

State of Oklahoma

Disaster Recovery Program

Action Plan

Submitted to the
U.S. Department of Housing and Urban Development
By The State of Oklahoma

March 23rd, 2014

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I. Executive Summary

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

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

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

The Federal Register Notice also imposes strict expenditure and compliance deadlines on the State. Accordingly, HUD is allowing Grantees to request less than the full funding amount in a Partial Action Plan. The State of Oklahoma, like other states to which CDBG-DR Program funds were allocated by HUD, will pursue incremental obligation of the Funding to support its tornado relief and restoration programs

and activities to ensure compliance with HUD’s deadlines. Specifically, the State is requesting that HUD make **\$4,246,016** available immediately upon approval of this Action Plan. HUD has assured the State that as it submits additional requests for additional portions of the Funding to be released, so long as everything is in order, they will approve the request promptly and without delay.

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

TABLE 1: STATE OF OKLAHOMA: CDBG-DR Allocations		
Activity	Allocation	Request for Partial Allocation
Housing (Owner-Occupied and Multi-family Housing)	\$ 1,871,770	\$445,569
Infrastructure	\$5,438,230	\$2,204,230
Mitigation & Resiliency	\$1,020,000	\$200,000
Public Facilities	\$0.00	\$0.00
Economic Revitalization	\$300,000	\$300,000
Administration	\$530,000	\$316,217
Planning	\$1,440,000	\$780,000
TOTAL	\$10,600,000	\$4,246,016

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

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

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

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

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

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

- Acquisition of real property;
- Acquisition, rehabilitation and construction of public works and facilities;
- Buyouts;
- Code enforcement;
- Relocation assistance;
- New construction, reconstruction and rehabilitation of residential and nonresidential properties;
- New construction, reconstruction and rehabilitation of public housing;
- Repair or rehabilitation of infrastructure;
- American Disability Act improvements;
- Rental assistance (limited); storm mitigation measures;

- Special economic development including: grants and loans to SBA-defined small businesses, job training, and the revitalization of business districts;
- Fair housing counseling;
- Homeownership counseling and assistance;
- Assistance to Community-Based Development Organizations for neighborhood revitalization, community economic development, energy conservation projects, homeownership assistance, fair housing, planning, and administrative costs, including actions to meet the grantee's certification to affirmatively further fair housing.

With respect to CDBG-DR Program eligible activities, the State must also ensure that at least 50% of its CDBG-DR grant funds are used for activities that benefit low- and moderate-income ("LMI") persons. LMI persons are defined for the purposes of the CDBG-DR Program as persons and families whose income does not exceed 80% of the area median income ("AMI"), as determined by HUD. This 50% requirement applies to the State's expenditure of the entirety of the Funding, less administration and planning, and does not apply to each individual program or activity. For the purposes of this Action Plan, that would mean a minimum of **\$4,315,000** of these funds must be obligated to the national objective of benefitting low- and moderate- income persons.

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

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

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

States may request additional waivers of program requirements by providing sufficient evidence that such waiver is necessary for the effective administration of the Funding. As of the date of this Action Plan, the State has not requested any such specific waivers. The State reserves the right to

pursue such waivers under all broad program categories as may be appropriate and necessary as additional information relative to “unmet need” and other parameters are obtained.

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

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

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

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

II. Introduction

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

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

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

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

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

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

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

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

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

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

III. Disaster Impact and Response

Overview

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

1. Tornadoes on May 19th, 2013

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

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

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

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

2. Tornado on May 20th, 2013

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

3. Tornadoes & Flashfloods on May 31st, 2013

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

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

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

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

A team of consultants began delivering the assistance on June 18th -- less than a month after the May tornadoes -- at a kick-off meeting convened by the Oklahoma HUD Field Office. Over the span of five weeks, this early intervention offered representatives of the City of Moore, the City of Oklahoma City and the State of Oklahoma timely guidance on strategies to gather complete information on the disaster's impacts (both direct and indirect), to address the disaster with upfront planning and engagement of all stakeholders as well as to prepare for implementing recovery activities. Because FEMA could not completely assess the storm's damage and turned to the Oklahoma HUD Field Office for help, the team also assisted HUD in presenting this full picture of the conditions resulting from the disaster.

City of Oklahoma City

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

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

OKC Event #1

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

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

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

OKC Event #2

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

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

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

OKC Event #3:

- May 31st SW OKC Tornado (EF 1; 0 fatalities; Length .4 miles; Width: 250 yards);
- May 31st SE OKC Tornado (EF 1; 0 fatalities; Length 10 miles; Width: 250 yards);

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

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

TABLE 4: MAY 31TH TORNADO AND FLASH FLOOD DAMAGE IN OKLAHOMA CITY					
EVENT #3: SE AND SW OKC					
TYPE	AFFECTED	MINOR	MAJOR	DESTROYED	TOTALS
Single Family	424	10	1	0	435
Mobile Home	120	12	4	0	136
Apartment	83	3	6	0	92
Business	60	23	11	0	94
Public Facilities	7	0	0	0	7
Total:	694	48	22	0	764

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



Figure 1: Damage within Oklahoma City

City of Shawnee

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

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

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

TABLE 5: MAY 19TH TORNADO DAMAGE IN CITY OF SHAWNEE					
TYPE	AFFECTED	MINOR	MAJOR	DESTROYED	TOTALS
Single Family	2	22	12	18	54
Mobile Home	0	0	0	0	0
Apartment	0	0	0	0	0
Business	0	0	0	0	0
Public Facilities	0	0	0	1	1
Total:	2	22	12	19	55

City of Norman

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

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

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

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

Balance of State

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

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

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

Demographics

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

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

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

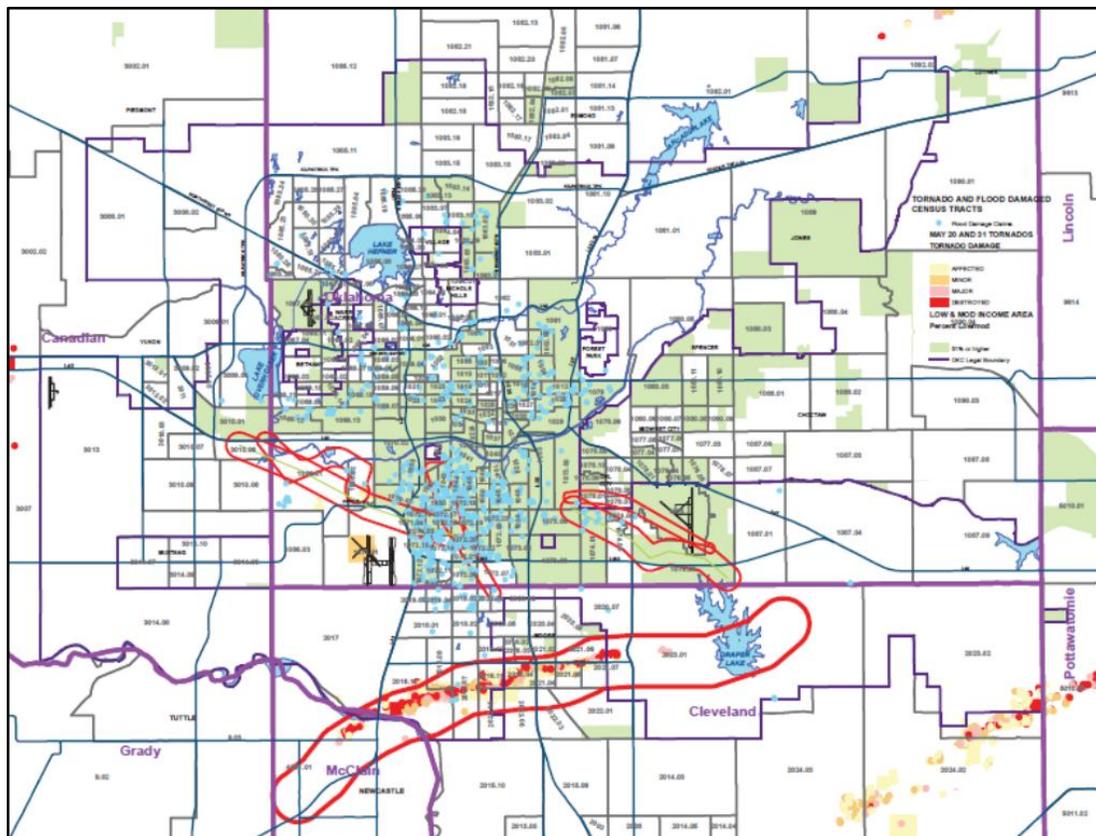


Figure 2: Tornado and Flood Impacted Areas in Oklahoma City

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

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

Affected Census Tracts

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

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

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

² QCT Database: Accessed Jan 15, 2014

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

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

Canadian County

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

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

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

Cleveland County

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

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

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

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

Pottawatomie County

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

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

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

Oklahoma County

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

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

On average, the homeownership rate in the affected census tracts was 59.2%, lower than the City's homeownership rate of 60.4%, and the State's homeownership rate of 67.2%. Thirteen (13) of the affected census tracts within Oklahoma County are designated low income. Table 8 on the following page summarizes the demographic data for each affected county area within Oklahoma City.

**TABLE 8: OKLAHOMA CITY
SUMMARY OF DEMOGRAPHICS FOR ALL COUNTIES & AREAS AFFECTED WITHIN OKLAHOMA CITY³**

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

Cleveland County (Outside of Moore and Oklahoma City)

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

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

³ American Community Survey; Accessed Jan 12, 2014

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

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

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

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

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

Pottawatomie County (Outside Oklahoma City)

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

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

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

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

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



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

Le Flore County

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

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

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

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

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

Lincoln County

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

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

Lincoln County's total population in 2012 was 34,273. Approximately 8.5 percent (8.5%) of Lincoln County's population is minority. The largest minority populations are American Indian and African-

American with 10.5% and 2.4% of the population, respectively. Twenty-nine percent (28.7%) of the population is elderly.

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

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

McClain County

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

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

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

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

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

Okfuskee County

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

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

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

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

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

Okmulgee County

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

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

Okmulgee County's total population in 2012 was 40,069. Approximately 34 percent (34.0%) of Okmulgee County's population is minority. The largest minority populations are American Indian and African

American with 18.9% and 13.4% of the population, respectively. Approximately twenty-nine percent (28.5%) of the population is elderly.

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

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

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

TABLE 9: SUMMARY OF COUNTIES AFFECTED: CLEVELAND (OUTSIDE OF OKC); LE FLORE; LINCOLN; MCCLAIN; OKFUSKEE; OKMULGEE; AND POTTAWATOMIE												
			Top Two Minority Population Segments									
County	Total Pop	Percent Minority	African-American	American Indian	Asian	Other	Two or More Races	Percent Elderly	Income	Household Median in Poverty	Percent of Families	Rate Homeownership
Cleveland	256,550	20%	4.1%	4.1%	--	--	--	21.2%	\$54,883	7.9%	67.2%	
Le Flore	50,056	24.9%	2.8%	17.2%	--	--	--	28.2%	\$36,084	6.6%	67.2%	
Lincoln	34,273	8.5%	2.4%	10.5%	--	--	--	28.7%	\$42,953	12.4%	77.8%	
McClain	34,506	8.2%	--	10.6%	--	2.0%	--	25.5%	\$54,544	8.2%	81.5%	
Okfuskee	12,191	24.7%	10.0%	14.6%	--	--	--	28.8%	\$34,258	20.4%	71%	
Okmulgee	40,069	34.0%	13.4%	18.9%	--	--	--	28.5%	\$39,142	15.3%	70.4%	
Pottawatomie	69,442	24.1%	2.7%	11.7%	--	--	--	26.1%	\$42,467	14.1%	72.2%	

IV. Unmet Needs Assessment

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

Housing Needs Assessment

Owner-Occupied Unmet Need

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

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

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

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

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

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

Multifamily Unmet Need

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

Homelessness, Transitional and Supportive Facilities, Units and Populations

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

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

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

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

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

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

Unmet Economic Development Needs

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

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

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

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

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

Infrastructure Needs Assessment

Based on the State’s needs assessment survey, public outreach and FEMA reports, it is clear that Oklahoma and particularly Oklahoma City, sustained significant damage to infrastructure as a result of

the tornadoes. It should be noted that infrastructure stands as the single largest category in terms of unmet needs among all eligible CDBG-DR categories as defined by this Action Plan.

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

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

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

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

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

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

Public Facilities Needs Assessment

Based on the State’s needs assessment survey, public outreach and FEMA reports, Oklahoma sustained some direct damage to public facilities as a result of the tornadoes and flooding. The State has identified several public building projects with unmet needs totaling approximately \$192,000. These projects relate to public building repairs (e.g. community rooms, schools) that sustained direct storm related damage. Overall, public facilities represent a small portion of the overall demonstrated unmet need.

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

Mitigation & Resiliency Needs Assessment

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

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

1. County Level Threat and Hazard Identification/Risk Assessment – Example: Identify areas subject to natural disasters and potential manmade hazards. Provide historical

overview of continuous threats such as tornadoes/wind storms, floods, ice storms, fire, and drought.

