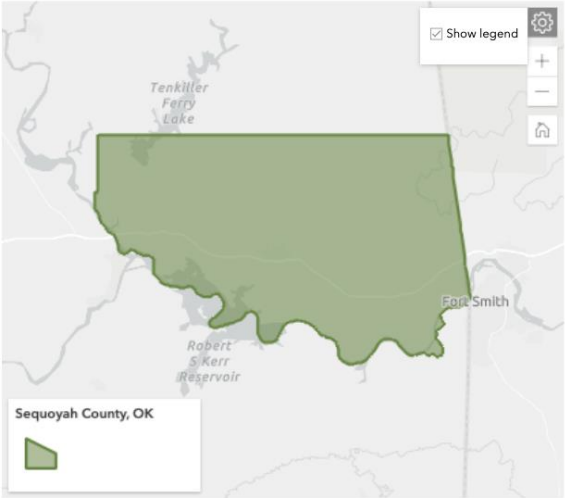


POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

44,267
Population

41.6
Median Age

2.6
Average Household Size

$42,148
Median Household Income

16,966
Households

6,492
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

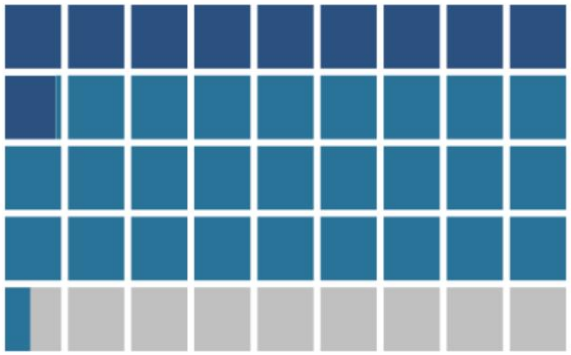
Race and Ethnicity

The largest group: White Alone (63.33)
The smallest group: Pacific Islander Alone (0.05)

Indicator ▲	Value	Diff
White Alone	63.33	-5.27
Black Alone	1.87	-5.71
American Indian/Alaska Native Alone	22.08	+13.24
Asian Alone	0.87	-1.58
Pacific Islander Alone	0.05	-0.14
Other Race	1.5	-3.93
Two or More Races	10.31	+3.4
Hispanic Origin (Any Race)	4.59	-7.14

Bars show deviation from Oklahoma

POPULATION BY AGE



Under 18 (22%) Ages 18 to 64 (59%) Aged 65+ (19%)

EDUCATION

18%
No High School Diploma

39%
High School Graduate

28%
Some College

15%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

56%
Use Computer

75%
Use Cell Phone

Languages

23,254
2019 Pop 18-64 Speak only English (ACS 5-Yr)

18
2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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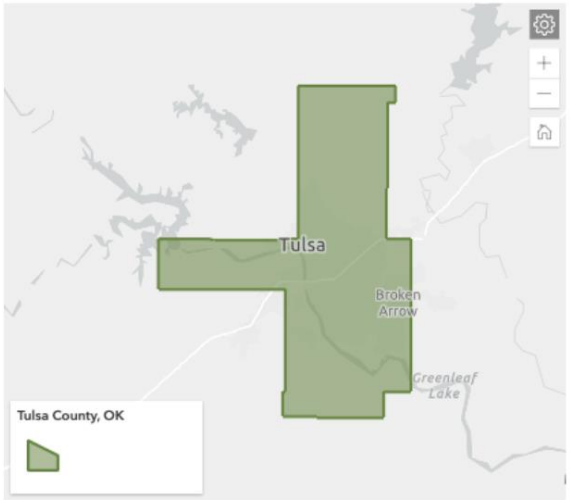


POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

644,724
Population

37.1
Median Age

2.5
Average Household Size

$57,261
Median Household Income

256,778
Households

67,484
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

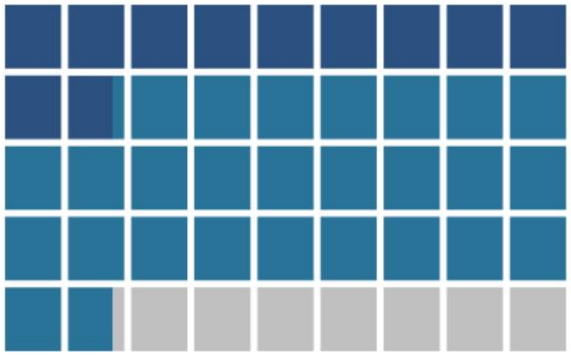
Race and Ethnicity

The largest group: White Alone (64.95)
The smallest group: Pacific Islander Alone (0.17)

