

2026 GENERAL APPLICATION REQUIREMENTS

CDBG GRANTS	MAX AWARD	APPLICATIONS ACCEPTED	QUALIFY
10 Programs Available	Varies by Grant Program	March 2 - Oct. 16, 2026	<ul style="list-style-type: none"> ✓ Eligible City or County Government ✓ Meet a CDBG National Objective ✓ Approved Pre-application

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Information is subject to change based on updates to HUD regulations, program requirements, and federal guidance.

The CDBG Program

The Community Development Block Grant (CDBG) program is funded by an annual Congressional appropriation through the U.S. Department of Housing and Urban Development (HUD). As outlined in the federal statute, the purpose of the program is to develop viable communities by providing decent housing, suitable living environments, and expanding economic opportunities, principally for beneficiaries of Low- and Moderate-Incomes (LMI).

2026 Program Funding

CDBG PROGRAM	MAX AWARD	TOTAL FUNDING	REVIEWED	MATCH
Blueprint to Build	\$2,500,000	\$12,750,000	Monthly	Varies
Commercial Rehabilitation	\$300,000	\$1,200,000	45 Days	25%
Community Facilities: Large	\$210,001 - \$1,500,000	\$7,600,000 Combined	Monthly	20%
Community Facilities: Small	\$ 50,000 - \$210,000		Monthly	10%
Economic Development	\$750,000	\$750,000	45 Days	50%
Housing Rehabilitation and Demolition	\$300,000	\$1,200,000	45 Days	N/A*
Regional Water Implementation	\$2,000,000	\$2,000,000	Monthly	50%
Urgent Need for Disasters	\$100,000	\$200,000	ASAP	N/A*
Water & Sewer Infrastructure	\$800,000	\$1,500,000	Monthly	25%
Youth Job Training	\$100,000	\$500,000	Monthly	10%

* For all CDBG programs, the grantee (city/county) must pay the cost of the environmental review if awarded.

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: 20–45 days after the submission deadline, depending on grant program

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

Funding Disclaimer

The Kansas Department of Commerce expects to announce selected grantees within 20–45 days after the submission deadline.

If selected, applicants may only incur eligible expenditures after:

1. The grant contract agreement is fully executed by all parties; and
2. The official period of performance has begun.

Application Procedures and Submission

- The application takes approximately 2 hours to complete, depending on project complexity and preparation.
- Applications that are incomplete or missing documentation will not be reviewed for rating or considered for funding.
- Questions and submission of additional documentation should be directed to Andrew Hayman at CDBG@ks.gov

To Apply:

1. Access the application through the Salesforce Grants Portal: <https://kansascommerce.my.site.com/Grants/s/>
2. Complete all required fields and upload all required attachments.
3. Review the application for completeness and accuracy.
4. Submit the application electronically prior to the stated deadline.

Applicants will receive an automated confirmation email upon successful submission.

Applications submitted after 11:59 PM (CT) on Friday, October 16, 2026 will not be accepted. The Salesforce portal will automatically close at the deadline. Technical difficulties experienced by the applicant will not extend the deadline. Applicants are strongly encouraged to submit early to avoid last-minute issues.

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 Applicants

Only cities and counties (units of local government) can apply for CDBG funds. All incorporated cities or counties in Kansas that do not receive an annual CDBG entitlement allocation from HUD are eligible to apply to the Kansas CDBG program.

Entitlement communities are large cities (population of 50,000 or more) and urban counties (population of 200,000 or more) that receive CDBG funding directly from HUD. Non-entitlement communities are smaller cities and rural counties that apply for funding through the State CDBG program.

The following entitlement communities are **NOT** eligible to apply in the state CDBG program: **Kansas City, Lawrence, Leavenworth, Manhattan, Overland Park, Topeka, Wichita, and all of Johnson County.**

Application Limits

Applicants may receive up to two total CDBG projects per year, but no more than one can come from a major category. Major categories include Community Facilities (Large or Small), Blueprint to Build, Water and Sewer Infrastructure, and Regional Water Implementation. For example, a city may apply for both Housing Rehabilitation and Community Facilities: Large but cannot apply for both Large and Small Community Facilities projects.