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

V. Proposed Allocation of the Funding

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

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

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

TABLE 14: SUMMARY OF UNMET NEEDS & PROPOSED ALLOCATIONS		
Activity	Total Unmet Need	Proposed Allocation
Housing (Owner-Occupied and Multi-family Housing)	\$1,726,201	\$1,871,770
Infrastructure	\$8,588,235	\$5,438,230
Public Facilities	----	----
Economic Revitalization	\$2,000,000	\$300,000
Mitigation & Resiliency	\$1,020,000	\$1,020,000
Administration	\$530,000	\$530,000
Planning	\$1,590,000	\$1,440,000
TOTAL	\$15,284,436	\$10,600,000

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

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

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

The following additional factors will guide the allocation of Funding:

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

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

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

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

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

Housing (Rehabilitation, Reconstruction & New Construction)

Allocation \$1,871,770

Single Family

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

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

Multi-family Housing

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

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

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

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

The State conducted extensive outreach to Low Income Housing Tax Credit (LIHTC) affordable housing, HUD Assisted housing, and McKinney-Vento funded shelters. All known HUD Assisted and Low Income Housing Tax Credit affordable housing developments were surveyed to identify damage associated with the May 19th, 20th and May 31st storm events. Four survey responses were received that identified \$170,000 unmet need in multi-family housing rehabilitation assistance. All responses were located

within the Oklahoma City. (The State will provide further detail regarding the type of units, PHA; HUD Assisted; etc) and the type of damage (wind; flood, etc.) separately).

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

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

Housing Goals

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

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

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

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

Owner-occupied Housing Program

Based on lessons learned from past disasters, and the particular needs of the State's most impacted communities, the State will have a single owner-occupied housing program limited to Oklahoma City to provide funding both to property owners that need only rehabilitation assistance and those that need substantial rehabilitation or reconstruction assistance as well as mitigation.

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

Eligibility Threshold Requirements

- Unmet Needs – Funding is available solely to address unmet needs;
- Eligible/Fundable – each property must be determined to be an eligible and fundable activity under the Housing and Community Development Act as modified by the Federal Register Notice and all other applicable regulations and guidance, including, without limitation, the following activities:
 - Acquisition of real property; buyouts; code enforcement; relocation assistance; new construction, reconstruction and rehabilitation of residential and nonresidential properties; new construction, reconstruction and rehabilitation of public housing; American Disability Act improvements; fair housing counseling; homeownership counseling and assistance; and actions to meet the State's certification to affirmatively further fair housing.
- Impacted and Distressed Area – each property must be located within Oklahoma City;
- Readiness to Proceed – each property must be capable of being undertaken immediately to provide outcomes to intended beneficiaries affected by the disaster;

- Feasibility – each property must be found to be financially feasible, sustainable and likely to contribute to the long-term recovery of disaster impacted communities; and
- Consistency with Consolidated Plan/Action Plan – each property must be reflective of the goals, priorities and requirements of the State of Oklahoma’s 2014-2018 Consolidated Plan.
- No portion of the Funding may be used to reimburse the applicant for costs incurred prior to their application.

Funding Priorities

- Projects that benefit LMI persons and/or are located in LMI Areas (i.e. an area with household incomes at or below 80% of the area median income);
- Projects that enable the State to satisfy the federal requirement that at least 30.4% of the Funding be spent in Cleveland County;
- Projects that include deep income targeted units (i.e. units for extremely low income persons or families, the homeless or persons at risk of becoming homeless);
- Projects that address conditions that threaten the health and safety of either the occupants or the public;
- Projects that contribute significantly to the long-term recovery and economic revitalization of the affected area;
- Projects undertaken on behalf of a beneficiary or sponsor that commits to contribute financially in the repair, construction or mitigation of the project (this can be through private insurance, NFIP, FEMA, SBA, and/or other sources); and
- Mitigation – cost effective resiliency and other activities designed to harden the property in order to minimize reoccurrence of storm damage whenever possible or to protect households from future disasters by providing safe rooms or storm shelters.

Multifamily Rehabilitation Program

The Multifamily Rehabilitation program will provide financial assistance to rehabilitate LMI units in eligible multifamily properties with unmet need, including public housing, HUD-assisted housing,

McKinney-Vento funded shelters and housing for the homeless, which were damaged by the tornadoes and are located outside the 100 year flood plain in any community in Oklahoma City. The general requirements of this program are as follows:

1. Eligible applicants include owners of existing low moderate income (LMI) multifamily properties outside of the 100 flood plain in Oklahoma City (for-profit and non-profit owners as well as public housing authorities);
2. An eligible applicant's property must have been damaged by a tornado or flooding during the period May 18th through June 2nd, 2013;
3. Each property to be assisted must have been insured at the time of the storm;
4. Each property to be assisted must be current on property taxes, if applicable ("current on property taxes" includes being in compliance with a payment plan or stipulated agreement with the taxing entity);
5. Each property must have a minimum of five units (applicants may aggregate existing units to meet the threshold of five units);
6. Properties to be assisted must meet applicable local codes or rehabilitation standards at completion;
7. The owner/developer must submit a relocation plan that conforms to the Uniform Relocation Act (the "URA"), if applicable;
8. The owner must propose the financial structure, which, at a minimum shall meet all of the following criteria:
 - a. CDBG-DR Program funds are used as gap financing in the form of a subordinate debt, which may be secured by a mortgage;
 - b. CDBG-DR Program funds are limited to the hard and soft costs of rehabilitation;
 - c. The application accounts for the expenditure of all benefits received prior to application, including:
 - i. insurance payments;

- ii. FEMA or SBA payments
 - iii. Cash or other benefits provided by any charitable organization in connection with the project;
 - iv. Other federal, State or local financial assistance provided in connection with the project
9. All properties assisted with CDBG-DR Program funds shall be encumbered with a lien for a period to be determined by ODOC or its assigns based standard underwriting of the project;
10. The property and the applicant meet all of the federal, State and local requirements of eligibility and underwriting for the Funding and all other applicable federal requirements;

Infrastructure

Allocation \$5,438,230

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

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

Infrastructure Goals

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

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

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

Infrastructure Program

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

Eligibility Threshold Requirements

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

Funding Priorities

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

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

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

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

Public Facilities

Allocation: \$0

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

Economic Revitalization

Allocation: \$300,000

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

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

Eligibility Threshold Requirements

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

Funding Priorities

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

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

Mitigation & Resiliency

Allocation: \$1,020,000

Resilience Goals

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

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

Eligibility Threshold Requirements

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

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

Funding Priorities

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

Planning

Allocation: \$1,440,000

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

Planning Goals

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

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

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

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

1. To establish the housing baseline for long term planning efforts;

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

Long-Term Recovery Planning

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

Administration

Allocation: \$530,000

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

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

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

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

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

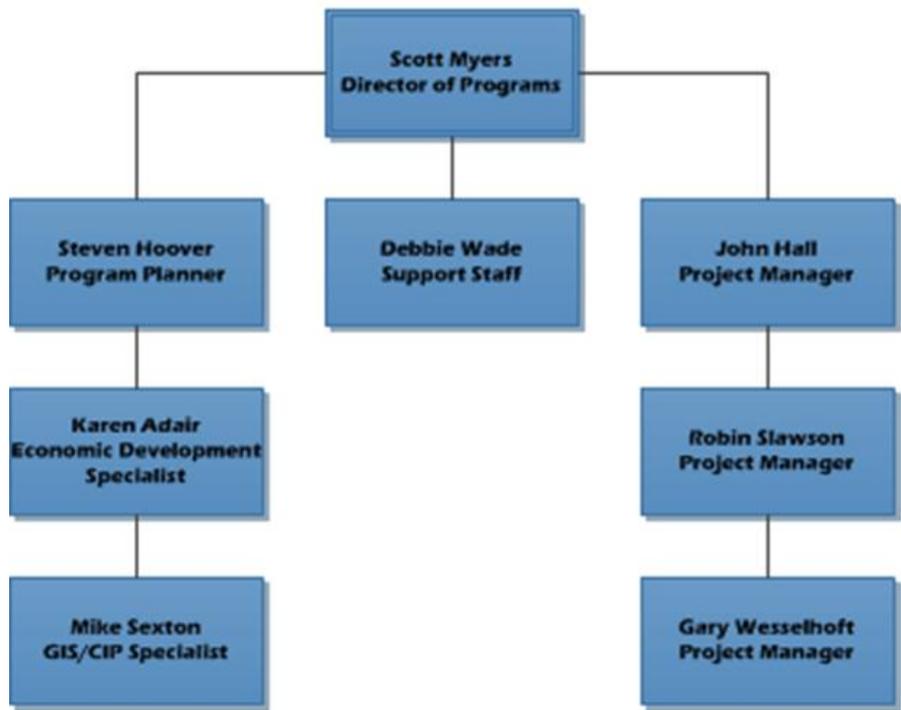
ODOC staff will also oversee the extensive federal requirements associated with programmatic compliance and monitoring. These staff members will be responsible for ensuring the overall administration of the Funding complies with all applicable federal requirements. They will monitor other ODOC staff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

also be responsible for monitoring all ODOC contractors and service providers as detailed in the CDBG-DR Compliance and Monitoring Manual, attached as Appendix C to this Action Plan. As previously noted, there will also be long term compliance requirements associated with some of these program activities (i.e. liens on homeowner and multifamily properties for extended periods.

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

Effective February, 2014, the Organizational Chart for the Department of Housing can be found on the following page:

Community Development Services Community Infrastructure Team



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

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

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

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

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

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

Economic Development		
Program	Explanation	Amount
SBA	Small Business Administration	TBD
USDA	US Department of Agriculture (Agribusiness)	TBD

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

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

VII. Other Program Requirements

Green Building Standards

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

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

Green Initiative

This project is designed to meet the Green Communities Initiative Criteria created by the Enterprise Community Partners. Contractors are encouraged to follow the "Green Communities Initiative" listed:

- All particleboard components shall meet ANSI A208.1 for formaldehyde emission limits or all exposed particleboard edges shall be sealed with a low Volatile Organic Compounds (VOC) sealant or have a factory applied low VOC sealant prior to installation. All MDF edges shall meet ANSI A208.2 for formaldehyde emission limits or all exposed particleboard edges shall be sealed with a low VOC sealant or have a factory applied low VOC sealant prior to installation.
- Recycle all cardboard generated by construction to the local recycling plant. Recycle all removed metals (copper, iron, tin, aluminum, etc.) to a local recycling plant.

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

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

are available with these designations, and therefore, acknowledges that in a rehabilitation situation most products will be available with conservation designations.

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

Compliance and Monitoring

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

The Funding is targeted to areas with the greatest needs based on data provided by FEMA, the State and local governments. The Funding must be used in accordance with the Federal Register Notice, which provides the regulatory framework established by HUD for the CDBG-DR Program and the Funding.

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

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

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

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

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

Duplication of Benefits

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

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

disaster recovery program. As a result, all disaster recovery funds must be governed by policies and procedures to prevent duplication of benefits.

The State, through ODOC, will establish a database for the collection of data on each resident/client receiving any portion of the Funding and will implement the following framework for determining and preventing Duplication of Benefits in its CDBG-DR Program:

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

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

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

Program Income

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

Action Plan. Additionally, the State will withhold 2% percent of a n y program income to offset that State’s administrative cost and any other eligible administrative expenses.

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

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

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

Capacity Building

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

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

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

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

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

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

1. Including qualified small and minority/women businesses on solicitation lists.
2. Assuring that small and minority/women businesses are solicited whenever they are potential sources.

3. When economically feasible, dividing total requirements into smaller tasks or quantities so as to permit maximum small and minority/women business participation.
4. Using the services and assistance of the Small Business Administration, the Office of Minority Business Enterprise of the Department of Commerce and the Community Services Administration as required.
5. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority business, and women's business enterprises.
6. If any subcontracts are to be let, requiring the prime contractor to take affirmative steps in 1 through 5 above.
7. Grantees shall take similar appropriate affirmative action in support of women's business enterprises.
8. Grantees are encouraged to procure goods and services from labor surplus areas.
9. Grantor agencies may impose additional regulations and requirements in the foregoing areas only to the extent specifically mandated by statute or presidential direction.

Definitions

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

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

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

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

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

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

Citizen Participation

The State has an adopted Citizen Participation Plan as required by HUD in its Five Year Consolidated Plan/Annual Action Plan. The plan(s) provide citizens with information on how they can participate in HUD's formula funded CDBG program as well as the HOME, ESG, and HOPWA Programs. Upon notification that the State would receive a CDBG-DR grant allocation, the State has adopted this Citizen Participation Plan and modified it for this CDBG-DR Action Plan in accordance with the guidance set forth in the Federal Register Notice(s).

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

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

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

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

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

STATE GOVERNMENT WEATHER CANCEL!