Indicator ▲	Value	Diff
White Alone	64.95	-3.65
Black Alone	10.48	+2.9
American Indian/Alaska Native Alone	6.26	-2.58
Asian Alone	3.91	+1.46
Pacific Islander Alone	0.17	-0.02
Other Race	7.43	+2
Two or More Races	6.8	-0.11
Hispanic Origin (Any Race)	14.06	+2.33

Bars show deviation from Oklahoma

POPULATION BY AGE



Under 18 (24%) Ages 18 to 64 (60%) Aged 65+ (16%)

EDUCATION

10%
No High School Diploma

25%
High School Graduate

31%
Some College

33%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

69%
Use Computer

82%
Use Cell Phone

Languages

331,855
2019 Pop 18-64 Speak only English (ACS 5-Yr)

3,851
2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)

821
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

122
2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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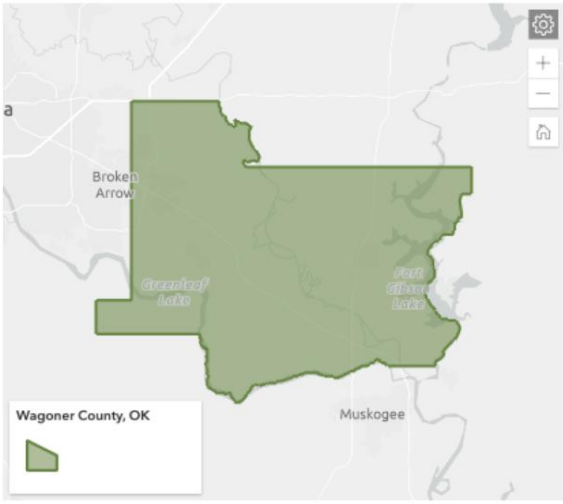


POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

86,161
Population

39.9
Median Age

2.7
Average Household Size

$64,559
Median Household Income

31,795
Households

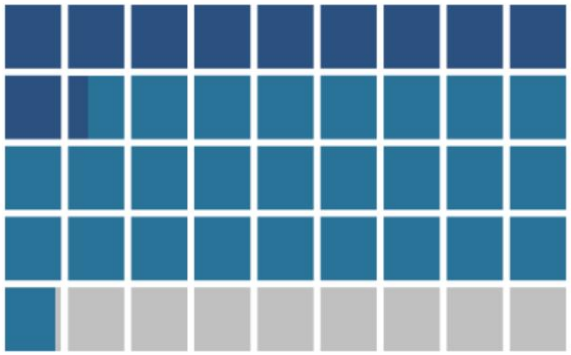
10,044
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

Race and Ethnicity

The largest group: White Alone (73.58)
The smallest group: Pacific Islander Alone (0.08)

Indicator ▲	Value	Diff
White Alone	73.58	+4.98
Black Alone	3.81	-3.77
American Indian/Alaska Native Alone	10.09	+1.25
Asian Alone	1.82	-0.63
Pacific Islander Alone	0.08	-0.11
Other Race	2.69	-2.74
Two or More Races	7.94	+1.03
Hispanic Origin (Any Race)	7.4	-4.33

POPULATION BY AGE



Under 18 (23%) Ages 18 to 64 (59%) Aged 65+ (18%)

EDUCATION

9%
No High School Diploma

33%
High School Graduate

34%
Some College

24%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

66%
Use Computer

79%
Use Cell Phone

Bars show deviation from Oklahoma

Languages

43,719
2019 Pop 18-64 Speak only English (ACS 5-Yr)

122
2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)

6
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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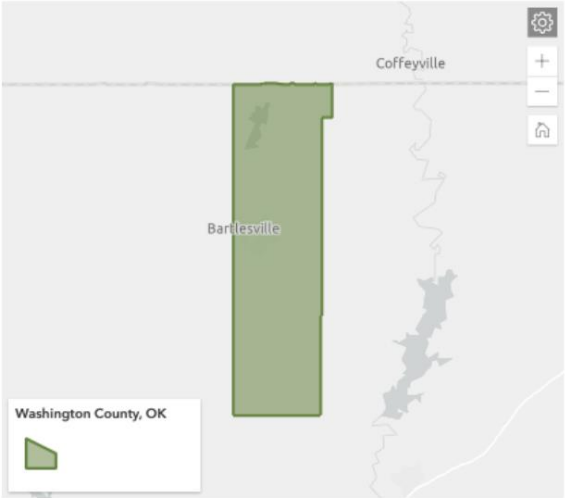


POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

50,852
Population

42.6
Median Age

2.4
Average Household Size

$55,791
Median Household Income

20,905
Households

6,161
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

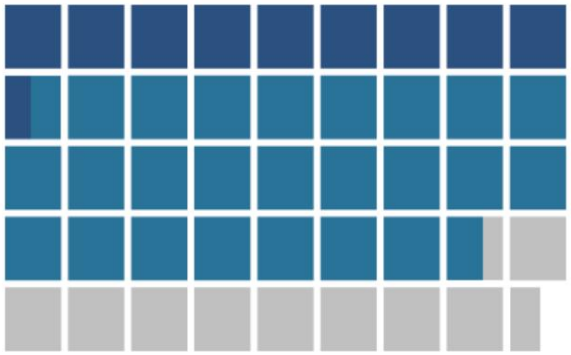
Race and Ethnicity

The largest group: White Alone (74.54)
The smallest group: Pacific Islander Alone (0.07)

Indicator ▲	Value	Diff
White Alone	74.54	+5.94
Black Alone	2.63	-4.95
American Indian/Alaska Native Alone	10.25	+1.41
Asian Alone	2.62	+0.17
Pacific Islander Alone	0.07	-0.12
Other Race	2.35	-3.08
Two or More Races	7.55	+0.64
Hispanic Origin (Any Race)	6.7	-5.03

Bars show deviation from Oklahoma

POPULATION BY AGE



Under 18 (21%) Ages 18 to 64 (56%) Aged 65+ (22%)

EDUCATION

9%
No High School Diploma

34%
High School Graduate

27%
Some College

30%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

64%
Use Computer

77%
Use Cell Phone

Languages

27,049
2019 Pop 18-64 Speak only English (ACS 5-Yr)

36
2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)

17
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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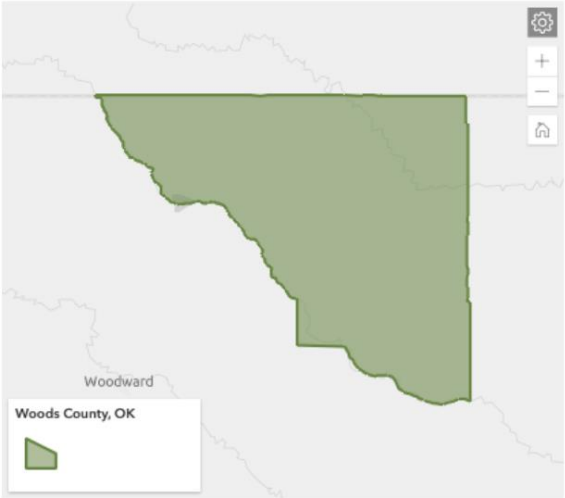


POPULATION TRENDS AND KEY INDICATORS

KEY FACTS

8,752
Population

36.9
Median Age

2.2
Average Household Size

$48,386
Median Household Income

3,451
Households

1,077
2019 Households with 1+ Persons with a Disability (ACS 5-Yr)

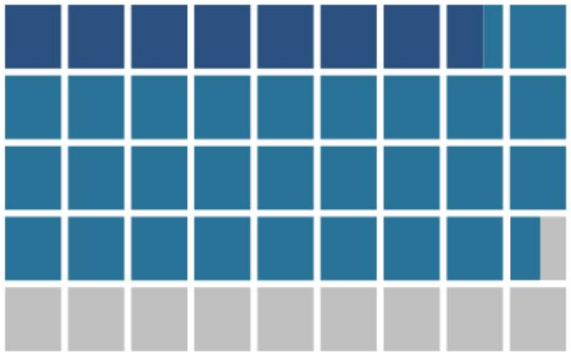
Race and Ethnicity

The largest group: White Alone (84.89)
The smallest group: Pacific Islander Alone (0.05)

Indicator ▲	Value	Diff
White Alone	84.89	+16.29
Black Alone	3.4	-4.18
American Indian/Alaska Native Alone	2.87	-5.97
Asian Alone	1.37	-1.08
Pacific Islander Alone	0.05	-0.14
Other Race	3.87	-1.56
Two or More Races	3.54	-3.37
Hispanic Origin (Any Race)	8.24	-3.49

