



KANSAS
COMMERCE

BLOCK BY BLOCK, HELPING KANSAS COMMUNITIES THRIVE

FREQUENTLY ASKED QUESTIONS

for 2023 CDBG Applications

General Community Facilities Questions

Q Is there a match requirement?

A Yes, the application requires a 25 percent cash match.

Q Can the donation of land meet part of the match requirement?

A Yes, it can but at least 10 percent of the match must be cash.

Q Are there any requirements or certifications required for the person who writes the grant?

A No certifications are required.

Q How to figure out the low- and moderate-income (LMI) requirements?

A Cities and Counties can qualify by using the 2015 HUD Census data spreadsheet to determine their current LMI percent that HUD is reporting as a qualifier. If the community does not meet our 51 percent LMI requirement based on the data in that document, they can choose to do an income-based survey of the city or county that benefits from the project. Sometimes projects are not a city-wide or county-wide benefit, which results in target area benefit. To meet the 51 percent LMI requirement for this type of project, an income-based survey of the beneficiaries only in that area is required. Additional information on how to conduct an income-based survey can be requested from the CDBG team.

Q If we apply for more than one project will that hurt our applications rating or chances?

A Cities are eligible to submit only one application per year for our Annual Competition. Counties may apply for two. They may apply for one for themselves or one on behalf of another organization or entity.

- Q The city or county will need to purchase land to complete a project. Does the land need to be purchased and the deed filed before applying?**
- A No. The applicant must follow Uniform Relocation Act (URA) and only sign an option to purchase. For more information contact CDBG staff.
- Q How much information is required from the PER/PAR?**
- A In our General Application Requirements document we list all required PER/PAR items. Use the following link and review page: [2023-General-Application-Requirements-10-11-2022.pdf](#) (kansascommerce.gov)
- Q Do we have to complete an Environmental Review Record (ERR) if we already have completed one in the area?**
- A Most likely, but you can contact the CDBG staff to review.
- Q Can you provide the link to the Administrator Territories list?**
- A [Administrator-Territories-12-8-2022.pdf](#) (kansascommerce.gov)
- Q How do we figure in undocumented citizens when doing a survey to meet LMI? Or in a childcare facility? Do undocumented citizens count as LMI?**
- A LMI surveys include the name, address and self-reported income information provided by the resident.

Community Centers, Parks and Libraries

- Q What are the rules if we are purchasing an existing building?**
- A The grantee must follow Uniform Relocation Act (URA). If CDBG is paying for the building or will be counted for the match, do not sign a deed, you only need an option to purchase.
- Q Is it possible for the community center or library to work with another entity (school district, hospital, senior center, etc.)?**
- A Yes, the partnership details will be defined in the interlocal agreement.
- Q Can an established community center or library apply for renovations and updates to their building with CDBG funds?**
- A Yes, updates and renovations of the facility are eligible items with grant funding.
- Q Can an application be submitted for a senior only center or a youth only center?**
- A Currently, we are accepting applications for community-wide benefit community centers. Senior centers and youth centers are considered limited clientele projects that limit access to the facility to only seniors or youth, so they are ineligible.

As an alternative to having a senior or youth-only project, the community could design their buildings to have specific spaces that serve those groups' needs and can also be used by other beneficiaries.

- Q Can our community center have a workout room and a gymnasium?**
- A Yes, those are eligible spaces to house within the facility. The purchase of the equipment to place in those spaces is not eligible. Only the construction of the building is eligible.

Q Can we rent spaces and rooms to residents in our facilities?

A This depends upon who is renting the facility and what activities will be taking place there. Rental of rooms for community gatherings, parties, showers, events, and so forth is allowed. Rental of spaces and rooms for businesses to run their services out of would be ineligible.

Q Can a recreation center be a part of a community center?

A Yes, designated space for a recreational area within a community center is eligible. The purchase of equipment and supplies to be used within that space, is not an eligible expense.

Q What can be included in a park project?

A Many amenities can be included in a park project. Some examples of a comprehensive park project are as follows: Playground equipment, walking trails, water fountains, restrooms, shelter houses, benches, splash pads, basketball courts and pickleball courts. This list is not exclusive, and if your community has an idea for something else to include in their project, the CDBG team will be happy to discuss those options with you.

Q Can a community apply for a new or updated sports facility such as a ballfield, tennis court or football field?

A A community can include sports facilities as part of their overall park project that would include other park amenities such as playgrounds, trails, benches and shelter houses. They will not be eligible to apply for the facility by themselves.

Q Can stationary exercise equipment be included in a park project?

A Yes, this would be eligible with an overall park project.

Sidewalks and Trails

Q Is a trail just for recreation and exercise?

A A trail is a path that helps connect residents throughout the community to essential goods and services they may need to access by walking, jogging, or biking. They can be used for recreation and exercise, but the goal of the project should be to link residents to community amenities/services they need and better access to those services.

Q Can our sidewalks be updated to just include ADA curb cuts only?

A Sidewalk projects can include ADA curb cuts, but a project that only focuses on replacing curb cuts alone is not eligible.

Q Can we build a walking bridge over a highway?

A Yes.

Non-Profit Childcare and Early Education Facilities

Q If the building is rented to the childcare provider, who must hold a not-for-profit status?

A The childcare provider is the only one that must hold the not-for-profit status.

Q If moving into an existing building is there any extra testing that must take place?

A The building must be tested for Lead-Based Paint and radon.

Q How to figure LMI?

A It's a snapshot in time. This will be completed when the facility is open. CDBG will pick a week to view who is at the facility and the self-certifications. After the facility meets 51 percent LMI the project will proceed to closeout.

Q How to calculate LMI?

A For a 4-person household that is LMI with two kids in the facility, that counts as two LMI.

Q Will there be any reporting requirements from CDBG, after the grant is closed?

A After closeout, it is the responsibility of the grantee to assure the facility remains LMI.

Q What if the childcare facility is leasing the building?

A The application must include a lease agreement for at least 10 years.

Q What are the rules if we are purchasing an existing building?

A The grantee must follow Uniform Relocation Act (URA). If CDBG is paying for the building or will be counted for the match, do not sign a deed only, get an option to purchase.

If sold within 5 years of closeout, the property must be sold to the entity at the current fair market value at the time of purchase unless the property will continue to be used for an activity that meets a CDBG National Objective and transfer is approved. Sale proceeds would be considered program income.

If the building is owned by the childcare facility, a lien will be placed on the building to assure the facility stays non-profit and open for 5 years. If closed before the five years, the grant must be repaid on a pro-rated basis. For example: if the facility closes after two and a half years, half of the grant must be repaid. If the facility remains open after year five the grantee can release the lien.

If the building is leased, a condition of the award will be to offer something that can be used for security and the action will be the same as mentioned above.

Q Does the staff of the facility have to have any training?

A Yes, the staff will be required to take some training.

Q The application requires a 25 percent cash match. Can the donation of land meet some of the requirements?

A Yes, it can but at least 10 percent must be cash.

Q Are there any requirements/certifications for the person who writes the grant?

A No certifications are required.

Q Can the childcare be for after school?

A The facility itself should primarily serve children ages 0-5. The facility itself can have an area that could be used for afterschool activities, but its primary focus cannot be afterschool programs.

**Q City limits in Manhattan can't have childcare. Can it serve children who live in Manhattan?
Manhattan vs Riley County.**

A The State of Kansas CDBG program may only serve residents who live outside of an entitlement community. Residents within the city limits of an entitlement community would be considered ineligible to utilize the facility.

Q Are there any restrictions on what the building is/was used for? Could a hospital wing be renovated for childcare?

A CDBG has no specific restrictions on the prior use of a building when it comes to renovations for creating a childcare or early education facility. There may be licensing and health state regulations that could impact what type of facilities can be used. Communicating with KDHE, DCF and the State Fire Marshall will help to determine if there are any concerns within an existing building.

Q Can the gifted amount for land be counted as a match? For example, if the land is 100k but they are only asking 50k for it, can they use it as match?

A Yes, but at least 10 percent of the match must be cash. The purchase of land must follow Uniform Relocation Act (URA) requirements. You should only sign an option to purchase in order to count the land purchase as match.

Q Can churches qualify as a non-profit entity for these projects?

A Churches can qualify for childcare and education facilities as non-profits. There are regulations that must be followed by the organization that is funded. Contact Commerce for a full outline of what these are. In general, the organization may not use funds to support inherently religious activities such as worship or religious instruction. They must agree to serve all eligible beneficiaries without regard to religion or beliefs.

Q Are there any specific rules for childcare programs that operate in the evening/night?

A Please consult with KDHE for licensing rules and requirements.

Q What about cash flow for a non-profit childcare? How can it be sustainable?

A Child Care Aware of Kansas has resources to help communities identify sustainability plans to help them be successful in their project planning and implementation.

Q Can the grant pay for fencing and playground equipment since a fenced outside area is required?

A Fencing and playground equipment that is considered permanent fixtures would be eligible for these projects.

Accessibility for Public and Commercial Facilities (Removal of Architectural Barriers - ABR)

Q What is the best way to get started?

A This is up to the city. They might want to involve the Chamber of Commerce to determine which businesses want to participate or drive downtown to see which businesses could use assistance.

Q What if a business does not want to participate?

A CDBG has no rule on who must participate or not.

Q Who must provide the match?

A It can be the city, businesses, a foundation, or any combination of these suggestions.

Q Can a downtown coffee shop that is owned by a church qualify for ABR?

A It depends. There are rules applied to churches and federal funding. Speak to CDBG staff specifically about your project to determine eligibility.

Q How do we meet a National Objective to be eligible for ABR?

A To qualify under the limited clientele national objective:

- Removal of architectural barriers to:
 - The mobility of elderly persons, or
 - The severely disabled will be presumed to qualify under this category if it is restricted, to the extent practicable, to the removal of such barriers by assisting.
- Definition of Severely Disabled Persons are considered severely disabled if they:
 - Use a wheelchair or another special aid for 6 months or longer.
 - Are unable to perform one or more functional activities (seeing, hearing, having one's speech understood, lifting, carrying, walking up a flight of stairs, and walking).
 - Need assistance with activities of daily living (getting around inside the home, getting in or out of bed or a chair, bathing, dressing eating, and toileting) or instrumental activities of daily living (going outside the home, keeping track of money or bills, preparing meals, doing light housework, and using the telephone).
 - Are prevented from working at a job or doing housework.
 - Have a selected condition including autism, cerebral palsy, Alzheimer's disease, senility or dementia, or intellectual disability.
 - Are under 65 years of age and are covered by Medicare or receive supplemental Security Income (SSI).

 **Youth Job Training (YJT)**

Q Who are the beneficiaries?

A At-risk youth will benefit from this funding opportunity. At-risk youths could include those at risk of involvement or further involvement in the criminal or juvenile justice system, at risk of involvement in the child welfare system, at risk of education failure (includes risk due to social conditions), education failure (dropping out, expelled, no GED, etc.), youth with no work experience, youth with a history of employment failure, homeless youth, or youth with a disability.

Q Is an instructor's salary an eligible use of funds?

A Yes. An instructor (or other program staff) is necessary for training; therefore, the salary is an eligible expense. The salary expense must also be allocable to the program and that must be documented (i.e., document the number of staff hours worked on the program and the number of hours worked outside the program – using timesheets as an example)

Q What are eligible uses of funds?

A The costs of labor, supplies, materials and other costs associated with the program (i.e., purchase of furnishings, equipment and other personal property needed to operate the program).

Q Whom do we partner with?

A We are encouraging partnerships with educational institutions and/or other entities involved in youth job training.

Q Is there a match requirement?

A Yes, the program requires a 25 percent match.

Q What is the age range for the students who will benefit from this program?

A 12-22 years of age

Q Can a school district employee's salary meet part of the match requirement if this employee will serve as coordinator or navigator of the program?

A Yes, but at least 15 percent of the match must be cash. The number of hours spent on the program by this staff person must be documented to be eligible as a match.

Q Are there any requirements or certifications required for the grant writer?

A No.

Q After the project is complete, will there be any ongoing reporting requirements?

A No.

Q How to meet the low- and moderate-income (LMI) requirements?

A At the time of program participation, the subrecipient must determine the youth's family income. The subrecipient will need to gather information on the family's income and compare it to the HUD income charts to determine if they meet LMI. LMI is defined as incomes at or below 80 percent of the county's average median family income, based on family size. At least 51 percent of all program participants must be determined to be LMI. HUD income limit charts are available to assist with this determination. CDBG will accept self-certifications of income from program participants.

Q If we apply for more than one project will that hurt our applications rating or chances?

A Cities are eligible to submit only one application per year for our Annual Competition. Counties may apply for two; a county may apply for one for themselves and one on behalf of another organization or entity.

Q For the application, does the city need to register through KDC to apply?

A Yes. The applicant must register with the Kansas Department of Commerce to complete an application.

Q How long do each of the sections need to be? (Community needs, project needs, project readiness, project impact, project sustainability.)

A No set amount. Provide enough detail to fully understand the project and needs.

Q Are there any new reporting requirements with this program?

A Yes, this public service program requires the recipient to determine outcomes expected from participation in this program. Measuring these outcomes is required and periodic reporting of performance will also be required.

Q Would applied learning programs be eligible?

A Yes, as long as the program explicitly impacts workforce development.

Q Can churches qualify as a non-profit entity for these projects?

A Churches can qualify for childcare and education facilities as non-profits. There are regulations that must be followed by the organization that is funded. Contact Commerce for a full outline of what these are. In general, the organization may not use funds to support inherently religious activities such as worship or religious instruction. They must agree to serve all eligible beneficiaries without regard to religion or beliefs.

Q Can youth be paid for internship opportunities through this funding?

A Yes, as long as the program meets the 51 percent LMI beneficiary requirement.

Regional Water Planning Grants

Q Do regional water projects have to prove LMI to apply?

A No, a regional water application can be submitted without proving LMI.

Q How many systems does it take to make up a regional water application?


A Currently, regional water projects are being defined as three or more systems. However, if you have a project that would involve two systems, please reach out to Ginny Eardley. We will be happy to discuss your project directly with KDHE and USDA-RD.


More Questions?

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