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

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

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

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

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

The State welcomes public comments and encourages citizens to submit written comments. All postal delivered written comments are submitted to:

Oklahoma Department of Commerce

Attn: Scott Myers, Community Development / Community Infrastructure

900 N. Stiles Ave.

Oklahoma City, OK 73104-3234

Under the State's Citizen Participation Plan, each comment will be considered and personally addressed and attached in the Appendix of the CDBG Disaster Recovery Action Plan. One written comment was received and is attached as Appendix D of this 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.

Action Plan Amendments

Substantial Amendments to the Action Plan

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

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

Only those amendments that meet the definition of a Substantial Amendment are subject to the public notification and public comment procedures previously identified herein. Specifically, a public notice

will be published 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.

Citizens, units of local government, and community partners will be provided with advanced notice and the opportunity to comment on proposed Substantial Amendments to the Action Plan. An electronic copy of the proposed Substantial Amendment will be posted on the State's official CDBG Disaster Recovery webpage located on the ODOC website. Hard copies will also be made available upon request; however, hard copies are subject to printing fees as mandated under State regulation. No less than seven days will be provided for review and comment on the Substantial Amendment. Comments will be accepted electronically or in writing. A summary of all comments received and responses will be included in the Substantial Amendment that is submitted to HUD for approval.

Non-Substantial Amendments to the Action Plan

Non-Substantial Amendments 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 previously identified herein. All Amendments (Non-Substantial and Substantial) to the Action Plan (Substantial Amendments will be numbered sequentially) and will be posted to the CDBG Disaster Recovery webpage located on the ODOC website.

Performance Reports

The State must submit a Quarterly Performance Report ("QPR") through HUD's Disaster Recovery Grant Reporting (DRGR) system no later than thirty days following the end of each calendar quarter. Within three (3) days of submission to HUD, the QPR must be posted on the State's CDBG Disaster Recovery webpage located on the ODOC website for public review and comment. The State's first QPR is due after the first full calendar quarter after the grant award. QPR's will be posted on a quarterly basis until all funds have been expended and all expenditures have been reported. Each QPR will include information about the uses of funds in activities identified in the Action Plan as entered in the DRGR reporting system. This includes, but is not limited to: project name, activity, location, and national objective; funds budgeted, obligated, drawn down, and expended; the funding source and total

amount of any non-CDBG Disaster Recovery program funds to be expended on each activity; beginning and actual completion dates of completed activities; achieved performance outcomes such as number of housing units complete or number of low and moderate income persons benefiting; and the race and ethnicity of persons assisted under direct- benefit activities. The State must also record the amount of funding expended for each contractor identified in the Action Plan. Efforts made by the State to affirmatively further fair housing will also be included in the QPR.

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

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 scott_myers@okcommerce.gov or be mailed to:

Oklahoma Department of Commerce

Attn: Scott Myers, Community Development / Community Infrastructure

900 N. Stiles Ave.

Oklahoma City, OK 73104-3234

The State will make every effort to provide a timely written response to every citizen complaint within fifteen 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 Action Plan or related documents in alternate formats consistent with the provisions of federal requirements related to limited English proficiency must be directed to Scott Myers (405-815-5356 or scott_myers@okcommerce.gov) of the Community Development Department.

APPENDICES

CDBG DISASTER RECOVERY

ACTION PLAN

APPENDIX A

DAMAGE ASSESSMENT REPORT

Oklahoma Tornado Disaster & Related Events

Final Report

August 6th, 2013



Overview

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

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

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

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

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

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

Description of Events/Damage

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

1. Tornadoes on May 19th, 2013

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

2. Tornado on May 20th, 2013

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

3. Tornadoes & Flashfloods on May 31st, 2013

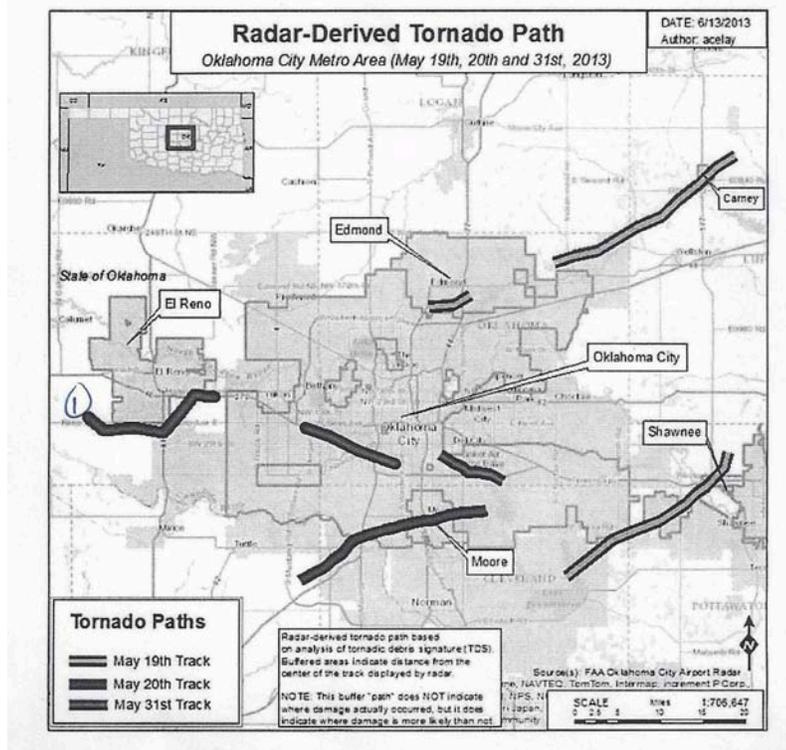
- El Reno, Southwest OKC and Southeast OKC tornadoes (EF 5/1, 9 fatalities); OKC flash floods

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

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

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

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



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

Damage assessments completed by local and state Emergency Management Services report significant damage in Moore, OK and nearby sections of southwestern Oklahoma City resulting from the May 20th tornado. Widespread damage is also reported from the related events and activities.

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

City of Moore

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



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

Event:

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

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

Damage:

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



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

A major park containing a memorial was also destroyed.

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



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

Plans for rebuilding the hospital are under consideration.

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

(A photograph of the bowling alley appears here.)

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



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

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

Moore

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

City of Oklahoma City

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

Event #1:

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

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

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

Damage:

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

OKC 1

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

Event #2:

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

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

Damage:

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

OKC 2

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

Event #3:

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

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

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

Damage:

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

OKC 3

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

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

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

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



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

City of Edmond

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

Event:

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

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

Damage:

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

Edmond

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

City of Shawnee

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

Event:

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

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

Damage:

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

Shawnee

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

City of Norman

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

Event:

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

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

Damage:

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

Norman

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

Balance of State

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

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

Balance of State

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

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



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

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

Estimated Cost of Damages

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

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

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

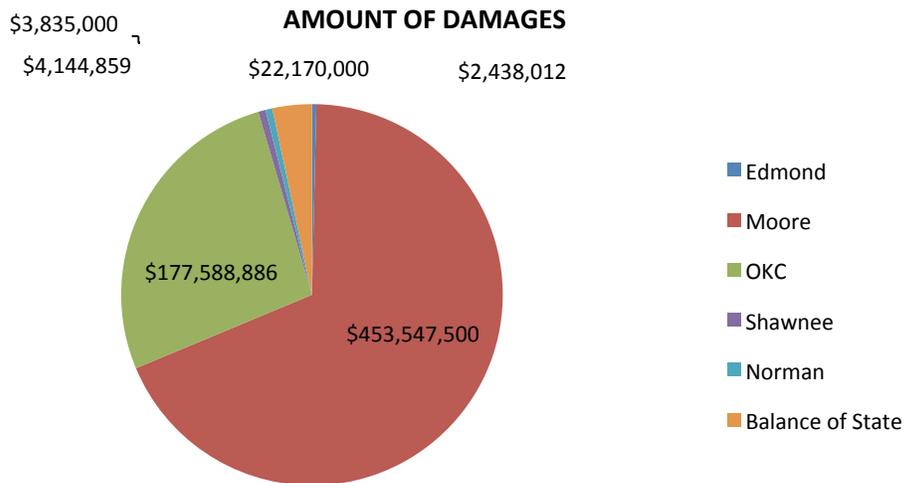
As noted above, the damage estimate by category does not include the complete balance of the state. However, the team can provide a single estimate for the additional cost of the damages reported, but not verified, by assuming 1% of the all damages have not been reported. The cost estimate for unreported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

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

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

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

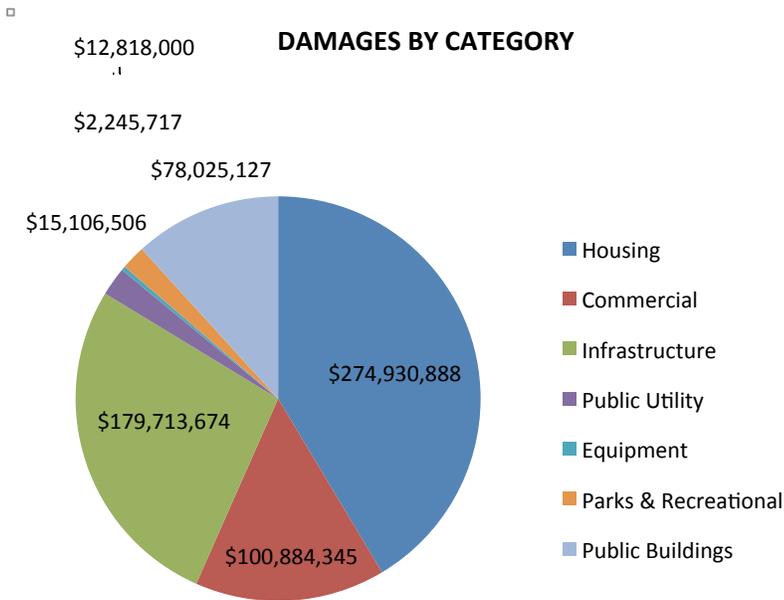
percentages of the total damages, the balance of state portion is the third largest percentage of the damages.



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

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

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



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

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

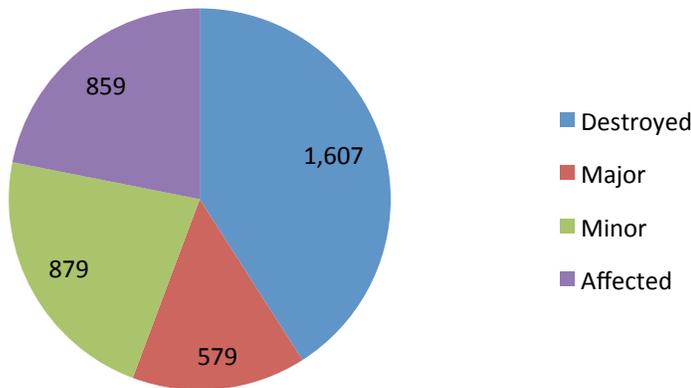
A breakdown of public facilities appears here including: equipment; parks & recreational facilities; and public buildings.

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

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

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

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



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

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

Mitigation and Resiliency

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

Public Schools

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

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

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

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

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

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

³ Local estimates provided by Moore & Oklahoma City

⁴ Oklahoma Department of Education:

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



Residential Safe Rooms

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

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

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



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

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

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

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

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

Building Codes

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

⁵ US Census Bureau Quick Facts; Moore, OK

⁶ US Census Bureau Quick Facts; Oklahoma City, OK

Other

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

For Further Information

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

Appendix A

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

Entitlements

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

Non-Entitlements

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



Non-Entitlements (Continued)

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

* Portions of Oklahoma County are outside of OKC.

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

Appendix B

Atoka County

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

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

Latimer County

No damage reports available; Included in Amendment 7

Event Date	Counties	Designation	Fatalities	Length in Miles	Width in Yards	Path
April 14 th	Latimer Le Flore	EF 1	0	5 m	600 y	4.6 WSW - 0.5 NNW Talihina

Le Flore County

Three events; No damage estimates available; Included as part of Amendment 6.