Bars show deviation from Oklahoma

POPULATION BY AGE



Under 18 (17%) Ages 18 to 64 (62%) Aged 65+ (21%)

EDUCATION

10%
No High School Diploma

30%
High School Graduate

28%
Some College

32%
Bachelor's/Grad/Prof Degree

INTERNET ACCESS

62%
Use Computer

75%
Use Cell Phone

Languages

5,352
2019 Pop 18-64 Speak only English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Spanish & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Asian-Pacific Isl & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Indo-European & No English (ACS 5-Yr)

0
2019 Pop 18-64 Speak Other Language & No English (ACS 5-Yr)

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Appendix G: Funding Allocations under Public Law 115-254 and 116-20 December 3, 2019

Funding Allocations under Public Law 115-254
and 116-20
December 3,
2019

This memorandum describes allocations of CDBG-DR funding appropriated under Public

Laws 115-254 and 116-20. There are four components to the allocation:

(1) Unmet Needs for 2018 Disasters
(2) Unmet Needs for 2019 Disasters declared through October 4, 2019
(3) $431 million for infrastructure unmet needs for 2017 disasters, of which $331 million is reserved for Hurricane Maria impacted areas
(4) Funds being held for any additional unmet needs for disasters occurring in 2019

The basic formula for the 2018 and 2019 disasters combines

three elements: (1) Estimated serious unmet housing

needs;
(2) Estimated serious unmet business needs; and
(3) Estimated local cost share requirement for FEMA Public Assistance Categories C to G.

The allocations for 2017 disasters are calculated with updated local cost share estimates for FEMA Public

Assistance Category C to G. The Appendix describes the exact methodology. The rest of the document

offers the following tables:

Table 1: 2018
Disasters Table 2:
2019 Disasters Table

3: 2017 Disasters
Table 4: Remaining
funds

Table 4 shows that $272 million of appropriated funds have not yet been allocated. Those funds will be allocated for any additional disasters of 2019 that meet the most impacted and distressed criteria for inclusion. If funds remain after considering additional disasters of 2019, the balance will be allocated to the mitigation needs of 2018 disaster proportional to the total 2018 unmet need allocations on Table 1.

Tables 5, 6, and 7 provide the data used to calculate the unmet needs.

Table 1 - Allocations for Unmet Needs under Public Laws 115-254 and 116-20 - 2018 Disasters

FEMA disaster No.	Grantee	Unmet needs allocation under Public Law 115-254	Unmet needs allocation under Public Law 116-20	Combined allocation for unmet needs (Pub. L. 115-254 and Pub. L. 116-20)	Minimum amount that must be expended for recovery in the HUD-identified "most impacted and distressed" areas
4357	American Samoa	$16,539,00	$6,500,00	$23,039,00	($23,039,000) All components of American
4413	State of Alaska	$0	$35,856,00	$35,856,00	(No less than $28,685,000) Anchorage Borough
4407, 4382	State of California	$491,816,00	$525,583,00	$1,017,399,00	(No less than $813,919,000) Butte, Lake, Los Angeles, and
4399	State of Florida	$448,023,00	$287,530,00	$735,553,00	(No less than $588,442,000) Bay, Calhoun, Gulf, and Jackson Counties; 32321 (Liberty), 32327 (Wakulla), 32328 (Franklin), 32346 (Wakulla and
4400	State of Georgia	$34,884,00	$6,953,00	$41,837,00	(No less than $33,470,000) 39845 (Seminole) Zip
4365	Kauai County, HI	$0	$9,176,00	$9,176,00	(No less than $7,341,000) 96714 (Kauai) Zip Code
4366	Hawaii County, HI	$66,890,00	$16,951,000	$83,841,00	($83,841,000) Hawaii County
4396, 4404	Commonwealth of the Northern Mariana Islands	$188,652,00	$55,294,00	$243,946,00	(No less than $195,157,000) Saipan and Tinian Municipalities
4393	State of North	$336,521,00	$206,123,00	$542,644,00	(No less than $434,115,000) Brunswick, Carteret, Columbus, Craven, Duplin, Jones, New Hanover, Onslow, Pender, and Robeson Counties; 28352 (Scotland), 28390 (Cumberland), 28433 (Bladen), and 28571
4394	State of South	$47,775,00	$24,300,00	$72,075,00	(No less than $57,660,000) Horry and Marion counties.
4377	State of Texas	$46,400,00	$26,513,00	$72,913,00	(No less than $58,330,000) Hidalgo County
4402	State of Wisconsin	$0	$15,355,00	$15,355,00	(No less than $12,284,000) 53560 (Dane) Zip Code
	Subtotal 2018 Disasters		**$1,677,500,000**	**$1,216,134,000**	**$2,893,634,000**