A county may submit one application for its own needs along with one “on behalf of” application for a city, township, or subrecipient such as a rural water, sewer, or fire district, or a nonprofit. If the county does not apply for its own needs, it may instead submit two “on behalf of” applications. In addition to the limits above, an applicant may also submit one Economic Development, Commercial Rehabilitation, or Housing Rehabilitation application within the same program year. For any “on behalf of” application, an Interlocal Agreement must be signed by all parties before submission and included in the application.

Communities with an open project that is currently in a time extension are not eligible until the project has been successfully closed.

Partnerships and Agreements

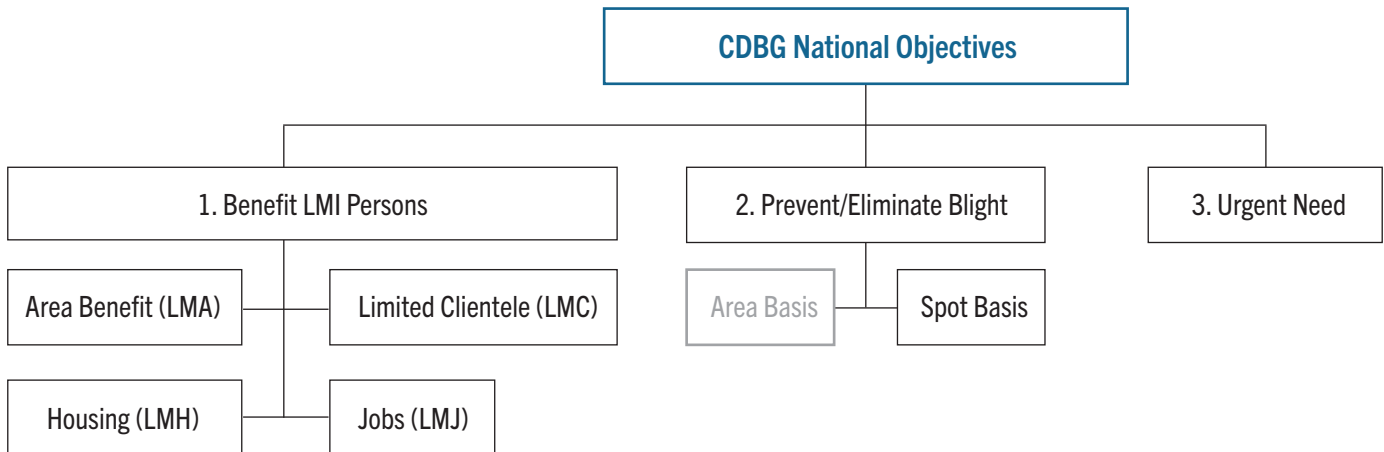
A city or county may apply for CDBG funds and partner with other cities, counties, or organizations to carry out eligible activities. In these cases, the partnership must be made official with either an Interlocal Agreement or Subrecipient Agreement. Groups such as housing authorities, rural water or sewer districts, rural fire districts, planning commissions, local development groups, or nonprofits can participate in a project, but only if the city or county includes them with a Subrecipient Agreement.

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



1. Benefit LMI Persons

Funded activities that benefit LMI persons can include a wide range of activities. The LMI national objective can be achieved through four subcategories: Area Benefit (LMA), Limited Clientele (LMC), Housing (LMH), and Jobs (LMJ).

a. Area Benefit (LMA)

Other public facilities activities, such as water, sewer and storm water projects, generally qualify under the national objective of providing area wide benefits to LMI persons. The ‘benefit to LMI persons’ test is met by documenting that 51% or more of the persons who live in the project area may be defined as being LMI. This can be accomplished either by using [HUD census data](#) or by conducting an income survey. Other possible area-wide projects include libraries, fire stations, and community centers.