Event Date	Counties	Designation	Fatalities	Length in Miles	Width in Yards	Path
April 14th	Latimer Le Flore	EF 1	0	5 m	600 y	4.6 WSW - 0.5 NNW Talihina
April 14th	Le Flore	EF 1	0	7	440 y	2.9 SSE Wister - 3.2 S Poteau
April 14th	Le Flore	EF 1	0	1.5 m	300 y	2.1 WSW - 1.7 NW Howe

Nowata County

Includes one tornado; No damage reports available; Included in Amendment 7; News reports indicate another tornado went through the area on April 30th destroying a mobile home and damaging a number of homes. No NOAA data available on April 30th event

Event Date	Counties	Designation	Fatalities	Length in Miles	Width in Yards	Path
April 14 th	Nowata Washington	EF 1	0	1.6 m	200 y	7.2 ESE - 8.5 W Delaware

Okfuskee County

One tornado; Included in initial declaration;

Event Date	Counties	Designation	Fatalities	Length in Miles	Width in Yards	Path
April 14 th	Okfuskee Okmulgee	EF 1	0	11 m	100 y	0.5 S Haydenville - 4 N Nuyaka

Okmulgee County

No damage reports available; Included in Amendment 7

Event Date	Counties	Designation	Fatalities	Length in Miles	Width in Yards	Path
April 14 th	Okfuskee Okmulgee	EF 1	0	11 m	100 y	0.5 S Haydenville - 4 N Nuyaka

Pittsburg County

Two events; No damage reports available; Included in Amendment 7

Event Date	Counties	Designation	Fatalities	Length in Miles	Width in Yards	Path
April 14 th	Atoka Pushmataha Pittsburg	EF 1	0	14 m	1,100 y	0.8 S Daisy - 4.5 SE Weathers
April 14 th	Pittsburg	EF 1	0	5.5 m	300 y	5.9 S - 2.2 SE Bache

Pushmataha County

A total of four events on April 14th; Areas identified as Oleta, Corinne & Sobol; No damage information; Included in Amendment 7;

Event Date	Counties	Designation	Fatalities	Length in Miles	Width in Yards	Path
April 14 th	Atoka Pushmataha Pittsburg	EF 1	0	14 m	1,100 y	0.8 S Daisy - 4.5 SE Weathers
April 14 th	Pushmataha	EF 1	0	3 m	400 y	0.5 WSW - 2.6 ENE Jumbo
April 14 th	Pushmataha	EF 2	0	7 m	1,000 y	10.5 SW - 3.7 WSW Clayton
April 14 th	Pushmataha	EF 1	0	14 m	1,100 y	7.5 NW - 7.1 NW Clayton



Appendix C

The table below is based on a FEMA report that has compiled information on applications received for individual assistance through July 2013.

County	Total Apps	Owners		Renters		Insured		Uninsured	
		Count	%	Count	%	Count	%	Count	%
Canadian (County)	1,054	833	79.0%	216	20.5%	631	59.9%	423	40.1%
Cleveland (County)	8,485	6,005	70.8%	2,437	28.7%	5,382	63.4%	3,103	36.6%
Le Flore (County)	35	31	88.6%	4	11.4%	14	40.0%	21	60.0%
Lincoln (County)	183	163	89.1%	20	10.9%	98	53.6%	85	46.4%
McClain (County)	94	87	92.6%	7	7.4%	75	79.8%	19	20.2%
Okfuskee (County)	46	39	84.8%	7	15.2%	23	50.0%	23	50.0%
Oklahoma (County)	4,305	2,096	48.7%	2,185	50.8%	1,415	32.9%	2,890	67.1%
Okmulgee (County)	79	62	78.5%	17	21.5%	37	46.8%	42	53.2%
Pottawatomie (County)	575	482	83.8%	90	15.7%	331	57.6%	244	42.4%
Totals	14,856	9,798	66.0%	4,983	33.5%	8,006	53.9%	6,850	46.1%

CDBG DISASTER RECOVERY

ACTION PLAN

APPENDIX B

DEMOGRAPHICS TABLES FOR OKC COUNTIES

Demographics for Affected Counties In Oklahoma City Limits

OKLAHOMA CITY - CANADIAN COUNTY AFFECTED CENSUS TRACT DEMOGRAPHICS												
			Top Two Minority Population Segments									
Tract	Total Pop	Percent Minority	African-American	American Indian	Asian	Other	Two or More Races	Percent Elderly	Income	Household Median in Poverty	Percent of Families	Rate Homeownership
3002.02	4,062	17.30%	---	5.90%	---	---	4.50%	17.80%	\$56,875	8.30%	74.30%	
3008.01	7,837	16.10%	---	3.70%	---	---	5.80%	15.40%	\$90,125	1.90%	91.70%	
3008.02	2,375	14.30%	---	12.30 %	---	---	---	28.10%	\$64,775	9.30%	90.10%	
3009.01	5,553	16.90%	---	6.20%	---	---	7.30%	14.80%	\$58,364	8.40%	73.00%	
3009.02	2,714	12.50%	---	---	2.60%	4.80 %	---	13.10%	\$65,085	6.20%	78.80%	
3009.04	3,163	15.10%	---	6.90%	---	---	5.60%	18.70%	\$53,274	7.70%	71.10%	
3009.05	4,595	17.40%	4.40%	---	6.90%	---	4.40%	15.10%	\$76,818	2.80%	84.30%	
3010.03	6,140	13.90%	---	---	4.00%	---	3.90%	10.70%	\$58,088	7.00%	76.20%	
3010.06	3,150	18.50%	---	---	7.80%	---	6.50%	12.30%	\$64,398	3.20%	86.90%	
3010.07	4,845	15.20%	---	5.50%	16.30%	---	---	14.00%	\$54,461	9.20%	72.40%	
3010.08	5,306	31.90%	---	---	15.30%	---	9.60%	14.40%	\$99,792	1.50%	85.60%	
3011	5,685	6.10%	---	1.30%	3.30%	---	---	20.60%	\$66,154	8.50%	83.00%	
3014.1	4,283	14.10%	---	4.30%	---	---	5.20%	15.10%	\$54,408	1.80%	57.30%	
SUMMARY	59,708	16.10%	4.40%	5.76%	8.03%	4.80 %	5.87%	16.16%	\$66,355	5.83%	78.82%	

OKLAHOMA CITY - CLEVELAND COUNTY AFFECTED CENSUS TRACT DEMOGRAPHICS ¹												
			Top Two Minority Population Segments									
Tract	Total Pop	Percent Minority	African-American	American Indian	Asian	Other	Two or More Races	Percent Elderly	Income Household Median	in Poverty	Percent of Families	Homeownership Rate
2016.02	2,595	14.9%	---	4.9%	---	---	6.3%	6.3%	\$46,700	8.7%	80.4%	
2016.03	3,776	27.7%	---	---	---	7.0%	10.1%	17.1%	\$41,033	16.0%	47.6%	
2016.07	5,037	19.8%	---	5.6%	6.7%	---	---	6.7%	\$84,088	2.6%	86.0%	
2016.09	4,221	26.0%	---	---	16.6%	---	5.5%	22.1%	\$91,120	4.5%	98.6%	
2016.10	3,281	14.4%	---	---	---	7.4%	8.2%	15.6%	\$76,052	3.4%	92.0%	
2016.11	2,400	19.8%	---	---	---	7.4%	12.4%	19.8%	\$72,652	5.4%	84.9%	
2016.12	5,005	17.1%	---	---	4.8%	---	6.0%	10.8%	\$58,014	6.8%	79.4%	
2017.00	1,428	5.8%	---	2.2%	1.9%	---	---	1.9%	\$101,488	0.6%	91.9%	
2020.04	3,544	17.9%	---	7.4%	---	---	10.8%	10.8%	\$63,728	7.8%	79.1%	
2020.07	3,357	33.0%	---	---	---	14.2%	18.9%	33.1%	\$54,125	11.7%	88.0%	
2020.08	3,835	24.5%	---	6.6%	---	---	7.6%	7.6%	\$61,968	6.8%	80.2%	
2021.02	2,633	13.0%	---	---	---	8.5%	4.9%	13.4%	\$35,568	28.2%	57.4%	
2022.01	3,255	20.5%	---	6.7%	---	---	10.4%	10.4%	\$78,573	2.3%	93.7%	
2022.03	2,090	26.7%	---	---	---	11.5%	14.8%	26.3%	\$74,695	7.1%	80.8%	
2022.06	3,457	29.9%	8.0%	---	---	9.7%	---	9.7%	\$63,732	3.8%	49.8%	
2023.01	5,243	11.3%	---	---	---	4.8%	5.2%	10.0%	\$68,454	2.8%	91.4%	
2023.02	5,369	9.6%	---	4.4%	---	---	4.7%	4.7%	\$60,575	8.7%	90.9%	
2024.02	6,172	19.8%	---	9.4%	---	9.3%	---	9.3%	\$48,227	11.9%	86.1%	
2024.03	5,111	15.4%	---	---	---	7.1%	8.3%	15.4%	\$64,974	5.4%	94.7%	
SUMMARY	71,809	19.3%	8.0%	5.9%	7.5%	8.7%	8.9%	13.2%	\$65,567	7.61%	81.73%	

¹ American Community Survey; Accessed Jan 12, 2014

OKLAHOMA CITY - POTTAWATOMIE COUNTY AFFECTED CENSUS TRACT DEMOGRAPHICS²

			Top Two Minority Population Segments									
Tract	Total Pop	Percent Minority	African-American	American Indian	Asian	Other	Two or More Races	Percent Elderly	Household Median Income	Percent of Families in Poverty	Homeownership Rate	
5010.01	8,589	19.2%	-	4.7%	-	-	5.3%	17.6%	\$49,135	12.0%	75.6%	
5010.03	4,521	14.2%	-	8.0%	-	-	6.3%	20.4%	\$52,024	17.6%	93.4%	
SUMMARY	13,110	16.7%	-	6.4%	-	-	5.8%	19.0%	\$50,580	14.8%	84.5%	

² American Community Survey; Accessed Jan 12, 2014

OKLAHOMA CITY - OKLAHOMA COUNTY AFFECTED CENSUS TRACT DEMOGRAPHICS³

			Top Two Minority Population Segments									
Tract	Total Pop	Percent Minority	African-American	American Indian	Asian	Other	Two or More Races	Percent Elderly	Income Household Median	In Poverty	Percent of Families	Rate Homeownership
1042.00	1,774	43.8%	---	---	---	31.2%	6.5%	9.1%	\$25,026	29.5%	54.7%	
1043.00	3,889	35.5%	---	---	---	15.5%	13.6%	8.6%	\$25,573	35.8%	39.6%	
1044.00	3,462	50.5%	---	---	---	24.2%	11.8%	11.1%	\$24,724	42.0%	48.5%	
1055.00	3,300	48.2%	---	---	---	35.9%	5.5%	11.7%	\$30,521	25.6%	51.6%	
1056.00	4,118	35.3%	---	---	---	8.9%	19.9%	7.3%	\$30,750	32.9%	47.8%	
1057.00	882	48.6%	15.4%	---	---	11.3%	---	10.1%	\$22,936	31.6%	27.2%	
1070.01	5,243	48.5%	---	6.8%	---	---	29.6%	11.7%	\$26,510	25.5%	55.4%	
1070.02	2,439	20.3%	---	7.9%	---	---	6.8%	12.0%	\$35,529	13.0%	58.2%	
1071.01	103	61.2%	---	---	---	61.2%	---	8.7%	\$58,387	0.0%	22.5%	
1071.04	2,736	41.6%	10.9%	---	---	17.5%	---	18.4%	\$25,938	26.6%	47.5%	
1072.06	4,334	37.4%	---	---	---	6.5%	15.1%	18.4%	\$37,473	23.5%	53.1%	
1072.07	1,932	28.7%	9.4%	---	---	---	11.4%	11.7%	\$50,643	17.1%	50.7%	
1072.13	4,642	43.8%	13.0%	---	---	13.1%	---	9.5%	\$28,401	21.4%	38.1%	
1072.14	2,561	28.3%	---	---	---	10.8%	10.5%	20.7%	\$36,099	12.8%	76.6%	
1072.15	4,077	35.1%	---	---	---	16.3%	9.0%	16.5%	\$36,964	17.1%	64.6%	
1072.16	3,382	41.3%	---	---	---	25.4%	6.1%	17.3%	\$24,620	25.8%	41.6%	
1072.17	1,951	41.0%	6.8%	---	---	22.0%	---	15.8%	\$30,313	20.6%	75.4%	
1072.18	3,434	36.7%	14.0%	---	---	---	12.2%	20.1%	\$35,640	19.8%	46.0%	
1072.19	3,692	52.0%	---	---	8.4%	31.6%	---	10.2%	\$31,186	29.8%	70.0%	
1072.2	3,598	31.6%	---	---	---	14.7%	9.6%	15.4%	\$28,902	36.5%	48.4%	
1072.21	2,057	25.4%	---	5.2%	---	---	13.9%	27.9%	\$40,701	7.1%	71.1%	
1072.22	1,629	40.5%	---	16.0%	---	13.3%	---	22.7%	\$35,083	26.3%	52.9%	
1073.05	1,278	42.9%	27.5%	---	---	---	10.0%	13.8%	\$20,142	36.5%	25.3%	