Table 2 - Allocations for Unmet Needs under Public Law 116-20 only - 2019 Disasters

FEMA disaster No.	Grantee	Unmet needs allocation under Public Law 116-20	Minimum amount that must be expended for recovery in the HUD-identified "most impacted and distressed" areas
4441	State of Arkansas	$8,940,00	(No less than $7,152,000) 71602 (Jefferson) and 72016 (Perry) Zip Codes
4421	State of Iowa	$96,741,00	(No less than $77,393,000) Mills County; 51640 (Fremont) Zip Code
4451	State of Missouri	$30,776,00	(No less than $24,621,000) St. Charles County; 64437 (Holt) and 65101 (Cole) Zip Codes
442	State of Nebraska	$108,938,00	(No less than $87,150,000) Sarpy County; 68025 (Dodge), 68064 (Douglas), and 68069 (Douglas) Zip
444	State of Ohio	$12,305,00	(No less than $9,844,000) 45426 (Montgomery) Zip Code
443	State of	$36,353,00	(No less than $29,082,000) Muskogee and Tulsa Counties; 74946 (Sequoyah) Zip Code
4454 &	State of Texas	$212,741,000	(No less than $170,193,000) Cameron, Chambers, Harris, Jefferson, Liberty, Montgomery, and Orange counties; 78570 (Hidalgo) Zip Code
	Subtotal 2019 Disasters	**$506,794,000**	

Table 3 - Allocations for Additional Unmet Infrastructure Needs - 2017 Disasters

FEMA disaster No.	Grantee	Unmet infrastructure needs allocation under Public Law 116-20 (covered	Minimum amount that must be expended for recovery in the HUD-identified "most impacted and distressed" areas
4344 &	State of	$38,057,52	(No less than $30,446,000) Sonoma and Ventura counties; 93108, 94558, 95422, 95470, and 95901
4337 & 4371	State of Florida	$38,637,74	(No less than $30,910,000) Brevard, Broward, Clay, Collier, Duval, Hillsborough, Lee, Miami-Dade, Monroe, Orange, Osceola, Palm Beach, Polk, St. Lucie, and Volusia counties; 32084, 32091, 32136,
4294, 4297,	State of Georgia	$13,015,596	(No less than $10,412,000) 31520, 31548, and 31705 Zip Codes.
4317	State of Missouri	$9,847,01	(No less than $7,878,000) 63935, 63965, 64850, 65616, and 65775 Zip Codes.
4336 & 4339	Commonwealth of	$277,853,23	($277,853,230) All Components Puerto Rico
4335 & 434	U.S. Virgin	$53,588,88	($53,588,884) All components of the U.S. Virgin Islands
	Total	**$431,000,000**	
	Subtotal Maria Disasters	**$331,442,114**	

Table 4. Remaining Funds

	PL 115-254	PL 116-20
Allocations 12-3-19	$1,677,500,00	$2,153,928,00
HUD S&E	$2,500,00	$0
HUD TA and Capacity Building	$0	$5,000,00
Remaining	$0	$272,072,00
Total Appropriated	**$1,680,000,0**	**$2,431,000,0**

Table 5b. 2019 Serious Housing Unmet Needs (Data from

Grantee	Disaster Number	Disaster Type	Serious Unmet Housing Need Estimate Most Impacted	Total Any Damage	Total Serious Damage	Owner Serious Unmet	Renter Serious Unmet	Total Serious Unmet	County Most Impacted Areas	Zip Code Most Impacted Areas	Total Most Impacted Areas
Oklahoma	4438	Severe Storms/Tornadoes/ Flood/Wind/ Landslides/Mudsli	$24,206,42	1,086	689	391	88	479	2	1	3

