

NEBRASKA

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) APPLICATION GUIDELINES

State of Nebraska

2025 | 1.0

Contents

| | |
|--|-----------|
| RECORD OF CHANGE | v |
| Common Acronyms/Abbreviation Index | vii |
| CDBG Program Representatives..... | viii |
| Part I. Overview | 1 |
| CDBG Overall Purpose | 1 |
| CDBG Application Timing | 1 |
| CDBG Opportunity Chart 2025 | 2 |
| Part II. General CDBG Application Guidelines | 3 |
| Section 1: Applicants | 3 |
| 1.1 Eligible Applicants | 3 |
| 1.2 Types of Applicants | 3 |
| 1.3 Special Policies for Applicants | 3 |
| 1.4 Applicant Account: Grant Management System..... | 5 |
| Section 2: Funding Summary | 6 |
| 2.1 National Objectives Defined..... | 6 |
| 2.2 National Objective Options for CDBG Opportunities..... | 12 |
| 2.3 Public Benefit Standards | 12 |
| 2.4 Compliance with the State’s Consolidated Plan..... | 12 |
| Section 3: Activities | 13 |
| 3.1 CDBG Eligible Activities and Nebraska Priority Activities..... | 13 |
| 3.2 CDBG Ineligible Activities | 13 |
| 3.3 Special Policies for Activities | 14 |
| 3.4 Proposed and Actual Beneficiaries..... | 15 |
| Section 4: Funding | 16 |
| 4.1 Grant Amount and Matching Funds..... | 16 |
| 4.2 Program Income | 16 |
| 4.3 Budget | 17 |
| Section 5: Applications | 17 |
| 5.1 Application Development and Use of Consultants | 17 |
| 5.2 Application Online Submission..... | 17 |
| 5.3 Application Due Dates | 17 |
| 5.4 Application Criteria..... | 18 |
| 5.5 Application Thresholds..... | 18 |
| 5.6 Priority Applicants | 19 |

| | |
|--|-----------|
| 5.7 Curing an Incomplete Application | 19 |
| 5.8 Application Threshold Review and Selection Process | 19 |
| 5.9 Application Review and Selection Process (ED only) | 20 |
| 5.10 Application Review for Multiple Applications | 20 |
| 5.11 Application Exhibits – Full List and Descriptions | 20 |
| Section 6: Post-Award Requirements | 24 |
| Part III. CDBG Application Opportunities | 26 |
| Opportunity 1: Downtown Revitalization (DTR)..... | 26 |
| 1.1 DTR Purpose | 26 |
| 1.2 DTR Priority Activity | 26 |
| 1.3 DTR Eligible Activities | 27 |
| 1.4 DTR Ineligible Activities | 27 |
| 1.5 DTR Grant Amount and Matching Funds | 28 |
| 1.6 DTR Application Exhibits | 28 |
| 1.7 DTR Application Criteria | 28 |
| Opportunity 2: Economic Development (ED) | 36 |
| 2.1 ED Purpose | 36 |
| 2.2 ED Priority Activity..... | 36 |
| 2.3 ED Eligible Activities | 36 |
| 2.4 ED Ineligible Activities (Businesses <i>not</i> eligible for ED funding) | 37 |
| 2.5 ED Grant Amount and Matching Funds | 37 |
| 2.6 ED Application Thresholds..... | 37 |
| 2.7 ED Application Exhibits..... | 38 |
| 2.8 ED Application Criteria | 38 |
| Opportunity 3: Planning (PP) | 44 |
| 3.1 PP Purpose | 44 |
| 3.2 PP Priority Activities | 44 |
| 3.3 PP Eligible Activities..... | 44 |
| 3.4 PP Ineligible Activities | 44 |
| 3.5 PP Grant Amount and Matching Funds..... | 45 |
| 3.6 PP Application Exhibits..... | 45 |
| 3.7 PP Application Criteria..... | 46 |

| | |
|---|-----------|
| Opportunity 4: Public Works – Facilities (PWF) | 49 |
| 4.1 PWF Purpose | 49 |
| 4.2 PWF Priority Activities | 49 |
| 4.3 PWF Eligible Activities | 50 |
| 4.4 PWF Ineligible Activities | 50 |
| 4.5 PWF Grant Amount and Matching Funds | 51 |
| 4.6 PWF Application Exhibits..... | 51 |
| 4.7 PWF Application Criteria | 52 |
| Opportunity 5: Public Works — Infrastructure (PWI) | 57 |
| 5.1 PWI Purpose | 57 |
| 5.2 PWI Priority Activities..... | 57 |
| 5.3 PWI Eligible Activities | 58 |
| 5.4 PWI Ineligible Activities | 58 |
| 5.5 PWI Grant Amount and Matching Funds | 59 |
| 5.6 PWI Application Exhibits | 59 |
| 5.7 PWI Application Criteria | 60 |
| Opportunity 6: Tourism Development (TD) | 67 |
| 6.1 TD Purpose | 67 |
| 6.2 TD Priority Activities..... | 67 |
| 6.3 TD Eligible Activities | 67 |
| 6.4 TD Ineligible Activities | 68 |
| 6.5 TD Grant Amount and Matching Funds | 68 |
| 6.6 TD Application Exhibits..... | 69 |
| 6.7 TD Application Criteria | 69 |
| Part IV. Application Budget User Guide | 73 |
| HUD MATRIX CODES/PROJECT ACTIVITIES | 73 |
| Part V. Glossary of Terms | 76 |
| Part VI. Appendices, Addendums, & Other Additional Materials | 81 |
| Appendices | 81 |
| Addendum | 81 |
| Frequently Asked Questions | 82 |

RECORD OF CHANGE

The Version identifier appears on the cover page of this document. Summary of changes includes a brief description of the revisions in descending order and grouped by Program Year. Revisions notated by version number may include updates to formatting and clarifying information not constituting a substantive change in meaning or policy and so are not specifically noted.

| Version | Date | Summary of Changes |
|------------------------------------|--------|--|
| Consolidated Plan 2025-2029 | | |
| 2025 Program Year | | |
| 1.0 | 6/2025 | <ol style="list-style-type: none"> 1. Added Acronyms/Abbreviation Index. 2. Reformatted and organized Part II & Part III for greater clarity and ease of use. 3. Updated 5.5 Application Thresholds. 4. Added subsections 5.6 Priority Applicant & 5.7 Curing an Incomplete Application. 5. DTR: Updated Application Criteria for clarity. 6. ED: Added 17C as eligible activity; Added LMA, LMC and S/B as eligible National Objectives; Removed Targeted Industry section; eligibility of Non-Profit businesses. 7. Planning: Added S/B as eligible National Objective (SBA only). 8. PW: Increased Project Activity maximum from \$450,000 to \$600,000. 9. TD: Significant changes to scoring section. 10. Scoring: All opportunity sections changed to a maximum of 100 points. Cost Per Benefit removed from grant amount section and added as part of the scoring criteria. 11. Added Application Budget User Guide section. 12. Added Appendices, Addendums, & Other Additional Materials section. |
| Consolidated Plan 2019-2024 | | |
| 2024 Program Year | | |
| 1.1 | 6/2024 | <ol style="list-style-type: none"> 1. New LMISD data included. |
| 1.0 | 6/2024 | <ol style="list-style-type: none"> 1. Increased Project Activity maximum from \$400,000 to \$450,000 for Tourism and Public Works opportunities. 2. Adjustment of priorities for Downtown Revitalization. 3. Due Date: All competitive cycles due on September 15, 2024. 4. DTR: Parks, Recreational Facilities (03F) removed as eligible activity. 5. PWF: HUD Matrix 03F Parks, Recreational Facilities added <i>priority will not be given to Seasonal facilities, i.e. swimming pools, splash pads, etc.</i> |
| 2023 Program Year | | |
| 1.0 | 6/2023 | <ol style="list-style-type: none"> 1. Application Threshold: <i>Applicant demonstrates progress financially on prior CDBG grant awards</i> was removed. 2. DTR: Commercial Rehabilitation (14E) to include rehabilitation of vacant or vacated commercial property as a speculative offering with no business tenant committed, is now not permitted. 3. DTR: Scoring overall points increased from 95 to 105. 4. PW: Construction Management decreased from \$10,000 to \$5,000. |

| 2022 Program Year | | |
|--------------------------|---------|---|
| 1.1 | 11/2022 | 1. Second round of funding for 2022 Public Works Opportunity announced. |
| 1.0 | 6/2022 | 1. Owner Occupied Rehab: Removed as opportunity. 2. Planning: Removed S/B as National Objective to meet HUD Overall Benefit; Added Tiered Matching requirements. 3. PW: Added 25% match for counties. |
| 2021 Program Year | | |
| 1.0 | 6/2021 | 1. PW: Split into Facilities and Infrastructure opportunities; Removed Water/Wastewater as standalone opportunity. 2. Budget: Add Construction Management as its own budget line item, separate from Project Costs. 3. Scoring Criteria: Removed Municipal Equalization Fund (MEF). |

Common Acronyms/Abbreviation Index

| Acronym | Description |
|---------|---|
| CDBG | Community Development Block Grant |
| CFR | Code of Federal Regulations |
| DED | Department of Economic Development (Nebraska) |
| DTR | Downtown Revitalization |
| GMS | Grant Management System (State system: AmpliFund) |
| ED | Economic Development |
| LMA | Low and Moderate Area |
| LMC | Low and Moderate Clientele |
| LMI | Low- and Moderate-Income Persons (includes LMA, LMC, LMJ) |
| LMJ | Low and Moderate Jobs |
| NDO | Nonprofit Development Organization |
| PP | Planning |
| PWF | Public Works Facility |
| PWI | Public Works Infrastructure |
| SAM | System of Awards Management (Federal system) |
| SBA | Slum and Blight Area |
| SBS | Slum and Blight Spot |
| TA | Technical Assistance |
| TD | Tourism Development |
| UGLG | Unit of general local government |

CDBG Program Representatives

| | |
|--|--------------|
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| Tom Stephens , Financial Packager <i>Economic Development</i> | 402-471-6587 |
| Angie Taylor , Community Dev. Coordinator <i>Planning</i> | 402-480-3523 |

All email addresses are generally firstname.lastname@nebraska.gov. For a current listing of Nebraska Department of Economic Development (DED) staff, please visit the department’s Contact page, <https://opportunity.nebraska.gov/contact/>.

Individuals who are hearing and/or speech impaired and have a TTY, may contact the Department through the Statewide Relay System by calling (711) INSTATE (800) 833-7352 (TTY) or (800) 833-0920 (voice). The relay operator should be asked to call DED at (800) 426-6505 or (402) 471-3111. Additional information is at the Nebraska Relay website <http://www.nebraskarelay.com/>. Nebraska Relay offers Spanish relay service for our Spanish-speaking customers. Spanish-to-Spanish (711) or 1-888-272-5528/ Spanish-to-English (711) or 1-877-564-3503. Nebraska le ofrece el servicio de relevo a nuestros clientes en español. Los consumidores de TTY pueden escribir por máquina en español y las conversaciones serán retransmitidas en español y inglés.

Part I. Overview

CDBG Overall Purpose

The Nebraska Community Development Block Grant (CDBG) program has the primary objective to strengthen and grow Nebraska communities through community betterment programs and services to provide a stable platform for community and economic development. The Nebraska Department of Economic Development (DED) administers the CDBG program. Not sure what CDBG is? View the introductory slide deck on the CDBG home page, look for the *Start Here* link: <https://opportunity.nebraska.gov/programs/community/cdbg/>

The Department’s role in Nebraska CDBG project activities is to provide funding to communities for community development and economic development projects to leverage and utilize additional federal, state, and private resources within a community providing decent housing, a suitable living environment, and expanding economic opportunities.

CDBG Application Timing

| Opportunity Type | Application Types | Application Window Opens | Application Deadline 11:59 pm Central | Contact (see info previous page) |
|---|---------------------|---|---------------------------------------|----------------------------------|
| Downtown Revitalization (DTR) | Individual | July 1 | September 15** | Gina Doose |
| Economic Development (ED)* | Individual or Joint | July 1 | Open cycle through June 30, 2026 | Tom Stephens |
| Planning (PP) | Individual or Joint | July 1 <i>Potential 2nd cycle tbd</i> | September 15** | Angie Taylor |
| Public Works Facilities (PWF) or Infrastructure (PWI) | Individual or Joint | July 1 <i>Potential 2nd cycle tbd</i> | September 15** | Nicole Bartels |
| Tourism Development (TD) | Individual or Joint | July 1 | Open cycle through June 30, 2026 | Nicole Bartels |

*ED Projects require a Pre-Application and Invitation to apply

** Awards are typically announced mid-November.

Open cycles. These funding opportunities (ED, TD) accept applications throughout the program year (July 1, 2025 – June 30, 2026). An applicant can receive more than one award during the program year. A separate application is required. **Office Hours.** Visit DED’s **CDBG home page** (<https://opportunity.nebraska.gov/programs/community/cdbg/>) to view upcoming drop-in slots to request pre-application assistance in a virtual meeting or reach out to your CDBG program representative.

The following funding opportunities are made available through the CDBG Program for 2025 Program Year (July 1, 2025 – June 30, 2026):

CDBG Opportunity Chart 2025

| Opportunity | National Obj. / HUD Matrix Code(s) ¹ | Match ² | Minimum | | Maximum | |
|---|---|--|------------------------------------|-------------------------------------|-----------------------------|--------------|
| | | | CDBG Project Activity ³ | CDBG Project Activity ³ | General Admin. ⁴ | Const. Mgmt. |
| Downtown Revitalization (DTR) | SBA SBS LMA LMC <i>Priority Activity: 14E Commercial Rehab</i> | 25% | \$250,000 | \$400,000 | 10% or \$25,000 | \$10,000 |
| Economic Development (ED) | LMJ LMA LMC SBA SBS <i>Priority Activities: 18A Econ. Dev. Direct Financial Assistance to For-Profit Business</i> | 100% | \$125,000 | \$1,000,000 | \$10,000 (flat amount) | \$5,000 |
| Planning (PP) | LMA LMC SBA <i>Priority Activity: 20A Planning</i> | <ul style="list-style-type: none"> Multi-Jurisdictional: based on the entities participating 10% for Villages 20% for Second Class Cities 25% for Counties 30% for First Class Cities | \$20,000 | Single, \$50,000 Joint, \$70,000 | 10% or \$3,000 | N/A |
| Public Works — • Facilities (PWF) or • Infrastructure (PWI) | LMA LMC <i>Priority Activities: Refer to Part III Section 4.2 (PWF) Section 5.2 (PWI)</i> | | \$250,000 | \$600,000 | 10% or \$25,000 | \$5,000 |
| Tourism Development (TD) | SBA SBS LMA LMC LMJ <i>Priority Activities: Refer to Part III, Section 6.2.</i> | 25% | \$250,000 | \$450,000 | 10% or \$25,000 | \$5,000 |

¹ Full list and description of activities appears at [Part II, Section 3.02](#). In addition, all projects are eligible for 21A General Administration (GA); and all except PP are eligible for Construction Management (CM; under the HUD Matrix Code activity for CDBG infrastructure greatest amount of CDBG funds budgeted).

² GA & CM activities are not used for calculating match requirements.

³ CDBG Project Activity refers to HUD Matrix Code eligible activities, Section 3. Project Activity does *not* include Construction Management, and/or General Administration.

⁴ The lesser amount

Part II. General CDBG Application Guidelines

As the designated state-administering agency, the Nebraska Department of Economic Development (DED) funds activities authorized under the federal Housing and Community Development Act of 1974, as amended, and designed to meet the goals identified in the State of Nebraska’s Consolidated Plan.

Each of the sections found within *Part II. General CDBG Application Guidelines* are clarified within *Part III. CDBG Application Opportunities*.

Unless otherwise noted, all criteria in Part II apply to all CDBG opportunity types.

Section 1: Applicants

1.1 | Eligible Applicants

Eligible CDBG applicants include every Nebraska county or incorporated municipality with a population of less than 50,000 that are *not* classified as a CDBG Entitlement Community (Omaha, Lincoln, Bellevue, and Grand Island). Special policy exceptions are provided in *Part II. Section 1.3 – Special Policies for Applicants*.

1.2 | Types of Applicants

CDBG permits two types of applicants:

- 1) **Individual:** An eligible municipality may apply only for projects within its corporate limits, and an eligible county may apply only for such projects or activities in unincorporated areas. This includes all CDBG opportunity types.
 - a) Only incorporated municipalities are eligible to apply for Downtown Revitalization.
- 2) **Joint:** Eligible applicants may jointly apply for projects when it can be clearly documented that mutual action by the applicants is required. The applicant local government in a multi-jurisdictional application must also be a direct participant in the study/project. The applicant local government cannot serve only as a pass through for CDBG funds or only as the general administrator of the study/project.

1.3 | Special Policies for Applicants

- 1) A **municipality** may *not* apply for a project undertaken *outside* its corporate or jurisdiction limits unless the project either:
 - a) Occurs within its zoning jurisdiction; or
 - b) Involves property acquired by the municipality prior to project implementation through purchase, donation, or a permanent easement.

Activities *may* serve beneficiaries *outside* the applicant’s jurisdiction provided the applicant is meeting its community development and/or economic development needs. If beneficiaries are not residents of the applicant’s jurisdiction, explain how the jurisdiction’s needs are being met by the proposed activity (*see 24 C.F.R. §570.486(b)*). Applicants seeking multi-community funding may be subject to additional requirements; applicants for such projects should contact the program representative for technical assistance as early as possible in the application window.

- 2) A **county** may *not* apply for projects undertaken within the corporate limits or zoning jurisdiction of a municipality unless the projects involve either:
 - a) Public facilities within an eligible incorporated municipality that are owned or operated by the county; or
 - b) Activities to be provided county-wide, either directly by the county or through contract with another local or area agency.

- 3) A **joint application** must include a written agreement made in accordance with state law (Inter-local Cooperation Act) that
 - a) Stipulates that the parties will cooperate in undertaking the project;
 - b) Delineates responsibilities and authorities of each party with respect to grant administration; and
 - c) Authorizes one of the parties to act as primary agent for administrative and monitoring purposes. The applicant local government in a multi-jurisdictional application must be a direct participant in the project. The applicant local government cannot serve only as a pass-through for CDBG funds or only as the general administrator of the project.

Multi-Jurisdictional Projects

Meeting a national objective in multi-jurisdictional projects can prove difficult because all communities in the project must meet the national objective. This may be cumbersome to meet unless the project involves a county that is 51% or greater LMI.

In general, a multi-jurisdictional approach would require there to be an existing relationship between the communities and their respective residents, as in the case of a labor-shed. One possible approach is to consider that CDBG-funded activities within one applicant community may serve beneficiaries outside the applicant's jurisdiction provided the applicant is meeting its community development and economic development needs. Where beneficiaries are not residents of the applicant's jurisdiction, the application narrative would need to explain how the jurisdiction's needs are being met by the proposed activity (note: 24 C.F.R. §570.486(b)). For example, if Anytown is proposing to extend water and sewer service outside its corporate limits, Anytown must also own the water or sewer service for which it plans to extend.

Returning to the labor-shed example, there may be unincorporated communities that are included in Anytown's labor-shed. Anytown may want to extend or provide services outside corporate or jurisdiction limits within the county into these incorporated municipalities. Activities would need to be within the service area of the municipality's public facility service (e.g., fire protection, street, sewer, water lines). However, for comprehensive planning and other public activities it may be okay to consider those areas within extraterritorial jurisdiction of the lead community, Anytown.

Overall, a CDBG funded project must meet the low- and moderate-income national objective and report on beneficiaries. For multi-community purposes, beneficiaries are likely to be LMI persons or households. It is imperative that the project is built around the problem/need and the proposed solution, not one or the other. This makes modeling difficult as community needs are specific to the community and do not often fit into a particular mold so as to approach it at the multi-community level.

- 4) **Economic Development (ED), Public Works—Facilities (PWF), and Tourism Development (TD).** If an application requires **participation of entities that are not eligible applicants**, each entity must provide written assurance that it concurs with the project and is committing its resources, if any, as stated in the application. An agreement that stipulates the decision-making authority, administration, contract compliance, reporting, etc. shall be executed and submitted as an upload to the application. In all instances, the subrecipient has the final responsibility for implementation of the project and must retain environmental and financial responsibility. In some instances, a draft agreement is acceptable at the time of application; however, the executed agreement is required before release of funds.

NOTE: Include within the application the following documentation about the partner entity committing resources:

- a) Proof of Secretary of State Registration
 - b) System for Awards Management (SAM), <https://sam.gov/>
 - c) Agreement (if applicable)
- 5) Eligible applicants may provide CDBG funds to a subrecipient Neighborhood-based Nonprofit Organization or **Nonprofit Development Organization (NDO)**.