³ American Community Survey; Accessed Jan 12, 2014

1073.06	3,440	44.3%	24.4%	---	---	---	17.2%	16.9%	\$27,872	35.1%	49.8%
1074.01	6,310	66.6%	47.8%	7.7%	---	---	---	9.4%	\$30,938	25.6%	50.9%
1074.03	5,551	37.3%	20.3%	---	7.5%	---	---	12.6%	\$56,875	8.7%	76.1%
1074.04	3,487	57.4%	36.0%	---	---	---	10.9%	14.3%	\$53,929	6.1%	57.0%
1074.05	4,263	44.9%	20.5%	8.8%	---	---	---	9.3%	\$63,977	9.9%	79.4%
1078.01	3,721	52.5%	39.9%	---	---	---	8.5%	15.9%	\$41,692	19.5%	60.5%
1078.07	2,759	29.1%	12.2%	5.7%	---	---	---	21.4%	\$42,933	13.3%	73.7%
1078.08	1,775	24.8%	11.2%	7.5%	---	---	---	20.7%	\$45,056	12.8%	56.7%
1086.01	2,348	34.2%	---	---	15.3%	8.5%	---	12.2%	\$49,886	16.1%	74.1%
1086.02	810	6.3%	2.1%	---	---	4.2%	---	36.4%	\$42,870	21.1%	96.6%
1087.01	2,543	19.2%	9.7%	---	---	---	7.4%	27.1%	\$74,375	4.1%	91.0%
1087.04	4,901	14.8%	---	5.9%	---	---	6.4%	18.8%	\$71,265	5.7%	89.0%
1087.09	3,338	17.9%	---	5.2%	---	---	9.3%	20.0%	\$48,365	12.5%	90.8%
1092.02	2,236	13.1%	4.6%	6.6%	---	---	---	20.4%	\$54,572	7.3%	78.5%
SUMMARY	113,995	37.3%	18.0%	7.5%	10.4%	19.5%	11.4%	15.7%	\$39,099	20.3%	59.2%

CDBG DISASTER RECOVERY

ACTION PLAN

APPENDIX C1

COMPLIANCE MONITORING HANDBOOK

Oklahoma Disaster Funds

Compliance Monitoring Handbook

Introduction

As part of the State's ongoing responsibilities for the administration of U.S. Department of Housing and Urban Development (HUD) federally funded programs, the Oklahoma Department of Commerce (ODOC) will conduct comprehensive monitoring reviews for all programs and activities that fall under the Federal Register Notice, Vol. 78, No. 241, December 16, 2013. The Federal Register Notice provides the regulatory framework established by HUDs State of Oklahoma's Disaster Recovery Program. The State of Oklahoma and its sub recipients that receive CDBG-DR funds are required to comply with all HUD's rules and regulations concerning program performance and any rules and regulations unique to the Disaster Recovery legislation.

Oklahoma's Department of Commerce monitoring and compliance handbook provides a guide for areas of programmatic review and responsibilities relating to compliance which will enable the funding recipients and the general public to understand the program, its objectives and methods to ensure success of the program. ODOC understands the importance and need for a compliance program that insures that all participants in the CDBG-DR program are adequately and responsibly carrying out their various ethical, legal, and fiduciary responsibilities in the administration of its programs and activities.

The State of Oklahoma as recipient of CDBG-DR funds is responsible for ensuring that the funds are used in accordance with all applicable program requirements. ODOC understands that the use of sub recipients does not relieve the State of compliance responsibilities. ODOC will utilize its current CDBG Program monitoring policies and procedures to ensure compliance with all federal guidelines. The policies and procedures are consistent with those used by HUD to monitor state-administered and entitlement programs and are modified as appropriate to monitor specifics of the Disaster Recovery program. Reimbursement of expenditures will be disallowed if local governments cannot properly document the use of funds that do not address disaster-related needs or are clearly not for the greatest need. In such case, the local government receiving the funding would be required to refund the amount of the grant disallowed.

Applicability

The ODOC will be contracting out with Sub recipients to carry out project delivery activities. Due to the limited number of contracts, the ODOC will monitor 100 percent of all contracts. This compliance manual applies to all federal and state requirements including but not limited to:

1. Program Progress
2. National Objectives
3. Cooperative Agreements
4. Beneficiary/Contractor Requirements
5. Continued Affordability Requirements
6. Eligible Uses
7. Fair Housing and Equal Opportunity
8. Homebuyer Programs
9. Rental Projects
10. Administrative and Financial Requirements
11. Environmental Reviews
12. Labor Standards Administration
13. Lead Based Paint Compliance
14. Relocation and Real Property Acquisition
15. Fraud, Waste and Abuse
16. Duplication of Benefits

Objectives

HUD describes monitoring as integral management control techniques and a Government Accounting Office (“GAO”) standard. It is an on-going process that assesses the quality of a program over a period of time. Accordingly, the monitoring process shall provide ODOC information about sub recipients that will be critical for making informed judgments about CDBG-DR program effectiveness and management efficiency. Monitoring is helpful in identifying occurrences of fraud, waste and abuse. ODOC will use monitoring to accomplish the following objectives:

- Provide that all CDBG-DR activities and projects are carried out efficiently, effectively, and in compliance with applicable laws and regulations.
- Assist sub recipients to improve their performance, develop or increase capacity, and augment management and technical skills.
- Ensure that sub recipients with project delivery responsibilities will be monitored through regular reviews and recommend appropriate compliance/management steps are taken to reduce compliance problems and fraud, waste and abuse.

- Ensure compliance roles and responsibilities are clearly established across ODOC and the sub recipient and that care is given to delegating authority to the sub recipient.
- Ensure that sub recipients have written policies and procedures and internal control systems capable of ensuring compliance.
- Individual's responsible DRGR compliance and ethics programs have adequate resources authority and competencies to carry out their responsibilities.
- Ensure that sub recipients maintain an effective mechanism to report any wrongdoing, including mechanisms to allow for anonymous reporting, and protect against retaliation.
- Enable the State to submit appropriate and documented quarterly reports in HUDs Disaster Recovery Grant Reporting (DRGR) System.
- Enable the State to submit annually financial summary reports in HUD's DRGR system.

Managing the Monitoring Process

ODOC will conduct 100% on-site monitoring of each contract under the Supplemental Disaster Program; therefore a Risk Analysis will not be necessary to determine monitoring priorities. On-site monitoring is a structured review conducted by ODOC staff at locations where project activities are being carried out and project records are being maintained. On-site monitoring will be conducted during the course of a project and at the completion of the project. The monitoring review considers all available evidence of conforming to the approved Action Plan and all other federal and state requirements. Checklists are utilized to ensure that all requirements are addressed.

ODOC Program Monitors will be thoroughly familiar with the Disaster program to be monitored and knowledgeable of the entities to be monitored. Preparation for monitoring is critical and includes:

1. Understanding governing statutes, regulations and official guidance;
2. Reviewing and analyzing participant reports, available data, Field Office files, audits and financial information, previous monitoring reports and issues; and
3. Obtaining other relevant information from previous monitoring reports and issues

This preparatory work may result in revisions to the individual monitoring strategy, either with respect to areas to be covered, estimated time-frames, and or staff resources needed/participant staff to be consulted.

ODOC will be in constant communication with our sub recipients. These sub recipients will be provided guidance and the monitoring checklist regarding technical areas which will be carefully reviewed. These include:

- Program Progress
- National Objectives of Benefit to CDBG- eligible beneficiaries
- State requirements
- Affordability Requirements
- Environmental
- Fair Housing and Equal Opportunity
- Labor
- As applicable Homebuyer and Homeowner programs
- As applicable Rental projects
- Administrative and Financial management requirements
- Lead hazards

Conducting the Monitoring

All monitoring by ODOC will consist of the following elements:

A. Notification to the Sub-recipient.

After the monitoring strategy has been developed, communicate with the sub-recipient to establish a date (whether on-site or remote). Once a date has been set, a formal written letter to the sub-recipient will be sent. Unless there are extenuating circumstances, the letter will be sent at least two weeks prior to the monitoring. The letter will discuss the monitoring schedule identify the areas to be reviewed, and the names and titles of the ODOC staff conducting the monitoring. It will also request that the necessary participant staff be available during the monitoring. For on-site monitoring, the letter will confirm the need for any required services (e.g., conference rooms, telephones, and computers). For remote monitoring, the letter will identify specific information to be submitted by the program participant and a timeframe for submission.

B. Entrance Conference. The purpose of the entrance conference is to:

1. Explain how the monitoring will be conducted;
2. Identify and confirm key program participant staff that will assist during the monitoring;
3. Set- up or confirm meeting or interview times (including any clients who may be interviewed) and, if applicable, schedule physical inspections;

4. Verify the programs/activities to be reviewed and, if on-site, how access to files and work areas will be granted (some programs files can be sensitive; some work areas can be hazardous).

C. The Assessment Process.

Monitoring entails interviews and file reviews to verify and document compliance and performance (and can include physical inspections, if monitoring is conducted on-site). ODOC will utilize checklists designed to capture all appropriate information and guide the review of the monitoring based on CPD Monitoring Handbook 6509.2 Rev-6 published by HUD.

1. Evaluate

The monitoring checklist is designed to assess and document compliance with program requirements based upon:

- a. File reviews to determine the accuracy of the information, using both automated and manual data and reports submitted to ODOC by the sub-recipient; and
- b. Interviews with sub-recipient staff, contractors, and clients to clarify and determine the accuracy of the information, assess level of satisfaction with the provision of services or the “end products,” and document performance.

Specific responses to the Monitoring Checklist questions are required. Although this approach can take more time up-front, it yields higher quality reviews that provide a better picture of the sub-recipient grant program for supervisory staff, HUDs Local Office, and others who have a need to review performance. The responses to each question provide important documentation for ODOCs administrative record.

ODOC will use a common sense approach and engage in a thorough evaluation of data and other information to draw defensible and supportable conclusions. ODOC understands that the main objective of monitoring is to assist program participants in carrying out their program responsibilities. “Is the program purpose being accomplished? Are the program beneficiaries being served as intended?” Are program requirements being met?

2. Communicate

Throughout the monitoring, ODOC will maintain an on-going dialogue with the program participant. This communication will keep the participant informed as to how the monitoring is progressing, enables discussions of any problem areas encountered, and provides the participant an opportunity to

make “on-the-spot” adjustments or corrections or present additional information to help the ODOC Monitor. It also minimizes the potential for surprises to the participant when the exit conference is held as well as when the monitoring results are formally communicated in writing.

3. Document

The responses to the questions in the Monitoring Checklist form the basis for monitoring conclusions and are supplemented by program participant records copied or reviewed during the monitoring. All Checklist questions will be clearly answered (both the “Yes/No/N/A” box and the “Findings/Comments” text box). For example, an N/A response could indicate either that the question did not apply or the reviewer was unable to answer it (due to time constraints, unexpected problems in other areas, etc.). The “Finding/Comments” section needs to succinctly but explicitly explain this.

D. Exit Conference.

At the end of the monitoring review, ODOC will conduct an exit conference with the appropriate participant officials or staff to discuss preliminary conclusions. In part, this serves to confirm the accuracy and completeness of the information used to form the basis for the monitoring conclusions. It may also highlight areas of disagreement between ODOC and the participant. The ODOC monitor is responsible for using the Checklist not only to prepare for the exit conference by clearly and concisely summarizing the conclusions, but also to document the issues discussed at the exit conference, the date and time of the meeting, and the names and titles of the attendees. To the extent that a program participant signifies disagreement, the basis for any objections should be noted. These summarizations are used to develop the monitoring letter.

MONITORING CONCLUSIONS

A. Decision Categories. As a result of monitoring, ODOC will reach one or more conclusions that:

1. Performance was adequate or exemplary;
2. There were significant achievements;
3. Concerns need to be brought to the attention of the program participant;
4. Technical assistance was provided or is needed; and/or
5. There were findings that require corrective actions.

All conclusions – positive or negative - must be supportable, defensible, and adequately documented.

B. Findings and Concerns. Where deficiencies are identified, the following procedures apply:

1. Findings. Where an identified deficiency results in a finding, the finding must include the **condition, criteria, cause, effect, and required corrective** action.
 - a. The **condition** describes what was wrong or what the problem was.
 - b. The **criteria** cite the regulatory or statutory requirements that were not met.
 - c. The **cause** explains why the condition occurred.
 - d. The **effect** describes what happened because of the condition.
 - e. The **corrective action** identifies the action(s) needed to resolve the problem and, unless inapplicable or there are extenuating circumstances, should include the time frame by which the participant is to respond to the finding.
2. Concerns. Monitoring concerns brought to the program participant's attention should include the **condition, cause, and effect**. The ODOC monitor will suggest or recommend actions that the program participant can take to address a concern, based on sound management principles or other guidelines. However, corrective actions are not *required* for concerns.

SANCTIONS

A. The Process

Identify monitoring deficiencies that rise to the level of a "finding" require corrective action. Responsibility rests both with the ODOC Monitor and the entity being monitored. The ODOC monitor must validate that there is sufficient documented information and/or evidence to support a finding of noncompliance. The entity being monitored has a responsibility to determine, or assist the ODOC Monitor in determining the reason why a requirement was violated or provide evidence of compliance.

A key ingredient of effective monitoring is the ability to identify the root cause(s) of any identified deficiencies, whether the problem is an isolated occurrence or systemic. Such knowledge leads to the development of optimal corrective actions. Keep in mind that there may be any number of acceptable

solutions to resolve a deficiency. Ideally, the program participant should agree with ODOCs assessment of the cause and offer a workable solution. In some cases, the ODOC Monitor may need to determine appropriate action if compliance is not possible, i.e., do we want money recovered, a grant reduced, limited or terminated? Contemplation of those or other serious corrective actions triggers the need for ODOC to contact the local HUD Office. Additionally, suspected instances of fraud or misconduct should be referred to the HUD Office of the Inspector General for further investigation as appropriate.