Most Impacted Area	Serious Unmet Housing Need Estimate Most Impact	Total Any Damage	Total Serious Damage	Owner Serious Unmet	Renter Serious Unmet	Total Serious Unmet
74946: Sequoyah (County)	$2,826,05	66	66	27	24	51
Muskogee (County)	$10,810,829	341	261	160	40	200
Tulsa (County)	$10,569,537	679	362	204	24	228

Table 5bi. Housing Multipliers 2019 Disasters – Estimated average cost to repair for uninsured properties after subtracting out average per unit amount estimated to be covered by SBA and FEMA assistance

	Serious Unmet Housing Need		
	Major-Low	Major-High	Severe
Oklahoma	$31,492	$49,592	$69,101

Table 6b. 2019 Disasters – Serious Unmet Business Need

Grantee	Estimated Serious Unmet Business Needs	Applicants Inspected with serious damage and denied or still in	Multiplier for pre-inspection denial due to credit or income	Estimated Applicants with Serious Unmet Needs (Inspected and Uninspected)
Oklahoma	$3,818,265	20	1.92	38

Table 7b. 2019 Infrastructure Need (Data 1/15/2019)

Grantee	**Category C to G FEMA PA**	**Federal Share**	**Local Share (Unmet**	**Federal Share**
Oklahoma	$33,312,456	$24,984,34	$8,328,114	75%

Detailed Methodology

Allocation of CDBG–DR Funds to Most Impacted and Distressed Areas due to 2018 Federally Declared Disaster s

Background

The FAA Reauthorization Act of 2018 (Public Law 115–254) enacted on October 5, 2018, appropriated $1,680,000,000 through the Community Development Block Grant disaster recovery (CDBG-DR) program. The statutory text related to the allocation is as follows:

"For an additional amount for ''Community Development Fund'', $1,680,000,000, to remain available until expended, for necessary expenses for activities authorized under title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et seq.) related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas resulting from a major disaster declared in 2018 pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.): *Provided*, That funds shall be awarded directly to the State or unit of general local government at the discretion of the Secretary[.]"

Public Law 116-20 appropriated $2,431,000,000 through the Community Development Block Grant disaster recovery (CDBG-DR) program. The statutory text related to the allocation is as follows:

"For an additional amount for ''Community Development Fund'', $2,431,000,000, to remain available until expended, for necessary expenses for activities authorized under title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et seq.) related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas resulting from a major disaster that occurred in 2018 or 2019 (except as otherwise provided under this heading) pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.): *Provided*, That funds shall be awarded directly to the State, unit of general local government, or Indian tribe (as such term is defined in section 102 of the Housing and Community Development Act of 1974) at the discretion of the Secretary... *Provided further*, That of the amounts made available under this heading $431,000,000 shall be allocated to meet unmet infrastructure needs for grantees that received allocations for disasters that occurred in 2017 under this heading of division B of Public Law 115-56 and title XI of subdivision 1 of division B of Public Law 115-123, of which $331,442,114 shall be allocated to those grantees affected by Hurricane Maria:

"*Provided further*, That of the amounts made available under this heading, up to $5,000,000 shall be made available for capacity building and technical assistance...*Provided further*, That of the amounts made available under this heading and under the same heading in Public Law 115–254, up to $2,500,000 shall be transferred, in aggregate, to ''Department of Housing and Urban Development—Program Office Salaries and Expenses—Community Planning and Development'' for

necessary costs, including information technology costs, of administering and overseeing the obligation and expenditure of amounts under this heading[.]"

Most impacted and distressed areas

As with prior CDBG-DR appropriations, HUD is not obligated to allocate funds for all major disasters occurring in the statutory timeframes. HUD is directed to use the funds "in the most impacted and distressed areas." HUD has implemented this directive by limiting CDBG-DR formula allocations to grantees with major disasters that meet three standards:

(1) Individual Assistance/IHP designation. HUD has limited allocations to those disasters where FEMA had determined the damage was sufficient to declare the disaster as eligible to receive Individual and Households Program (IHP) funding.

(2) Concentrated damage. HUD has limited its estimate of serious unmet housing need to counties and zip codes with high levels of damage, collectively referred to as "most impacted areas." For this allocation, HUD is defining most impacted areas as either most impacted counties – counties exceeding $10 million in serious unmet housing needs – and most impacted Zip Codes – Zip Codes with $2 million or more of serious unmet housing needs. The calculation of serious unmet housing needs is described below.

(3) Disasters meeting the most impacted threshold. Only 2018 and 2019 disasters that meet this requirement for most impacted damage are funded if one or more county or zip code meets the thresholds above. Note that this allocation only includes disasters declared as of October 4, 2019. Other 2019 disasters will be addressed in a future notice.