Service Area - Determining the service area is critical to a successful area benefit project. The service area should be the area served by the project and may not follow existing boundaries. The service area of an activity is determined by the grantee and must be approved by Commerce. Factors for determining an appropriate service area include:

- The nature of the activity
- The location of the activity
- Accessibility issues
- Availability of comparable activities
- Existing boundaries for facilities and public services

b. **Limited Clientele (LMC)**

Under this category, 51% of the beneficiaries of an activity must be LMI persons. Activities in this category provide benefits to a specific group of persons rather than everyone in an area. To determine the beneficiaries of activities are at least 51% LMI and qualify under the limited clientele category, activities must meet one of the following tests:

- Require documentation on family size and income to show that at least 51% of the clientele served are LMI; or
- Exclusively serve a clientele that is generally presumed by HUD to be principally LMI persons. This presumption covers abused children, battered spouses, elderly persons, severely disabled adults, homeless persons, illiterate persons, persons living with AIDS, and migrant farm workers; or
- Have income eligibility requirements limiting the activity to LMI beneficiaries only; or
- Be of such a nature and in such a location that it can be concluded that clients are primarily LMI. An example is a daycare center that is designed to serve residents of a public housing complex.

c. **Housing (LMH)**

Housing rehabilitation activities must improve permanent, residential structures that are occupied by LMI households. To meet the LMI Housing national objective, the occupancy of the housing unit shall be based on the household income of all household members over 18 years of age using the following rules:

- Each single-family unit rehabilitated with CDBG funds must be occupied by an LMI household
- If the structure contains two dwelling units, at least one must be occupied by an LMI household
- For properties with more than two units, at least 51% of the units must be occupied by LMI households

d. **Jobs (LMJ)**

Economic development activities are undertaken for the purpose of job creation or retention. To meet the LMI jobs national objective, the activity must create or retain permanent jobs, at least 51% of which (computed on a Full-Time Equivalent basis) will be made available to, taken by, or held by LMI persons. The following requirements must be met to adhere to this national objective.

- For activities that create jobs, there must be documentation indicating that at least 51% of the created jobs will be made available to or held by LMI persons.
- For funded activities that retain jobs, there must be sufficient evidence that the jobs would have been lost without CDBG assistance and that one or both of the following applies to at least 51% of the jobs retained:
 - The job is held by an LMI person; or
 - The job can reasonably be expected to turn over within the following two years and steps will be taken to ensure that the job will be filled by, or made available to, an LMI person.

2) Prevent or Eliminate Blight (Spot Basis)

The focus of activities under the elimination of blight national objective (spot basis) is a change in the physical environment of a deteriorating area or property. This contrasts with the LMI benefit national objective where the goal is to ensure that funded activities benefit LMI persons. Activities are limited to clearance, relocation, historic preservation, remediation of environmentally contaminated properties, and building rehabilitation activities. Activities qualifying under spot basis are strictly limited to eliminating specific instances of blight.

3) Urgent Need

The use of the urgent need national objective category is rare and is designed only for activities that alleviate emergency conditions. Only the immediate emergency will be addressed through this category with long-term resolution of the problem being addressed through regular CDBG rounds of awards or other funding sources. Qualified urgent need activities must meet the following criteria:

- The existing conditions must pose a serious and immediate threat to the health and welfare of the public;
- These conditions must be of recent origin and have become urgent within six months following the disaster;
- Applications must be certified as an urgent need by the agency having jurisdiction over said conditions;
- The grantee certifies and Commerce determines that the grantee is unable to finance the activity on its own; and
- The grantee certifies and Commerce determines that other sources of funding are not available.

Ineligible Program Costs

Ineligible expenses include, but are not limited to:

- Fundraising
- Taxes, except sales tax on goods and services and payroll taxes
- Lobbyists or political contributions
- Bad debts, late payment fees, finance charges, or contingency funds
- Parking or traffic violations
- Out-of-state transportation and travel expenses (Kansas is considered the home state for determining whether travel is out of state)
- Any additional expenses deemed ineligible under applicable state or federal regulations governing the funding source

State Priorities and Program Eligibility

Although an activity may be eligible under federal CDBG regulations, it is not automatically eligible under Kansas CDBG grant programs. Each year, the State gathers public input to determine funding priorities through the Consolidated Plan, which guides which activities will be eligible and how funds will be distributed to address local needs. When Kansas regulations are more restrictive than federal rules, state standards must be followed (e.g. procurement thresholds or limits on certain activity types such as area-wide blight).