B. Monitoring Checklist

The questions contained within the Monitoring Checklist provide a standardized format structure of the financial and programmatic monitoring compliance areas. The Checklist provides a tool, which allow for fair and consistent monitoring procedures. Use of the Checklist will assure completeness and thoroughness of the monitoring. The Checklist also provides the monitor the information needed to prepare the monitoring letter upon return to the ODOC home offices. The checklist also provides the documentation and information necessary to justify corrective action and further monitoring if necessary. Any findings or problems noted during monitoring will be first noted on the monitoring checklist either next to the questions or noted on the note page at the back of the checklist. These problems or findings will be discussed with appropriate grantee personnel during the Exit Conference.

Understanding the cause serves to outline the action or actions needed to resolve the violation(s). To assist the ODOC monitor in developing corrective actions for findings of noncompliance, Attachment 2 of this Chapter provides a “sanctions table” by program or technical area. ODOCs and HUDs discretion for resolving deficiencies lies within these parameters. An important and fundamental principle of the monitoring process is that ODOC is *required to make findings* when there is evidence that a statute, regulation or requirement has been violated but it retains *discretion in identifying appropriate corrective action(s)* to resolve deficiencies. An equally fundamental principle is that program participants have due process rights to contest findings.

C. Monitoring Letter

Within 60 days after completion of monitoring, ODOC will send written correspondence to the sub-recipient describing the results – in sufficient detail to clearly describe the areas that were covered and the basis for the conclusions. Each monitoring letter is to include:

- A. the program, project or entity monitored;
- B. the dates of the monitoring;
- C. the name(s) and title(s) of the ODOC staff who performed the monitoring review.
- D. A listing of the program/project/activity areas reviewed (which, in most cases, will repeat the areas outlined in the notification letter to the participant);
- E. if applicable, a brief explanation of the reasons why an area specified in the notification letter was not monitored (e.g., time constraints, unanticipated problems arising in another area);
- F. monitoring conclusions;
- G. if applicable clearly labeled findings and concerns;
- H. if there are findings, an opportunity for the sub-recipient to demonstrate, within a time prescribed by ODOC, that the participant has, in fact, complied with the requirements;
- I. response time frames, if needed;
- J. an offer of technical assistance, if needed or a description of technical assistance provided during the monitoring.

Because ODOC works in partnership with the entities it funds, generally, the tone of the monitoring letter will be positive, in recognition of our common goal to responsibly and effectively implement Oklahoma Disaster program. ODOCs monitoring letter will not include general statements that the program participant “complied with all applicable rules and regulations.” Such broad general statements can negate ODOCs ability to apply sanctions, if deemed necessary at a later date. Monitoring conclusions, therefore, should be qualified, i.e., “based upon the materials reviewed and the staff interviews, the activity/area was found to be in compliance with (specify requirements).”

CLOSING FINDINGS

- A. General. Follow-up by ODOC Monitors serves two purposes:
 1. It provides an opportunity to evaluate the effectiveness of monitoring efforts in maintaining or improving participant performance; and

2. It enables to determine that required corrective actions are implemented.

GAO considers the monitoring process to be completed only after an identified deficiency has been corrected, the corrective action produces improvements and it is determined that management action is not needed (see GAO/AIMD-00-21.3.1, *Standards for Internal Control in the Federal Government*, "Monitoring").

- B. Follow-Up. All follow-up actions will be documented and communicated to program participants. Target dates are assigned when corrective actions are required and relayed to the participant in the monitoring letter.
 1. In the event that a program participant fails to meet a target date - and has not alerted ODOC as to the reason for not meeting the date (and, if appropriate and agreed-upon, established a new date) - the ODOC monitor will follow-up either by telephone or email, with a reminder. Either form of contact will be documented.
 2. If the program participant has not responded within 30 days after the date of the ODOC Monitor's reminder, a letter will be sent to the program participant requesting the status of the corrective action(s) and warning the participant of the possible consequences (under the applicable program requirements) of a failure to comply. Where the program participant is unresponsive or uncooperative, the ODOC will contact the HUD Local Office for guidance on carrying out progressive sanctions.
 3. When the program participant notifies ODOC that the corrective actions have been implemented, the appropriate Monitoring Staff will review the submitted information within 15 working days. Regardless of whether the response is acceptable (and/or sufficient to close a monitoring finding) or inadequate, a letter will be sent to the program participant within 30 calendar days of receipt of its submission. The correspondence will either inform the participant that a finding has been closed; acknowledge any interim actions that have been taken and reaffirm an existing date; or state that additional information/action is needed and establish a new target date to resolve the deficiency. When determining whether it is reasonable or appropriate to establish new target dates, ODOC will consider the program participant's good faith efforts as well as any extenuating circumstances beyond the participant's control that impact timely and effective resolution.

BUILDING THE ADMINISTRATIVE RECORD

- A. The Administrative Record will include all documents considered, either directly or indirectly, by ODOC in reaching a final decision on an issue. Documents can include contracts, forms, agreements, internal memoranda and notes, correspondence, email, electronic submissions, and any other document considered by the decision-maker or his staff in reaching the decision. It can be used by ODOC to take enforcement actions (e.g., to reduce or terminate a participant's grant) or to defend ODOC's decision if sued. Once the final decision is made, the Administrative Record cannot be supplemented with subsequent documents.

ODOC will ensure that it has a sufficient administrative record that supports its decisions so that ODOC can defend itself against appeals of the decision. In HUD-CPD programs that provide the participant an opportunity for a hearing before an administrative law judge before ODOC can reduce or terminate the grant, ODOC must have the evidence to support the determination that the program participant failed to substantially comply with the program requirement. The administrative record provides the primary evidence.

- B. All basic documents will be readily available. ODOC will write correspondence with the realization that it can be used effectively either for or against ODOC in litigation. Therefore, any written correspondence "stands on its own," whether you initiate it or are replying to a submission from the participant (or outside of the ODOC). It should be understandable to a third party reading it for the first time months or years later.

Correspondence containing administrative decisions requires special attention. When ODOC makes a finding, a request for corrective action is being conveyed, or ODOC is saying "no" to a request, the letter conveying the decision or action needs will show an understanding of the nature of the issue and explain our reasons.

Adverse actions must cite the authority, e.g., the applicable regulation, OMB Circular, or statutory provision. ODOC will avoid characterizations or personal opinions in written correspondence, whether letters, emails, or internal memorandums. ODOC will answer all correspondence within a reasonable amount of time after received. Demands or requests that we make of our program participants must be reasonable and it must be possible to complete required actions within the time allotted. All attachments will be retained to incoming or outgoing correspondence. All dates, signatures, and concurrences will be clearly legible. These actions will help protect ODOC against allegations of arbitrary and capricious conduct.

Telephone calls will be returned promptly. Notes will be taken of such calls, including the date of the call, the names of the people who participated in the call, and the substance of the conversations. For non-documentary materials, such as pictures, videotapes, recordings of interviews, etc., identify each item as to date, place, and names or narrators (if applicable).

- C. **Errors to Avoid.** To the extent that compliance issues arise with a program participant that results in litigation, indefensible or incomplete administrative records can hurt ODOCs ability to prove our case. Some of these problems are fixable; some are not. However, any problems either have to be corrected before ODOC can go to court or a judgment made by the Local HUD Office that a problem is fatal to any enforcement effort. ODOC will be cognizant of the problems that are difficult to fix such as:

1. Letters from ODOC that deny a request but do not explain the basis for the denial or cite the wrong authority;
2. Letters from ODOC containing unreasonable requests, either in time or action;
3. Unfulfilled promises by ODOC;
4. Letters that demonstrate lack of understanding of what a participant was asking for or proposing;
5. Actions taken by ODOC that do not follow our own procedures including inconsistencies in making findings;
6. Letters that do not stand on their own (i.e., are not understandable to a third party reading them for the first time months or years later);
7. Missing or illegible documents; and/or
8. Letters that clear findings without stipulations or verification of compliance.

- D. **Potential Consequences.** All ODOC files will be disclosed in litigation if the program participant requests it. Therefore, ODOC will create any kind of document, particularly internal memos, avoid conclusions, predictions, or inferences - they can harm the Department in litigation. Note that email messages are retained in back-up systems for up to three years after you delete them and, in most cases, must be disclosed in litigation. Voice mail messages are generally retained for up to three calendar days. All monitoring conclusions must be supported.

DUPLICATION OF BENEFITS POLICY

Section 312 of the Robert T. Stafford Disaster Assistance and Emergency Relief Act (42 U.S.C. 5155) prohibits any person, business concern, or other entity from receiving Financial assistance with respect to any part of a loss resulting from a major disaster as to which he or she has received financial assistance under any other program or from insurance or any other source. In accordance with the Stafford Act, Disaster Recovery funds issued through the Department of Housing and Urban Developments Community Development Block Grant (CDBG-DR) program may not be used for any costs for which Other disaster recovery assistance was previously provided for the same purpose.

A duplication of benefit occurs when a beneficiary receives assistance from multiple sources such as FEMA, NFIP, private insurance companies, non-profits, City State, etc., for cumulative amount that exceeds the total need for a particular recovery purpose. The amount of the duplication is the amount of assistance provided in excess of need. The State of Oklahoma (Oklahoma Department of Commerce) Duplication of Benefit (DOB) Policy adheres to the guidelines published in the Federal Register/Vol. 76, No. 221/Wednesday, November 16, 2011.

There are various programs identified in the State CDBG Disaster Recovery Program-Action Plan that is subject to the Duplication of Benefit Policy. The Sub-grantee must calculate the amount of funds previously received or made available to assist with disaster needs. The sub grantee, during the intake/application process, persons, business concerns, and other entities will be required to disclose all sources of disaster recovery assistance received, and the sub-grantee will verify the amount received.

The sub-grantee at a minimum will:

- Identify the total need of assistance
- Identify the total of all available assistance
- Identify the assistance determined to be not available for the same purpose/activity
- Perform calculation determining the total funds available from other sources.
- Perform calculation determining the maximum eligible award
- Require all applicants to sign a subrogation agreement to repay any assistance later received for the same purpose
- Recapture funds if necessary. If additional need is established, subsequent funds would not be considered a duplication. If additional need is not demonstrated, disaster recovery funds must be recaptured to the extent they are in excess of the need and duplicate other assistance received by the beneficiary for the same purpose.

The Oklahoma Department of Commerce will contract out Disaster Recovery Funds with Units of Local Government (sub-grantees) for the implementation of all project delivery

and management activities. In performance of these activities the administrative function of the ODOC will be ensuring that all CDBG-DR requirements are met although the work is performed by the Sub-grantee. The Sub-grantee will perform the required analysis and determine any duplication of benefits (DOB). The Sub-grantee will work with all State, Federal, and private agencies, including FEMA, to obtain information about any assistance received from those agencies and their programs for each applicant. Project Manager Staff at ODOC will monitor the DOB process to ensure that Sub-grantees have conducted and complied with DOB analysis.