For disasters that meet the most impacted threshold described above, the unmet need allocations are based on the following factors summed together:

(1) Repair estimates for seriously damaged owner-occupied units without insurance (with some exceptions) in most impacted areas after FEMA and SBA repair grants or loans; an estimate for homeowners served by FEMA's Permanent Housing Construction program is also deducted from the homeowner unmet need estimate;

(2) Repair estimates for seriously damaged rental units occupied by very low-income renters in most impacted areas;

(3) Repair and content loss estimates for small businesses with serious damage denied by SBA; and

(4) The estimated local cost share for Public Assistance Category C to G projects.

Methods for estimating serious unmet needs for housing

The data HUD uses to calculate unmet needs for 2018 qualifying disasters come from the FEMA Individual Assistance program data on housing-unit damage as of July 17, 2019. The data for 2019 qualifying disasters are as of November 13, 2019.

The core data on housing damage for both the unmet housing needs calculation and the concentrated damage are based on home inspection data for FEMA's Individual Assistance program and SBA's disaster loan program. HUD calculates "unmet housing needs" as the number of housing units with unmet needs times the estimated cost to repair those units less repair funds already provided by FEMA and SBA.

Each of the FEMA inspected owner units are categorized by HUD into one of five categories:

- Minor-Low: Less than $3,000 of FEMA inspected real property damage.
- Minor-High: $3,000 to $7,999 of FEMA inspected real property damage

- Major-Low: $8,000 to $14,999 of FEMA inspected real property damage and/or 1 to 3.9 feet of flooding on the first floor.

- Major-High: $15,000 to $28,800 of FEMA inspected real property damage and/or 4 to 5.9 feet of flooding on the first floor.

- Severe: Greater than $28,800 of FEMA inspected real property damage or determined destroyed and/or 6 or more feet of flooding on the first floor.

When owner-occupied properties also have a personal property inspection or only have a personal property inspection HUD reviews the personal property damage amounts such that if the personal property damage places the home into a higher need category over the real property assessment, the personal property amount is used as follows:

- Minor-Low: Less than $2,500 of FEMA inspected personal property damage
- Minor-High: $2,500 to $3,499 of FEMA inspected personal property damage
- Major-Low: $3,500 to $4,999 of FEMA inspected personal property damage or 1 to 3.9 feet of flooding on the first floor.
- Major-High: $5,000 to $9,000 of FEMA inspected personal property damage or 4 to 5.9 feet of flooding on the first floor.
- Severe: Greater than $9,000 of FEMA inspected personal property damage or determined destroyed and/or 6 or more feet of flooding on the first floor.

To meet the statutory requirement of "most impacted" in this legislative language, homes are determined to have a high level of damage if they have damage of "major-low" or higher. That is, they have a FEMA inspected real property damage of $8,000 or above, personal property damage $3,500 or above, or flooding 1 foot or above on the first floor.

Furthermore, a homeowner with flooding outside the 1% risk flood hazard area is determined to have unmet needs if they reported damage and no flood insurance to cover that damage. For homeowners inside the 1% risk flood hazard area, homeowners without flood insurance with flood damage below the greater of national median or 120% of Area Median Income are determined to have unmet needs. For non-flood damage, homeowners without hazard insurance with incomes below the greater of national median or 120% of Area Median Income are included as having unmet needs.

FEMA does not inspect rental units for real property damage so personal property damage is used as a proxy for unit damage. Each of the FEMA-inspected renter units are categorized by HUD into one of five categories:

- Minor-Low: Less than $1,000 of FEMA inspected personal property damage
- Minor-High: $1,000 to $1,999 of FEMA inspected personal property damage
- Major-Low: $2,000 to $3,499 of FEMA inspected personal property damage or 1 to 3.9 feet of flooding on the first floor.
- Major-High: $3,500 to $7,500 of FEMA inspected personal property damage or 4 to 5.9 feet of flooding on the first floor.
- Severe: Greater than $7,500 of FEMA inspected personal property damage or determined destroyed and/or 6 or more feet of flooding on the first floor.

To meet the statutory requirement of “most impacted” for rental properties, homes are determined to have a high level of damage if they have damage of “major-low” or higher. That is, they have a FEMA personal property damage assessment of $2,000 or greater or flooding 1 foot or above on the first floor.