Grant Administration

All CDBG projects require a designated individual to administer the grant, which must be decided in advance and included in the application. The maximum amount of CDBG funds that can be used for grant administration is 12.5% of the CDBG grant request or \$35,000, whichever is less. Commerce maintains a list of grant professionals who are interested in administering CDBG projects in Kansas at [kansascommerce.gov/cdbg/find-assistance-in-your-area/](https://www.kansascommerce.gov/cdbg/find-assistance-in-your-area/). CDBG prefers interested parties attend one annual training before CDBG lists/accepts those services. Please note that these individuals are not affiliated with the Kansas Department of Commerce, and no guarantee is implied as to the quality of their services.

General Grant Process

Most CDBG grant programs operate on a two-year timeline. The first year focuses on completing any necessary design, creating specs and drawings for construction bidding, and environmental review activities, with project implementation typically starting in the second year. The Youth Job Training and Urgent Need programs operate on a one-year timeline, while the Regional Water program is a three-year timeline. The below process is general. Please see specific program guidelines for more information.

1. Planning Phase

- Discuss your project with a CDBG project manager to determine eligibility
- Work directly with the city or county government to plan the project and gather required materials
- Determine which national objective the project will meet and how compliance will be documented
- Procure professional services such as grant administrator, engineer, and architect
- Initial public hearing (following the appropriate timeline and including notice requirements)
- Prepare application materials (reports, inspections, forms,
- Finalize Preliminary Engineering or Architecture Report (PER/PAR), if applicable
- Secure matching funds (must be in hand or have commitment letters, no pledges)
- If purchasing real property or securing permanent or temporary easements, follow the Uniform Relocation Assistance and Real Property Acquisition Act (URA)

2. Pre-Application Phase

- Download the applicable grant program documents and forms from the website
- Submit pre-application, if applicable (feedback within ten days)

3. Application Phase

- Submit application (see table for review time frames)
- Receive award letter and condition letter, if approved
- Attend required grantee training
- Sign contract

4. Post Award

- Complete NEPA Environmental Review (**must be paid with local funds**)
- Finalize all design work, including specifications and construction drawings, in preparation for bidding
- Review and follow CDBG guidelines for open and fair competitive bidding for construction contracts
- If applicable, comply with Uniform Relocation Assistance (URA), Davis-Bacon wage rates, Labor Standards, BABA purchasing regulations, and Section 3
- Initial monitoring scheduled by CDBG staff after the first construction draw

5. Closeout

- Final monitoring after final construction draw
- Resolve any deficiencies outlined in monitoring letter
- Closeout public hearing
- Receive Certificate of Completion with closeout letter confirming project has been approved for closeout
- City/county submits closeout packet to CDBG (include photos, quotes, etc.)
- Complete any future/ongoing compliance/documentation requirements

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 for a period of at least 5 FULL days in advance (but no more than 20 days) 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 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 or website 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.

The total project funding and CDBG amount requested must match what appears in the public hearing notice.

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.

Note: For Urgent Need applications only, the required public comment period after the hearing has been shortened from 15 to 5 FULL days, due to the urgency of these projects.

Example Public Hearing Timeline

Sun.	Mon.	Tues.	Wed.	Thurs.	Fri.	Sat.
1	2	3	4	5 Notice is Published (Day 0)	6 Day 1	7 Day 2
8 Day 3	9 Day 4	10 Day 5	11 Public Hearing	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.

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 ___ hours/days prior to the meeting date to allow for necessary arrangements. Every effort will be made to make reasonable accommodations for these persons.

Matching Funds

Local funding is required for all CDBG projects (except Housing and Urgent Need), 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). ***For all CDBG programs, the grantee must pay the cost of the environmental review if awarded.***

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, economic development agencies, and grants or loans from other federal or state 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). For the Youth Job Training program, at least 5% of the matching funds must be cash from a local source. 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 and percentage of time 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.

Note: The Urgent Need grant program does not require a pre-application.

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 if you do a building renovation or demolition.

Note: Does not apply to Housing or Youth Job Training programs

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, grantee must conduct a full NEPA environmental review of the project, even for small projects that don't require construction. 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.

The NEPA review focuses on exploring possibilities and evaluating 1) how the project's design may affect the environment, and 2) whether the surrounding environment is appropriate for the project purpose. Once a CDBG application is submitted, no "choice limiting actions" can occur for any part of the project, whether funded by CDBG or other sources. "Choice limiting actions" refer to any commitments of HUD or non-HUD funds or any activities by the grantee, project participants (public or private, nonprofit or for-profit), or their contractors that could negatively impact the environment or restrict the range of reasonable alternatives.

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

Threshold Requirements

Applications must meet certain threshold requirements before they will be scored and ranked. **Threshold requirements vary by program, but typically include the following:**

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 objective of the CDBG program.

6. Survey process approval is required for all CDBG applicants prior to conducting surveys. Completed income surveys are required at the time of application and 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. *Note: For Urgent Need, provide documentation of funds investigated.*
8. 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.
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, CDBG amount requested, and scope of work must match what appears in the public hearing notice.
10. All required subrecipient and interlocal agreements must be included, if applicable.
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.

Additional threshold requirements may apply. See individual program guidelines for additional requirements.

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. **The rating points, required narrative, and required upload attachments to the applications can be found in the specific program guidelines.**

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.

Following completion of the ratings, Commerce leadership 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 HUD.

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 a 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/>

State Compliance Criteria

1. **Administration Allowance:** To budget an application, applicants may not propose more than \$35,000 or 12.5% of the amount of funds requested for CDBG, whichever is less.
2. **Project Budgets:** Construction line items are for construction only; acquisition line items are for the purchase price and appraisal costs; relocation is a separate line item. **Administrative line items include all publishing fees.** Therefore, grantees should not contract for the total administrative amount unless the administrator is to pay for all such items, or the grantee has agreed to pay for such items. Mortgage lien filings and all acquisition costs except purchase price and appraiser's fees should be shown as a legal cost but this does not deduct from administrator maximums. CDBG funds will not replace any existing employee salaries for administration, but employee salaries can be counted as a local match.

3. Administration by Engineering and Architectural Firms: Engineering/Architectural firms or any employee or principal thereof may not administer any CDBG grant in which they are participating in any other capacity, regardless of the size of the grant.
4. Administration by Housing Inspector, Risk Assessors, or Asbestos Inspectors: The Administrator of Record must be a different individual from the person or persons conducting Housing Inspector, Risk Assessor, or Asbestos Inspector inspections. The same individual may perform different types of inspections (i.e., Housing Inspectors, Risk Assessors, Asbestos Inspectors, or Radon Inspections). The Administrator and Inspector of record may belong to the same firm, organization, or company.
5. Engineering/Architectural Allowance: There are no CDBG requirements on cost allowance. If CDBG funds are going to be used for payment, CDBG procurement must be followed. If local funds are used for payment, the local procurement requirements must be followed.
6. Agreements or Contracts: Written agreements shall be executed between the parties detailing the responsibilities, standards, and fees. For engineering/architectural documents it must include a *not to exceed clause*. All contracts must include the required federal contract provisions.
7. Negotiated Funding: The state reserves the right to negotiate with applicants and deny partial or total funding of any application each funding period.
8. Minimization of Displacement: Commerce will discourage applicants from proposing displacement in all projects unless no feasible alternative exists. Alternatives will be reviewed for feasibility and technical assistance will be provided to minimize displacement.
9. Environmental Impact: All CDBG projects are required to complete an environmental review under the National Environmental Policy Act (NEPA), and must be paid with local funds. Applicants are encouraged to be sensitive to potential environmental impacts while their CDBG projects are initially considered and planned to avoid problems that could delay or even prevent a project from being implemented.
10. Pre-Application: A pre-application form must be submitted for all CDBG grant programs except Urgent Need. Only those with an approved pre-application may submit a full application, but pre-application approval does not ensure grant funding. The last date to submit a pre-application is Sept. 15, 2026.
11. Survey Submission: All requests to conduct a survey should be approved by CDBG staff prior to their commencement. To initiate the survey process, the following documentation must be provided:
 - **A letter from the City or County**: The letter should provide a detailed description of the project, including its location and intended beneficiaries. It must include a map of the project site, a description of the survey methodology used, specify the applicant's population and estimated number of housing units.
 - **Random Sample Surveys**: For communities with a population of 200 or higher, a random sample survey is recommended. If a random sample survey is required, it is necessary to include the estimated number of housing units within the service area. This is the number that will determine how many random numbers are generated to assist the community with conducting the survey. It is important that this is as accurate as possible. Random Sample Surveys are based upon the total number of housing units in the service area and not on population.
 - Please ensure that all necessary documents are submitted to CDBG staff before proceeding with any surveys.
 - Survey Methodology approval will be issued by CDBG staff in the form of a formal memo. For Random Sample Surveys, an approved random number string will be included with the approval. It is essential that this approval memo be received before your community proceeds with conducting any surveys. Surveys conducted without prior approval will not be recognized as valid for CDBG purposes.
 - Original completed income surveys must be turned in at the time of application to verify LMI qualification of the applicants and are now considered a threshold item.
12. Notification: Commerce will notify all applicants of the results of the CDBG competitions. Successful applicants who have unresolved financial audit exceptions in prior CDBG or other state or federal programs must resolve the findings before a contract can be executed.

13. CDBG Policy when Applicant Discovers Error after Award Announcement:

- In the CDBG application process, unless the state has made a calculation or procedural error, there is no provision to correct applicant error after grant award announcements. The state would violate its program requirements if any application was reconsidered.
- In all cases, it is the applicant's responsibility to proofread and double-check the accuracy of the information submitted in the application.
- The chief elected official accepts the responsibility that the information in the application is correct by signing the "Statement of Assurances and Certification" included in the grant application.

14. Kansas CDBG Administrative Procedure for Request for Information:

Kansas Open Records Law

- All requests for information from the CDBG program will be subject to the Kansas Open Records Law (K.S.A. 1983 Supp. 45-206 et seq.). The Kansas law requires that all records of a public agency be open to inspection. CDBG applications are, as defined by K.S.A. 1983 Supp. 45-207, public records and as such are open for inspection, except as otherwise provided by the Act. All requests must be specifically made in writing.
- Consensus rating information will be made available under the above procedures. Individual staff notes are not a part of the body of "public information" and, therefore, will not be made available. [K.S.A. 45-211(a)(20)].

15. Conflict of Interest: No city or county employee, elected or employed, can separately contract with the grantee to perform any portion of the grant either directly or through an outside firm.

16. Design Build/CMAR: 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. This criterion does not apply to Blueprint to Build projects.

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 with an aggregate of \$250,000 or more funds 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.

Citizenship Requirements

All CDBG-funded activities that provide direct financial assistance or individual benefits (including Youth Job Training, childcare, housing, and similar programs) must comply with federal citizenship and immigration eligibility requirements. Recipients must verify that individuals receiving assistance are U.S. citizens or otherwise eligible under federal law, including notation of federal enumerators to verify legal status or use of the Systematic Alien Verification for Entitlements (SAVE) system where applicable. This requirement does not apply to public facility or infrastructure projects that do not provide direct financial assistance. All verification must be conducted consistently, with proper documentation, and in compliance with confidentiality and civil rights requirements established by HUD.

Technical Assistance Available

Communities may request technical assistance from the CDBG program office in Topeka at (785) 296-3481 or by email at cdbg@ks.gov. It will not be the role of the CDBG program staff to assist communities in preparing their grant applications since they will ultimately be involved in the review and enforcement of these projects. Staff may answer specific technical questions, critique earlier pre-application submissions, and provide other assistance as needed.

Upload Checklist

Required application forms vary by program. See **individual program guidelines for additional requirements**. Forms are available in the online CDBG Resource Library at kansascommerce.gov/cdbg/resource-library. In general, most applications require the following:

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

Additional supporting documents, if applicable

12. Maintenance and Operation Resolution
13. Preliminary Engineering/Architectural Report
14. Interlocal or Subrecipient Agreements
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

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