CDBG DISASTER RECOVERY

ACTION PLAN

APPENDIX C2

COMPLIANCE MONITORING HANDBOOK

PROGRAM AND TECHNICAL AREA SANCTION REFERENCES FOR NONCOMPLIANCE REMEDIES

Instructions: The purpose of this table is to provide the sanction authority, by program or technical area, to assist HUD reviewers when determining. Appropriate corrective actions for Findings:

PROGRAM/TECHNICAL AREA	SANCTION AUTHORITY
CDBG Entitlement Program	24 CFR 570.304(a), 570.910, 570.911(a) and (b), 570.912, 570.913
Non-Entitlement CDBG Grants in Hawaii, Insular Areas Program	24 CFR 570.304(a), 570.910, 570.911(a) and (c), 570.912, 570.913
CDBG State Program	24 CFR 570.485(c), 570.495, 570.496
CDBG Recovery (CDBG-R) Entitlement Program	24 CFR 570.304(a), 570.910, 570.911(a) and (b), 570.912, 570.913, and Title XII of Division A of the American Recovery and Reinvestment Act of 2009
Non-Entitlement CDBG Recovery (CDBG-R) Grants in Hawaii, Insular Areas Program	24 CFR 570.304(a), 570.910, 570.911(a) and (c), 570.912, 570.913, and Title XII of Division A of the American Recovery and Reinvestment Act of 2009
CDBG Recovery (CDBG-R) State Program	24 CFR 570.485(c), 570.495, 570.496 , and Title XII of Division A of the American Recovery and Reinvestment Act of 2009
Colonia Set-Aside under the CDBG State Program	24 CFR 570.485(c), 570.495, 570.496, and Section 916 of the Cranston-Gonzalez National Affordable Housing Act of 1990
Section 108 Loan Guarantee Program	24 CFR 570.304(a), 570.485(c), 570.708
Economic Development Initiative (EDI)	24 CFR 570.304(a), 570.485(c), 570.708
Brownfields Economic Development Initiative (BEDI)	24 CFR 570.304(a), 570.485(c), 570.708
Disaster Recovery Assistance	24 CFR 570.304(a), 485(c), 495, 496, 910, 911(a)&(b), 912 & 913
Emergency Shelter Grants (ESG)	24 CFR 576.67
HOME Investment Partnerships Program (HOME)	24 CFR 92.551, 92.552
Homelessness Prevention and Rapid Rehousing Program (HPRP)	HPRP Notice, Section V. Post-Award Process Requirements (H) Sanctions (1) HUD Sanctions
Housing Opportunities for Persons With AIDS (HOPWA)	24 CFR 574.500(c)
Neighborhood Stabilization Program 1 (NSP-1) Entitlement Program	24 CFR 570.304(a), 570.910, 570.911(a) and (b), 570.912, 570.913, and Section 2301 of the Housing and Economic Recovery Act of 2008
Non-Entitlement Neighborhood Stabilization Program 1 (NSP-1) Grants in Hawaii, Insular Areas Program	24 CFR 570.304(a), 570.910, 570.911(a) and (c), 570.912, 570.913, and Section 2301 of the Housing and Economic Recovery Act of 2008
Neighborhood Stabilization Program 1 (NSP-1) State Program	24 CFR 570.485(c), 570.495, 570.496, and Section 2301 of the Housing and

Economic Recovery Act of 2008	
PROGRAM/TECHNICAL AREA	SANCTION AUTHORITY
Neighborhood Stabilization Program 2 (NSP-2) Entitlement Program	24 CFR 570.304(a), 570.910, 570.911(a) and (b), 570.912, 570.913, and Title XII of Division A of the American Recovery and Reinvestment Act of 2009
Non-Entitlement Neighborhood Stabilization Program 2 (NSP-2) Grants in Hawaii, Insular Areas Program	24 CFR 570.304(a), 570.910, 570.911(a) and (c), 570.912, 570.913, and Title XII of Division A of the American Recovery and Reinvestment Act of 2009
Neighborhood Stabilization Program 2 (NSP-2) State Program	24 CFR 570.485(c), 570.495, 570.496, and Title XII of Division A of the American Recovery and Reinvestment Act of 2009
Neighborhood Stabilization Program 2 (NSP-2) Nonprofit Grantee	24 CFR 84.62, 570.502(b), 570.910, 570.911(a), 570.913, and Title XII of Division A of the American Recovery and Reinvestment Act of 2009
Section 8 Mod. Rehab. SRO Program for Homeless Individuals	24 CFR 882.516(d)
Shelter Plus Care (S+C)	24 CFR 582.400 (b)
Supportive Housing Program (SHP)	24 CFR 583.400(b)
Empowerment Zones	Grant Agreement, Articles I, II, III and IV
Historically Black Colleges and Universities (HBCUs)	Housing and Community Development Act of 1974, Section 111
Rural Housing and Economic Development (RHED)	RHED Grant Agreement, Article I.A
Community Development TA Cooperative Agreements	Cooperative Agreement Provisions, Sanctions Section
Youth build	24 CFR 585.405(1)
Citizen Participation ¹	24 CFR 91.500, 92.550, 570.493, 570.903
Consolidated Plan ¹	24 CFR 91.500&520, 92.550, 570.493&903, Cranston-Gonzalez National Affordable Housing Act, Section 108
Environment (see Chapter 21 for program-specific regulations)	24 CFR 58.77(d)(1)
Fair Housing and Equal Opportunity (FHEO)	24 CFR 91.500, 92.551, 92.552, 92.619, 570.404, 570.496, 570.708, 570.904, 574.500(c), 576.67, 582.330, 583.325, 585.402, 598.430, 882.808(o)
Labor (see Chapter 23 for program-specific regulations)	29 CFR 5.5(a)(7), 29 CFR 5.5(b)(2)
Lead Hazards (see Chapter 24 for program-specific regulations)	24 CFR 35.170
Relocation	See Attachment I in Chapter 25 for program-specific regulations.
Flood Insurance	See Attachment 27-1 in Chapter 27 for program-specific regulations.

¹ Applicable to entities covered under the Consolidated Plan requirements only.

CDBG DISASTER RECOVERY

ACTION PLAN

APPENDIX D1

CITIZEN PARTICIPATION PUBLIC COMMENT

CDBG-DR Citizen Participation / Public Comment

The State has an adopted Citizen Participation Plan as required by HUD in its Five Year Consolidated Plan / Annual Action Plan. The plan(s) provide citizens with information on how they can participate in HUD's formula funded CDBG program as well as the HOME, ESG, and HOPWA Programs. Upon notification that the State would receive a CDBG-DR grant allocation, the State has adopted this Citizen Participation Plan and modified it for this CDBG-DR Action Plan in accordance with the guidance set forth in the Federal Register Notice(s).

On February 26, 2014, the proposed CDBG-DR Action Plan was made available for public comment. By regulation, a minimum of seven (7) days is required to allow for public review of the proposed Action Plan.

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

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

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

Public Input Session #1 (Informal): February 6, 2014, Needs Assessment / CDBG DR Survey Discussion

STATE GOVERNMENT WEATHER CANCEL!

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

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

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

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

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

The State welcomes public comments and encourages citizens to submit written comments. All postal delivered written comments are submitted to:

Oklahoma Department of Commerce
Attn: Scott Myers, Community Development / Community Infrastructure
900 N. Stiles Ave.
Oklahoma City, OK 73104-3234

Under the State's Citizen Participation Plan, each comment will be considered and personally addressed and attached in the Appendix of the CDBG Disaster Recovery Action Plan. One written comment was received and is attached to the Appendix of this Action Plan

SUMMARY OF PUBLIC COMMENTS AND RESPONSES

The following is a compilation of all comments received as a result of the Public Hearing and the public comment period. Pursuant to the State of Oklahoma Consolidated Plan Public Comment format, the comments received and their respective responses are grouped by topic and are followed by the response of the agency. All comments are required to be submitted in written form either by postal mail or electronically via email.

CDBG-DR – General Comments

Topic – Agribusiness Funding Request

Comment: Jack Stewart, Canadian County Commissioner District 3 (See Appendix Section C-2)

Canadian County appreciates your consideration regarding inclusion in the CDBG-DR Action Plan and your support.

In regard to the above referenced request this letter is to introduce Levi Clifton, Field of Teams Leader. Debra "Levi" Clifton is a 3rd generation farmer with a 116-year-old farm located 15 miles south of where the El Reno Tornado hit. In the aftermath, she decided it was time to help the affected community of farmers so she started Field of T.E.A.M.S., a group dedicated to clearing the fields of tornado generated debris. She is most knowledgeable about the scope and extent of the damage to Agribusiness in the path of the Tornado from this Event.

Levi and I have been working with FEMA to prepare a survey of affected Agribusinesses. Initial results of this survey indicate that this sector has sustained approximately two million (\$2,000,000.00 U.S.D.) in damage. Levi has spent considerable time and effort in conducting this survey and is still collecting information.

Upon review of this information and subsequent meetings and discussion we are seeking support of CDBG-DR funds to assist us in rectifying some of this damage. Please contact me at your earliest convenience with any questions, comments and direction you may provide.

Response: (Scott Myers, ODOC)

We appreciate your comment. Given CDBG-DR requirements listed in the Federal Register Notice(s) as indicated in the CDBG-DR Action Plan and the current amount of CDBG-DR funding, the State is limited to a maximum allocation of \$300,000 as identified under the CDBG-DR Action Plan. The State must establish the following eligibility threshold requirements and funding priorities for the program.

Eligibility Threshold Requirements

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

Funding Priorities

- Due to limited funds, a preference will be given to businesses located in LMA's or operated by Section 3 eligible applicants.
-

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

CDBG DISASTER RECOVERY

ACTION PLAN

APPENDIX D2

CANADIAN COUNTY COMMISSIONER LETTER-CDBG DR

OFFICE OF

County Commissioners

201 N. CHOCTAW
CANADIAN COUNTY, OKLAHOMA
EL RENO, OKLAHOMA 73036

Phil Carson, District No. 1
David Anderson, District No. 2
Jack Stewart, District No. 3

County Commissioners Office Phone
(405) 262-1070, Ext. 6200
(405) 422-2429 FAX

Jack Stewart, P.E.
Canadian County Commissioner, District 3
201 N. Choctaw Ave., El Reno, OK 73036

February 25, 2014

Scott Myers, Director of Programs
Oklahoma Department of Commerce
900 N Stiles Ave., Oklahoma City, OK 73104-3234

Re: Request for Canadian County's Participation and Application for Proposed Use of CDBG-DR Economic Development Funding and letter of Introduction for Levi Clifton, Field of T.E.A.M.S. Leader Concerning Agribusiness damage in the May 31, 2013 Tornado Event

Mr. Myers,

Canadian County appreciates your consideration regarding inclusion in the CDBG-DR Action Plan and your support.

In regard to the above referenced request this letter is to introduce Levi Clifton, Field of Teams Leader. Debra "Levi" Clifton is a 3rd generation farmer with a 116-year-old farm located 15 miles south of where the El Reno Tornado hit. In the aftermath, she decided it was time to help the affected community of farmers so she started Field of T.E.A.M.S., a group dedicated to clearing the fields of tornado-generated debris. She is most knowledgeable about the scope and extent of the damage to Agribusiness in the path of the Tornado from this Event.

Levi and I have been working with FEMA to prepare a survey of affected Agribusinesses. Initial results of this survey indicate that this sector has sustained approximately two million (\$2,000,000.00 U.S.D.) in damage. Levi has spent considerable time and effort in conducting this survey and is still collecting information.

Upon review of this information and subsequent meetings and discussion we are seeking support of CDBG-DR funds to assist us in rectifying some of this damage. Please contact me at your earliest convenience with any questions, comments and direction you may provide.

Sincerely,



Jack Stewart P.E.

Copy to:
Canadian County Commissioners
Levi Clifton, Field of T.E.A.M.S.
Senator Ron Justice - District 23, Oklahoma State Legislature
Wayne H. Rickard, Federal Disaster Recovery Coordinator, DHS-FEMA, Region 6
Charlie Cook, Community Planning and Capacity Building, DHS-FEMA, Region 6



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CDBG DISASTER RECOVERY

ACTION PLAN

APPENDIX E

IMPEDIMENTS TO FAIR HOUSING

IMPEDIMENTS TO FAIR HOUSING CHOICE (State Jurisdictional Review)

The Housing Priorities and Strategies component in the State's Consolidated Plan identifies the need to minimize barriers to affordable housing from the state perspective. Before there is further discussion regarding the impediments of fair housing choice, one must first understand that the availability of and the ability to obtain affordable housing has a direct impact on those classified as 'protected classes' under the Fair Housing Act. Demographic, employment, and income data show that minorities, families with children (including single parent families), and persons with disabilities are proportionally overrepresented in low-income data and constitute those who are most often in need of affordable housing. It is this connection that one should understand that many barriers to affordable housing can in turn be understood to be an impediment to fair housing choice.

Conclusions drawn from the survey, demographic, economic, and housing related information reveal that these areas share some common themes which also qualify as impediments to fair housing. A discussion of these impediments (deterrents) follows. Each discussion concludes with an action plan outlining what steps the State of Oklahoma will take to try to diminish or eliminate these impediments.

A. Impediment – Lack of Affordable of Housing for Rent

The recent recession caused many homeowners to lose their homes through foreclosure, changing those individuals for homeowners to renters. In addition, the resulting slump in the housing market and the increased risk to real estate lenders has made home loans more difficult to obtain. This comes at a time when more people are out of work or simply working at any job they can find. Household incomes are down and the costs of rents and utilities are rising. During the real estate boom, builders moved away from the construction of rental properties and into the construction of housing for sale.

In recent years, Affordable Housing Tax Credit rental projects have been delayed due to a lack of demand for the Tax Credits. There has been a resulting increase in the demand for rental housing at a time when there is a shortage of decent, safe and sanitary housing units for rent. These factors have created a severe shortage of affordable rental housing. This shortage of affordable rental housing has had a disproportionate impact on minorities, families with children, and individuals with disabilities.

Action - (Lack of Affordable of Housing for Rent)

Stimulus funds from the Tax Credit Assistance Program (TCAP) and the Section 1602 Exchange Program (Exchange Program) have been invaluable in reviving stalled Affordable Housing Tax Credit (AHTC) projects, which are all rental projects. Thirty-eight (38) projects received funding through one or both of these programs. Some have recently been completed, and the rest should be in service by the end of 2011. This will help ease the shortage of affordable rental housing.

In addition, OHFA is considering using a greater percentage of its HOME Investment Partnerships Program (HOME Program) funds for rental activities than in previous years. This is in response to public comment and the results of both surveys. OHFA will put forward this idea in the public input sessions and hearings for the 2012 HOME Program Action Plan. Unfortunately, the funds available through the

HOME Program have never been sufficient to meet the needs of the State of Oklahoma, and these funds have been reduced significantly in recent years. OHFA is not aware of the amount of funding that will be available for the 2012 Program Year. Nonetheless, OHFA will do everything it can, with the limited funds available, to provide the State of Oklahoma with as many affordable rental housing units as possible.