Furthermore, landlords are presumed to have adequate insurance coverage unless the unit is occupied by a renter with income less than the greater of the Federal poverty level or 50% of median income. Units occupied

by a tenant with income less than the greater of the poverty level or 50% of median income are used to calculate likely unmet needs for affordable rental housing.

The average cost to fully repair a home for a specific disaster to code within each of the damage categories noted above is calculated using the median real property damage repair costs determined by the SBA for its disaster loan program for the subset of homes inspected by both SBA and FEMA for each eligible disaster.

Minimum multipliers are not less than the 1st quarter median for all Individual Assistance (IA) eligible disasters combined in each disaster year at the time of the allocation calculation, and maximum multipliers are not more than the 4th quarter median for all IA eligible disasters combined in each disaster year with data available as of the allocation. Because SBA is inspecting for full repair costs, their estimate is presumed to reflect the full cost to repair the home, which is generally more than the FEMA estimates on the cost to make the home habitable. If there is a match of fewer than 20 SBA inspections to FEMA inspections for any damage category, the minimum multiplier is used.

For each household determined to have unmet housing needs (as described above), their estimated average unmet housing need is equal to the average cost to fully repair a home to code less assistance from FEMA and SBA provided for repair to the home, based on their damage category (noted above).

Methods for estimating serious unmet economic revitalization needs

Based on SBA disaster loans to businesses using data for 2018 disasters from as of date July 17, 2019, and for 2019 disasters from as of data November 14, 2019, HUD calculates the median real estate and content loss by the following damage categories for each state:

- Category 1: real estate + content loss = below $12,000
- Category 2: real estate + content loss = $12,000–$29,999
- Category 3: real estate + content loss = $30,000–$64,999
- Category 4: real estate + content loss = $65,000–$149,999
- Category 5: real estate + content loss = $150,000 and above

For properties with real estate and content loss of $30,000 or more, HUD calculates the estimated amount of unmet needs for small businesses by multiplying the median damage estimates for the categories above by the number of small businesses denied an SBA loan, including those denied a loan prior to inspection due to inadequate credit or income (or a decision had not been made), under the assumption that damage among those denied at pre-inspection have the same distribution of damage as those denied after inspection.

Methods for estimating unmet infrastructure needs

To calculate 2018 and 2019 unmet needs for infrastructure projects, HUD obtained FEMA cost

estimates (as of July 17, 2019, for the 2018 disasters and November 13, 2019, for 2019 disasters) of the expected local cost share to repair the permanent public infrastructure (Categories C to G) to their pre-storm condition.

To calculate additional infrastructure unmet needs for 2017 disasters, HUD compares the change in FEMA Category C to G local match cost estimates between March 2018 (when funds had been allocated under Public Law 115-23) and November 2019. For grantees impacted by Hurricane Maria – Puerto Rico and the Virgin Islands – the statutorily required allocation of $331,442,114 is allocated proportional based on their relative share of growth in Category C to G local match cost estimates. For other 2017 grantees where the November 2019 estimate exceeds the March 2018 estimate, each grantee is first increased dollar-for-dollar to

their local match requirements. For any of the remaining funds of the required $431 million for 2017 disasters, they are allocated to the non-Maria disasters that have been funded at 100% or less of infrastructure match needs proportional to their share of eligible grantees' November 2019 estimated infrastructure match needs.

Allocation Calculation

Once eligible entities are identified using the above criteria, the allocation to individual grantees represents their proportional share of the estimated unmet needs. For the formula allocation, HUD calculates total unmet recovery needs for eligible 2018 and 2019 disasters as the aggregate of:

- Serious unmet housing needs in most impacted counties;
- Serious unmet business needs; and
- Unmet infrastructure need.

Two jurisdictions have their unmet needs calculations adjusted due to unusual circumstances not covered in the standard methodology. First, Hawaii County in Hawaii has 76 homes that were not damaged but are completely surrounded by lava fields. HUD assumes that those homes will never be habitable and categorizes them as destroyed with no insurance for the serious unmet need calculation. Second, FEMA is administering its Permanent Housing Construction program in the Northern Marianas and expects to serve 455 homeowners with seriously damaged homes. As such HUD subtracts the unmet needs of 455 homeowners from the base estimate.

The allocation for 2017 disasters is allocated for additional unmet infrastructure needs.

Thank you for reading the 2019 CDBG-DR Action Plan!