



# URGENT NEED FOR DISASTERS

<p><b>MAX AWARD</b></p> <p><b>\$100,000</b></p>	<p><b>MATCH</b></p> <p><b>Cost of the Environmental Review</b></p>	<p><b>APPLICATIONS ACCEPTED</b></p> <p><b>March 2 - Oct. 16, 2026</b></p>	<p><b>QUALIFY</b></p> <ul style="list-style-type: none"> <li>✓ Meet the Urgent Need objective</li> <li>✓ Submit Project Need Narrative</li> <li>✓ Cover environmental review costs</li> </ul>
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## Purpose

The Urgent Need Program provides funding to assist local governments in responding to severe, unforeseen conditions that pose an immediate threat to the health or welfare of their community. These conditions must have occurred within **six months** prior to the application and must be verified by the appropriate agency with jurisdiction. The emergency must be confirmed by the agency that has authority over the issue. For example, this could be the Kansas Department of Health and Environment (KDHE) for water or sewer issues, or another appropriate regulatory agency depending on the situation. A letter or statement from the city or county alone is not sufficient. Verification must come from the external agency that has jurisdiction over the affected system or hazard.

This funding is available only when no other financial resources are accessible to address the emergency. Other sources of funding **MUST** have been investigated and **MUST** be unavailable. Documentation certifying this fact must be included with the application. All activities must be on the approved list of eligible expenditures adopted from Title I of the Housing and Community Development Act of 1974, as amended.

**The scope of the Urgent Need project must focus solely on the immediate threat. Long-term solutions must be pursued through regular CDBG funding grants or other sources.**

## 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:** As soon as possible for urgent need applications  
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 Tim Parks 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

- Activities designed to meet urgent health and welfare needs and for which no other financial resources are available to meet such needs. It is the responsibility of the applicant to justify in its application the appropriateness of each proposed activity.
- Professional Services: post-award administration, engineering, and architectural costs and fees

AVAILABLE FUNDING: \$200,000	
Maximum Per Award	\$100,000
Administration	Up to 12.5% of grant
Match	Cost of the environmental review
Expected Awards	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 for the **Urgent Need** program must meet the Urgent Need national requirement to be eligible. Specifically, proposed applications must provide documentation showing that they meet each of the following criteria:

1. **Address an immediate threat** - Conditions pose a serious and immediate threat to the health or welfare of the community
2. **Are of recent origin** - The condition arose or became urgent within the past six months
3. **Are certified as an Urgent Need** - Application must be certified by a state agency with jurisdiction over the conditions
4. **Demonstrate lack of alternative funding** - The applicant must show that it cannot finance the activity on its own and no other funding sources are available.

## 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.

## Grant Process

Unlike most CDBG programs, the Urgent Need Grant Program operates on an accelerated one-year timeline. Applications submitted will be reviewed as soon as possible. If approved, a contract with the state will be executed within 30 days of the award notice, and construction must begin within 60 days. Projects must be planned for completion within 12 months of the start date. Failure to meet these deadlines may result in the grant being withdrawn by the Department of Commerce.

BEFORE APPLICATION	APPLICATION CRITERIA	POST AWARD
<ul style="list-style-type: none"> <li>Initial public hearing (following Urgent Need timeline)</li> <li>Documentation of funds investigated</li> <li>Certified documentation of urgent need by agency with jurisdiction on conditions</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, and BABA purchasing regulations</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.

Due to the urgent nature of these projects, the required public comment period after the hearing has been shortened from 15 full days to **5 full days**. The initial public hearing must be held at least 5 FULL days before the CDBG application is submitted to allow for public comment after, and no earlier than 120 days. **The total project funding and CDBG amount requested must match what appears in the public hearing notice.**

**Example Timeline for Urgent Need Grants Only**

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 Application can be submitted	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

**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.

## 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

Funding for the Urgent Need Grant Program is available only when no other financial resources are accessible to address the emergency. Other sources of funding **MUST** have been investigated and **MUST** be unavailable. Documentation certifying this fact must be included with the application. **The applicant is responsible for paying for the cost of the Environmental Review, which will count as the match for the application.**

## 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 complete an 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 the criteria of the CDBG Urgent Need national objective.
6. Provide appropriate documentation certifying other sources of funding have been investigated and are not available.
7. A Preliminary Engineering Report (PER) or Preliminary Architectural Report (PAR) must be included, if applicable. The report shall address the items included in the section herein discussing such requirements.
8. 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 5 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.**
9. All required subrecipient and interlocal agreements must be included, if applicable.
10. 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.
11. A map of the project area must be included.

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 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.