OHFA will also make every effort to encourage builders and developers to use Oklahoma Housing Trust Fund (HTF) monies as part of their development funding for rental properties. The HTF provides very low interest construction financing for both rental and homeownership projects, especially in the rural areas of the State. Once again, the amount of these funds is extremely limited, and the State legislature is no longer providing ongoing funding for the program. OHFA has only the existing funds, less than \$5 million, to assist these projects. OHFA is further limited by the HTF Rules regarding rental projects. Under the HTF Rules, OHFA may only fund up to 25% of the total development costs of a rental project with monies from the HTF. Also, this is only a construction loan program, and builders and developers must repay the funds by obtaining permanent financing once the project is complete.

B. Impediment – Financial Cost Burden of Low incomes or High Rents

This impediment is another one that was heavily emphasized in both surveys. Financial cost burden has been identified in prior analyses as a major impediment to fair housing choice. The problem has only been exacerbated by the recent economic downturn. Unemployment is up, many others are underemployed, and incomes are not rising at the same rate as the cost of rent and utilities.

Financial cost burden can pose a substantial impediment to the protected classes. Affordable units are generally defined as housing available to households at a cost that is no more than 30% of the total household income. Paying more than 30% of monthly income, sometimes substantially more, for rent/mortgage payments and utilities severely handicaps the members of the protected classes, who predominantly tend to have only lower income opportunities.

Local property tax has been identified as increasing the cost of housing for many Oklahomans across the state. Local governments are placing an increasing portion of the total tax burden on property taxes. This tax shift is occurring because the property tax is the only tax most local governments and school districts have flexibility to modify. High property taxes affect the cost of housing for both renters and homeowners.

Rental assistance and utility assistance payments represent the only viable way to alleviate the situation. However, all of the public housing authorities (PHAs) in the State of Oklahoma are oversubscribed in the area of rental and utility assistance. Most if not all of the PHAs have very long waiting lists for this assistance, and have closed their waiting lists due to the length of time it would take any new applicant to receive assistance. In light of the current economic slump and the political situation at the federal level, it is not anticipated that there will be any increase in the Section 8 Housing Choice Voucher Program, or any of the other federal and/or State sources of rental and utility assistance.

Action – (Financial Cost Burden of Low incomes or High Rents)

OHFA is considering increasing the amount of HOME funds set aside for Tenant-Based Rental Assistance (TBRA), in response to the results of the two surveys previously mentioned. It is anticipated that this will be one of the recommendations of the Affordable Housing Committee. Unfortunately, OHFA's funds are limited in this regard. The available HOME funds have been cut by 12% for 2011, and may be cut even further for 2012. Since a substantial part of the 2011 HOME funds have already been committed, and the rest are set-aside for other activities, there are no 2011 funds available for TBRA. Any increase for 2012 would have to be approved through the Consolidated Planning Process.

C. Impediment - Unemployment or Underemployment

This impediment ties directly to Impediment 'B' listed above. Unemployment and underemployment contribute to the financial cost burden of rent, mortgage payments and/or utilities facing individuals or households in the protected classes. If the able-bodied adult members of these households are unable to find employment at a salary equivalent to their skills and abilities, or are unable to find employment of any kind, the problem of financial cost burden becomes much worse. Larger amounts of assistance are required to help these families.

Absent an economic recovery affecting both the State of Oklahoma and the nation as a whole, rental and utility payment assistance will be required for more of the households in the protected classes, and in greater amounts. However, all of the public housing authorities (PHAs) in the State of Oklahoma are oversubscribed in the area of rental and utility assistance. Most if not all of the PHAs have very long waiting lists for this assistance, and have closed their waiting lists due to the length of time it would take any new applicant to receive assistance. In light of the current economic slump and the political situation at the federal level, it is not anticipated that there will be any increase in the Section 8 Housing Choice Voucher Program, or any of the other federal and/or State sources of rental and utility assistance.

Action – (Unemployment or Underemployment)

OHFA is considering increasing the amount of HOME funds set aside for Tenant-Based Rental Assistance (TBRA), in response to the results of the two surveys previously mentioned. It is anticipated that this will be one of the recommendations of the Affordable Housing Committee. Unfortunately, OHFA's funds are limited in this regard. The available HOME funds have been cut by 12% for 2011, and may be cut even further for 2012. Since a substantial part of the 2011 HOME funds have already been committed, and the rest are set-aside for other activities, there are no 2011 funds available for TBRA. Any increase for 2012 would have to be approved through the Consolidated Planning Process.

D. Impediment – Lack of Accessible Housing for the Disabled

Affordable, accessible housing is not readily available for many people with developmental disabilities. People who need accessible housing often have trouble finding it or obtaining the funds to modify existing housing. The lack of affordable housing in general only makes this situation worse. Many Oklahomans with developmental disabilities have Supplemental Security Income (SSI) as their only source of income. SSI payments are inadequate to pay market rents, and there are long waiting lists for

housing subsidies. Many individuals with developmental disabilities require some support services to enable them to live independently. For a number of reasons, it is frequently difficult to fund appropriate levels of flexible services to provide this support.

Oklahomans with developmental disabilities who need accessible housing have a difficult time finding appropriate units. Many developers, including developers of public housing, are only willing to develop accessible units if there is specific demand at the time the units are built. Furthermore, landlords often are not willing to leave accessible units open for those who need them, and will rent those units to people who do not need accessible housing. These actions contribute to a shortage of accessible housing.

Even low-income housing is frequently too expensive for people with developmental disabilities who live on SSI. Section 8 Housing vouchers have provided the primary subsidy for very low-income individuals living in community housing. Unfortunately, decreasing support for low income housing programs at the local, state, and federal level have made the problem of finding affordable housing for people with developmental disabilities even worse.

Action - (Lack of Accessible Housing for the Disabled)

Developers of AHTC properties are not required to provide any accessible units, as the AHTC Program does not mandate compliance with Section 504 of the Rehabilitation Act, which requires a certain minimum number of accessible units. However, many recent AHTC properties received assistance through the TCAP Program in order to complete stalled projects. All of the AHTC developments assisted with TCAP funds are required to meet the cross-cutting federal requirements, including Section 504. This means that many new rental developments that will place in service over the next year will have accessible units for disabled individuals or households.

The availability of units is only part of the problem, however. Disabled households must be able to pay the cost of rent and utilities for those units. As previously mentioned, OHFA is considering using more of its 2012 HOME Program allocation for TBRA. OHFA will look at requiring any TBRA activity to give preference to disabled individuals and households, similar to the preference given to such individuals and households by the Section 8 Housing Choice Voucher Program currently administered by OHFA.

E. Impediment - General Lack of Affordable Housing

This impediment is closely tied to Impediment 'A', a lack of affordable rental housing. It is evident from the survey responses and from the demographic, economic and housing data that all types of affordable housing are in short supply. Although rental housing appears to be the greatest need, affordable housing units for homeownership are also greatly needed.

Construction costs are rising, forcing the cost of homes for sale to increase. The average cost of homes for sale has risen at a greater rate than incomes have increased. To make matters worse, stricter lending practices resulting from the collapse of the housing market bubble have made it much more difficult for households with small down-payments and less than stellar credit to be approved for the purchase of a

home. The protected classes are disproportionately represented in the lower income strata, and are more likely to face great difficulties in becoming homeowners due to the conditions mentioned.

Action – (General Lack of Affordable Housing)

Due to the limited amount of HOME Program funds available, and the changes that will be proposed to the HOME Program set-asides in order to address other impediments to fair housing choice, it will not be possible to use HOME funds to address the lack of affordable housing for homeownership. As previously mentioned, OHFA will propose using HOME funds to help alleviate the shortage of other forms of affordable housing, such as housing units for rent.

To address the shortage of affordable housing for homeownership, OHFA will make every effort to educate the public regarding its Single Family Mortgage Revenue Bond Program (SFRMB). OHFA Advantage is a program offered through the SFRMB Program. OHFA Advantage offers 30 year, fixed rate, low interest home loans with 3.5% down payment assistance to homebuyers, statewide. Three products are available for eligible homebuyers to purchase any new or existing home: 1st Gold (most homebuyers), OHFA Shield (Police Officers & Fire Fighters) and OHHA 4Teachers (Educators). To qualify for OHFA Advantage (state bond money), households need only contact a participating lender. Homebuyers must meet income, purchase price and credit score guidelines. The maximum purchase price is \$189,607 and a minimum credit score of 620.

OHFA will also make every effort to encourage builders and developers to make us of the previously mentioned Oklahoma Housing Trust Fund. The HTF provides low-interest construction loan financing for both affordable housing for sale and affordable housing for rent. The HTF is an especially good source of funding for affordable housing for sale, since it can finance 100% of the construction costs of homes for sale.

F. Impediment - Racial bias, Prejudice or Stereotyping

Racial bias, prejudice or stereotyping impediments can be most difficult to address and can originate by various means. The lack of knowledge or education regarding fair housing laws and protections can sometimes serve as an impediment source for protected class members. This can include both those persons offering housing and persons seeking housing. Typically, a landlord's only sources of information regarding fair housing issues are general media reports, or possibly occasional housing presentations. Although many housing groups provide education to their members, not all of the landlords belong to these groups. This is holds especially holds true in the rural areas served by the State. Additionally, a vast majority of fair housing claims emanate from the two largest cities, thus indicating that residents in more remote communities (1) are less familiar with fair housing laws and complaint procedures; (2) are unwilling to travel the distances required to pursue action; and (3) perceive that the laws apply only to the metropolitan areas.

There have been many changes to fair housing law since 1968 and the information that many have been using may simply be out of date. The problem of outdated information affects not only private parties, but also has impacted some local government agencies charged with enforcing fair housing laws.

Outdated information may result persons seeking housing to become victims of misinformation or result in a lack of information about their housing rights. It is difficult to combat housing discrimination if people who are discriminated against are not aware that the practice is illegal.

Action – (Racial bias, Prejudice or Stereotyping)

☒ Action: As stated before, while unlawful, prejudice and stereotyping can be the most pervasive and are difficult to correct. Bigotry is not hereditary but a learned behavior stemming from early childhood or through negative life experiences. Educational awareness as mentioned previously is the best available tool but it ultimately remains up to the individual to act upon the new behavior. The State will continue to train funding recipients to recognize housing discrimination or direct clients who encounter housing problems and then to refer them to agencies that can help them remedy the issue or file a complaint with HUD or the OHRC.

☒ Action: Community Action Agencies and/or other community-based non-profit organizations are encouraged to remain proactive in regard to fair housing. These agencies are more readily accessible at the local level and are key players in rural housing advocacy. These local resources are encouraged to develop media campaigns which recognize the most opportune methods of reaching rural citizens, such as weekly or bi-weekly newspapers, county extension programs, or posters at the county fairgrounds, for example. Such public relations efforts might emphasize the concept that fair housing is indeed an issue on a statewide basis and not just limited to the most highly populated areas.

☒ Action: The State is now using online survey technology. This allows for a more direct method to reach rural Oklahoma in order to identify existing impediments. The initial results of using online survey methodology have been very promising. This online survey method provides many benefits over older postal mailing methods. First, emailing surveys or links to online survey questionnaires is very cost effective in an era of diminishing federal funding. Second, it is anticipated that the ease of use and accessibility to the survey will generate more responses than through previous postal mailing formats. The State sees this as a continually evolving process. As technology changes, survey delivery will adapt and change accordingly. Additionally, the questions themselves will change and be refined based off of previous survey response. Simply put, there is a continuous learning curve built in which will allow improved targeting and provide for getting the most accurate fair housing related data possible.

☒ Action: Programs which are administered by ODOC all require that grantees certify their compliance with fair housing laws, regulations, and standards. Implementation manuals which accompany the programs include the following requirements in regard to fair housing provisions for state-funded jurisdictions. By contractual requirement; contractors shall administer the program to affirmatively further fair housing in compliance with Public Law 88-352, Public Law 90-284, and 24 CFR Part 570.601 and 570.904(c). Fair housing requirements apply to all communities irrespective of size, with or without minority residents. For each fiscal year the contractor has received a contract from ODOC, the contractor must provide documentation of the steps taken to affirmatively further fair housing.

The following excerpt below is incorporated into the CDBG monitoring checklists. It verifies that grantees have met the following conditions in regards to fair housing.

a. Does Grant Recipient have an Ordinance? _____ or Resolution? Date: _____

How Enforced? _____

b. Have Complaints been received? _____

Is there documentation describing process to handle discrimination complaints (i.e. complaint form)?

c. Identify steps taken to further fair Housing (there must be one (1) step for each FY CDBG's have been received).

Year ____ Step Year Step

Year ____ Step Year Step

d. Were CDBG funds expended to further fair housing? _____

Findings/Comments:
