



# REGIONAL WATER IMPLEMENTATION

## MAX AWARD

\$2,000,000

## MATCH

50%

of the CDBG grant request

## APPLICATIONS ACCEPTED

March 2 - Oct. 16, 2026

## QUALIFY

- ✓ Benefit Low- to Moderate-Income persons
- ✓ Consolidation of two or more water systems
- ✓ Approved Pre-Application

## Purpose

The Regional Water Implementation Program is designed to support water infrastructure projects that benefit multiple communities, especially in rural Kansas, by encouraging regional collaboration and leveraging federal funding. This initiative provides funding for projects that facilitate the consolidation of water systems under a single governing body, support the creation or expansion of a Public Wholesale Water Supply District (PWWS), or benefit at least two unconnected Primary Water Systems (PWS). A PWS is defined as a public water supply system that is either a voting member of a PWWS, a participant in an interlocal agreement, or an independent system not currently connected to or purchasing water from another system.

In addition to primary systems, the program may also support Secondary Systems—those that purchase treated water from a primary system and benefit from the proposed project but are not voting members of a PWWS, participants in an interlocal agreement, or otherwise directly involved in the implementation. By aligning with the Kansas Water Plan, the program addresses both water quantity and quality concerns, while fostering long-term sustainability and economic growth in rural communities.

## Authority

The Community Development Block Grant (CDBG) program is authorized under Title I of the Housing and Community Development Act of 1974, as amended (42 U.S.C. § 5301 et seq.). The statute authorizes the U.S. Department of Housing and Urban Development to allocate CDBG funds to states for distribution to non-entitlement units of general local government. Federal regulations governing the State CDBG program are codified at 24 CFR Part 570, Subpart I.

## Timeline

**Grant Announcement:** January

**Application Period:** March – October 16

**Submission Deadline:** October 16 at 11:59 PM (CT)

**Award Notification:** 20–30 days after the submission deadline

Applications may be reviewed as received, as applicable to the program.

## Application Procedures

- Online application link can be found here: <https://kansascommerce.my.site.com/Grants/s/>
- Questions and submission of additional documentation should be directed to Andrew Hayman at [CDBG@ks.gov](mailto:CDBG@ks.gov)
- Applications that are incomplete or missing documentation will not be reviewed for rating or considered for funding

## Release of Information

Information submitted to the Kansas Department of Commerce relating to the application may be subject to the Open Records Law (K.S.A. 45-215 et seq.).

## Eligible Use of Funds

Funding from this program helps to promote collaboration and consolidation of water systems throughout Kansas. Eligible expenses include:

- Projects that will result in system consolidation where two or more systems merge, resulting in one public water supply system with a single governing body
- Projects that result in the creation or expansion of a Public Wholesale Water Supply District.
- Projects that benefit a minimum of two public water supply systems and must be primary systems not currently connected
- Professional services: post-award administrative, engineering, and architectural costs and fees

AVAILABLE FUNDING: \$2,000,000	
Maximum Per Award	\$2,000,000
Administration	Up to 12.5% of grant or \$35,000, whichever is less
Match	50% of total CDBG grant request
Expected Awards	1-2

## CDBG National Objectives

The Community Development Block Grant (CDBG) program is designed to provide decent housing, suitable living environments, and expand economic opportunities principally for persons of Low- and Moderate-Income (LMI). All CDBG projects must meet a national objective and involve an eligible activity under the Housing and Community Development Act of 1974.

The three CDBG national objectives are:

1. Benefit Low- and Moderate-Income (LMI) Persons
2. Prevention or Elimination of Blight
3. Addressing an Urgent Need

All activities proposed in applications for the **Regional Water Implementation Grant Program** must meet the national objective of benefiting LMI persons with a minimum of 51% LMI beneficiaries. This can be accomplished either by using [HUD census data](#) or by completing an income-based survey. Applicants must receive CDBG approval before starting a survey and follow the approved survey methodology.

## Eligible Applicants

**Only cities and counties (units of local government) can apply for CDBG grants.** Large cities and urban counties are considered entitlement communities and receive CDBG funds directly from HUD, while smaller communities apply through the State CDBG program.

The following entitlement communities are **NOT** eligible to apply to the State CDBG program: Kansas City, Lawrence, Leavenworth, Manhattan, Overland Park, Topeka, Wichita, and all of Johnson County. Communities with an open project that is currently in a time extension are not eligible until the project has been successfully closed.

## Grant Process

Unlike most CDBG programs, the Regional Water Implementation program operates on a three-year timeline. The first year focuses on completing any necessary design and environmental review activities, with project implementation typically starting in the second year. Applications received by the 15th of each month will be reviewed by the 30th, with award letters issued as soon as possible.

BEFORE APPLICATION	APPLICATION CRITERIA	POST AWARD
<ul style="list-style-type: none"> <li>Initial public hearing (following the appropriate timeline). Must be advertised in all jurisdictions.</li> <li>Secure matching funds</li> <li>Submit pre-application</li> </ul>	<ul style="list-style-type: none"> <li>Completed Preliminary Engineering or Architectural Report (PAR/PER)</li> <li>Environmental determination of level of review form</li> <li>Community needs narrative</li> <li>Procure professional services, such as grant administration, engineering, and architectural services before applying</li> </ul>	<ul style="list-style-type: none"> <li>Complete Environmental Review (must be paid for with local funds)</li> <li>If applicable, comply with Uniform Relocation Assistance (URA), Davis-Bacon wage rates, BABA purchasing regulations, and Section 3</li> </ul>

## Public Hearings and Citizen Participation

Citizen participation is a required component of the CDBG program. Any local government applying for CDBG funds must provide citizens with reasonable opportunities to participate in the planning and development of applications, especially residents of proposed project areas. Citizens must be provided adequate and timely information so they can be meaningfully involved in important decisions.

Local governments must hold an initial public hearing to allow citizens the opportunity to comment on community needs and the proposed use of funds. If funded, a second public hearing must be held at the project's conclusion to review the project's results and obtain input on the grantee's performance.

Public hearings must be held at a time and location convenient to potential or actual beneficiaries, with accommodations for non-English speaking residents and persons with disabilities. Public hearings may not be held in any buildings built or rehabilitated with CDBG funds. Records of these efforts must be part of the grant files, including the public hearing notice, affidavit of publication, record of posting, public hearing attendance log, public hearing minutes, any written complaints and grantee response, and any other documented efforts to involve citizens throughout all stages of the project.

### Requirements to Publish a Public Hearing Notice

A notice about the hearing must be published at least 5 FULL days in advance (but no more than 20 days) in advance to allow citizens the opportunity to schedule their attendance. The day that the public hearing notice is first advertised and the day of the public hearing do NOT count towards the minimum 5 day period.

Notices must be published in a local newspaper having the widest general circulation in the community or on the grantee government website that is accessible to persons with disabilities or Limited English Proficiency. Applicants must also make every effort to inform those who might not be reached through the newspaper notice that the public hearing is to be held. Such efforts might include the distribution of leaflets, posting notices on bulletin boards at town hall, social media channel announcements, notices to local organizations, clubs, and churches, and/or personal contact. Notices must be published in all multi-jurisdictional areas.

### Initial Public Hearing

The purpose of the initial public hearing is to inform citizens about the proposed project, including its location, total cost, activities, and beneficiaries. Community members must be given a chance to suggest other project ideas and share their input, and the local governing body should carefully consider this feedback before submitting the application. The initial public hearing must be held at least 15 FULL days before the CDBG application is submitted, and no earlier than 120 days. **The total project funding and CDBG amount requested must match what appears in the public hearing notice.**

## SAMPLE PUBLIC HEARING NOTICE

The City/County of \_\_\_\_\_ will hold a public hearing on (day), (date), at (time) in the (location) to consider an application to be submitted to the Kansas Department of Commerce for Community Development Block Grant (CDBG) funds under the \_\_\_\_\_ category. A specific project application to be discussed is (description) in an area generally bounded by (location) that will consist of (specific activities). The estimated project cost is \$\_\_\_\_\_ with the grant request for \$\_\_\_\_\_ of the project cost.

Other project proposals introduced at the hearing will be considered. Oral and written comments will be recorded and become a part of (City/County)'s CDBG Citizen Participation Plan.

Persons with disabilities or non-English speaking persons who wish to attend the public hearing and need assistance should contact (local contact name) at (address and telephone) no later than (number of hours/days) prior to the meeting date to allow for necessary arrangements. Every effort will be made to make reasonable accommodations for these persons.

### Example Timeline

Sun.	Mon.	Tues.	Wed.	Thurs.	Fri.	Sat.
1	2	3	4	5 <b>Notice is Published</b> (Day 0)	6 Day 1	7 Day 2
8 Day 3	9 Day 4	10 Day 5	11 <b>Public Hearing</b>	12 Day 1	13 Day 2	14 Day 3
15 Day 4	16 Day 5	17 Day 6	18 Day 7	19 Day 8	20 Day 9	21 Day 10
22 Day 11	23 Day 12	24 Day 13	25 Day 14	26 Day 15	27 Application can be submitted	28
29	30	31				

### **Closeout Public Hearing**

The second public hearing is held at the conclusion of the project prior to closeout to inform citizens of the project's successful or unsuccessful completion, as well as provide results, project totals, funds expended, and obtain input on the grantee's performance. This public hearing cannot be held until a final monitoring letter has been received by the grantee and all deficiencies have been resolved.

## Matching Funds

Local funding is required for all CDBG projects, and no project can be funded entirely by grants. Matching funds can originate from private or public sources, but the application must document that these funds are firmly committed (e.g., a letter of commitment from a bank or other funding source).

Applicants are encouraged to leverage a variety of matching funds to strengthen their CDBG proposals. Eligible sources of match include bank loans, industrial revenue bonds, owner equity, contributions from local governments, and grants or loans from other federal programs such as KDHE or USDA Rural Development. Other grant funds may also be used as match if the grant funding is secured by the time the CDBG contract is signed. To be considered secured, funds must either be deposited in a city or county account under the applicant's control or supported by an official award letter from the granting agency outlining the award amount and terms. All matching funds must be clearly documented and verifiable.

At least 10% of the matching funds must be cash from a local source (i.e., owner funds, city/county cash). In-kind contributions are also allowed in various forms, but this funding source cannot make up more than 10% of the local match. If salary for a city or county employee is used, payrolls and timesheets outlining hours worked on CDBG projects (including the percentage of total hours) must be submitted to project managers for approval.

**Any expenses incurred prior to the grant award are ineligible for reimbursement with CDBG funds and cannot be counted as local match for the project. This includes application writing, preliminary architecture/engineering, and the acquisition of property/buildings (option agreements are allowable).**

## Pre-Application

Interested applicants should consult with CDBG staff to discuss their project idea and review the necessary planning needed before submitting a pre-application. Applicants must submit a pre-application to allow CDBG to provide early feedback and address any eligibility concerns before applicants complete the full application, and ensure projects align with program goals and are prepared for funding.

The pre-application requires a brief project description, estimated budget, eligibility status, and proof of readiness to proceed requirements. Commerce will review submissions within 10 days and provide further instructions. Only those with an approved pre-application may submit a full application, but pre-approval does not ensure grant funding. The deadline to submit a pre-application is Sept. 15, 2026.

**Pre-Application:** <https://forms.office.com/g/2MtSs7bep1>

## Preliminary Engineering/Architectural Report

CDBG projects proposing construction activities must undergo review by a licensed professional engineer or architect before an application can be submitted. The review will consist of a Preliminary Engineering Report (PER) or Preliminary Architectural Report (PAR) sufficient in scope to analyze the need, determine the most appropriate solution alternatives, provide estimated construction and non-construction costs, and recommend the required level of funds for operation and maintenance of the system, if applicable. **Note: If a vendor is used to supply a cost estimate, said vendor cannot bid on the work if the applicant receives a grant award.**

Incomplete or inadequate information may lead to a request for corrections from the applicant or the application not passing threshold, depending on the type and extent of the information missing. At a minimum, the following must be addressed in the report:

1. Name of the applicant or owner of the system.
2. Name, address, and telephone number of the engineering/architectural company.
3. Date of review.
4. Description and documentation of the problem.
5. Cause(s) of the problem, including the age of any existing publicly owned system(s).

6. Discussion of the alternatives – Several alternatives should be considered to determine feasibility and cost-effectiveness, with justification of the alternative selected. The alternatives must be listed.
7. Estimated construction and non-construction costs. Cost per square foot is not an acceptable architectural estimate. Costs must be broken out for the specific structure.
8. If the scope of the report includes more activities than the proposed CDBG project, clearly identify the CDBG portion in narratives and cost estimates.
9. Analysis of operation, maintenance, and replacement budget.
10. Land requirements – Identify sites and easements required. Also specify whether these properties are currently owned, acquired, or leased. Must attach proof to receive credit.
11. Asbestos must be addressed for any building renovation or demolition.

## Environmental Review

All CDBG-funded projects require an environmental review under the National Environment Policy Act of 1969 (NEPA) and HUD's implementing regulations at 24 CFR Part 58. The Environmental Determination of Level of Review form must be submitted with the application. This form will inform Commerce as to what level of environmental review you will undertake for your project if awarded.

Post-award, the city or county must conduct a full environmental review of the project. This responsibility cannot be delegated and the cost to conduct the review **must be paid with local funds**. The entire project, not just the CDBG-funded portion of the project, is subject to the NEPA review. The project must group together all activities that are related either on a geographical or functional basis or are logical parts of an overall project into a single project for review. The environmental review process includes determinations of applicability to various laws and authorities, consultation with various regulatory agencies, publication of findings, a 7-day or 15-day advertised local comment period, and a 15-day state comment period.

**No project activities may begin until the review is complete and the environmental release of project funds is issued by Commerce.**

## Threshold Requirements

Before the application is scored and ranked, it must meet the following threshold requirements:

1. The applicant must be eligible.
2. The application must be received within the application period.
3. Only complete standard application forms will be accepted.
4. The proposed activity for CDBG funding must be an eligible activity under Section 105(a) of Title I of the Housing and Community Development Act of 1974, as amended.
5. The proposed project must meet a national CDBG objective. If the national objective of the project is to benefit LMI persons, the percentage of LMI beneficiaries must be 51% or higher.
6. Survey process approval is required for all CDBG applicants prior to conducting surveys. Completed income surveys are required at the time of application. Surveys must demonstrate a minimum of 51% LMI beneficiaries.
7. Provide appropriate matching funds with supporting documentation. All matching funds must be secured at the time of application.
8. A Preliminary Engineering Report (PER) or Preliminary Architectural Report (PAR) must be included. The report shall address the items included in the section herein discussing such requirements.
9. The public hearing notice must be published at least 5 full days before the hearing (starting one day after publication and not counting the date of the hearing) but no more than 20 full days prior to the hearing. The public hearing must occur at least 15 full days and no more than 120 full days before the application due date. The total project funding and CDBG amount requested must match what appears in the public hearing notice.

10. All required subrecipient and interlocal agreements must be included.
11. If CDBG funds are used for the procurement of professional services, the procurement must follow the CDBG procurement process as outlined in the CDBG Grantee Handbook, which includes free and open competition. Projects may not follow a Design Build approach or a Construction Manager at Risk (CMAR) approach. Construction contract(s) must not be procured until after grant award and environmental review approval.
12. A target area map must be included, along with an applicant jurisdiction map, if different from the target area.

Should any document be missing, incorrect, or otherwise have deficiencies that do not meet threshold requirements, contact will be made with the applicant after the applications are initially reviewed. The applicant will be given two weeks from notification to correct the deficiency. Threshold items such as an inadequate amount of time for a public hearing, a public hearing not having required information, or a public hearing too late would not be correctable, and the application will not be scored. The extension of time granted is not intended to provide extra time for securing commitments from alternative sources, lifting contingencies, or finalizing the particulars of the application.

## Rating Criteria

All CDBG projects are evaluated based on a numerical scoring system tied to the established rating criteria. While there is no official minimum score required for consideration, priority is given to applications that score higher. As a general guideline, projects scoring below 70 are typically not competitive and are less likely to be approved. Applicants are encouraged to review the criteria carefully and ensure their proposals are as compelling as possible.

All applications must include a Community Needs Narrative, which should describe the community’s overall prioritized needs, not just those related to the proposed project. Applicants should explain how these needs were identified and whether they have been formalized in any existing plans or documents. The narrative should tell the story of the community and highlight needs across all sectors. It is limited to one page and must specifically address housing needs. Examples of community needs include education, childcare, fire safety, community and government buildings, transportation, recreation, housing, workforce development, economic development, and homelessness.

The matrix below describes each selection criterion as a numerical score within the **Regional Water Implementation Program**.

<b>SELECTION CRITERIA MATRIX</b>	<b>MAXIMUM</b>
1. Project Need	40
2. Project Alternatives	10
3. Past Efforts to Address Need	10
4. Project Readiness	30
5. Project Impact	10
7. Optional Bonus Points	Up to 10
<b>MAXIMUM TOTAL</b>	<b>100 Points</b>

### 1. Project Need (40 points)

- a. Applicants must state their need, the cause of the problem, how long the problem has existed, and how the problem affects the community. Applicants must also document the urgency of the problem and what state/federal regulations are being violated, if any. The more an applicant documents a need in actual terms and figures, the stronger the application. The applicant must explain the importance of this project need as compared to total community needs, and describe how the consolidation will impact residents. While letters of support are required to showcase community backing, they will not receive specific point values in the scoring process. Letters may be provided from anyone who shows their support of the project including residents, local businesses, foundations, non-profits, and members of local government.

## 2. Project Alternatives (10 points)

- a. Applicants will be required to summarize all the alternative solutions that were examined to address the need above. This must also include a financial analysis of all the proposed solutions. Failure to include financial alternatives will result in point deductions. Applicants will also be required to document all sources of funding for the project. The applicant must state the solution it has chosen and the reasoning behind the choice. Describe any acquisition activities completed or required for the project.
- b. Scope of Work: Describe the project (number of blocks of streets, square footage of buildings, linear feet of waterlines, etc.), including the project completion time frame, activities, project costs, and costs per person benefiting. Describe separately the activities covered by the CDBG funds. Discuss any force account construction labor and equipment proposed and the basis of cost estimate for it. Provide a timeline of critical benchmarks in the total project.

## 3. Past Efforts to Address Need (10 points)

- a. Applicants must describe all efforts from the previous five years that have been made to address the community's overall needs. This includes the proposed project and all other city activities, i.e., street improvements, water/sewer improvements, senior center, health department, ADA, etc.

## 4. Project Readiness (30 points)

- a. Applicants must describe the degree to which the applicant is ready to proceed with the project. Has the applicant pre-selected the professional services it will need? In the event real property is required for the project, does the applicant have ownership or an "option to purchase" the property? Proof of ownership or the option agreement must be attached to receive points. Finally, provide an explanation and documentation of leverage commitments. Are there any environmental concerns that would delay the project?
- b. Bonds are not required to be sold to be eligible, but a commitment for purchase must be "in hand" for any issues other than private market. Bond ordinances must be passed and published, and proof thereof included in the application.

## 5. Project Impact (10 points)

- a. Applicants should describe anticipated positive impact on the LMI community. Describe measurable outcomes, which LMI residents will benefit, and how you will determine if the project is a success.
- b. Applicants should discuss sustainability and long-term benefits to the LMI population of the project.
- c. Applicants should discuss integration with other community development initiatives in the community. How does this project connect to other initiatives in your community for the LMI population?

## 6. Optional Bonus Points (up to 10 points)

A total of 10 bonus points is available under two criteria: applicants who have not received funding in the past five years (5 points) and private match (5 points). If seeking bonus points for private donations or foundation grants, at least 10% of the matching funds must come from that source to gain the 5 bonus points.

Following completion of the ratings, Commerce will conduct a comprehensive review to ensure that projects are equitably distributed across the state, with priority given to those demonstrating the capacity to complete on time, presenting minimal CDBG compliance risks, and contributing to geographic dispersion.

# Grant Performance Expectations

In addition to Applicant Eligibility requirements, all CDBG grantees are expected to comply with the following standards:

## 1. Project Completion

Grantees are expected to complete all approved project activities within the 24-month grant period whenever feasible. Construction projects should generally complete design and environmental review during the first year and target physical construction completion by the end of the second year. Completion expectations may vary by activity type and award agreement requirements.

## 2. Allowable Costs

Only eligible and allowable CDBG expenses may be included in the approved project budget.

### 3. Administrative and Compliance Requirements

Grantees must:

- Provide all information necessary to execute the grant award agreement.
- Sign and return the grant award agreement within 30 calendar days of receipt.
- Comply with applicable acquisition, environmental review, labor standards, and procurement requirements, including URA, NEPA, Davis-Bacon, and competitive procurement rules.
- Submit quarterly progress and financial reports.
- Obtain prior written approval from Commerce for changes to project scope, budget, or timeline.
- Submit a final performance report within 90 days of project completion.
- Maintain complete grant records for at least three years after state grant closeout with HUD, or longer if required by audit, litigation, or compliance obligations.
- Comply with the State of Kansas policy prohibiting sexual harassment, discrimination, and retaliation as established by Executive Order 18-04.

### Accountability and Reporting

Grantees must comply with all accountability, reporting, and monitoring requirements established in the grant agreement and applicable guidance from Kansas Commerce.

Quarterly performance and financial reports must document:

- Activity status
- Milestone achievement
- Beneficiary data (if applicable)
- Compliance or implementation issues

A final report is required within 90 days of project completion or closeout. Grantees are subject to monitoring, including desk reviews, site visits, financial review, and national objective verification. Failure to submit timely or accurate reports may result in payment holds or administrative action.

### Grant Payments

CDBG funds are distributed on a reimbursement basis.

Grantees must:

- Incur eligible costs prior to requesting payment.
- Submit payment requests with supporting documentation (e.g., invoices, contractor pay applications, proof of payment).
- Ensure requests align with the approved scope, budget, and timeline.

Commerce may delay or withhold payments if reports are not current, documentation is incomplete, or compliance issues exist. Final payment will not be released until all closeout requirements are satisfied.

### Release of Information

Information submitted to the Kansas Department of Commerce relating to a CDBG application or award may be subject to disclosure under the Kansas Open Records Act, K.S.A. 45-215 et seq. Except as required by law, confidentiality cannot be guaranteed. Personally Identifiable Information (PII) and other legally protected or sensitive information should not be included in public records. Grantees are responsible for identifying, exempting, or redacting PII or sensitive information prior to public release in accordance with applicable law and HUD and state open records guidance.

## Definitions

An eligible applicant is a general-purpose unit of local government, including a city or county, that is eligible to receive State CDBG funds. In Kansas, eligible applicants are non-entitlement communities as defined by the U.S. Department of Housing and Urban Development.

### Subrecipient

A subrecipient means an entity that receives a subaward from a local unit of government to carry out all or a portion of a CDBG award. The term subrecipient does not include a beneficiary or participant. Characteristics that support classification as a subrecipient include when the entity:

1. Determines who is eligible to receive CDBG assistance;
2. Has its performance measured in relation to whether CDBG objectives were met;
3. Has responsibility for programmatic decision-making;
4. Is responsible for adherence to applicable CDBG program requirements; and
5. Implements a program for a public purpose specified in authorizing statute, rather than providing goods or services for the benefit of the pass-through entity.

### Low- and Moderate-Income (LMI)

Families or households whose income does not exceed 80 percent of the area median income, as determined annually by HUD.

### National Objective

One of the three primary objectives established under the HUD CDBG program. Every CDBG-funded activity must meet at least one national objective to be eligible for funding.

### Matching Funds

Matching funds are the portion of total project costs contributed by the applicant or other non-CDBG sources. Match may include local government funds, private funds, donated land, or other eligible cash contributions directly related to the approved project.

### Additional Definitions

Additional program and technical definitions may be found on the Kansas Department of Commerce CDBG Resource Page: <https://www.kansascommerce.gov/cdbg/resource-library/>

## Post Award Requirements

### Real Property Acquisition

If the project involves the purchase of land, buildings, or easements, the property transactions must follow the provisions of the Uniform Relocation Assistance (URA) and Real Property Acquisition Policies Act of 1970, as amended. This law is commonly referred to as the Uniform Act. The Uniform Act applies regardless of whether federal grant funds are being utilized for the actual property transaction. **The use of CDBG funds in any part of the project triggers the application of the Uniform Act.**

### Davis-Bacon Wage Rates

Davis-Bacon requirements are triggered when construction work over \$2,000 is financed in whole or in part with CDBG funds. **If CDBG funds are used to finance only a portion of the construction work, labor standards are applicable to the entire construction work.** If the application is funded, the grantee will have to consult with Commerce to obtain wage rate determinations as applicable. Commerce must be contacted concerning the applicability of Davis-Bacon wage rates.

### Build America, Buy America (BABA) Act

The grantee must comply with the Build America, Buy America (BABA) Act, which requires all iron, steel, manufactured products, and construction materials used in federally funded infrastructure projects to be produced in the United States. Funds obligated by HUD must follow BABA requirements unless an approved waiver applies, as outlined in HUD's "Public Interest Phased Implementation Waiver for FY 2022 and 2023" (88 FR 17001).

### Section 3

Section 3 of the Housing and Urban Development Act of 1968 requires that recipients of CDBG funding direct employment, training, and contracting opportunities to low-income individuals and the businesses that employ these persons within their community, to the greatest extent feasible. Section 3 applies to construction projects exceeding \$300,000 or more in CDBG and/or other HUD covered funds.

## Upload Checklist - Regional Water

The following forms must be signed and submitted through the online application portal. Forms are available in the online CDBG Resource Library at [kansascommerce.gov/cdbg/resource-library](https://kansascommerce.gov/cdbg/resource-library).

1. Project Budget Form
2. Statement of Assurances and Certifications
3. Resolution of Governing Body to File Application
4. Maintenance and Operation Resolution
5. Commitments from other Funding Sources
6. Affidavit of Public Hearing Notice
7. Environmental Determination of Level of Review
8. Letters of Support
9. Map of Project Area
10. Disclosure Report
11. Anti-Displacement Plan
12. Project Items BABA Status Worksheet
13. Preliminary Engineering/Architectural Report
14. Interlocal or Subrecipient Agreements

**Please also include the supporting documents below, if applicable:**


15. Income Survey Documentation:
  - a. Copy of Survey Process Approval from CDBG
  - b. Copy of Survey Instrument
  - c. Survey Methodology
  - d. Copy of Survey Tabulation w/description of variance, if applicable


More Questions?

**CONTACT THE CDBG TEAM**

 CDBG@ks.gov

 [kansascommerce.gov/cdbg](https://kansascommerce.gov/cdbg)

 785-296-3481

 915 SW Harrison St.,  
Suite 250  
Topeka, Kansas 66612

# CDBG Regional Water Implementation Scoring Rubric

The following are the review criteria the review team will use to score each grant application for Regional Water Implementation. Each grant will be rated based on the criteria listed and given a score out of one hundred.

	Exemplary	Meets Expectations	Insufficient Evidence
<b>(1) Project Need- 40 Points Possible</b>	<p>Clearly states the regional need, identifies the cause of the problem, explains how long the issue has existed, and describes how it affects the community, surrounding region, and all cities and counties impacted by the project. The urgency of the problem is well documented, including identification of any state or federal regulatory violations. The need is supported with strong quantitative data and specific figures. The applicant explains the importance of the project relative to other community and regional needs and clearly describes how consolidation will impact residents. All required documentation is thorough and compelling.</p> <p>(30-40 Points)</p>	<p>States the need and generally describes the cause, duration, and impact of the problem on the region, and the cities or counties affected by the project. Some documentation of urgency and regulatory concerns is provided, but detail or quantitative support may be limited. The importance of the project compared to other community and regional needs is addressed but lacks depth. Consolidation impacts are mentioned but not fully analyzed. Documentation is adequate but not comprehensive.</p> <p>(15-29 Points)</p>	<p>Provides a vague or incomplete description of the need, including limited or no discussion of the causes, duration, or impact on the region, and affected cities or counties. Urgency and regulatory violations are missing or poorly documented. Minimal or no quantitative data is included. The importance of the project relative to other community and regional needs is not addressed. Consolidation impacts are unclear or absent.</p> <p>(0-14 Points)</p>
<b>(2) Project Alternatives- 10 Points Possible</b>	<p>Thoroughly summarizes all alternative solutions considered and includes a complete financial analysis of each option. All funding sources are clearly documented. The selected solution is clearly identified and well justified.</p>	<p>Summarizes alternative solutions and provides some financial analysis, but details may be limited. Funding sources are identified but not fully documented. The chosen solution</p>	<p>Fails to summarize reasonable alternatives or omits financial analysis. Funding sources are not clearly documented. The selected solution is not justified. Acquisition activities and scope of work are</p>

# CDBG Regional Water Implementation Scoring Rubric

	<p>Acquisition activities are fully described. The scope of work includes detailed quantities, timeframes, activities, total costs, cost per beneficiary, CDBG-funded activities, cost estimate basis, and a clear timeline of critical benchmarks.</p> <p>(9-10 Points)</p>	<p>is stated with basic reasoning. Acquisition activities and scope of work are described but lack detail in quantities, timelines, costs, or benchmarks. Some required elements may be incomplete.</p> <p>(5-8 Points)</p>	<p>vague or incomplete. Required details such as costs, timelines, CDBG activities, or benchmarks are missing.</p> <p>(0-4 Points)</p>
<p><b>(3) Past Efforts to Address Need- 10 Points Possible</b></p>	<p>Comprehensively describes efforts within the previous five years to address community needs, including the proposed project and other municipal activities such as streets, water and sewer, senior services, health, ADA compliance, and related improvements. The narrative clearly demonstrates consistent and strategic community development efforts.</p> <p>(9-10 Points)</p>	<p>Describes some efforts from the previous five years but does not fully address all relevant community activities. The explanation shows general effort but lacks detail or completeness.</p> <p>(5-8 Points)</p>	<p>Provides little or no description of past efforts within the previous five years. Information is vague, incomplete, or unrelated to overall community needs.</p> <p>(0-4 Points)</p>
<p><b>(4) Project Readiness- 30 Points</b></p>	<p>Clearly demonstrates readiness to proceed. Professional services have been pre-selected or a clear procurement plan is documented. Proof of property ownership or an option to purchase is attached if required. Leverage commitments are fully documented. Any environmental concerns are identified and addressed. Bond commitments, ordinances, and proof of publication are included as required. Documentation is complete and</p>	<p>Demonstrates general readiness but some documentation is incomplete or pending. Professional services, property control, leverage commitments, environmental considerations, or bond documentation are partially addressed but not fully documented. Some minor barriers to immediate implementation may exist.</p> <p>(15-24 Points)</p>	<p>Does not demonstrate readiness to proceed. Required documentation for professional services, property ownership or options, leverage commitments, environmental review, or bond requirements is missing or inadequate. Significant barriers to implementation are evident.</p> <p>(0-14 Points)</p>

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	<p>shows the project can move forward without delay.</p> <p>(25-30 Points)</p>		
<b>(5) Project Impact- 10 Points</b>	<p>Clearly describes measurable positive impacts on the LMI community, identifies which LMI residents will benefit, and explains how success will be measured. Demonstrates strong sustainability, including long-term collaborative strategies to address water scarcity and resource resilience. The project is clearly integrated with other community development initiatives and shows meaningful coordination to support the LMI population.</p> <p>(9-10 Points)</p>	<p>Describes general positive impacts on the LMI community and provides limited measurable outcomes. Sustainability—including regional considerations and coordination—and integration with other initiatives are mentioned but lack depth or specificity.</p> <p>(5-8 Points)</p>	<p>Provides minimal or vague description of impact on the LMI community. Measurable outcomes, sustainability, regional coordination, or integration with other initiatives are not addressed.</p> <p>(0-4 Points)</p>
<b>Total: 100 Points</b>			