In addition, urgent need applications must include a **Project Need Narrative**, which should clearly describe the project, explain the

seriousness of the conditions requiring assistance, and document why CDBG funds are essential to address the problem. The narrative should be factual, concise, and supported by relevant documentation that clearly demonstrates the urgency and necessity of the proposed project, and include the below:

- Detailed description of project activities and how they will address the identified problem.
- Explanation of the seriousness of the conditions, including how the situation poses a risk to health, safety, or community welfare.
- Timeline of events showing when the problem occurred or how it recently became an immediate threat.
- Actions already taken by the applicant to mitigate or address the issue.
- Overview of other financial resources explored, including local, state, or federal programs, and an explanation of why these resources were not available or sufficient.

## 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 or buildings, 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).

## Upload Checklist - Urgent Need

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. Documentation certifying other sources of funding have been investigated
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, if applicable
14. Certification of Urgent Need from the appropriate agency
15. City/County budget

More Questions?

**CONTACT THE CDBG TEAM**



CDBG@ks.gov



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



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# CDBG Urgent Need for Disasters Scoring Rubric

The following are the review criteria the review team will use to score each grant application for Urgent Need for Disasters. 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) Address an Immediate Threat- 25 Points Possible</b>	<p>Provides a clear, detailed, and compelling Community Needs Narrative and Project Need Narrative. The project is thoroughly described, and the seriousness of the conditions is clearly documented with factual evidence demonstrating an immediate threat to health, safety, or community welfare. A clear timeline establishes when the problem occurred or escalated, actions already taken are explained, and documentation strongly supports the urgency of CDBG funding. The narrative is concise, well-organized, and fully supported by relevant documentation.</p> <p>(20-25 Points)</p>	<p>Somewhat describes community needs. The project description addresses the seriousness of the conditions and identifies potential risks to health, safety, or welfare, but documentation or timeline details may be incomplete or somewhat unclear. Actions taken and supporting documentation are included but may lack depth. The narrative demonstrates urgency but may not be fully compelling or thoroughly supported.</p> <p>(11-19 Points)</p>	<p>Does not clearly describe the community's prioritized needs. Lacks sufficient detail, and the seriousness of the conditions is not clearly demonstrated as an immediate threat to health, safety, or welfare. The timeline is missing or unclear, actions taken are not described, and documentation does not substantiate urgency.</p> <p>(0-10 Points)</p>
<b>(2) Emergency of Recent Origin- 25 Points Possible</b>	<p>Clearly documents that the conditions prompting the request are of recent origin, generally within the past 6 months, and provides a well-supported timeline showing when and how the issue developed into an urgent threat. Evidence demonstrates that the need was unforeseen and not the result of long-term neglect.</p>	<p>Indicates that the conditions are of recent origin and provides some timeline information, though documentation may lack precision or strong supporting evidence. The narrative suggests the issue is recent but may not fully distinguish between long-standing issues and newly urgent conditions.</p>	<p>Does not adequately demonstrate that the conditions are of recent origin. The timeline is missing, vague, or unsupported by documentation. The issue appears to be long-standing without evidence of recent escalation or change, and the narrative does not substantiate that the need qualifies as recent.</p>

# CDBG Urgent Need for Disasters Scoring Rubric

	Documentation is thorough and supports the claim of recent occurrence or recent escalation.  (20-25 Points)	(11-19 Points)	(0-10 Points)
<b>(3) Issue is certified as an Urgent Need- 20 Points</b>	Includes proper certification from an appropriate agency and clearly demonstrates that the project meets urgent need criteria. Thoroughly explains the seriousness of the conditions and provides strong factual documentation that the situation poses an urgent threat All required certifications and supporting materials are complete and consistent with the narrative.  (17-20 Points)	Includes required certification from an appropriate agency and addresses urgent need criteria, but supporting documentation or explanation of seriousness may lack depth or clarity. Connection between certification and documented conditions is present but not fully developed.  (9-16 Points)	Does not include proper certification or fails to clearly demonstrate that the project meets urgent need criteria. Documentation does not sufficiently support the urgent need claim. Required elements are missing or inconsistent.  (0-8 Points)
<b>(4) Demonstrates Lack of Alternative Funding- 30 Points</b>	Provides a comprehensive overview of other financial resources explored, including local, state, and federal programs, and clearly explains why those resources were unavailable or insufficient. Documents specific efforts made to secure alternative funding and demonstrates that CDBG funds are essential to address the problem. Supporting documentation substantiates the lack of feasible alternatives.  (21-30 Points)	Identifies other financial resources that were explored and provides a general explanation of why they were not available or sufficient. Documentation of efforts may be limited, and the explanation of why CDBG funds are essential may lack detail, but the basic requirement is addressed.  (11-20 Points)	Does not adequately describe other financial resources explored or fails to explain why those resources were unavailable or insufficient. Little or no documentation of efforts to secure alternative funding, and the narrative does not clearly demonstrate that CDBG funds are necessary to address the problem.  (0-10 Points)
<b>Total: 100 Points</b>			