NOTE: Include within the application the following documentation about the nonprofit:

- a) Proof of Secretary of State Registration
 - b) System for Awards Management (SAM), <https://sam.gov/>
 - c) Memorandum of Understanding (if applicable)
- 6) **Economic Development.** As allowed within *Part II. Section 1.3 (4) and (5)*, this funding opportunity allows the eligible applicant, as identified in *Part II. Section 1.1*, to collaborate with eligible businesses and the Nonprofit Development Organization (NDO) to receive funding.

A Nonprofit Development Organization (NDO) is generally involved when the CDBG funds are used to make a loan. If CDBG funds are used for infrastructure development activity to assist a business (defined in *Part II. Section 3.2*), NDOs are generally not involved.

For more information regarding NDOs refer to Chapter 8 of the CDBG Administration Manual.

1.4 | Applicant Account: Grant Management System

DED utilizes the grant management system (GMS) known as **AmpliFund**. This system will be used to submit applications and if awarded, the subrecipient uses the GMS as the tool for ongoing grant management. If the applicant does not have an account portal, please refer to [DED Grants Help Center](#) for guidance. *Upload file sizes are limited to 1GB.*

If the applicant has an account and needs to add a new user, please reach out to DED or AmpliFund Customer Support to have the user added to the account.

Like all web-based systems, it may time out or experience other connectivity impacts. While it is possible to Save As Draft an incomplete application, be advised that a session may be interrupted and changes could be lost. For that reason, it is recommended that narrative responses be drafted outside the GMS, then copied/pasted into the GMS during the application process. In these instructions, unless otherwise

denoted as an UPLOAD file attachment request, all application responses are provided directly into the GMS.

Section 2: Funding Summary

2.1 | National Objectives Defined

The primary national CDBG objectives are principally intended to benefit low- and moderate-income (LMI) persons in one or more ways:

- (1) the development of viable communities by providing decent housing,
- (2) suitable living environments, and
- (3) expanded economic opportunities

Under these guidelines, this is accomplished by funding projects that meet at least one national objective. Further guidance about CDBG National Objectives is available in the CDBG Administration Manual.

- **Funding priority will be provided to the applicant meeting the national objective benefitting low- and moderate-income persons.**
- **Applicants are required to identify and document the national objective(s) selected to qualify their project for CDBG funding.**

Based on the amended 1974 HCD Act and HUD guidance, the national objectives are defined and clarified by DED as follows:

- 1) **NATIONAL OBJECTIVE 1: Benefit to low- and moderate-income (LMI) persons.** An LMI person is defined as a member of a family having an income equal to or less than the income limits established by HUD for their resident county. The income limits as published by HUD at <https://www.hudexchange.info/programs/home/home-income-limits/> are determined for each Nebraska County on the higher of either: 80% of the median income of the county, or 80% of the median income of the entire non-metropolitan area of the state.

Project Activities, also known as “HUD Matrix Codes”, describe each budget line item comprising a project. LMI project activities must meet one or more of the following criteria below and in the absence of substantial evidence to the contrary, each will be considered to meet the LMI national objective.

- a) **Area Benefit (LMA):** An area benefit activity is available to *all residents* of an area that is **primarily residential**. To qualify on an area basis, the activity must meet the identified needs of LMI persons residing in an area where at least 51% of residents are LMI persons. The benefits of this type of activity are available to all residents in the area regardless of income. If the assisted activities *serve* an area having an LMI concentration *below* 51%, the activity may not qualify even if there is reason to believe that it will actually be used primarily by LMI persons.

Such an area need not be coterminous with census tract or other officially recognized boundaries but must be the ENTIRE area served by the activity (i.e., an arterial street or sewer interceptor line running through a neighborhood would serve more residents than those in the immediate

neighborhood). To determine the percentage of LMI persons in the target area, subrecipients may review “LMISD” data from the most current US Census.

If the LMI total is near but falls below the 51% threshold, a community could consider conducting an income survey in the designated project target area to help it qualify under LMA for CDBG funding. Survey results are valid for five (5) years.

Subrecipients would conduct an income survey of the residents within the project target area if data from the most current Census does not reflect current relative income levels in an area or census boundaries do not coincide with the service area of an activity. Applicants must use survey methodology as prescribed by U.S. Department of Housing and Urban Development and set forth in the State’s CDBG Administration Manual or, as appropriate, superseding policy memorandum.

b) **Limited Clientele (LMC).** These are activities that provide a benefit to *a specific group of persons* rather than everyone in an area generally. It may benefit particular persons without regard to the area in which they reside or be an activity that provides benefit on an area basis but only to a specific group of persons who reside in the area. In either case, at least 51% of the beneficiaries of the activity must be LMI persons. To qualify under this subcategory the activity must meet one of the following tests:

1. Exclusively benefits a clientele who are generally presumed by HUD to be principally LMI persons. The following groups are currently presumed by HUD to be made up principally of LMI persons:
 1. Abused children
 2. Battered spouses
 3. Elderly persons
 4. Adults meeting Bureau of Census’ definition of severely disabled adults
 5. Homeless persons
 6. Illiterate adults
 7. Persons living with AIDS
 8. Migrant farm workers;

or,
2. Require information on family size and income so that it is evident that at least 51% of the clientele are persons whose family income does not exceed the LMI limit, this includes the case where the activity is restricted exclusively to LMI persons; or,
3. Require information on family size and income so that it is evident that at least 51% of the clientele are persons whose family income does not exceed the LMI limit, this includes the case where the activity is restricted exclusively to LMI persons; or,
4. Be of such nature and in such a location that it may reasonably be concluded that the activity’s clientele will primarily be LMI persons (e.g. a daycare center that is designed to serve residents of a public housing complex); or,

5. Be an activity that removes material or architectural barriers to the mobility or accessibility of elderly persons or of adults meeting Bureau of Census' Current Population Reports definition of "severely disabled," provided it is restricted, to the extent practicable, to the removal of such barriers by assisting the reconstruction of a public facility or improvement or rehabilitation or a privately-owned nonresidential building that does not qualify under LMI area benefit criteria.

Activities that benefit a service or target area generally cannot qualify under the Limited Clientele criterion. For example, while a clinic serving only persons with AIDS living in a particular area would clearly qualify as a Limited Clientele activity, a clinic providing CDBG-subsidized health services that are available to *all* persons in the area would not. A clinic open to an entire community must instead meet the criteria for an Area Benefit activity.

- c) **Job Creation/Job Retention (LMJ):** An activity generally meets this national objective when it is designed to create or retain permanent jobs where at least 51% of the jobs, computed on a full-time equivalent (FTE) basis of 2,080 hours, *involve the employment of LMI persons.*

- (1) If a business receives other CDBG assistance, the total CDBG amount cannot be more than \$35,000 per job created/retained.
- (2) If meeting the National Objective of Benefit to Low- and Moderate-Income persons through job creation/retention funds an attraction, the total CDBG amount cannot be more than \$35,000 per job created/retained.

1. **Created Jobs.** Jobs **created** because of CDBG assistance, defined:

- (1) **Full-Time Equivalent (FTE):** Jobs are computed on a full-time equivalent basis of 2,080 hours per year or 40 hours per 52 weeks per year.
- (2) **LMI Person:** A person whose family income is equal to or less than the income limits for their resident county. This test counts the entire family (household) income. *Note that the wage of the job taken is irrelevant.*
- (3) **Permanent Jobs:** A job is permanent if it is a full- or part-time position and will be, or can reasonably be expected to be, available for at least six continuous months. Seasonal jobs may be considered. Not eligible are temporary jobs (i.e., construction jobs related only to the project's new or renovated real estate) and jobs indirectly related to the assisted business. (i.e., trickle-down jobs). Generally, contracted workers are not considered eligible.
- (4) **Made Available To:** Jobs will be available to LMI persons if special skills that can only be acquired with substantial training or work experience beyond high school are not a prerequisite to fill the jobs and LMI person are given first consideration for such jobs.

First consideration for jobs made available to LMI persons defined:

1. The business must use a hiring practice that under usual circumstances would result in over 51% of LMI persons interviewed for the jobs being hired.
2. The business must seriously consider enough LMI persons as job applicants to give reasonable opportunity to fill the position with such LMI persons.

3. The distance from residence and availability of transportation to the job site must be reasonable before an LMI person may be considered a serious applicant for the job.
2. **Retained Jobs.** Retained jobs would be lost without CDBG assistance. Documentation is necessary to show that at least 51% of the jobs are known to be held by LMI persons, or steps will be taken to ensure that at least 51% of the jobs which can reasonably be expected to become available through turnover within the following two years will be filled by or made available to LMI persons.

Jobs **retained** because of CDBG assistance, defined:

- (1) There must be clear and objective evidence that permanent jobs will be lost without CDBG assistance.
- (2) The definition of “clear and objective” evidence that jobs will be lost includes:
 - (i) Evidence that the business has issued a notice to affected employees or made a public announcement to that effect; or,
 - (ii) Analysis of relevant financial records, which clearly and convincingly show that the business is likely to cut back on employment in the near future without the planned intervention.
3. **Provisions for aggregating jobs.** As a rule, jobs from each business receiving CDBG assistance must be considered a separate activity for purposes of demonstrating compliance with the LMJ requirements. Even if the state or its subrecipient considers the CDBG-funded activity to be a business loan fund, HUD generally considers assistance to each business as a separate activity. However, there are certain circumstances under which subrecipients *may aggregate* the jobs created or retained by two or more assisted businesses for this purpose, as follows:
 - (a) Where CDBG funds are used to acquire, develop, or improve real property (for example, a business incubator, an industrial park, or shopping mall), *jobs may be aggregated* for all the businesses which locate on the property, provided such businesses are not otherwise assisted with CDBG funds.
 - (b) Where CDBG funds are used for public facilities or improvements (infrastructure), that will result in the creation or retention of jobs by more than one business, the jobs created or retained by all such businesses because of the public facility or improvement *may (and sometimes must) be aggregated*, using the following ground rules:

Examples of when aggregating jobs is required.

Where such an improvement (to infrastructure or public facilities) is undertaken for the benefit of one or more specific businesses, but the *improvement clearly benefits other businesses* or allows other sites to be developed, jobs created or retained because of the public improvement *must be aggregated by all businesses in the service area* of the infrastructure.

EXAMPLE 1: A city’s existing industrial park is fully developed and cannot accommodate a new metal stamping plant that wishes to locate in the city. The city buys an adjoining parcel, divides it into four lots,

and uses CDBG funds to install water, sewer, and roads through the parcel to serve the new plant. However, the other three lots in the parcel are now developable because these improvements serve them too. *The city must aggregate the metal stamping plant jobs plus any jobs which are created or retained because of other businesses subsequently locating on the other three lots—even if no other business had committed to locate there at the time the improvements were constructed.*

PROVIDED: Where such an improvement is undertaken principally for the benefit of one or a few particular businesses, and the cost (in CDBG funds) for the facility/improvement amounts to less than \$10,000 per job to be created or retained by those businesses, *only the jobs created or retained by those specific businesses for which the facility/improvement is principally undertaken* must be aggregated. The subrecipient can disregard any incidental job creation that might occur because other businesses might also benefit from the improvement.

PROVIDED: Where the CDBG cost per FTE job expected to be created or retained is \$10,000 or more, jobs created or retained because of the public improvement, by all businesses in the service area of the infrastructure, *must be aggregated*. The aggregation must include all businesses which, because of the public improvement, locate or expand in the service area of the improvement *between the date the state awards the CDBG funds to the subrecipients and the date one year after the physical completion of the facility/improvement.*

EXAMPLE 2: The state provides CDBG funds to allow the city to double the capacity of its sewage plant (and handle a new poultry processing plant), at a cost of \$11,200 per new poultry plant job. Over the next 12 months, four new businesses decide to locate in town, because the city has sufficient sewage treatment capacity to handle their effluence. *The city must aggregate job creation figures for the poultry plant plus the four new businesses.*

2) **NATIONAL OBJECTIVE 2: Aid in prevention or elimination of slums and blight (S/B).** “Slums” has the meaning as substandard areas as defined in Section 18-2103 (31) Neb. R.R.S. “Blight” has the same meaning as blighted areas as defined in Section 18-2103 (3) Neb. R.R.S. The focus of activities under the Prevention/Elimination of Slums and Blight (SB) National Objective is a *change in the physical environment of a deteriorating area or spot*. This contrasts with the LMI benefit national objective where the goal is to ensure that funded activities benefit LMI persons.

Activities meeting one or more of the following criteria, in the absence of substantial evidence to the contrary, will be considered to meet this national objective:

- a) **On an area basis (SBA).** An activity will be considered to meet this objective if:
 - 1. The area is designated by official action of the local government as substandard or blighted in accordance with the applicable state statute.
 - 2. There is a substantial number of deteriorated or deteriorating structures throughout the area, or public improvements throughout the area are in a general state of deterioration.
 - 3. The assisted activity is designed to address one or more of the conditions which contributed to the deterioration of the area.
 - 4. Documentation is provided and maintained by the recipient on the boundaries of the area and the conditions which qualified the area at the time of its designation; and
 - 5. Activities to be assisted with CDBG funds must be limited to those that address one or more of the conditions that contributed to the deterioration of the area.

NOTE: *Planning-only* grants can meet this national objective where the plans are for the entire slum or blighted area, or if all elements of the planning are both necessary for and related to an activity that, if implemented, could be shown to meet the slum/blight national objective criteria. Because an activity must meet a national objective throughout the life of the grant, *an area that is not yet designated cannot meet this category.*

- b) **On a spot basis (SBS).** An activity must be designed to eliminate specific conditions of blight or physical decay not located in a designated slum or blighted area; and be limited to one of the following: acquisition, clearance, relocation, historic preservation, or rehabilitation of buildings, but only to the extent necessary to eliminate specific conditions detrimental to public health and safety. (Public improvements cannot qualify under this standard except for rehabilitation of public buildings and historic preservation of public property that is blighted.)

Qualifying activities under this National Objective either **1) clearly eliminate objectively determinable signs of slums or blight in a defined slum or blighted area** or **2) are strictly limited to eliminating specific instances of blight outside such an area.** HUD provides a list of criteria, all of which must be met; generally requiring that the area must be:

1. Officially designated and meet the requirements of state statutes.
 2. Demonstrate signs of economic disinvestment, indicated by either:
 - (a) A substantial number of deteriorated or deteriorating buildings throughout the area
or
 - (b) Public improvements throughout the area must be in a general state of deterioration.
 3. Documentation is maintained substantiating those conditions considered as a part of designation and re-designated every 10 years; and
 4. The activities assisted with CDBG funds must be limited to those that address one or more of the conditions that contributed to the decline of the area.
- 3) **NATIONAL OBJECTIVE 3: Urgent Need.** *(The State of Nebraska currently does not offer this on an ongoing basis and would have to amend the State's Consolidated Plan, Section II, Section 2.4 if the need arises.)* To comply with the national objective of meeting community development needs having a particular urgency, an activity must be designed to alleviate existing conditions which the local government certifies, and the State determines:
- a) Pose serious and immediate threat to the health or welfare of the community,
 - b) Are of recent origin or recently became urgent. A condition will generally be considered to be of recent origin if it developed or became critical within 18 months preceding the subrecipient's certification.
 - c) The unit of local general government (UGLG) is unable to finance the activity on its own, and other sources of funding are not available to carry out the activity, as certified by both the State and the subrecipient.

2.2 | National Objective Options for CDBG Opportunities

1. LMI
 - a) **LMA:** DTR, ED, PP, PWF, PWI, TD (all)
 - b) **LMC:** DTR, ED, PP, PWF, PWI, TD (all)
 - c) **LMJ:** ED, TD
2. S/B
 - a) **SBA:** DTR, ED, PP, TD
 - b) **SBS:** DTR, ED, TD

View the [CDBG Overview](#) above for National Objectives listed per opportunity type.

2.3 | Public Benefit Standards

This standard applies only for projects (ED or TD) qualified under LMJ. CDBG awards are limited to a maximum of \$35,000 per FTE job created or retained. There are incentives (in scoring the project) for awards that are less than the maximum. These limits are known as the Public Benefit Standard and are part of the federal limitations described in 24 CFR 570.482(f).

NOTE: Public Benefit Standards are *not* applicable to Downtown Revitalization, Planning, nor Public Works opportunities.

2.4 | Compliance with the State’s Consolidated Plan

Per the proposed 2025 – 2029 Consolidated Plan, the Nebraska CDBG program is focused on achieving at least one of three objectives with funded CDBG project activities:

1. Providing Suitable Living Environments: Improving the safety and livability of neighborhoods; increasing access to quality facilities and services; and reducing the isolation of income groups within an area through integration of low-income housing opportunities.
2. Providing Decent Housing: Preserving the affordable housing stock; increasing availability of permanent housing that is affordable to low- and moderate-income persons without discrimination; and increasing the supply of supportive housing.
3. Expanding Economic Opportunities: Creating jobs that are accessible to low- and moderate-income persons; making down payment and closing cost assistance available for low- and moderate-income persons; promoting long term economic and social viability; and empowering low-income persons to achieve self-sufficiency.

Each project activity awarded is focused on achieving one of the following outcomes:

- Availability/Accessibility: Associated with activities that make services, infrastructure, public services, public facilities, housing or shelter available or accessible to LMI people.
- Affordability: Associated with activities that provide affordability in a variety of ways to LMI people. It includes the creation or maintenance of affordable housing, basic infrastructure hookups, or services such as transportation or day care.
- Sustainability: Associated with activities aimed at improving communities or neighborhoods, helping to make them livable or viable by providing benefit to persons of LMI or by removing or eliminating slums or blighted areas, through multiple activities or services that sustain communities or neighborhoods.

Section 3: Activities

3.1 | CDBG Eligible Activities and Nebraska Priority Activities

The Housing and Community Development Act of 1974 (HCDA), as amended, is the primary authority for determining the eligibility of potential CDBG activities. The activities listed in Section 105(a) may be funded in whole or in part with CDBG funds. An **Activity** is a budget line-item documenting the work component(s) comprising a project to be funded by the opportunity award and are synonymous with “HUD Matrix Codes”. A full list of activities can be found on the HUD Exchange, <https://files.hudexchange.info/resources/documents/Matrix-Code-Definitions.pdf>. *Applicants should be aware that although an activity may be eligible under Federal statute and HUD regulations, it may not be competitive under the guidelines and ranking system in the respective Nebraska CDBG **Funding Opportunities**.*

The State has adopted **Priority Activities** as part of the State’s Consolidated Plan and Annual Action Plan. *One or more Priority Activities must be included in each application. **Secondary activities** must be used in conjunction with an opportunity’s priority activity, and an application consisting *solely* of supporting activities is ineligible to receive funds. Restrictions or ineligible activities are identified in each opportunity section in *Part III – CDBG Application Opportunities*.*

3.2 | CDBG Ineligible Activities

Please consult a CDBG program representative to determine the possible eligibility of any other non-listed proposed activities within the Nebraska CDBG program. The following activities are ineligible within the CDBG Program:

- 1) General administrative and audit costs which exceed the allowable maximum.
- 2) Buildings, or portions thereof, used predominantly for the general conduct of government cannot be assisted with CDBG funds. Such buildings are defined as city and village halls, county administrative buildings, office buildings, or other facilities in which the general administrative affairs of the government are conducted. This definition does not include such facilities as neighborhood service centers or special purpose buildings located in LMI areas that house various non-legislative functions or services provided by government at decentralized locations. However, the removal of architectural barriers to make public buildings accessible to elderly and handicapped persons is eligible.
- 3) General government expenses cannot be paid with CDBG funds, except for those costs that are directly attributable to administration of a local CDBG program and are documented as such. (*Eligible cost expenses are detailed in 2 CFR. §200*).
- 4) CDBG funds cannot be used to pay for facilities or equipment used for political purposes or to engage in other political activities such as candidate forums, voter transportation, or voter registration. However, a facility originally financed as a whole or in part with CDBG funds may be used on an incidental basis to hold political meetings, candidate forums, or voter registration campaigns; provided all parties and organizations have access to the facility on an equal basis, and are assessed equal rent or use charges, if any.

- 5) The purchase of equipment, fixtures, motor vehicles (including ambulances), furnishings, or other personal property, not an integral structural fixture with CDBG funds, is generally ineligible, except:
 - a) The purchase of construction equipment is ineligible. However, compensation for the use of such equipment through leasing & rental (2 CFR 200.465), depreciation (2 CFR 200.436), or use allowance pursuant to 2 CFR §200 as applicable for an otherwise eligible activity, is an eligible use of CDBG funds. Notable exception: The purchase of construction equipment for use as part of a solid waste disposal facility is eligible.
 - b) Fire protection equipment is considered an integral part of a public facility and thus, the purchase of such equipment would be eligible; and
 - c) CDBG funds may be used to purchase or to pay depreciation or use allowances (in accordance with 2 CFR, §200, as applicable) for such items when necessary for use by a municipality or county in the administration of activities assisted with CDBG funds, or when eligible as firefighting equipment, or when such items constitute all or part of a public service.

- 6) The general rule is that any expense associated with repairing, operating, or maintaining public facilities, improvements and services is ineligible. Specific exceptions to this general rule are operating and maintenance expenses associated with public service activities, interim assistance, and office space for program staff employed in carrying out the CDBG program.

For example, the use of CDBG funds to pay the allocable costs of operating and maintaining a facility used in providing a public service would be eligible, even if no other costs of providing such a service are assisted with such funds. Examples of ineligible operating and maintenance expenses are maintenance and repair of streets, parks, playgrounds, water and sewer facilities, neighborhood facilities, senior centers, centers for the handicapped, parking, and similar public facilities. Examples of maintenance and repair activities for which CDBG funds may not be used include the filling of potholes in streets, repairing of cracks in sidewalks, the mowing of recreational areas, and the replacement of expended street light bulbs, and payment of salaries for staff, utility costs, and similar expenses necessary for the operation of public works and facilities.

3.3 | Special Policies for Activities

Special policies affecting CDBG eligible activities listed in *Part II, Section 3.1* are:

- 1) **Facilities containing both eligible and ineligible uses.** A public facility otherwise eligible for assistance under the CDBG program may be provided with CDBG funds even if it's part of a multiple use building containing ineligible uses, if:
 - a) The facility which is otherwise eligible and proposed for assistance will occupy a designated and discrete area within the larger facility; and
 - b) The subrecipient can determine the costs attributable to the facility proposed for assistance as separate and distinct from the overall costs of the multiple use building and/or facility. Allowable costs are limited to those attributable to the CDBG funding eligible portion of the building or facility.

- 2) **Fees for use of facility.** Reasonable fees may be charged for the use of the facilities assisted with CDBG funds, but charges, such as excessive membership fees, which will have the effect of precluding LMI persons from using the facilities, are not permitted.
- 3) **Target Area Definition.** A target area is substantial and contiguous. Generally, substantial means a concentration of 100 or more families and primarily residential in character. A contiguous target area is generally delineated along block lines and by natural/man-made boundaries, such as streets, highways, railroads, and streams. Alleys and lot lines do *not* delineate target area boundaries exclusively. The entire community is considered the target area if there are less than 100 families. These local areas are locally defined. These local designations may have a variety of names – revitalization areas, target neighborhoods, priority zones, etc. All target areas will be reviewed for the direct effects of the assisted activity to LMI person and other person inside or outside the target area as well.

The target area for a county is a substantial and contiguous area of concentrated families or the entire unincorporated area. County applications exclude the incorporated areas, unless the county is a lead applicant in a joint application submitted in conformance with *Part II. Section 1.3*.

A target area must be appropriately designed to coincide with the project service area. Separate activities may include different target areas or a combined target area to be most effective.

3.4 | Proposed and Actual Beneficiaries

Each project activity must serve **beneficiaries** (indicator). Below are **types**, also known as “Units of Accomplishment”:

1. Persons Assisted (Public Facility or Public Services)
2. Households Assisted (Public Facility or Public Services activities)
3. Household Housing Units
4. Jobs
5. Businesses (Façade treatment/building rehab)
6. Businesses Assisted

The indicator is determined by the Goal Outcome Indicator identified in the Consolidated Plan. The applicant identifies how each project activity will align with the beneficiary type. Once the beneficiary type is determined the applicant needs to identify the **total number** of beneficiaries proposed to benefit by the CDBG Activity. Certain national objectives also require the number of **LMI persons**, and the **percentage** of LMI%, that will benefit from the CDBG activity. Beneficiary types and quantities are proposed during the application process, adopted into the agreement, and get reported on for the life of the grant. Once the agreement is executed, any change would require an amendment request and approval process.

Section 4: Funding

4.1 | Grant Amount and Matching Funds

Matching funds are funds that must be contributed by the applicant and are required in most instances and unless otherwise described in *Part III*. The proposed match must be towards CDBG-eligible activities directly related to the proposed project(s) or directly benefiting a substantial majority of the LMI persons or families residing within the service area during the period of performance. Consideration for the match may be given for such sources as public and/or private funds. An all-cash match is preferable.

With limited exception, as detailed below, any CDBG-eligible activity may be proposed to meet the matching requirements. The following activities are considered **program administration costs** and **supporting delivery costs** and should not be used for calculating your total CDBG project cost or match requirements:

- a) General Administration (GA)
- b) Construction Management (CM)

Match is proportionally injected into the project as CDBG-funded activities are drawn down. For this reason, unless otherwise directed by DED or negotiated, it is recommended that each project activity proposed for CDBG-funding be matched at the proportion identified.

For a multi-jurisdictional application, the match will be based on the entities participating. For example, if two villages and a First-Class city are participating, the match amount would be determined by the First-Class City.

At DED's discretion, in-kind contributions, or services such as materials, labor, or other items that are directly related to the project, may be considered on a case-by-case basis. Where an applicant or subrecipient proposes use of in-kind match, the calculated value must be accountable, reasonable, and supported by adequate source documentation. It may be difficult to adequately account for such costs. If considering using in-kind match, consult with the program representative of the CDBG funding opportunity prior to submitting a full application.

4.2 | Program Income

Program income is defined as gross income received by a State, a UGLG, or a subgrantee of the UGLG that was generated from the use of CDBG funds, regardless of when the CDBG funds were appropriated and whether the activity has been closed out, except in limited circumstances [See also 24 CFR. §570.489(e)(2)].

If a UGLG has CDBG local program income currently, that funding will be required to be applied to the open grant first. Program income is *not* allowable as local match. Creation of *new* local program income revolving loan funds will *not* be authorized.

Review Chapter 8, Program Income of the CDBG Administration Manual for information and requirements regarding Program Income.

4.3 | Budget

Within the grant management system, GMS, applicants will input budget information within the section labeled “Budget”. The proposed total project budget includes all costs for project delivery and administration. Two types of **project (activity)** delivery costs are: 1) **project** delivery costs and 2) **supporting** delivery costs. All items listed as match and CDBG costs must be allowable and eligible under the CDBG Program. Detailed information provided in this section will be used to evaluate the accuracy and reasonableness of activities as identified throughout the application.

Provide a breakdown of the major project costs for each line-item activity/HUD matrix code. For reporting and monitoring purposes, it is recommended that a project consist of as few budget line items as possible.

Section 5: Applications

5.1 | Application Development and Use of Consultants

CDBG funds cannot be used to fund application preparation. **If awarded, Release of Funds (ROF) must be received before engineering/architectural services or other project activities are contracted or become eligible for reimbursement.** A development district can incur eligible expenses for a funded CDBG before ROF (i.e., to submit special conditions, ERR, etc.). However, that is only if the city or county is a dues-paying member of that development district and that no procurement for general administration is necessary.

A development district shall, as directed by its policy board, serve as a regional resource center and provide planning, community and economic development, and technical assistance to local governments which are members of the district and may provide assistance to industrial development organizations, tourism promotion organizations, community development groups, and similar organizations upon request.

Federal requirements do not apply to applicants selecting consultants to assist with the preparation of an application; however, *these costs are not eligible for reimbursement.* If another third-party entity assisted the applicant with the application preparation, post-award grant administration must then be procured in accordance with CDBG guidelines. Refer to the CDBG Administration Manual for more information.

5.2 | Application Online Submission

All application submissions occur electronically through the GMS. Links to the Application Portal can be accessed using the Nebraska Department of Economic Development website, where you will see each opportunity’s Apply button: <https://opportunity.nebraska.gov/programs/community/cdbg/>.

5.3 | Application Due Dates

Unless otherwise announced by DED through official press release or other such notification, this section describes the application due dates for each opportunity for the current program year.

All CDBG funding opportunities begin accepting 2025 CDBG applications on July 1, 2025.

Applicants may submit 2025 applications until June 30, 2026 (by 11:59PM CST), or as otherwise directed by the department for these opportunities:

- Economic Development
- Tourism Development

The 2025 CDBG Applications for the following funding opportunities must be submitted by 11:59PM Central Time (CT) to the department by the identified date listed below,

- Downtown Revitalization Due: **September 15, 2025**
- Planning Due: **September 15, 2025**
Additional Cycles: TBD
- Public Works – Facilities..... Due: **September 15, 2025**
Additional Cycles: TBD
- Public Works – Infrastructure Due: **September 15, 2025**
Additional Cycles: TBD

Upon completion of the first cycle application process and availability of funding, the following funding opportunities may conduct an additional cycle. The department will issue notice if an additional cycle occurs for any of the funding opportunities below:

- Planning
- Public Works

5.4 | Application Criteria

Refer to each opportunity’s Application Criteria section.

5.5 | Application Thresholds

Applicant must meet threshold requirements to be considered eligible for an award of funds. Applications may be considered *incomplete* if application thresholds are not met. DED will notify applicants not having met application threshold and will allow the applicant the chance to cure the deficiencies. Threshold minimums include:

- a) Applicant is eligible. See *Part II. Section 1.*
- b) Applicant has no significant, unresolved audit findings as issued by DED.
- c) Applicant is current with all reporting requirements for open awards, including but not limited to, semi-annual project status reports, program income reports, closeout reports, audit reports, notification of annual audit reports, etc.
- d) Application is complete for required exhibits.
- e) Activities are eligible and are identified as a State CDBG Priority. See *Part II. Section 3.*

As part of application threshold review, DED will also identify if an applicant is classified as a Priority Applicant.

5.6 | Priority Applicants

In the event of a tiebreaker and to facilitate targeted investments in community development initiatives, DED shall prioritize applicants meeting certain characteristics. **Priority Applicants** demonstrate either or both of the following:

1. Applicants who have not received an award of CDBG funding within the last five (5) years. The date of the Program Year of funding shall be used as a marker.
2. Applicants ranking higher on the targeted investments index.⁵ Applicants located in a higher ranked county will be given priority over those ranked lower. The index can be found on the DED website.

NOTE: Applicants are *not* awarded additional points for being identified as a Priority Applicant.

5.7 | Curing an Incomplete Application

In cases where DED has notified an applicant of an incomplete application and funding remains available for award, such applicants will be given **45 days** to address the deficiencies and resubmit their application for consideration. The CDBG Program Manager, or their designee, shall inform the local contacts listed in the application of the areas of deficiencies (e.g., missing or incomplete required exhibit(s), documentation of resolved audit finding) and timeline for resubmission. Any resubmitted (or “cured”) applications will then undergo the application review and scoring process. Where applicable, any resulting awards shall be supplemental to the Program Year’s awards.

DED, in its sole discretion, reserves the right cease an application round. Where applicable, applicants are given one chance to cure their application in a single application round. For example, if DED issues notice to Anytown about their incomplete application, Anytown can resubmit *one* time. If the application is still incomplete upon resubmission, DED will issue a Notice of Non-Selection.

5.8 | Application Threshold Review and Selection Process

All applications will be reviewed by the CDBG program representative to ensure that threshold requirements identified in *Part II. Section 5.5* are met. Applications may be considered *incomplete* if application thresholds are not met. DED will notify applicants not having met application threshold and will allow the applicant the chance to cure the deficiencies, *Part II. Section 5.7*. The resubmitted threshold items will be reviewed for compliance.

If an application meets all the threshold requirements, then the application will be reviewed by the Review Team based on the application criteria. Until available funds are exhausted and/or at the department’s discretion, the highest-ranking applications are recommended for award. Unless otherwise noted, applications for all funding opportunities are reviewed by a Review Team, which may include consultation with other vested state agencies.

After threshold compliance and Review Team consensus scoring, recommendations are presented to the CDBG program representative for consultation. The CDBG program representative submits a memo recommending the opportunity applicant local government application for award to the department

⁵ In FY2024-25, the DED Research Team developed an index to assist in making targeted investments. DED anticipates this index will be updated on a five-year basis to account for change over time, which aligns with the timing of the 2030-2034 Consolidated Plan. Access the index online: <https://opportunity.nebraska.gov/programs/research/#targeted-investment-index>

Director for approval, denial, or further consultation. The Department Director may identify a Deputy Director to review the recommendation memo on the Director’s behalf. The department issues the award selections (i.e., Notice of Approval) and notifications for non-selected applicants.

If an applicant is awarded, they become known as a **subrecipient**. The application record then converts to a (grant) award record in the GMS.

5.9 | Application Review and Selection Process (ED only)

Decisions on Economic Development applications will be reviewed by the department’s Project Review Committee (PRC). This review is based on the individual and collective determination of committee members, in consultation with other department staff as necessary, applying analyses of objective criteria important in assessing whether to use federal CDBG dollars on a proposed project and in distinguishing among competing applications. A group/consensus decision is reached by evaluating the merits of each application and deciding whether to fund, and at what level of funding.

5.10 | Application Review for Multiple Applications

When more than one application is under review, those ranking highest in competitive order shall be selected for funding subject to the amount of funds available for each priority. Otherwise, an applicant under individual review is scored according to the selection criteria and must meet the minimum threshold for consideration for approval.

5.11 | Application Exhibits – Full List and Descriptions

Application Exhibits are required to be submitted based on the opportunity information found in *Part III. CDBG Application Opportunities*.



Templates and further guidance for each narrative are available on the department’s website, on the CDBG Application Guidelines page, at:

<https://opportunity.nebraska.gov/programs/community/cdbg/guidelines/>.

Exhibit A: Public Hearing Documentation

This is a required exhibit for all CDBG applications. Pursuant to the Citizen Participation Plan, this is a required exhibit for all CDBG applications. Applicants must solicit and document public engagement and input on community development needs and proposed activities within their application. At a minimum this includes holding one public hearing in connection with the application. A template for this exhibit is available online.

Exhibit B: Authorizing Resolution

This is a required exhibit for all CDBG applications. This exhibit authorizes the Chief Elected Official to sign application materials and if awarded, the CDBG agreement between the Nebraska Department of Economic Development and the UGLG. A template for this exhibit is available online.

Exhibit C1: Statement of Assurances and Certification

This is a required exhibit for all CDBG applications. This exhibit identifies laws and regulations that the UGLG need to comply with if awarded CDBG funds. A new exhibit needs to be completed at the date of application to assure that all thresholds have been met. A template for this exhibit is available online.

Exhibit C2: Citizen Participation Plan

This is a required exhibit for all CDBG applications, as indicated in 24 CFR 570.486 and the State's Citizen Participation Plan. This is a policy that the local of unit government adopts and needs to be updated if the form or adopted policy changes, or authorized chief elected official changes. A template for this exhibit is available online.

Exhibit D: Residential Anti-Displacement and Relocation Assistance Plan

This is a required exhibit for all CDBG applications, as indicated within 24 CFR Part 42. This is a policy that the UGLG adopts and must update if the form or adopted policy changes, or if the authorized chief elected official (CEO) changes. A template for this exhibit is available online.

Exhibit E: LMA - Area Basis: How to Pull Current Census Data

To qualify a project activity under the national objective of benefiting low- and moderate-income (LMI) persons on an **area** basis (LMA), at least 51% of the residents in the service area must be LMI, according to the most recent 5-year American Community Survey (ACS) data. Follow the instructions in this Exhibit to determine eligibility. Census resources are available on the CDBG website or at <https://www.hudexchange.info/programs/acs-low-mod-summary-data/>. Please note that **Exhibit E is not a template; it is a reference guide** for accessing and downloading ACS LMISD data. Use the exported ACS data to respond to application questions and upload it as part of your application. Be sure to include the specific census data source used for qualification (e.g., ACS Census Data, block groups, etc.).

Exhibit E1: LMI - Area Basis: Census Income Survey & Certificate of Completion

If qualifying a project activity through the national objective benefit to low- and moderate-income persons on an area basis through **Census Income Survey**, then complete this exhibit. Also submit the Certification of Completion of Income Survey (template is found in the Exhibit E-1/E-2 document). A template for this exhibit is available online.

Exhibit E2: LMI - Area Basis: Random Sample Income Survey & Certificate of Completion

If qualifying a project activity through the national objective benefit to low- and moderate-income persons on an area basis through **Random Sample Income Survey**, then complete this exhibit. Also submit the Certification of Completion of Income Survey (template is found in the Exhibit E-1/E-2 document). A template for this exhibit is available online.

Exhibit E3: LMC - Limited Clientele Basis

If qualifying a project activity through the national objective benefit to low- and moderate-income persons on limited **clientele**, then complete this exhibit. A template for this exhibit is available online.

Exhibit E4: LMI – Jobs

If qualifying a project activity through the national objective benefit to low- and moderate-income persons on **jobs**, then complete this exhibit. This template will need to be completed and signed by a representative of the business. A template for this exhibit is available online.

Exhibit F1: Slum and Blight Area Basis (SBA) Documentation

If qualifying a project activity through the national objective elimination of slum and blight on an **area** basis, then complete this exhibit. A template for this exhibit is available online.

Exhibit F2: Slum and Blight Spot Basis (SBS) Documentation

If qualifying a project activity through the national objective elimination of slum and blight on a **spot** basis, then complete this exhibit. A template for this exhibit is available online.

Exhibit K1: Waiver of Procurement Process and Narrative

Complete this exhibit if the UGLG is requesting to waive procurement due to an individual or entity acting in the official capacity. A template for this exhibit is available online.

This exhibit is broken into two components:

- a. The UGLG is requesting a waiver from the department due to officials acting in the official capacity of the applicant.
- b. The UGLG is requesting a waiver from the department due to an interlocal agreement in place with the development district.

Exhibit K2: Procurement Process Completed Prior to Application

Complete this exhibit if the UGLG has gone through the procurement process prior to application. The documentation provided needs to address the procurement process completed to ensure all federal requirements were met per *2 CFR 200.320*. Materials to be provided as part of application submission include:

1. Identify the method of procurement for selection and related documentation.
2. Provide narrative to the process undertaken:
 - a. Solicitation from an adequate number of qualified offerors
 - b. Written method for conducting technical evaluations and making selections; and
 - c. Official meeting minutes approving the selected contract

Exhibit L: Letters of Support (if applicable)

Complete this exhibit if the UGLG has letters of support from members of the public. Applicants are encouraged to include letters of support, but such letters are not to be provided in place of narrative that describes and illuminates the outreach and collaborative efforts undertaken within the community by elected officials, community leaders, organizations, businesses, individuals, etc. Applicants may cite specific items included within the letters in their narrative response. Refer to the specific opportunity to determine if this exhibit is required. *Limit upload to five pages.*

Exhibit M: Map of Proposed Project Area

This is a required exhibit for all CDBG applications. One or more maps will be uploaded. A guide with instructions for this exhibit is available online.

Exhibit N: System for Awards Management Documentation

This is a required exhibit for all CDBG applications. Documentation for the UGLG must be provided. SAM is the federal system where entities register for federal funding eligibility and exclusion-tracking. If the applicant is also qualifying through Part II, Section 1.3, SAM documentation must be provided for those additional entities. A guide with instructions for this exhibit is available online.

Exhibit O: Four Factor Analysis Assessing Limited English Proficiency (LEP)

The Four Factor Analysis is a required exhibit for all CDBG applications and is a tool used to help a subrecipient conduct an analysis to determine whether additional language translation services may or must be provided for the project. If a Language Assistance Plan (LAP) is triggered by the LEP four factor analysis, it *may* be uploaded now and *will be required* no later than completion during the award's special conditions period. An instruction guide and template are included in this exhibit online.

Exhibit P: Commercial Rehabilitation Program Guidelines

Complete this exhibit if applying for the Downtown Revitalization opportunity, or for an Economic Development project involving commercial rehab. The Commercial Rehabilitation activity (14E) requires this supplement in which a community outlines the plan for how efforts to identify, receive applications for, score, and award downtown businesses will be handled with respect to any CDBG funds that may be awarded to the community. A guide with this exhibit and its checklist is available online.

Exhibit Q: Local Cost-Share Documentation

This is a required exhibit for all CDBG applications. This document describes how the required match will be achieved and if there is a funding gap, how it will be addressed. A guide with instructions and questions asked in this exhibit is available online.

Exhibit R: Preliminary Project Description & Level of Review

This is a required exhibit for all CDBG applications except the Economic Development (ED) opportunity. This purpose of this exhibit is to provide a streamlined review of the Environmental Review Record to ensure the preliminary project description is complete and follows *24 CFR Part 58*. This project description is not the narrative for the application submission. Also, based on the project description, the applicant must identify the Environmental Review Record Determination Level of Review (DLR). For more information regarding the Environmental Review Record, refer to Chapter 6 of the CDBG Administration Manual. This exhibit provides a checklist and is available online.

Section 6: Post-Award Requirements

Consideration should be given to a variety of Federal and State regulations that can have scheduling or cost implications. Refer to a **full list** in the CDBG Administration Manual, Chapter 5 (<https://opportunity.nebraska.gov/programs/community/cdbg/administration-manual/>). Among these are:

1. Agreement Period of Performance

All applications awarded funding have thirty **(30) months** from the Notification of Approval (NOA) letter to complete the project.

2. Records and Reporting

Retain all information on the CDBG Agreement activities for ten (10) years following completion and close-out of the grant (DED policy). During the CDBG Agreement Period of Performance, performance reports are required semi-annually. Projects deficient for reporting are subject to further action as described in the CDBG Administration Manual or other such publication or notification by the Department.

3. 2 CFR §200 Subpart F

Local governments and nonprofits that expend \$1,000,000 (amount was \$750,000, increase effective October 1, 2024) or more of federal funds must conduct a single audit of federal and local funds.

4. Davis-Bacon Act and Related Acts (DBRA)

This and related acts require that prevailing wage rates be paid to all employees working on a construction contract of \$2,000 or more. All CDBG projects are required to follow DBRA federal labor standards.

5. Acquisition/Relocation

Regulations for acquisition and relocation emphasize anti-displacement and should be discussed with the Department Uniform Relocation and Real Properties Acquisition Act (URA) representative at the beginning of the project. URA applies to all federally assisted activities that involve the acquisition of real property or the displacement of persons. If CDBG funds are used in *any part of the project*, the URA would govern the acquisition of real property, including easements, and any resulting displacement, even if local funds are used to pay the acquisition costs. The URA requirement may include formal notification of the affected property owner(s), preparation of an appraisal to determine fair market value, and a written purchase offer based on an amount determined to be fair market value. The only exception is a voluntary transaction that meets certain criteria.

6. Regulations Emphasize Anti-Displacement

However, if displacement is necessary, relocation assistance must be provided to persons displaced by rehabilitation, acquisition, demolition, or the conversion of units for use other than low- and moderate-income dwelling units. Subrecipient will be required to replace every occupied unit that is demolished or converted with CDBG funds on a one-for-one basis within a three-year period.

7. Procurement

Open and free competition on solicitation of professional services bidding is also required in most cases. If the applicant intends to use CDBG funds to pay all or a portion of fees, or intends to claim fees as match, then CDBG procurement guidelines must be followed. The subrecipient must establish and maintain effective internal controls over the CDBG award, providing reasonable assurance that all parties involved are compliant with federal, state, and local statutes, regulations, and the terms and conditions of the CDBG award. For more information refer to the [CDBG Administration Manual](#), Chapter 7 on Procurement.

8. Environmental Review

Subrecipients are required to obtain appropriate environmental clearance for their projects and to maintain an Environmental Review Record (ERR) for each project. Depending on the Determination of the Level of Review (DLR), the review process may involve consultation with various agencies, groups and individuals. The environmental review and Request for Release of Funds/Certification, if required, must be completed before the subrecipient, or any participant in the development process, incur costs against the project. Environmental Clearance and Release of Funds allow project delivery costs to be incurred. For more information refer to the [CDBG Administration Manual](#), Chapter 6 Environmental Review.

9. Section 3 (24 CFR Part 75)

Section 3 is a provision of the Housing and Urban Development Act of 1968 that helps foster local economic development, job opportunities, and self-sufficiency. Section 3 ensures employment and other economic opportunities generated by certain HUD assistance goes to the “greatest extent feasible” to low- and very low-income persons and businesses. Section 3 goals are applicable pursuant to [24 CFR Part 75](#) as dictated by HUD. As a recipient of HUD funding, Nebraska *tracks and reports on how its programs benefit low-and very low-income individuals*. Section 3 projects are defined as housing rehabilitation, housing construction, and other public construction projects assisted under HUD programs that provide housing and community development financial assistance when the total amount of assistance to the project exceeds a threshold of \$200,000.

10. Equal Opportunity, Fair Housing, and Accessibility

Laws require that CDBG subrecipients administer their projects in a manner that affirmatively furthers fair housing and equal opportunity. All subrecipients are required to undertake specific activities to further fair housing. Subrecipients must also ensure that all activities and services are accessible to those with disabilities.

11. Build America, Buy America Act (BABA)

The BABA Act has an impact on CDBG projects requiring that all iron, steel, manufactured products, including construction materials used in federally funded projects for infrastructure, must be produced in the United States. For more information, see the Build America, Buy America Act (BABA). Pub. L. No. 117-58, §§ 70901-52.

12. Continued Use

All community facilities assisted with CDBG funds must remain in the same use for five years after being closed out. For more information, see 24 CFR §570.489.

Part III. CDBG Application Opportunities

This area further elaborates how applications can be submitted within six opportunities.

Opportunity 1: Downtown Revitalization (DTR)

1.1 | DTR Purpose

CDBG funds can be utilized for downtown revitalization projects. The purpose of the Downtown Revitalization (DTR) opportunity is to leverage investments that will contribute to the revitalization or redevelopment of downtown infrastructure and develop a greater capacity for growth, addressing health and safety concerns and commercial revitalization within the traditional business centers of our Nebraska communities. This provides a sound basis for fostering local economic development through public and private sector partnerships. This recognizes the importance of the condition and viability of a downtown to increase the community's tax base and cultivates a tangible center for community activity. These projects directly relate to business retention, expansion, and location decisions, but also address public gathering space, recognizing that downtowns reflect the economic core and persona of our communities.

Activities assist communities in their implementation of comprehensive downtown revitalization plans to stabilize and enhance clearly defined downtown areas, providing benefit to low- and moderate-income residents of the community or aid in the elimination of substandard or blighted structures and areas in the downtown.

DTR resources are for the implementation of the project (i.e., physical improvements to the built environment); such funds become available to the applicant upon successful completion of the requirements of a downtown revitalization predevelopment/planning study. Because responsible, intelligent implementation arises from well-informed planning processes, if applicable the applicant must make available their DTR study prior to, or along with the application-

The primary objective for the DTR opportunity is funding projects meeting the CDBG national objective to aid in the prevention or elimination of slums or blight on an area (SBA). Activities proposed in applications for CDBG funding in the DTR opportunity may also meet the national objectives of benefitting low- and moderate-income persons (through the subcategories LMI Benefit as LMA on an Area Basis, LMC Limited Clientele, or SBS Slum/Blight on a spot basis).

1.2 | DTR Priority Activity

Eligible activities must be located within the downtown area. The Priority Activity for DTR is:

- a) **Commercial Rehabilitation (14E):** Rehabilitation of privately owned commercial property occupied by business tenants or the commercial property owner's business. *This activity is limited to exterior improvements (façade improvements). Interior improvements (e.g., electrical, plumbing, HVAC, etc.) are ineligible unless the activities address the correction of municipal code violations (i.e., public safety).*

ATTENTION: Public improvements, such as sidewalks or street improvements, cannot be combined into the priority activity of commercial rehabilitation. These are *separate* activities, and each must be reflected in the application budget as a separate budget line item.

1.3 | DTR Eligible Activities

Public facilities and improvements must support commercial rehabilitation and are not stand-alone activities. Following is a list of secondary activities:

- a) Acquisition of Real Property (01): Acquisition of real property that will be developed for a commercial purpose.
- b) Clearance and Demolition (04): Clearance or demolition of buildings/improvements, or the movement of buildings to other sites.
- c) Flood Drainage Improvements (03I): Acquisition, construction, or rehabilitation of flood drainage facilities. However, if stormwater management improvements are integral to another eligible CDBG activity like a street improvement activity, costs associated *should* be included in the street improvement activity rather than flood drainage improvements.
- d) Water/Sewer Improvements (03J): Installation or replacement of water lines, sanitary sewers, storm sewers, and fire hydrants. Costs of street reconstruction made necessary by water/sewer improvement activities are included under this activity.
- e) Street Improvements (03K): Installation or reconstruction of streets, street drains, storm drains, curbs and gutters.
- f) Sidewalks (03L): Improvements to sidewalks. (Only as a public safety improvement to meet American with Disability [ADA] Standards.) **For DTR, the sidewalks need to reside within the designated downtown district boundary.
- g) Other Public Improvements – Removal of Architectural Barriers (03Z)**⁶: Supporting Activities related to removal of architectural barriers that resist mobility and accessibility to sites/facilities.
- h) Construction Management: Costs related to compliance with Davis-Bacon and Related Acts (DBRA). Construction Management always supports the HUD Matrix Code activity with the greatest budgeted amount of CDBG funds.

Administration

- a) General Administration (21A): Overall administration, including (but not limited to) salaries, wages, and related costs of subrecipient staff or others engaged in grant management and implementation, monitoring, and evaluation.

1.4 | DTR Ineligible Activities

- a) Non-profit entities are not eligible for DTR funding.
- b) Rehabilitation of vacant or vacated commercial property as a speculative offering with no business tenant committed is not permitted.
- c) Repairing, operating, or maintaining eligible facility and infrastructure activities are ineligible.
- d) Refer to *Part II. Section 3.2 – Ineligible Activities*.

⁶ ***NOTE: Proceed with caution if using this activity and refer to CDBG Manual, Chapter 3 on National Objective eligibility.

1.5 | DTR Grant Amount and Matching Funds

| Downtown Revitalization – Key Minimums, Maximums, and Requirements | |
|--|---|
| Minimum CDBG Project Costs | \$250,000 |
| Maximum CDBG Project Costs | \$400,000 |
| General Administration | 10% of CDBG Project Costs not to exceed \$25,000 |
| Construction Management | \$10,000 |
| Local Matching Funds | 25% of CDBG Project Costs (excludes CDBG general administration and construction management.) |

1.6 | DTR Application Exhibits

The following exhibits are required for this opportunity unless otherwise noted:

| | | |
|-------------|---|--|
| Exhibit A | Notice of Public Hearing | |
| Exhibit B | Authorizing Resolution | |
| Exhibit C1 | Statement of Assurances and Certification | |
| Exhibit C2 | Citizen Participation Plan | |
| Exhibit D | Residential Anti-Displacement and Relocation Assistance Plan | |
| Exhibit E* | Low-and Moderate-Income (LMI) on an Area Basis: Current Census Data | Based on the National Objective(s), complete the corresponding exhibit(s). |
| Exhibit E1* | Low-and Moderate-Income (LMI) on an Area Basis: Census Income Survey & Certificate of Completion | |
| Exhibit E2* | Low-and Moderate-Income (LMI) on an Area Basis: Random Sample Income Survey & Certificate of Completion | |
| Exhibit E3* | Low-and Moderate-Income (LMI) on Limited Clientele | |
| Exhibit F1* | Aid in prevention or elimination of slums and blight (S/B) on an Area Basis (SBA) | |
| Exhibit F2* | Aid in prevention or elimination of slums and blight (S/B) on a Spot Basis (SBS) | |
| Exhibit K1a | Waiver of Procurement Process (Appointee) | if applicable |
| Exhibit K1b | Waiver of Procurement Process (Economic Development District) | if applicable |
| Exhibit K2 | Procurement Process Completed Prior to Application | If applicable |
| Exhibit L | Letters of Support | Required |
| Exhibit M | Map of Proposed Project Area | |
| Exhibit N | System for Awards Management Documentation | |
| Exhibit O | Four Factor Analysis Assessing Limited English Proficiency | |
| Exhibit P | Program Guidelines | |
| Exhibit Q | Budget and Local Cost-Share Documentation | |
| Exhibit R | Preliminary Project Description & Level of Review | |

1.7 | DTR Application Criteria

The matrix below summarizes each selection criteria as a numerical score within the DTR opportunity. The maximum number of points available within any application is 100 points. A minimum score of 30 points is required and some criteria require a minimum score as noted below.

| Selection Criteria Matrix – Downtown Revitalization (DTR) Opportunity | Maximum | Threshold Minimum |
|--|-------------------|-------------------|
| 1. Project Design | 40 | 16 |
| Overall Purpose and Identification of Need | 20 | |
| Project Impact – Goals & Objectives | 10 | |
| Planning and Implementation Processes | 10 | |
| 2. Project Readiness | 20 | 7 |
| 3. Business & Community Support | 20 | 7 |
| 4. Organizational Preparedness | 10 | - |
| 5. Achievements | 10 | - |
| Total points | 100 points | 30 points |
| On-Site Review <i>(Conducted at DED discretion. NOTE: No points awarded, in supplement of Application only.)</i> | | |

For each of the following sections, unless otherwise explicitly stated or an upload is requested, a project narrative must be provided directly into the GMS and additional information supplemented as noted within each individual criterion.

1) *Project Design*

Up to 40 points possible. Applicant must earn a minimum of 16 points to meet the threshold. This criterion describes how the proposed project addresses existing conditions as derived through processes completed as a part of the predevelopment planning process and/or prior implementation efforts. The project design narrative should include a summary of the overall scope of the project in relation to past, ongoing, and/or planned revitalization efforts.

A strong project design narrative should include a summary of the overall scope of the project in relation to past, ongoing, and/or planned revitalization efforts. This section should provide a clear nexus between the problem statement and outcomes described.

The application narrative shall be scored for clear and concise explanations of:

a) Overall Purpose and Identification of Need

The overall purpose should include references to existing, identifiable problems and conditions (i.e., a problem statement for which you are proposing a solution). Identify the current and existing conditions within the project location and overall community.

This section must include a summary of specific, concise information identifying:

- (1) Existing conditions of the *community*, including description of the overall character of the community as a whole.
- (2) Existing conditions of the *project location*, including description of the overall character of the project location specifically.
- (3) Overall *purpose* of the project in terms of the identified conditions.
- (4) UPLOAD: Project Need Overview. Include **photographs or images** of proposed properties (*limit upload to 5 pages*) that best illustrate and contextualize the project. Applicants are not required to upload photographs of all properties that may be eligible for or ultimately receive funding but should provide photographs that give a basis (i.e., frame of reference)

for the proposed project. For example: If the project is to improve a building, upload photographs of the building's front, back, side, side, and, if applicable, interior.

- NOTE: Uploaded content does *not* replace narrative and only supplements your written narrative.

b) Project Impact

This section includes concise definition of how the project fits into the applicant's overall revitalization effort (i.e., how you will define, measure, and accomplish success). Provide explanation of the following. This section will be answered in the GMS. *Limit each response to 1500 characters.*

- (1) Describe how the project fulfills the selected National Objective(s);
- (2) Describe how the applicant will define success (i.e., identify goals and objectives);
- (3) Describe how the applicant will track progress in measurable units, i.e., identify measurable outcome(s); and
- (4) Describe how accomplishments (within project implementation) will reduce or eliminate the need(s) and, if applicable, any plans to eliminate what needs remain.
- (5) Has the applicant completed a formal planning process addressing the project location?
 - If Yes, has the applicant adopted a Predevelopment Study/Downtown Revitalization Plan?
 - (i) Date of adoption.
 - (ii) Date of last update.
 - If No, provide an explanation. For example, if the plan is part of a broader Comprehensive Plan and/or an informal planning process occurred and a pre-development planning study specific to the downtown area was not conducted, describe what actions were taken and why a formal process did not occur.

c) Planning and Implementation

Provide a summary of the implementation process underway, identifying needs and priorities to be addressed within the proposed project, related background information and include a timeline for overall downtown revitalization efforts by identifying measurable benchmarks (dates of completed, underway or planned implementation). Benchmarks should include the following information as appropriate and applicable:

- (1) Process and completion of environmental review,
- (2) Completion of plans/specifications,
- (3) Securing any necessary permits and/or approvals,
- (4) Solicit construction bids (**NOTE: Do *not* enter into contracts until receiving environmental clearance and release of funds**),
- (5) Estimated construction start and completion dates, etc.
- (6) (*Supplemental*): Include an overview of the downtown revitalization/comprehensive plan by identifying the priorities and where projects were previously implemented, describe

the remaining needs and priorities to be addressed. Attaching portions of the planning document is not sufficient. This should include the date of the original planning process, and any updates as completed or planned. (Updates to the downtown revitalization plan may be formal or informal based on the nature of the update.) As it is supplemental to this criterion, applicants may cite specific items included within this overview in their narrative response.

(7) Will this project include land acquisition? (Yes or No)

(8) UPLOAD: Planning and Implementation Overview. *Limit upload to five pages.*

| | |
|---------------------------------|--|
| Points in this section include: | |
| 0 – 15 | Inadequately defined, below average compared to other applicants |
| 16 – 27 | Somewhat defined, project design is not fully articulated/understood |
| 28 – 40 | Well-defined, above average compared to other applicants |

2) *Project Readiness*

Up to 20 points possible. Applicants must earn a minimum of 7 points to meet threshold. This is a summary including the processes undertaken or underway to-date, (1) Identification of key collaborators (e.g., individuals, organizations, businesses, etc.); (2) Reasoning for selecting the proposed activities in terms of relative importance; and (3) Identification and summary of any past and/or concurrent efforts to resolve the problem(s).

A short description of prior and concurrent efforts related to the overall ability to complete the project. Narrative must convey applicant’s readiness and, if applicable, key collaborators. This section will be answered in the GMS. *Limit each response to 1500 characters.*

- a) Implementation strategy and role(s) key collaborator(s) (e.g., work plan for solutions to the problems/needs and impact as defined above)
- b) Financial and operational capacity of the community
- c) Has the applicant received a CDBG award for a similar/related project?
 - a. If Yes, what was the year of the most recent such award?
- d) What other non-CDBG resources (e.g., sales taxes, grants, foundations, etc.) will be used to complete the project?
 - a. Amount of secured funds (i.e., cash on-hand) as of the application submission.

| | |
|---------------------------------|---|
| Points in this section include: | |
| 0 – 6 | Inadequately defined, below average. Lack of local staff or ability to oversee the revitalization efforts from planning to the implementation of the project, no clear evidence of commitment to proceed with implementation, no evidence that code enforcement is in place. |
| 7 – 13 | Reasonably defined, average compared to other applicants. Local capacity demonstrated through past projects, past downtown and/or community improvement efforts, citizen participation, and strong evidence of a commitment to proceed with implementation of downtown revitalization plan; and code enforcement is in place. |
| 14 – 20 | Well-defined, above average. Significant local capacity demonstrated through past improvement efforts, citizen participation, and evidence of commitment to proceed with implementation of downtown revitalization plan; code enforcement in place; and strong evidence of interest groups, organizations, and/or demonstration of other such efforts dedicated to downtown development and revitalization. |

3) *Business & Community Support*

Up to 20 points possible. Applicant must earn a minimum of 7 points to meet threshold. Community involvement and participation is a fundamental part of any successful project and is required as part of the CDBG application process. Community surveys, town hall meetings, and/or interviews with community organizations, businesspersons, government officials and other community representatives are encouraged to determine perceived community needs. Public involvement should also be used to let residents know what needs were identified, how they were identified and to give residents an opportunity to respond to the proposed project. Existing capital improvement, comprehensive, economic development, housing, or other community development plans should be reviewed to determine if they reflect current conditions and goals or if there is a need to develop new goals and action plans. Special short-term committees can be asked to validate and/or update existing information.

The proposed project does not need to be the highest community priority. Often top-ranked needs can be addressed with other more appropriate local, state, or federal financial resources. Sometimes one of the community’s lower-ranked needs may address an issue that is a high priority for CDBG funds such as a project that will affect low- and moderate-income persons. Other times government and/or elected officials may be more aware of a need for which CDBG may be an appropriate resource than the general public. In this case, efforts should also be made to educate and inform the community about the need to build consensus and support to address the problem.

A strong narrative in this section identifies a significant number of businesses and/or partners contacted or otherwise engaged (i.e., included in the predevelopment/planning process) and clearly describes how the project will foster public and private sector partnerships for prioritized improvements to the downtown area. Applicant must include a summary of the noted support. This section will be answered in the GMS. *Limit each response to 1500 characters.*

- a) Business Community Support: Does this project affect area businesses (number of businesses)? Has the applicant reached out to those businesses that may be affected? Does the applicant have business “buy in”? Describe the level of capacity, commitment, and support.

- b) Resident Support: Does the applicant have resident “buy in”? Describe the level of capacity, commitment, and support.
- c) Community Leadership Support: the level of capacity, commitment, and support.
- d) Can the community show evidence of economic initiatives (ex. LB840, Historical Society), completing a business retention and expansion survey, or other viable fundraising efforts? Describe the Economic Initiatives.
- e) Would a visitor to your community describe the project location as “active”? (Yes or No)
 - i. If yes, provide brief explanation of events or other such programming that promotes and provides for residents and visitors gathering in the area (e.g., farmers market; annual sales; holiday, seasonal, or other festivals; etc.).
 - ii. If not, provide an explanation.
- f) Does the project involve **commercial rehabilitation** activities? (Yes or No)
 - i. If yes, is this a continuation of an existing Commercial Rehabilitation program? (Yes or No)
 - 1. If yes, is that program currently or formerly funded by CDBG funds? What is the most recent year of the CDBG award? (####)
 - 2. If not, what is the source of funding?
 - ii. If yes, in measurable units, provide a brief summary of its impact on overall revitalization.
 - iii. If yes, how many businesses have benefited to date from this program? (##)
 - iv. If yes, were any businesses denied benefit due to lack of available funds?
 - 1. If yes, provide an explanation (e.g., available funds exhausted already, ineligible activities proposed by business, etc.).
 - 2. If not, provide an explanation (e.g., funds were fully expended/interest exceeded resources, funds were moved into another activity, etc.)
 - v. If yes, what is the estimated total investment (including all sources) to date? (\$\$)
 - vi. If yes, what is the estimated total local matching/leveraged funds by area businesses? (\$\$)
 - vii. If yes, did the applicant solicit letters of intent and/or pre-apps to gauge interest in the program? Provide an explanation.
 - viii. If not, what evidence does the applicant have that the project will be successful if funded?
- g) Does the project involve **infrastructure** improvements (e.g., sidewalks, intersections, streets, public gathering space, etc.)? (Yes or No)
 - i. If yes, does the applicant own the affected property(-ies)?
 - ii. If not, does the applicant have an MOU with the current ownership?
- h) Does the project involve **sidewalks, intersections, and/or public gathering** space? (Yes or No)

- i. If yes, are the proposed improvements allow for ADA-accessibility?
- i) Are other formal or informal revitalization efforts complete, underway, or planned? (Yes or No)
Provide an explanation.
- j) Does the community have letters of support for the project?
 - i. If yes, complete Exhibit L.

| | |
|---------------------------------|--|
| Points in this section include: | |
| 0 – 6 | Inadequately defined, below average. No evidence or very little evidence from the general and business community that will commit resources and support downtown revitalization efforts. |
| 7 – 13 | Reasonably defined, average compared to other applicants. Some evidence from the general and business community to commit resources and support downtown revitalization efforts. |
| 14 – 20 | Well-defined, above average. Significant evidence from the general and business community that it will commit resources and support downtown revitalization efforts. |

4) *Organizational Preparedness*

Up to 10 points possible. No minimum points in this section are required to meet threshold. The community has a Redevelopment Authority or other downtown/business/community/economic development organization that is operational and functioning within the community.

- a) To receive points for this criterion, the applicant must upload a letter from the organization that verifies the presence of such organization in the community and provides a description of how the organization has played an active role throughout the downtown revitalization efforts. Moreover, the letter must describe how the organization, applicant community, and general public collaborate in terms of the proposed project.
- b) UPLOAD: Organization Preparedness Letter

| | |
|---------------------------------|---|
| Points in this section include: | |
| 0 | No organization established or inadequately defined, below average description |
| 5 | Organization established and reasonably defined; average description of preparedness compared to other applicants |
| 10 | Organization established and well-defined, above average |

5) *Achievements*

10 points possible. No minimum points in this section are required to meet threshold. Due to the nature of these programs, applicant may only earn points as an EDCC or LCC, not both. Applicant must demonstrate any of the following items at the time of application submittal, including:

- a) Applicant is designated as an Economic Development Certified Community, **10 points**.
 - a. For a complete list of communities and additional information, visit the DED website at: <https://opportunity.nebraska.gov/programs/community/edcc/>

- b) Applicant is designated as a DED Leadership Community, **10 points**.
 - a. For a complete list of communities and additional information, visit the DED website at: <https://opportunity.nebraska.gov/programs/community/lcc/>
- c) **UPLOAD:** Certifications or other documentation provided by DED that recognizes status (*Limit to 5 pages*)

6) *On-Site Review (optional)*

Conducted by DED staff, on-site reviews do not yield points independent of the application. This option is not a required part of the application process but may be completed at the department's discretion based upon activities proposed, risk analysis considerations, or other such factors.

Evaluation considerations include observation of dilapidating or substandard conditions; infrastructure in poor condition (e.g., deteriorating streets and sidewalks, accessibility issues, drainage problems, etc.); downtown structures in poor condition observable need of façade or public safety improvements; identification of moderate to significant **physical** or **economic** blight (e.g., more than 15% of the properties in the project area in a state of physical or economic blight); and a number of vacant buildings.

NOTE: For the purposes of DTR, the term “physical blight” includes deteriorated conditions, or states of disrepair, of downtown infrastructure, buildings, and other physical elements which detract from the overall appearance and identify of the downtown district. The physical blight adds to depressed property values and affects the ability to market and attract investment. “Economic blight” includes the existence of vacant, disinvested, or underutilized buildings, and parcels, which represents unrealized commercial potential and create a negative image of the downtown that harms efforts to attract new investment.

Opportunity 2: Economic Development (ED)

2.1 | ED Purpose

CDBG funds can be utilized for economic development projects. The objective of the Economic Development (ED) opportunity is to assist businesses which expand the state's economic base, and which create quality jobs primarily benefiting employees in the low- and moderate-income levels.

CDBG funds will be utilized within the Economic Development Priority Need by a UGLG for providing communities and counties with resources to assist for-profit businesses which expand the state's economic base, and which create quality jobs principally benefiting LMI employees and made available under the LMI CDBG National Objective criteria.

In addition, the CDBG State Revolving Loan Fund (RLF) objective is to provide adequate financing for local development to ensure Nebraska's economic prosperity and to use all resources in a timely manner. The State is responsible for ensuring that program income at the state and local levels is used in accordance with applicable federal laws and regulations. Program income for the state's program under the ED opportunity is regulated by the provisions of 24 C.F.R. §570.489(e).

During the Program Year, all activities proposed in applications for CDBG funding in the ED opportunity must meet the national objective of benefiting low- and moderate-income persons (through the subcategory LMI Jobs).

2.2 | ED Priority Activity

- a) Economic Development Direct Financial Assistance to For-Profit Business (18A): Financial assistance to private for-profit businesses to (for example) acquire property, clear structures, build, expand, or rehabilitate a building, purchase equipment, or provide operating capital. Forms of assistance include loans, and grants.

2.3 | ED Eligible Activities

- a) Acquisition of Real Property (01): Acquisition of real property that will be developed for a public purpose.
- b) Commercial Rehabilitation (14E): Rehabilitation of privately owned commercial property occupied by a business tenant or the commercial property owner's business. Rehabilitation of vacant or vacated commercial property as a speculative offering with no business tenant committed not permitted. *This activity is limited to exterior improvements (façade improvements). Interior improvements (e.g., electrical, plumbing, HVAC, etc.) are ineligible unless the activities address the correction of municipal; code violations (i.e., public safety).*
- c) Infrastructure Development (17B): Street, sewer, water, parking, or other improvements for commercial/industrial sites which are publicly owned and directly benefit a for-profit business that creates jobs. This activity also includes the installation of public improvements, such as the construction of streets to and through commercial/industrial areas.
- d) Construction and Rehabilitation (17C): Construction or rehabilitation of commercial or industrial buildings. Activities must be carried out by the subrecipient or by public or private non-profits.
- e) Construction Management: Costs related to compliance with Davis-Bacon and Related Acts (DBRA). Construction Management always supports the HUD Matrix Code activity with the greatest budgeted amount of CDBG funds.

Administration

- a) General Administration (21A): Overall administration, including (but not limited to) salaries, wages, and related costs of subrecipient staff or others engaged in grant management and implementation, monitoring, and evaluation.

2.4 | ED Ineligible Activities (Businesses *not* eligible for ED funding)

In addition to ineligible activities listed at *Part II. Section 3.2*, note these business types which are also *not* eligible for ED funding:

- a) Businesses that derive any revenues from gaming establishments and/or operations.
- b) Production agriculture enterprises. These are excluded because they lack the necessary requirement that there must exist extra levels of substantial and separately identifiable value-added processing being performed by employees of the production agriculture enterprise—beyond those tasks and activities of production, harvesting, and marketing normally associated with traditional agricultural production commodities. Examples of such ineligible enterprises (when they lack the extra value-added component) include grain farming, livestock raising, raising of poultry or the production of eggs, the production of milk, fruit or nut orchards, vegetable farming including hydroponics vegetable production, and aquaculture facilities.
- c) Trucking enterprises, which lack the requisite storage, warehousing, or distribution extra components which would distinguish them from the usual so-called "rolling stock" enterprises.
- d) Retail businesses or operations (eating and drinking establishments, commercial lodging, gas stations, commercial rest areas, and gift shops).

2.5 | ED Grant Amount and Matching Funds

| Economic Development – Key Minimums, Maximums, and Requirements | |
|---|---|
| Maximum CDBG Project Costs | \$1,000,000 |
| Minimum CDBG Project Costs | \$125,000 |
| General Administration | \$10,000 (flat amount) |
| Construction Management | \$5,000 |
| Local Matching Funds | 100% of CDBG Project Costs, i.e., 1:1 match |
| Public Benefit Standards per FTE – Max | \$35,000 |

2.6 | ED Application Thresholds

In addition to the application thresholds identified in *Part II. Section 5.4*, the following items apply.

****NOTE****: The business must have a “Pre-Application” and invitation from DED to apply. Please consult with the CDBG program representative if interested in applying for the ED opportunity.

Business and Financial Analysis documentation:

- Business plan-Business Strategy
- Resumes of key business personnel

- Business Financials: balance sheet, income statement, and cash flow statements (3 years historical/2 year pro forma)
- Guarantors' financial statements
- Project cost documentation, including vendor quotes or engineering estimates for equipment purchases
- Borrowing resolution authorizing business representative to borrow funds from the local government
- System Awards Management (SAM) documentation for business
- Environmental Review Record

2.7 | ED Application Exhibits

The following exhibits are required for this opportunity unless otherwise noted:

| | | |
|-------------|---|--|
| Exhibit A | Notice of Public Hearing | |
| Exhibit B | Authorizing Resolution | |
| Exhibit C1 | Statement of Assurances and Certification | |
| Exhibit C2 | Citizen Participation Plan | |
| Exhibit D | Residential Anti-Displacement and Relocation Assistance Plan | |
| Exhibit E* | Low-and Moderate-Income (LMI) on an Area Basis: Current Census Data | Based on the National Objective(s), complete the corresponding exhibit(s). |
| Exhibit E1* | Low-and Moderate-Income (LMI) on an Area Basis: Census Income Survey & Certificate of Completion | |
| Exhibit E2* | Low-and Moderate-Income (LMI) on an Area Basis: Random Sample Income Survey & Certificate of Completion | |
| Exhibit E3* | Low-and Moderate-Income (LMI) on Limited Clientele | |
| Exhibit E4* | Low-and Moderate-Income (LMI) Jobs | |
| Exhibit F1* | Aid in prevention or elimination of slums and blight (S/B) on an Area Basis (SBA) | |
| Exhibit F2* | Aid in prevention or elimination of slums and blight (S/B) on a Spot Basis (SBS) | |
| Exhibit K1a | Waiver of Procurement Process (Appointee) | if applicable |
| Exhibit K1b | Waiver of Procurement Process (Development District) | if applicable |
| Exhibit K2 | Procurement Process Completed Prior to Application | if applicable |
| Exhibit M | Map of Proposed Project Area | |
| Exhibit N | System for Awards Management Documentation | |
| Exhibit O | Four Factor Analysis Assessing Limited English Proficiency | |
| Exhibit Q | Budget and Local Cost-Share Documentation | |

2.8 | ED Application Criteria

The matrix below describes selection criteria as a numerical score for the Economic Development opportunity. The maximum number of points available within any application is 100 points. A minimum score of 25 points is required.

The scoring criteria includes: CDBG Funds Utilization; Community Impact and Investment; Business Factors; and Economic Development Certified Community. The Department’s PRC considers the following criteria, and uses the following scoring spectrum, when evaluating whether an application meets the minimum threshold requirement. Scoring 25 points is a necessary condition for further consideration; the minimum threshold is not the only determinate for a favorable recommendation submission by the PRC.

| Selection Criteria – Economic Development (ED) Opportunity | Maximum | Threshold Minimum |
|---|------------|-------------------|
| 1. CDBG Funding Utilization | 35 | - |
| 2. Community Impact and Investment | 30 | - |
| 3. Business Factors | 30 | - |
| 4. Economic Development or Leadership Certified Communities | 5 | - |
| Total Points | 100 | 25 |

CDBG Funding Utilization

Maximum, 35 Points

a) CDBG Funds Per Job Created/Retained

- \$35,000 or more = 0 points
- \$30,000 to <\$35,000 = 4 points
- \$25,000 to <\$30,000 = 8 points
- \$20,000 to <\$25,000 = 12 points
- \$15,000 to <\$20,000 = 16 points
- <\$15,000 = 20 points

b) CDBG Funding Compared to Total Project Funding (As %)

- 50% = 0 points
- 33% to <50% = 2 points
- 20% to <33% = 6 points
- <20% = 10 points

c) Aggregate Wages (And Benefits) Paid to Employees in Created Jobs within One Year Compared To CDBG Funds (As %)

- 100% or less = 0 points
- >100% to <125% = 2 points
- 125% or more = 5 points

Community Impact and Investment**Maximum, 30 Points**

a) *Location of community as more economically distressed than others, based on three broad location sectors:*

- Larger Community/County Locations? (Yes or No) = 10 points
Include: Beatrice, Columbus, Fremont, Hall County, Hastings, Kearney, Norfolk, North Platte, Scottsbluff/Gering, South Sioux City, Douglas County, Lancaster County, and Sarpy County
- Not one of the Larger Community Locations, but in the Interstate 80 Corridor? (Yes or No) = 20 points
- Is the location Rural (Encompassing All Locations Not Within The Two Location Sectors Above)? (Yes or No) = 30 points

Business Factors**Maximum, 30 Points**

a) *Owners' Equity in Project = 6 Points Possible*

- 10% Or Less = 0 points
- >10% To 20% = 2 points
- >20% To 33% = 4 points
- >33% = 6 points

b) *Loan Collateral and Loan Guarantees = 6 Points Possible*

- Unsecured, or a Junior Lien Position Offering Little Realizable Value = 0 points
- For the Spectrum In Between = 1-5 points
- Reasonably Secured as To Collateral Value and Liquidity, With Guarantees In Existence = 6 points

c) *Established Business, Or Business Start-Up = 6 Points Possible*

- Start-Up Business with All the Usual Risks of Failure = 0 Points
- Established Business with Negative Trends = 3 Points
- Established Business with Positive Trends = 6 Points

d) *Duration of Commitment to Maintaining the Created/Retained Jobs = 2 Points Possible*

- Committing to maintaining only for the minimum required by the Department's guidelines = 0 points
- Committing to substantially more than the minimum = 2 points

e) *Other = 10 Points Possible*

- Owner's Equity in Project

- Loan Collateral and Loan Guarantees:
 - Unsecured, or a Junior Lien Positioning Offering Little Realizable Value
 - For the Spectrum In Between
 - Reasonable Secured as To Collateral Value and Liquidity, With Grantees in Existence
- Established Business, or Start Up Venture
 - Start Up Venture with all the Usual Risks of Failure
 - Established Business, but with Negative Trends
 - Established Business with Positive Trends
- Duration of Commitment to Maintaining the Created/Retained Jobs
 - Committed to maintaining only for the minimum required by the Department’s guidelines
 - Committed to sustaining more than the minimum

Economic Development/Leadership Certified Community

Maximum, 5 Points

Points will be awarded in this section for applicants that are designated as:

- 1) The applicant is designated as an Economic Development Certified Community, **5 points**.
For a complete list of communities and additional information, visit the DED website at: <https://opportunity.nebraska.gov/programs/community/edcc/>
- 2) The applicant is designated as a DED Leadership Community, **5 points**.
For a complete list of communities and additional information, visit the DED website at: <https://opportunity.nebraska.gov/programs/community/lcc/>
- 3) Upload: Certifications or other documentation provided by DED that recognizes status (*Limit to 5 pages*)

Underwriting & Decision-Making Criteria

The Housing and Community Development Act (HCDA) and HUD’s CDBG regulations outline basic project “underwriting” guidelines/standards so that state programs administering federal CDBG funds will achieve the federal objectives of the CDBG program. The underwriting standards—the decision-making criteria used in the Nebraska CDBG ED opportunity are designed to address these federal guidelines.

The federal CDBG guidelines, as applied by the Department, may be summarized as follows:

- 1) **Project costs must be reasonable**, not excessive, and must be supported by cost analyses. Transactions must be carried out through arm’s length transactions, not insider arrangements.
- 2) All proposed **sources of financing necessary to carry out the project must be committed**. This ensures that time and effort is not wasted on assessing proposals, or awarding funds to projects that are not in a position to proceed to project completion within a reasonable time. To fulfill this requirement, the department requires a written verification affirming the various funding parties’ intentions to make funds available, and, depending on the nature of the funding party, a showing of their capacity to actually provide such funds.

- 3) To the extent practicable, **CDBG funds are not to be substituted for other funds**. This standard requires a financial underwriting analysis of the project. The level of analysis will vary with the nature and complexity of the project. Since projects in this opportunity provide financing for for-profit businesses, appropriate levels of private source financing (e.g., bank loans) are expected to be present, and equity participation in the project must be sufficient given the financial capacity of those owning the enterprise.
- 4) The **financial feasibility of the project** includes a public benefit. The public benefit expected from the investment of CDBG funds is the creation and maintenance of LMI jobs. That benefit will not materialize if the project is not financially feasible.
- 5) Avoidance of providing an **unreasonable return on investment to the owner** of the project. The availability of noninterest bearing loans and forgivable loans to for-profit businesses presents a potential for this to occur which must be addressed in analyzing, and in judging the merits of, each project.
- 6) To the extent practicable, **CDBG funds should be disbursed on a pro rata basis** with other project funding sources. CDBG money cannot be the first money into a project but rather should flow into a project in proportion to other project funding sources.

Part 5: Project Financing and Use of Loan Proceeds

- 1) CDBG Local Program Income
- 2) Financial Institution
- 3) Other Federal Sources
- 4) Total from Other Sources
- 5) Equity Injection
- 6) Total Financing Amount
- 7) Total Financing Annual Dept Services

Part 6: Pre-Application Upload

- 1) UPLOAD: Completed Pre-Application

Part 7: Project Income Certification

A template is provided on the CDBG website.

- 1) Does the city, village or county have CDBG Economic Development Program Income Revolving Load Funds (or “Re-use” funds)? (Yes or No)
- 2) Beginning Balance (account balance to date): (\$\$\$)
- 3) Total Committed Funds Not Yet Disbursed (\$\$\$)
- 4) Uncommitted Funds on Hands (\$\$\$)
- 5) UPLOAD: Completed Program Income Certification

Part 8: Employee Certification Form

Job categories must conform to the Economic Development Administration (EDA) job category descriptions (as shown). This category will agree with the proposed job creation summary found in Exhibit E4.

The Employee Certification form is a template (available in the CDBG Resource Library <https://opportunity.nebraska.gov/programs/community/cdbg/cdbg-resource-library/>) that will ultimately be provided by the business to every job applicant for the prospective employee's completion. Here, it should be pre-filled as much as is possible by the business (for future reuse with every job creation applicant) to include the applicable community LMI income levels for the current year. This form is:

- a “self-certification” form that is used to determine a household’s status as a low-to-moderate income household.
- used to survey existing employees in a “retained” jobs situation.

This form is to be completed and signed at the time of job application at the benefitted business by each prospective job applicant. Upload this form and duplicate for use when interviewing job applicants. Business and UGLG must keep on file to document LMI status of each job applicant, and the UGLG must maintain a file copy of all certifications.

- 1) Does the project include national objective LMJ? (Yes or No)
- 2) UPLOAD: Business-specific, pre-filled, reusable Employee Certification Form

Part 9: Economic Development Documentation

Upload Business and Financial Analysis documentation, if applicable:

- Business plan-Business Strategy
- Resumes of key business personnel
- Business financials: balance sheet, income statement, and cash flow statements (3 years historical/2 year pro forma)
- Guarantors' financial statements Project cost documentation, including vendor quotes or engineering estimates for equipment purchases
- Borrowing resolution authorizing business representative to borrow funds from the local government
- Environmental Review Record

Opportunity 3: Planning (PP)

3.1 | PP Purpose

CDBG funds can be utilized for planning projects. The purpose of the Planning (PP) funding opportunity is to provide communities with the opportunity to solve problems and meet citizen needs through an integrated community planning process that assesses community development needs, develops options for meeting those needs, and packages work plans or otherwise carries out strategic processes that provide the framework for successful projects directing resources toward State priorities.

Successful efforts shall involve strategic planning, implementation, monitoring, and evaluation. The outcome of a successful planning process will ultimately provide information and data that will be used in future planning and implementation efforts. Successful projects arise from effective efforts to involve stakeholders and gain their support throughout the process.

Priority is given to projects that benefit low- and moderate-income persons.

3.2 | PP Priority Activities

- a) Planning (20A): Includes, but not limited to the development of Comprehensive Plans, Community Development Plans, downtown redevelopment studies, Energy strategies, Capacity building, Environmental studies, Area neighborhood plans, Functional plans, etc.

3.3 | PP Eligible Activities

- a) General Administration (21A): Overall administration, including (but not limited to) salaries, wages, and related costs of subrecipient staff or others engaged in grant management and implementation, monitoring, and evaluation.

3.4 | PP Ineligible Activities

- a) Planning and capacity building activities do *not* include engineering, architectural, and design costs related to a specific project (for example, detailed engineering specifications and working drawings); or other costs of implementing plans.
- b) Refer to *Part II. Section 3.2* for other Ineligible Activities.

3.5 | PP Grant Amount and Matching Funds

| Planning – Key Minimums, Maximums, and Requirements | |
|--|--|
| Minimum CDBG Project Cost | \$20,000 |
| Maximum: Individual Community, CDBG Project Costs | \$50,000 |
| Maximum: Multi-Jurisdictional/Countywide, CDBG Project Costs | \$70,000 |
| General Administration | 10% of CDBG Project Costs not to exceed \$3,000 |
| Match | <ul style="list-style-type: none"> ▪ Villages: 10% of CDBG Project Costs ▪ Second Class Cities: 20% of CDBG Project Costs ▪ Counties: 25% of CDBG Project Costs ▪ First Class Cities: 30% of CDBG Project Costs ▪ Multi-Jurisdictional: Match is determined by the classification of UGLG participating in the application. |

3.6 | PP Application Exhibits

The following exhibits are required for this opportunity unless otherwise noted:

| | | |
|-------------|---|--|
| Exhibit A | Notice of Public Hearing | |
| Exhibit B | Authorizing Resolution | |
| Exhibit C1 | Statement of Assurances and Certification | |
| Exhibit C2 | Citizen Participation Plan | |
| Exhibit D | Residential Anti-Displacement and Relocation Assistance Plan | |
| Exhibit E* | Low-and Moderate-Income (LMI) on an Area Basis: Current Census Data | Based on the National Objective(s), complete the corresponding exhibit(s). |
| Exhibit E1* | Low-and Moderate-Income (LMI) on an Area Basis: Census Income Survey & Certificate of Completion | |
| Exhibit E2* | Low-and Moderate-Income (LMI) on an Area Basis: Random Sample Income Survey & Certificate of Completion | |
| Exhibit E3* | Low-and Moderate-Income (LMI) on Limited Clientele | |
| Exhibit F1* | Aid in prevention or elimination of slums and blight (S/B) on an Area Basis (SBA) | |
| Exhibit K1a | Waiver of Procurement Process (Appointee) | if applicable |
| Exhibit K1b | Waiver of Procurement Process (Development District) | if applicable |
| Exhibit K2 | Procurement Process Completed Prior to Application | if applicable |
| Exhibit M | Map of Proposed Project Area | |
| Exhibit N | System for Awards Management Documentation | |
| Exhibit O | Four Factor Analysis Assessing Limited English Proficiency | |
| Exhibit Q | Budget and Local Cost-Share Documentation | |
| Exhibit R | Preliminary Project Description & Level of Review | |

3.7 | PP Application Criteria

The matrix below describes each selection criteria as a numerical score for the Planning opportunity. The maximum number of points available within any application is 100 points. A minimum score of 30 points is required and some criteria require a minimum score as noted below.

| Selection Criteria Matrix – Planning (PP) Opportunity | | Points Possible | Threshold Minimum |
|---|-------------------------------------|-----------------|-------------------|
| 1. Project Need | | 30 | 10 |
| | Overall Purpose of Project | 20 | |
| | Capacity and commitment | 5 | |
| | Past efforts | 5 | |
| 2. Project Impact | | 30 | 10 |
| | Goals and objectives | 10 | |
| | Community Impact | 10 | |
| | Accomplishment in measurable units | 5 | |
| | Alternatives considered | 5 | |
| 3. Project Readiness | | 30 | 10 |
| | Planning activities and methodology | 30 | |
| 4. Community Support | | 10 | - |
| Total Points | | 100 | 30 |

For each of the following sections, unless otherwise explicitly stated or an upload is requested, a project narrative must be provided directly into the GMS and additional information supplemented as noted within each individual criterion.

1) Project Need

Up to 30 points is possible. A minimum of 10 points in this section is required to meet threshold. Community involvement and participation is a fundamental part of any community needs-assessment process and is required as part of the CDBG application process. Provide explanation of the following. This section will be answered in the GMS. *Limit each response to 1,300 characters.*

- a) **Overall Purpose**
 - i) Describe the plan and include the existing or imminent problem based on existing, identifiable problems, and conditions.
 - ii) How would the plan address it?
 - iii) How were the problems determined?
 - iv) If this project is to address disaster mitigation, please explain.
- b) **Capacity and Commitment**
 - i) How is the community prepared to undertake this project?
 - ii) What is the community committing to, regarding this project?
- c) **Past Efforts**
 - i) What has the community done previously to resolve the problem stated above?
 - ii) Has the community completed any formal or informal planning efforts to resolve the problem? (Yes or No)

(1) If yes, please explain the formal or informal planning efforts.

| | |
|---------------------------------|--|
| Points in this section include: | |
| 0 – 9 | Inadequately defined, below average |
| 10 – 20 | Reasonably defined, average compared to other applicants |
| 21 – 30 | Well-defined, above average |

2) *Project Impact*

Up to 30 points possible. A minimum of 10 points in this section in order to meet threshold. Provide explanation of the following. This section will be answered in the GMS. *Limit each response to 1,300 characters.*

- a) **Goals & Objectives.** NOTE: The goal is the ultimate end point. The objectives are precise actions/steps taken to get there – i.e. specific, measurable, tangible.
 - i) If awarded, describe the community’s goal for the project.
 - ii) Describe what objectives will be set to ensure project success.
- b) **Community Impact**
 - i) How will this project impact the community?
 - ii) Describe the importance of project activities to the community and provide clarity on how the project will benefit those identified by a CDBG National Objective.
 - iii) How will this project impact LMI individuals within the community, specifically?
- c) **Accomplishment**
 - i) Will the community impact be measurable? (Yes or No)
 - ii) If yes, explain the degree to which the accomplishments within project implementation (after plans have been completed) will reduce or eliminate the need(s).
 - iii) How does the community plan to eliminate what needs remain?
- d) **Alternatives**
 - i) Other than CDBG, were any alternative resources considered? (Yes or No)
 - ii) If yes, explain which ones and rationale for selection.

| | |
|---------------------------------|--|
| Points in this section include: | |
| 0 – 9 | Inadequately defined, below average |
| 10 – 20 | Reasonably defined, average compared to other applicants |
| 21 – 30 | Well-defined, above average |

3) *Project Readiness*

Up to 30 points possible. A minimum of 10 points in this section to meet threshold. Preference is given to projects that demonstrate a comprehensive approach. Provide explanation of the following. This section will be answered in the GMS. *Limit response to 1,100 characters.*

a) Planning & Methodology.

This would be your strategy. A strategy is how one plans to achieve their objectives and goals (i.e., the programs, initiatives, schedules, etc.). Describe the planning activities and methodology (e.g. work plan) for achieving the goals and objectives as outlined under the Project Impact section. This narrative should list and describe the activities and tasks, time frames, products, or outcomes, and key parties responsible for completing each activity.

| | |
|---------------------------------|--|
| Points in this section include: | |
| 0 – 9 | Inadequately defined, below average |
| 10 – 20 | Reasonably defined, average compared to other applicants |
| 21 – 30 | Well-defined, above average |

4) *Community Support*

Up to 10 points possible. There is no minimum threshold. Describe the citizen participation process, specifically outlining how broad-based community involvement and awareness has and/or will be utilized throughout the project and any related timelines. This section will be answered in the GMS. *Limit response to 1,100 characters.*

| | |
|---------------------------------|--|
| Points in this section include: | |
| 0 – 3 | Inadequately defined, below average |
| 4 – 7 | Reasonably defined, average compared to other applicants |
| 8 – 10 | Well-defined, above average |

Opportunity 4: Public Works – Facilities (PWF)

4.1 | PWF Purpose

The purpose of the Public Works-Facilities (PWF) opportunity is to provide for a broad range of investments to communities investing in effective and affordable facilities that address strategic long-term developments. This opportunity recognizes the importance of the availability and condition of community facilities. Funded projects shall develop the state’s communities and counties by providing residents with basic facilities with the opportunity to maximize energy efficiency and provide a suitable living environment.

During the Program Year, all activities proposed in applications for CDBG funding in the PW - Facilities opportunity must meet the national objective of benefitting low-and moderate-income persons (through the subcategories LMI Area Benefit and/or LMI Limited Clientele).

4.2 | PWF Priority Activities

Childcare centers; community centers; and senior centers; accredited public libraires; fire/rescue buildings (including fire trucks); neighborhood parks; tornado-safe shelters; removal of architectural barriers; etc.

Public Facilities and Improvements

Note: CDBG funds that are requested for public facility projects must meet the “residential in character” requirement per 24 CFR §570.483(b)(1)(i).

- a) Acquisition of Real Property (01): Acquisition of real property that will be developed for a public purpose. This activity **cannot** be a standalone eligible activity.
- b) Clearance and Demolition (04): Clearance or demolition of buildings/improvements, or the movement of buildings to other sites. This activity **cannot** be a standalone eligible activity.
- c) Senior Centers (03A): Acquisition, construction, or rehabilitation of a facility to be used by seniors (individuals 62 or older).
- d) Facilities for Persons with Disabilities (03B): Acquisition, construction, or rehabilitation of centers, group homes, and other facilities (except permanent housing) for persons with disabilities.
- e) Homeless Facilities (03C): Acquisition, construction, conversion of buildings, or rehabilitation of temporary shelters and transitional housing for the homeless, including victims of domestic violence, dating violence, sexual assault or stalking, disaster victims, runaway children, drug offenders, and parolees.
- f) Youth Centers (03D): Acquisition, construction, or rehabilitation of facilities intended primarily for young people aged 13 to 19. These include playgrounds and recreational facilities that are part of a youth center.
- g) Neighborhood Facilities (03E): Acquisition, construction, or rehabilitation of facilities that are principally designed to serve a neighborhood (ex. community center, libraries, etc.) and that will be used for social services or for multiple purposes (including recreation).
 - i) Libraries: Libraries constructed must be accredited through the Nebraska Public Library Accreditation program (<http://nlc.nebraska.gov/LibAccred/Standings.asp>).

- h) Parks, Recreational Facilities (03F): Development of open space areas or facilities intended primarily for recreational use. (Priority will **not** be given to seasonal facilities, i.e. swimming pools, splash pads, etc.).
- i) Child Care Centers (03M): Acquisition, construction, or rehabilitation of facilities intended primarily for children aged 12 and under.
- j) Fire Stations/Equipment (03O): Acquisition, construction, or rehabilitation of fire stations and/or the purchase of fire trucks and emergency fire rescue equipment.
- k) Health Facilities (03P): Acquisition, construction, or rehabilitation of physical or mental health facilities. Examples of such facilities include neighborhood clinics, hospitals, nursing homes, and convalescent homes.
- l) Other Public Improvements – Removal of Architectural Barriers (03Z)**⁷: Supporting Activities related to removal of architectural barriers that resist mobility and accessibility to sites/facilities.
- m) Non-Residential Historic Preservation (16B): Rehabilitation of historic buildings for non-residential use. Examples include the renovation of an historic building for use as a neighborhood facility, as a museum, or by a historic preservation society.
- n) Tornado Shelters Serving Private Mobile Home Parks (23): Construction or improvement of tornado-safe shelters for residents of manufactured housing parks. The construction of tornado shelters may be carried out in neighborhoods that may or may not contain a manufactured housing park, provided such a neighborhood contains not less than 20 manufactured housing units and the shelter is available to the manufactured housing residents.

4.3 | PWF Eligible Activities

- a) Construction Management: Costs related to compliance with Davis-Bacon and Related Acts (DBRA). Construction Management supports the HUD Matrix Code activity for CDBG facility or infrastructure greatest amount CDBG funds budgeted.
- b) General Administration (21A): Overall administration, including (but not limited to) salaries, wages, and related costs of subrecipient staff or others engaged in grant management and implementation, monitoring, and evaluation.

4.4 | PWF Ineligible Activities

- a) For infrastructure, verify that the project is “residential in character”. If the project is *not* residential in character, the project is **ineligible**.
- b) Buildings used for general government conduct (city/village halls, court houses, etc.), general government expenses, facilities and equipment used primary for political purposes, etc.
- c) Ambulances are ineligible.
- d) The general rule is that any expense associated with repairing, operation, or maintaining public facilities, improvements and services is ineligible.
- e) Refer to *Part II. Section 3.2* for other Ineligible Activities.

⁷ *****NOTE:** Proceed with caution if using this activity and refer to CDBG Manual, Chapter 3 on National Objective eligibility.

4.5 | PWF Grant Amount and Matching Funds

| Public Works – Key Minimums, Maximums, and Requirements | |
|---|--|
| Minimum CDBG Project Costs | \$250,000 |
| Maximum CDBG Project Costs | \$600,000 |
| General Administration (maximum) | 10% of CDBG Project Costs not to exceed \$25,000 |
| Construction Management (maximum) | \$5,000 |
| Match | <ul style="list-style-type: none"> ▪ Villages: 10% of CDBG Project Costs ▪ Second Class Cities: 20% of CDBG Project Costs ▪ Counties: 25% of CDBG Project Costs ▪ First Class Cities: 30% of CDBG Project Costs ▪ Multi-Jurisdictional: Match is determined by the classification of UGLG participating in the application. |

4.6 | PWF Application Exhibits

The following exhibits are required for this opportunity unless otherwise noted:

| | | |
|-------------|---|--|
| Exhibit A | Notice of Public Hearing | |
| Exhibit B | Authorizing Resolution | |
| Exhibit C1 | Statement of Assurances and Certification | |
| Exhibit C2 | Citizen Participation Plan | |
| Exhibit D | Residential Anti-Displacement and Relocation Assistance Plan | |
| Exhibit E* | Low-and Moderate-Income (LMI) on an Area Basis: Current Census Data | Based on the National Objective(s), complete the corresponding exhibit(s). |
| Exhibit E1* | Low-and Moderate-Income (LMI) on an Area Basis: Census Income Survey & Certificate of Completion | |
| Exhibit E2* | Low-and Moderate-Income (LMI) on an Area Basis: Random Sample Income Survey & Certificate of Completion | |
| Exhibit E3* | Low-and Moderate-Income (LMI) on Limited Clientele | |
| Exhibit K1a | Waiver of Procurement Process (Appointee) | if applicable |
| Exhibit K1b | Waiver of Procurement Process (Development District) | if applicable |
| Exhibit K2 | Procurement Process Completed Prior to Application | if applicable |
| Exhibit L | Letters of Support | if applicable |
| Exhibit M | Map of Proposed Project Area | |
| Exhibit N | System for Awards Management Documentation | |
| Exhibit O | Four Factor Analysis Assessing Limited English Proficiency | |
| Exhibit Q | Budget and Local Cost-Share Documentation | |
| Exhibit R | Preliminary Project Description & Level of Review | |

4.7 | PWF Application Criteria

The matrix below describes each selection criteria as a numerical score within the PWF opportunity. The maximum number of points available within any application is 100 points. A minimum score of 40 points is required and some criteria require a minimum score as noted below.

| Selection Criteria Matrix – Public Works Facilities (PWF) Opportunity | Maximum | Threshold Minimum |
|---|-------------------|-------------------|
| 1. Need & Extent of the Problem | 20 | 10 |
| 2. Community Support | 20 | 10 |
| 3. Project Impact | 20 | 10 |
| 4. Project Readiness | 20 | 10 |
| 5. Coordination with Other Funding Sources | 10 | - |
| 6. Achievements | 10 | - |
| Total | 100 points | 40 points |

For each of the following sections, unless otherwise explicitly stated or an upload is requested, a project narrative must be provided directly into the GMS and additional information supplemented as noted within each individual criterion.

1. Need & Extent

Up to 20 points is possible. A minimum of 10 points in this section is required to meet threshold. This section gives the applicant an opportunity to describe the need for the project based on existing, identifiable problems and conditions; how that project will meet an essential community development need or imminent problem; and how/why the project will improve the viability of the community. The section also allows the applicant to identify any past formal or informal efforts to resolve the problem. Provide explanation of the following. This section will be answered in the GMS. *Limit each response to 4,500 characters.*

- a) Provide documentation of the need, cause of the problem, how long the problem has existed and how the problem affects the community. Document the urgency of the problem and if any state/federal regulations are being violated. Provide factual information that illustrates the severity of identified problems in the community.
- b) UPLOAD: Include photographs, as applicable.
- c) Describe the importance of this project need as compared to total community needs.
- d) Describe past efforts from the previous 5 years to address the community's overall needs. This includes the proposed project as well as any other city activities such as street improvements, water/sewer improvements, senior center, ADA, etc.
- e) Summarize the alternative solutions that were examined to address the need above, including a financial analysis of all the proposed solutions (for example, if other solutions were too expensive, maintenance and upkeep costs are too high, etc.). State why the solution was chosen and the reasoning behind the choice.
- f) Has there been a formal study/report completed that recommends the proposed solution? If so, who completed it and when?
- g) UPLOAD: The formal study/report completed that recommends the proposed solution.

A strong narrative in this section will provide a clear nexus between the problem statement and outcomes described.

| | |
|---------------------------------|--|
| Points in this section include: | |
| 0 – 9 | Inadequately defined, below average |
| 10 – 14 | Reasonably defined, average compared to other applicants |
| 15 – 20 | Well-defined, above average |

2. Community Support

Up to 20 points is possible. A minimum of 10 points is required in this section to meet threshold. This section gives the applicant an opportunity to describe the citizen participation process that helped to determine the needs in the community, and how citizens were afforded the opportunity to participate in the assessment of the identified local need for the project. Provide explanation of the following. This section will be answered in the GMS. *Limit each response to 4,500 characters.*

- a) Were the community’s citizens (including LMI citizens), requested and encouraged to participate in the assessment of community issues, problems and needs; the identification of potential solutions; and priority to such issues, problems and needs identified in the “Need & Extent of the Problem” above?
 - If so, describe the process – e.g., a community needs assessment/survey, public meetings to discuss needs and/or outcomes, complaints regarding the problems (for example, potholes, etc.). Include dates of each activity. If a community needs assessment was conducted (in-person, US mail or on-line), include the response rate. For public meetings, include the number of attendees.
- b) UPLOAD: Community Needs Assessment/Survey or other data that show citizen participation
- c) Has the community developed a priority list using needs assessment, survey, public meetings, a 1- and 5-year Action Plan, etc.? (Yes or No) Describe the priority list.
- d) Provide a record of conducting other community, housing and economic development efforts with significant citizen involvement within the last 5 years that address items on the community’s priority list as well as other efforts – for example, a comprehensive plan, housing study, a capital improvement plan, LB840, a business retention and expansion survey, or other fundraising efforts.

| | |
|---------------------------------|--|
| Points in this section include: | |
| 0 – 9 | Inadequately defined, below average |
| 10 – 14 | Reasonably defined, average compared to other applicants |
| 15 – 20 | Well-defined, above average |

3. Project Impact

Up to 20 points possible. A minimum of 10 points is required in this section in order to meet threshold. This section gives the applicant the opportunity to describe the importance of project activities to the community and provide clarity on how the project will benefit those identified by a CDBG National Objective. For this criterion, it is necessary to create a nexus between the project need and the project outcomes as proposed. Provide explanation of the following. This section will be answered in the GMS.

Limit each response to 4,500 characters.

a) Project Benefit

- a. How will the completed activities benefit the community? Include discussion about how it will benefit low-and moderate-income (LMI) persons.
- b. Describe the proposed project outcome in measurable units, the degree to which these accomplishments within project implementation will reduce or eliminate the need(s), and any plans to eliminate what needs remain (if any). Include financial information, if applicable (for example, if maintenance costs are expected to decrease, those costs can then go towards a different community need, etc.).
- c. If the project targets a certain population, provide an explanation and the importance of the project for the targeted benefits.

b) Project Area

- a. Describe the characteristics of the surrounding area of the proposed project (i.e. residential, commercial, industrial, etc.) and how the project meets the requirement of “residential in character” per 24 CFR §570.483(b)(1)(i). For example, how many businesses or residences are located in or near the proposed project area?

c) Program Goals

- a. Briefly explain how the project scope is consistent with the goals and objectives of one or more adopted/approved community long-range plans, such as a Comprehensive Plan, Community Redevelopment Plan, Capital Improvements Plan, Strategic Plan, etc., if applicable.

d) Project Eligibility

- a. Describe how your project does **not** involve repair, operating or maintenance expenses.
 - i. The general rule is that any expense associated with repairing, operation, or maintaining public facilities, improvements and services is **ineligible** (see *Part II. Section 3.2 – Ineligible Activities*).

| | |
|---------------------------------|--|
| Points in this section include: | |
| 0 – 9 | Inadequately defined, below average |
| 10 – 14 | Reasonably defined, average compared to other applicants |
| 15 – 20 | Well-defined, above average |

4. *Project Readiness*

Up to 20 points possible. A minimum of 10 points is required in this section to meet threshold. This section gives the applicant the opportunity to describe prior and concurrent efforts related to the overall planning strategy; a workplan for solutions to the problems/needs and impact as defined above; project readiness; and financial and operational capacity of the community and demonstrate the capacity and commitment to successful completion of the project.

Provide explanation of the following. This section will be answered in the GMS system. *Limit each response to 4,500 characters.*

- a) Project Planning
 - a. Describe the degree to which the applicant is ready to proceed with the project. The response should describe the applicant’s capacity and commitment to successfully implement change and to complete the project.
 - b. Describe the project specific roles and responsibilities and the knowledge/experience of individual key staff members in planning, managing, and implementing projects in accordance with the work-plan/narrative schedule.
 - c. If the project is awarded funding, describe how the UGLG will ensure that the special conditions and environmental review record (ERR) are submitted within ninety (90) days of the notice of award (NOA).
- b) Project Costs
 - a. Describe any previous fund-raising efforts (if applicable) that helped to raise awareness of the project and raised funds that will be utilized as match for the project.
 - b. Have Davis-Bacon wage rates been considered in cost estimates?
- c) Project Description
 - a. Are there any known environmental concerns that would delay the project?
 - (a) If yes, explain the environmental concerns.
 - b. Does the applicant currently own the associated land? (Yes or No)
 - (a) If land is yet to be purchased, does the applicant have ownership of the land or have an “option to purchase” the land? (Yes or No)
 - (i) If Not: provide explanation.
 - (ii) If Yes: UPLOAD documentation as necessary.
- d) Project Support
 - a. Does the community have letters of support for the project?
 - (a) If yes, complete Exhibit L.

| | |
|---------------------------------|--|
| Points in this section include: | |
| 0 – 9 | Inadequately defined, below average |
| 10 – 14 | Reasonably defined, average compared to other applicants |
| 15 – 20 | Well-defined, above average |

5. Coordination with Other Funding Sources

Up to 10 points possible. There is no minimum threshold. This section gives the applicant the opportunity to describe prior and concurrent efforts related to the overall planning and fundraising for the project. An overall planning strategy is beneficial to bring multiple funding sources to a potential project and therefore allowing a more comprehensive approach to address the identified community needs.

There are a variety of funding sources that are available to a community. Some might include (but are not limited to) the United States Department of Agriculture (USDA) Community Facilities Program, USDA Rural development (various programs), local resources (including community foundations), the Nebraska Community Foundation, as well as any local fund-raising efforts that have taken place. Provide explanation of the following. This section will be answered in the GMS. *Limit each response to 4,500 characters.*

- a) Describe the efforts made by the community to secure additional funding for the proposed project. In the narrative, identify the funding sources contacted.
- b) Were efforts successful?
 - a) Yes, complete Exhibit Q.
 - b) No

| | |
|---------------------------------|--|
| Points in this section include: | |
| 0 – 3 | Inadequately defined, below average |
| 4 – 7 | Reasonably defined, average compared to other applicants |
| 8 – 10 | Well-defined, above average |

6. Achievements

Up to 10 points possible. There is no minimum threshold. Due to the nature of these programs, applicant may only earn points as an EDCC or LCC, not both. The applicant must demonstrate any of the following items at the time of application submittal, including:

- a) Applicant is designated as an Economic Development Certified Community, **10 points**.
For a complete list of communities and additional information, visit the DED website at: <https://opportunity.nebraska.gov/programs/community/edcc/>
- b) Applicant is designated as a DED Leadership Community, **10 points**.
For a complete list of communities and additional information, visit the DED website at: <https://opportunity.nebraska.gov/programs/community/lcc/>
- c) UPLOAD: Certifications or other documentation provided by DED that recognizes *status* (*Limit to 5 pages*)

7. Supplemental Materials (optional)

Depending on the nature and scope of the project activities proposed, the following information may be submitted to support the application:

- a) UPLOAD: Facility Floor Plan.

Opportunity 5: Public Works — Infrastructure (PWI)

5.1 | PWI Purpose

The purpose of the Public Works-Infrastructure (PWI) opportunity is to provide for a broad range of investments to communities investing in effective and affordable infrastructure that address strategic long-term developments. This opportunity recognizes the importance of the availability and condition of infrastructure. Funded projects shall develop the state's communities and counties by providing residents with basic infrastructure with the opportunity to maximize energy efficiency and provide a suitable living environment.

During the Program Year, all activities proposed in applications for CDBG funding in the PW - Infrastructure opportunity must meet the national objective of benefitting low-and moderate-income persons (through the subcategories LMI Area Benefit and LMI Limited Clientele).

Note: Public Works projects that are eligible for funding for **water/wastewater** are those designed to address and resolve a specific problem/need that will contribute to the revitalization of a community or specific target areas that are contiguous and substantial, where there is a concentration of lower income persons. Activities given priority are publicly owned water system improvements including source treatment, storage and/or distribution improvements; publicly owned sanitary sewer collection; and/or treatment system improvements. When in support of any of the above activities, clearance activities may be undertaken. Applications that are submitted solely to reduce user fees or for possible cost overruns (if the project is funded by other resources) will **not** be considered for funding.

5.2 | PWI Priority Activities

Street improvements; sidewalks, drainage improvements, removal of architectural barriers; water/wastewater, etc.

Note: CDBG funds that are requested for infrastructure projects must meet the “residential in character” requirement per 24 CFR §570.483(b)(1)(i).

1) Public Facilities and Improvements

- a) Acquisition of Real Property (01): Acquisition of real property that will be developed for a public purpose. This activity **cannot** be a standalone eligible activity.
- b) Clearance and Demolition (04): Clearance or demolition of buildings/improvements, or the movement of buildings to other sites. This activity **cannot** be a standalone eligible activity.
- c) Solid Waste Disposal Improvements (03H): Acquisition, construction, or rehabilitation of solid waste disposal facilities.
- d) Flood Drainage Improvements (03I): Acquisition, construction, or rehabilitation of flood drainage facilities, such as retention ponds, catch basins, streambank erosion controls, channelization of streambeds, or dams. This activity can also be used for “Green Infrastructure” improvements to manage stormwater. However, if stormwater management improvements are integral to another eligible CDBG activity like a street improvement activity, costs associated should be included in the street improvement activity rather than flood drainage improvements.

- e) Water/Sewer Improvements (03J): Installation or replacement of water lines, sanitary sewers, storm sewers, transmission lines, lift stations, sewage lagoons/ treatment facilities, water towers, water wells, and fire hydrants. Costs of street reconstruction (usually repaving) made necessary by water/sewer improvement activities are included under this activity.
- f) Street Improvements (03K): Installation or improvements of streets, street drains, storm drains, curbs and gutters, tunnels, bridges, and traffic lights/signs.
- g) Sidewalks (03L): Improvements to sidewalks.
- h) Other Public Improvements – Removal of Architectural Barriers (03Z)^{***8}: Supporting Activities related to removal of architectural barriers that resist mobility and accessibility to sites/facilities.

5.3 | PWI Eligible Activities

- a) Construction Management: Costs related to compliance with Davis-Bacon and Related Acts (DBRA). Construction Management supports the HUD Matrix Code activity for CDBG infrastructure greatest amount CDBG funds budgeted.
- b) General Administration (21A): Overall administration, including (but not limited to) salaries, wages, and related costs of subrecipient staff or others engaged in grant management and implementation, monitoring, and evaluation.

5.4 | PWI Ineligible Activities

- a) For infrastructure, verify that the project is “residential in character”. If the project is *not* residential in character, the project is **ineligible**.
- b) The general rule is that any expense associated with repairing, operation, or maintaining public facilities, improvements and services is ineligible.
- c) Applications that are submitted solely for reducing user fees or for possible cost overruns (if the project is funded by other resources) will not be considered for funding.
- d) Refer to *Part II. Section 3.2* for other Ineligible Activities.

⁸ *****NOTE:** Proceed with caution if using this activity and refer to CDBG Manual, Chapter 3 on National Objective eligibility.

5.5 | PWI Grant Amount and Matching Funds

| Public Works – Key Minimums, Maximums, and Requirements | |
|---|--|
| Minimum CDBG Project Costs | \$ 250,000 |
| Maximum CDBG Project Costs | \$ 600,000 |
| General Administration (maximum) | 10% of CDBG Project Costs not to exceed \$25,000 |
| Construction Management (maximum) | \$ 5,000 |
| Match | <ul style="list-style-type: none"> ▪ Villages: 10% of CDBG Project Costs ▪ Second Class Cities: 20% of CDBG Project Costs ▪ Counties: 25% of CDBG Project Costs ▪ First Class Cities: 30% of CDBG Project Costs ▪ Multi-Jurisdictional: Match is determined by the classification of UGLG participating in the application. |

5.6 | PWI Application Exhibits

The following exhibits are required for this opportunity unless otherwise noted:

| | | |
|-------------|---|--|
| Exhibit A | Notice of Public Hearing | |
| Exhibit B | Authorizing Resolution | |
| Exhibit C1 | Statement of Assurances and Certification | |
| Exhibit C2 | Citizen Participation Plan | |
| Exhibit D | Residential Anti-Displacement and Relocation Assistance Plan | |
| Exhibit E* | Low-and Moderate-Income (LMI) on an Area Basis: Current Census Data | Based on the National Objective(s), complete the corresponding exhibit(s). |
| Exhibit E1* | Low-and Moderate-Income (LMI) on an Area Basis: Census Income Survey & Certificate of Completion | |
| Exhibit E2* | Low-and Moderate-Income (LMI) on an Area Basis: Random Sample Income Survey & Certificate of Completion | |
| Exhibit E3* | Low-and Moderate-Income (LMI) on Limited Clientele | |
| Exhibit K1a | Waiver of Procurement Process (Appointee) | if applicable |
| Exhibit K1b | Waiver of Procurement Process (Development District) | if applicable |
| Exhibit K2 | Procurement Process Completed Prior to Application | if applicable |
| Exhibit L | Letters of Support | if applicable |
| Exhibit M | Map of Proposed Project Area | |
| Exhibit N | System for Awards Management Documentation | |
| Exhibit O | Four Factor Analysis Assessing Limited English Proficiency | |
| Exhibit Q | Budget and Local Cost-Share Documentation | |
| Exhibit R | Preliminary Project Description & Level of Review | |

5.7 | PWI Application Criteria

The matrix below describes each selection criteria as a numerical score within the PWI opportunity. The maximum number of points available within any application is 100 points. A minimum score of 40 points is required and some criteria require a minimum score as noted below.

| Selection Criteria Matrix – Public Works Infrastructure (PWI) Opportunity | Maximum | Threshold Minimum |
|---|-------------------|-------------------|
| 1. Need & Extent of the Problem | 20 | 10 |
| 2. Community Support | 20 | 10 |
| 3. Project Impact | 20 | 10 |
| 4. Project Readiness | 20 | 10 |
| 5. Coordination with Other Funding Sources | 10 | - |
| 6. Achievements | 10 | - |
| Total | 100 points | 40 points |

For each of the following sections, unless otherwise explicitly stated or an upload is requested, a project narrative must be provided directly into the GMS and additional information supplemented as noted within each individual criterion.

1. Need & Extent of the Problem

Up to 20 points is possible. A minimum of 10 points in this section is required to meet threshold. This section gives the applicant an opportunity to describe the need for the project based on existing, identifiable problems and conditions; how that project will meet an essential community development need or imminent problem; and how/why the project will improve the viability of the community. The section also allows the applicant to identify any past formal or informal efforts to resolve the problem. Provide explanation of the following. This section will be answered in the GMS. *Limit each response to 4,500 characters.*

- a) Provide documentation of the need, cause of the problem, how long the problem has existed and how the problem affects the community. Document the urgency of the problem and if any state/federal regulations are being violated. Provide factual information that illustrates the severity of identified problems in community.
- b) UPLOAD: Include photographs, as applicable.
- c) Describe the importance of this project need as compared to total community needs.
- d) Describe if this project will include any mitigation efforts as part of any disaster plans.
- e) Describe past efforts from the previous 5 years to address the community's overall needs. This includes the proposed project as well as any other city activities such as street improvements, water/sewer improvements, senior center, ADA, etc.
- f) Summarize the alternative solutions that were examined to address the need above, including a financial analysis of all the proposed solutions (for example, if other solutions were too expensive, maintenance and upkeep costs are too high, etc.). State why the solution was chosen and the reasoning behind the choice.
- g) Has there been a formal study/report completed that recommends the proposed solution? If so, who completed it and when?

- h) UPLOAD: The formal study/report completed that recommends the proposed solution.

A strong narrative in this section will provide a clear nexus between the problem statement and outcomes described.

| | |
|---------------------------------|--|
| Points in this section include: | |
| 0 – 9 | Inadequately defined, below average |
| 10 – 14 | Reasonably defined, average compared to other applicants |
| 15 – 20 | Well-defined, above average |

2. Community Support

Up to 20 points is possible. A minimum of 10 points is required in this section in order to meet threshold. This section gives the applicant an opportunity to describe the citizen participation process that helped to determine the needs in the community, and how citizens were afforded the opportunity to participate in the assessment of the identified local need for the project. Provide explanation of the following. This section will be answered in the GMS. *Limit each response to 4,500 characters.*

- a) Were the community’s citizens (including LMI citizens), requested and encouraged to participate in the assessment of community issues, problems and needs; the identification of potential solutions; and priority to such issues, problems and needs identified in the “Need & Extent of the Problem” above?
 - a. If so, describe the process – i.e. a community needs assessment/survey, public meetings to discuss needs and/or outcomes, complaints regarding the problems (for example, potholes, etc.). Include dates of each activity. If a community needs assessment was conducted (in-person, US mail or on-line), include the response rate. For public meetings, include the number of attendees.
- b) UPLOAD: Community Needs Assessment/Survey or other data that show citizen participation
- c) Has the community developed a priority list using needs assessment, survey, public meetings, a 1- and 5-year Action Plan, etc.? (Yes or No) If yes, describe the priority list.
- d) Provide a record of conducting other community, housing, and economic development efforts with significant citizen involvement within the last 5 years that address items on the community’s priority list as well as other efforts – for example, a comprehensive plan, housing study, a capital improvement plan, LB840, a business retention and expansion survey, or other fundraising efforts.

| | |
|---------------------------------|--|
| Points in this section include: | |
| 0 – 9 | Inadequately defined, below average |
| 10 – 14 | Reasonably defined, average compared to other applicants |
| 15 – 20 | Well-defined, above average |

3. Project Impact

Up to 20 points possible. A minimum of 10 points is required in this section in order to meet the threshold. This section gives the applicant the opportunity to describe the importance of project activities to the community and provide clarity on how the project will benefit those identified by a CDBG National Objective. For this criterium, it is necessary to create a nexus between the project need and the project outcomes as proposed. Provide explanation of the following. This section will be answered in the GMS. *Limit each response to 4,500 characters.*

a) Project Benefit

- 1) How will the completed activities benefit the community? Include discussion about how it will benefit low- and moderate income (LMI) persons?
- 2) Describe the proposed project outcome in measurable units, the degree to which these accomplishments within project implementation will reduce or eliminate the need(s), and any plans to eliminate what needs remain (if any). Include financial information, if applicable (for example, if maintenance costs are expected to decrease, those costs can then go towards a different community need, etc.).

b) Project Area

- 1) Describe the characteristics of the surrounding area of the proposed project (i.e. residential, commercial, industrial, etc.) and how the project meets the requirement of “residential in character” per 24 CFR §570.483(b)(1)(i). For example, how many businesses or residences are located in or near the proposed project area.

c) Project Goals

- 1) Briefly explain how the project scope is consistent with the goals and objectives of one or more adopted/approved community long-range plans, such as a Comprehensive Plan, Community Redevelopment Plan, Capital Improvements Plan, Strategic Plan, etc., if applicable.

d) Project Eligibility

- 1) Describe how your project does **not** involve repair, operating or maintenance expenses.
 - a. The general rule is that any expense associated with repairing, operation, or maintaining public facilities, improvements and services is **ineligible** (see Part II Section 3.2 – *Ineligible Activities*).
- 2) If your project includes **street improvements** (Yes or No), provide the following details of your proposed project as an *upload*:
 - a. Describe the location of the street(s) to be improved – i.e., downtown, residential, commercial, etc.
 - b. The type of street being improved (Freeways/Expressways; Major Arterials; Minor Arterials; Collectors; Local Collectors; Local Streets).
 - c. The total length of street(s) being improved (i.e., 0.5 miles, etc.)
 - d. The current surface of the street(s) being improved (gravel, asphalt, concrete, etc.).

- e. The proposed (improved) surface of the street(s) (gravel, asphalt, concrete, etc.).
 - f. **UPLOAD:** Street Improvement Project Supporting Documentation
- 3) If your project includes **water/wastewater**⁹ (Yes or No), provide the following details of your proposed application as an *upload*:
- a. Proposed solutions will be evaluated for the degree to which they are long term; appropriate in terms of capacity, sizing, and demand for the community; as well as technical, operational, and financial aspects of the project. Solutions must alleviate high priority needs. Applicants must have a reasonably projected user fee, including all potential grant funds. **Those fees that exceed \$30 per household per month will upload additional documentation below to supplement the application.** The additional information should include the overview of pricing decisions involving considerations of equity as well as efficiency. Low-income households, especially those served by high-cost systems, may face affordability problems if prices are raised. To alleviate these hardships, communities can offer pricing structures that mitigate impacts on low-income households.
 - b. Describe each major activity and identify who will own, operate, and maintain the proposed improvements. Provide information and supporting documentation identifying the number of residential users; projected monthly residential rate; debt service portion of the rate; operation and maintenance portion of the rate and identify if the water system is metered. If not, will the water system be metered as part of the project?
 - c. Also, maps that were included in another section need to identify the boundaries of the applicant’s jurisdiction, boundaries of the project service area, specific location of each activity, and areas within the 100-year flood hazard boundary.
 - d. **UPLOAD:** Water/Wastewater project supporting documentation

| | |
|---------------------------------|--|
| Points in this section include: | |
| 0 – 9 | Inadequately defined, below average |
| 10 – 14 | Reasonably defined, average compared to other applicants |
| 15 – 20 | Well-defined, above average |

4. Project Readiness

Up to 20 points possible. A minimum of 10 points is required in this section to meet threshold. This section gives the applicant the opportunity to describe prior and concurrent efforts related to the overall planning strategy; a workplan for solutions to the problems/needs and impact as defined above; project readiness;

⁹ It is important to determine a reasonable **water/wastewater** user fee. The user fees typically generate funds for daily operation and maintenance and long-term capital investments for drinking water and wastewater systems. Pricing of water services should accurately reflect the true costs of providing high-quality water and wastewater services to consumers to maintain infrastructure and plan for upcoming repairs, rehabilitation, and replacement of that infrastructure.

and financial and operational capacity of the community and demonstrate the capacity and commitment to successful completion of the project. Provide explanation of the following. This section will be answered in the GMS. *Limit each response to 4,500 characters.*

a) Project Planning

- a. Describe the degree to which the applicant is ready to proceed with the project. The response should describe the applicant’s capacity and commitment to successfully implement change and to complete the project.
- b. Describe the project-specific roles and responsibilities and the knowledge/experience of individual key staff members in planning, managing, and implementing projects in accordance with the work-plan/narrative schedule.
- c. If the project is awarded funding, describe how the UGLG will ensure that the special conditions and environmental review record (ERR) submission within ninety (90) days of the notice of award (NOA)?

b) Project Costs

- a. Describe any previous fund-raising efforts (if applicable) that helped to raise awareness of the project and raised funds that will be utilized as match for the project.
- b. Have Davis-Bacon wage rates been considered in cost estimates?

c) Project Description

Are there any known environmental concerns that would delay the project? If yes, explain the environmental concerns

- a. Does the applicant currently own the associated land? (Yes or No)
 - (1) If land is yet to be purchased, does the applicant have ownership of the land or have an “option to purchase” the land?
 - (2) If No, provide explanation.
 - (3) If Yes, **UPLOAD:** documentation as necessary.

d) Project Support

- a. Does the community have letters of support for the project?
 - (1) If Yes, complete Exhibit L.

For **water/wastewater** improvement projects, provide documentation that matching funds have been secured (binding commitments obtained, local funds budgeted, etc.), and realistic schedules are provided to: secure necessary property and easement rights, complete environmental review that complies with CDBG requirements, complete final design plans and bid specifications, complete review and obtain approval by other agencies of all permits necessary to complete project, start, and complete construction. For projects that contain the development of a **well field**, the water quality, and production capabilities of the site must be confirmed through the development of a test hole before an application will be considered.

Also, for **water/wastewater** projects, identify measurable benchmarks that have already been completed. These may include:

- Preliminary Engineering Report (PER)
- Administrative or Engineering Services Secured

- Environmental Review Completed
- Land Acquired
- Test Hole Drilling Completed
- Water Quality Testing Completed
- Plans and Specifications Completed and Approval Dates
- Permits and/or Approvals Obtained

| | |
|---------------------------------|--|
| Points in this section include: | |
| 0 – 9 | Inadequately defined, below average |
| 10 – 14 | Reasonably defined, average compared to other applicants |
| 15 – 20 | Well-defined, above average |

5. Coordination with Other Funding Sources

Up to 10 points possible. There is no minimum threshold. This section gives the applicant the opportunity to describe prior and concurrent efforts related to the overall planning and fundraising for the project. An overall planning strategy is beneficial in order to bring multiple funding sources to a potential project and therefore allowing a more comprehensive approach to address the identified community needs.

There are a variety of funding sources that are available to a community. Some might include (but are not limited to) the United States Department of Agriculture (USDA) Community Facilities Program, USDA Rural development (various programs), local resources (including community foundations), the Nebraska Community Foundation, as well as any local fund-raising efforts that have taken place. Provide explanation of the following. *This section will be answered in the GMS. Limit each response to 4,500 characters.*

- a) Describe the efforts made by the community to secure additional funding for the proposed project. In the narrative, identify the funding sources contacted.
- b) Were efforts successful?
 1. If Yes, complete Exhibit Q.

| | |
|---------------------------------|--|
| Points in this section include: | |
| 0 – 3 | Inadequately defined, below average |
| 4 – 7 | Reasonably defined, average compared to other applicants |
| 8 – 10 | Well-defined, above average |

6. Achievements

Up to 10 points possible. There is no minimum threshold. Due to the nature of these programs, applicant may only earn points as an EDCC or LCC, not both. The applicant must demonstrate any of the following items at the time of application submittal, including:

- a) Applicant is designated as an Economic Development Certified Community, **10 points**.

For a complete list of communities and additional information, visit the DED website at: <https://opportunity.nebraska.gov/programs/community/edcc/>

- b) Applicant is designated as a DED Leadership Community, **10 points**.

For a complete list of communities and additional information, visit the DED website at:
<https://opportunity.nebraska.gov/programs/community/lcc/>

- c) **UPLOAD:** Certifications or other documentation provided by DED the recognizes status (*Limit to 5 pages*)

7. *Supplemental Materials (optional)*

Depending on the nature and scope of project activities proposed, the following information may be required for the application:

- a) **UPLOAD:** Preliminary Engineering Report (PER), Environmental Review Completed, Land Acquired, Test Hole Drilling Completed, Water Quality Testing Completed, Plans and Specifications Completed and Approval Dates, Permits and/or Approvals Obtained

Opportunity 6: Tourism Development (TD)

6.1 | TD Purpose

CDBG funds will be used for economic development tourism focused projects. The purpose of the Tourism Development (TD) opportunity is to provide investments in effective and affordable tourist attraction facilities to quality communities that are investing in long-term development. This provides a sound basis for assisting tourist attraction projects that have attracted significant financial support and are likely to have long-term positive impacts on their local and regional economies. Tourist attraction projects that serve both a regional and a local economy of community need are a key element in satisfying the state objective.

During the Program Year, all activities proposed in applications for CDBG funding in the TD opportunity must meet the national objective of benefitting low- and moderate-income persons through the subcategories LMI Jobs (LMJ), LMI on an Area Basis (LMA), LMI Limited Clientele (LMC); or aid in the prevention or elimination of slums or blight in either an area (SBA) or spot basis (SBS).

Priority is given to projects meeting the primary national objective of benefitting low- and moderate-income persons.

6.2 | TD Priority Activities

Eligible Activities/Tourist Attractions are expected to draw 2,500 visits or more annually from origins of at least 100 miles away.

- a) Non-Residential Historic Preservation (16B): Rehabilitation of historic buildings for non-residential use. Examples include the renovation of an historic building for use as a neighborhood facility, museum, or by a historic preservation society.
- b) Neighborhood Facilities (03E): Acquisition, construction, or rehabilitation of facilities that are principally designed to serve a neighborhood and that will be used for social services or for multiple purposes (including recreation).
 - i) Convention Centers
 - ii) Participatory Sport Facilities
 - iii) Cultural and Heritage Recreational Sites and Facilities
 - iv) Scientific and Educational Interpretive Educational Sites and Facilities
- c) Other Public Improvements – Removal of Architectural Barriers (03Z)***¹⁰: Supporting Activities related to removal of architectural barriers that resist mobility and accessibility to sites/facilities.

6.3 | TD Eligible Activities

1) Public Facilities and Improvements

- a) Acquisition of Real Property (01): Acquisition of real property that will be developed for a public purpose. This activity **cannot** be a standalone eligible activity.

¹⁰ ***NOTE: Proceed with caution if using this activity and refer to CDBG Manual, Chapter 3 on National Objective eligibility.

- b) Clearance and Demolition (04): Clearance or demolition of buildings/improvements, or the movement of buildings to other sites. This activity **cannot** be a standalone eligible activity.
- c) Parks, Recreational Facilities (03F): Development of open space areas or facilities intended primarily for recreational use.
- d) Construction Management: Costs related to compliance with Davis-Bacon and Related Acts (DBRA). Construction Management always supports the HUD Matrix Code activity with the greatest budgeted amount of CDBG funds.

2) Economic Development

- a) Economic Development Direct Financial Assistance to For-Profit Business (18A): Financial assistance to private for-profit businesses to (for example) acquire property, clear structures, build, expand or rehabilitate a building, purchase equipment, or provide operating capital. Forms of assistance include loans, and grants.

3) Administration

- a) General Administration (21A): Overall administration, including (but not limited to) salaries, wages, and related costs of subrecipient staff or others engaged in grant management and implementation, monitoring, and evaluation.

6.4 | TD Ineligible Activities

- a) Retail Businesses or Operation (eating and drinking establishments, commercial lodging, gas stations, commercial rest areas, and gift shops.)
- b) Refer to *Part II. Section 3.2* for other Ineligible Activities.

6.5 | TD Grant Amount and Matching Funds

| Tourism Development – Key Minimums, Maximums, and Requirements | |
|---|---|
| Minimum CDBG Project Costs | \$250,000 |
| Maximum CDBG Project Costs | \$450,000 |
| General Administration | 10% of CDBG Project Costs, not to exceed \$25,000 |
| Construction Management | \$5,000 |
| Local Matching Funds | 25% of CDBG Project Costs |
| Public Benefit Standards per FTE – Maximum | \$35,000 <i>(LMJ Only)</i> |

6.6 | TD Application Exhibits

The following exhibits are required for this opportunity unless otherwise noted:

| | | |
|-------------|---|--|
| Exhibit A | Notice of Public Hearing | |
| Exhibit B | Authorizing Resolution | |
| Exhibit C1 | Statement of Assurances and Certification | |
| Exhibit C2 | Citizen Participation Plan | |
| Exhibit D | Residential Anti-Displacement and Relocation Assistance Plan | |
| Exhibit E* | Low-and Moderate-Income (LMI) on an Area Basis: Current Census Data | Based on the National Objective(s), complete the corresponding exhibit(s). |
| Exhibit E1* | Low-and Moderate-Income (LMI) on an Area Basis: Census Income Survey & Certificate of Completion | |
| Exhibit E2* | Low-and Moderate-Income (LMI) on an Area Basis: Random Sample Income Survey & Certificate of Completion | |
| Exhibit E3* | Low-and Moderate-Income (LMI) on Limited Clientele | |
| Exhibit E4* | Low-and Moderate-Income (LMI) Jobs | |
| Exhibit F1* | Aid in prevention or elimination of slums and blight (S/B) on an Area Basis (SBA) | |
| Exhibit F2* | Aid in prevention or elimination of slums and blight (S/B) on a Spot Basis (SBS) | |
| Exhibit K1a | Waiver of Procurement Process (Appointee) | if applicable |
| Exhibit K1b | Waiver of Procurement Process (Development District) | if applicable |
| Exhibit K2 | Procurement Process Completed Prior to Application | if applicable |
| Exhibit L | Letters of Support | if applicable |
| Exhibit M | Map of Proposed Project Area | |
| Exhibit N | System for Awards Management Documentation | |
| Exhibit O | Four Factor Analysis Assessing Limited English Proficiency | |
| Exhibit Q | Budget and Local Cost-Share Documentation | |
| Exhibit R | Preliminary Project Description & Level of Review | |

6.7 | TD Application Criteria

The matrix below describes each selection criteria as a numerical score within the TD opportunity. The maximum number of points available within any application is 100 points. A minimum score of 40 points is required and some criteria require a minimum score as noted below.

| Selection Criteria Matrix – Tourism Development (TD) Opportunity | Maximum | Threshold Minimum |
|--|------------|-------------------|
| 1. Project Need & Extent | 20 | 10 |
| 2. Project Impact | 25 | 10 |
| 3. Project Readiness | 25 | 10 |
| 4. Community Support | 25 | 10 |
| 5. Achievements | 5 | - |
| Total Points | 100 | 40 |

For each of the following sections, unless otherwise explicitly stated or an upload is requested, a project narrative must be provided directly into the GMS and additional information supplemented as noted within each individual criterion.

In the GMS, select the attraction type describe in the narrative that best matches the listed items:

- Historic restoration, rehabilitation, and preservation
- Scientific and education interpretive sites and facilities
- Heritage, historical, and cultural recreational sites and facilities
- Participating sports facilities and convention centers
- Other

1. Project Need & Extent

Up to 20 points possible. A minimum of 10 points is required in this section to meet threshold. The level of project need compared to other applicants. Provide explanation of the following. This section will be answered in the GMS. *Limit each response to 1,300 characters.*

- a) Explanations of the overall purpose of the project application and factual information that illustrates the tourism development needs.
- b) Past efforts to address the needs for tourism development.
- c) UPLOAD: Photos that best illustrate and contextualize the project (Max 5 photos per file)

| | |
|---------------------------------|--|
| Points in this section include: | |
| 0 – 9 | No clearly defined conditions or no clear description of the need for the project. |
| 10 – 14 | Minor conditions or minor needs only defined. |
| 15 – 20: | Project need clearly defined. |

2. Project Impact

Up to 25 points possible. A minimum of 10 points is required in this section to meet threshold. Within this section, the applicant explains the expected outcome of the project and the positive impact on local and regional economies. Provide explanation of the following. This section will be answered in the GMS. *Limit each response to 1,100 characters.*

- a) Describe the importance of project activities to the community and provide clarity on how the project will benefit those identified by the CDBG National Objective.
- b) Describe how the eligible activities/tourist attractions will draw 2,500 visits or more annually from origins of at least 100 miles away. Include verification in the supporting materials section.

| | |
|---------------------------------|---|
| Points in this section include: | |
| 0 – 9 | Inadequately defined |
| 10 – 19 | Reasonably defined project impact is average. |
| 20 – 25 | Above average description |

3. Project Readiness

Up to 25 points possible. A minimum of 10 points is required in this section to meet threshold. The level of capacity and commitment by the community scored as compared to other applicants. Provide explanation of the following. This section will be answered in the GMS. *Limit each response to 1,100 characters.*

- a) Describe the degree to which the applicant is ready to proceed with the project. The response should describe the applicant’s capacity and commitment to successfully implement change and to complete the project.
- b) Describe the project-specific roles and responsibilities and the knowledge/experience of individual key staff members in planning, managing, and implementing projects in accordance with the work-plan/narrative schedule.

| | |
|---------------------------------|--|
| Points in this section include: | |
| 0 – 9 | Lack of local staff or ability to oversee the efforts from planning to the implementation of the physical project, no availability of the site(s) investigated, preliminary work is not substantially completed, and project is not construction ready. |
| 10 – 19 | Local capacity demonstrated through past projects, past community improvement efforts, citizen participation, there is strong evidence of a commitment to proceed with project, the feasibility and cost estimates are reliable, the project is construction ready, and financial resources pending. |
| 20 – 25 | Significant local capacity demonstrated through past improvement efforts, financial resources are secured, match/non-CDBG funding is committed and documented. |

4. Community Support

Up to 25 points possible. A minimum of 10 points is required in this section to meet threshold. This section gives the applicant an opportunity to describe the citizen participation process that helped to determine the needs in the community, how citizens were afforded the opportunity to participate in the assessment of the identified local need for the project. Provide explanation of the following. This section will be answered in the GMS. *Limit each response to 3,300 characters.*

- a) Describe the public participation associated with identifying and developing this project. Also indicate the level of public participation to complete this project.

The following criteria are taken into consideration when determining the Community Support section:

- a) Were the community’s citizens requested and encouraged to participate in the assessment of community issues, problems and needs; the identification of the problems and needs identified in the Need & Extent section above? If so, describe the process, e.g., community needs assessment/survey, public meetings to discuss needs and/or outcomes.
 - i) UPLOAD: Comprehensive Needs Assessment/Survey or other data that show citizen participation.
- b) Has the community developed a priority list using needs assessment, survey, public meetings, Action Plan, strategy plan, etc. within the past three years?
 - i) If Yes, describe the priority list.

- c) Does the community have a record of conducting other community and economic development efforts with significant citizen involvement within the last three years that address items ranked on the community’s priority list? (Yes or No)
- d) Has the community adopted or updated a comprehensive plan, housing study, and/or a capital improvement plan within the past five years? (Yes or No)
 - i) UPLOAD: Documentation – Adopted or Updated Community Plan
- e) Can the community provide evidence of economic initiatives (ex. LB840), completing a business retention and expansion survey, or other viable fundraising efforts? (Yes or No)
 - i) UPLOAD: Documentation – Economic Initiatives

Complete Exhibit L if there are additional supporting letters from Community Resource Organizations or Community Resource Businesses that did not fit previous documentation in Community Support.

| Points in this section include: | |
|---------------------------------|---|
| 0 – 9 | Inadequately defined, below average. No evidence or very little evidence from the community that will commit resources and support efforts. |
| 10 – 19 | Reasonably defined, average. Some evidence of from the community to commit resources and support efforts. This may include letters of support, letters of intent from businesses and/or partners to commit resources, financial commitments from businesses and partners, or other such evidence of support for the project from the general and/or business community. |
| 20 – 25 | Well-defined, above average. Significant evidence from the general and business community that it will commit resources and support efforts. |

5. Achievement

Up to 5 points possible. There is no minimum threshold. Due to the nature of these programs, Applicant may only earn points as an EDCC or LCC, not both. The applicant may demonstrate either of the following items at the time of application submittal, including:

- a) Applicant is designated as an Economic Development Certified Community, **5 points**.
For a complete list of communities and additional information, visit the DED website at: <https://opportunity.nebraska.gov/programs/community/edcc/>
- b) Applicant is designated as a DED Leadership Community, **5 points**.
For a complete list of communities and additional information, visit the DED website at: <https://opportunity.nebraska.gov/programs/community/lcc/>
- c) UPLOAD: Certifications or other documentation provided by DED the recognizes status (*Limit to 5 pages*)

6. Supplemental Materials (optional)

Depending on the nature and scope of the project activities proposed, the following information may be submitted to support the application:

- a) UPLOAD: Facility Floor Plan, Proposed events source documentation, etc.

Part IV. Application Budget User Guide

Below are application budget line items (HUD Matrix Codes) in alphabetical order. This is an overview of eligible projects cost examples within each HUD Matrix Code. Please reach out to your program manager if you have questions about eligible costs.

GMS Instructions: *In the GMS budget section:*

1. Enter the total amount of project in the “Direct Costs” fields (Direct costs = Grant Funded + Cash Match).
2. Change “Calculate Match” to “Yes” and enter your match dollar amount.
3. “Grant-Funded” is your requested amount of CDBG funds.
4. After saving your line item, verify that the “Grant Funded”, “Cash Match”, and “Total Budgeted” columns are correct.
 - If your project has in-kind match, this will be incorporated into the budget at a later date if the project is awarded.

HUD MATRIX CODES/PROJECT ACTIVITIES

Acquisition of Real Property (01): Acquisition of real property that will be developed for a public purpose. This activity **cannot** be a standalone eligible activity.

Clearance and Demolition (04): Clearance or demolition of buildings/improvements, or the movement of buildings to other sites. This activity **cannot** be a stand along eligible activity.

Construction Management: Costs related to compliance with Davis-Bacon and Related Acts (DBRA). *Construction Management is a supporting project cost to the HUD Matrix (facility or infrastructure) activity greatest amount in the proposed CDBG budget.*

General Program Administration (21A): Overall administration, including (but not limited to) salaries, wages, and related costs of subrecipient staff or others engaged in grant management and implementation, monitoring, and evaluation.

Child Care Centers (03M): Acquisition, construction, or rehabilitation of facilities intended primarily for children aged 12 and under.

Commercial Rehabilitation (14E): Costs are limited to exterior improvements (façade improvements). *Interior improvements* (e.g., electrical, plumbing, HVAC, etc.) are **ineligible** unless the activities address the correction of municipal; code violations (i.e., public safety).

Construction and Rehabilitation (17C): The costs associated with the construction or rehabilitation of commercial or industrial buildings. Activities must be carried out by the subrecipient or by public or private non-profits.

Economic Development Direct Financial Assistance to For-Profit Business (18A): Financial assistance to private for-profit businesses to (for example) acquire property, clear structures, build, expand or rehabilitate a building, purchase equipment, or provide operating capital. Forms of assistance include loans, and grants.

Facilities for Persons with Disabilities (03B): Acquisition, construction, or rehabilitation of centers, group homes, and other facilities (except permanent housing) for persons with disabilities.

Fire Stations/Equipment (03O): Acquisition, construction, or rehabilitation of fire stations and/or the purchase of fire trucks and emergency fire rescue equipment.

Flood Drainage Improvements (03I): Acquisition, construction, or rehabilitation of flood drainage facilities, such as retention ponds, catch basins, streambank erosion controls, channelization of streambeds, or dams. This activity can also be used for “Green Infrastructure” improvements to manage stormwater. However, if stormwater management improvements are integral to another eligible CDBG activity like a street improvement activity, costs associated should be included in the street improvement activity rather than flood drainage improvements.

Health Facilities (03P): Acquisition, construction, or rehabilitation of physical or mental health facilities. Examples of such facilities include neighborhood clinics, hospitals, nursing homes, and convalescent homes.

Homeless Facilities (03C): Acquisition, construction, conversion of buildings, or rehabilitation of temporary shelters and transitional housing for the homeless, including victims of domestic violence, dating violence, sexual assault or stalking, disaster victims, runaway children, drug offenders, and parolees.

Infrastructure Development (17B): Costs associated with street, sewer, water, parking, or other improvements for commercial/industrial sites which are publicly owned and directly benefit a for-profit business that creates jobs. This activity also includes the installation of public improvements, such as the construction of streets to and through commercial/industrial areas.

Neighborhood Facilities (03E): Acquisition, construction, or rehabilitation of facilities that are principally designed to serve a neighborhood and that will be used for social services or for multiple purposes (including recreation).

Other Public Improvements – Removal of Architectural Barriers (03Z): Supporting Activities related to removal of architectural barriers that resist mobility and accessibility to sites/facilities.

*****NOTE:** Proceed with caution if using this activity and refer to CDBG Manual, Chapter 3 on National Objective eligibility.

Non-Residential Historic Preservation (16B): Costs associated with the rehabilitation of historic buildings for non-residential use. Examples include the renovation of an historic building for use as a neighborhood facility, museum, or by a historic preservation society.

Planning (20A): Includes, but not limited to the development of comprehensive plans, community development plans, downtown redevelopment studies, energy strategies, capacity building, environmental studies, area neighborhood plans, and functional plans.

Senior Centers (03A): Acquisition, construction, or rehabilitation of a facility to be used by seniors (individuals 62 or older).

Parks, Recreational Facilities (03F): Development of open space areas or facilities intended primarily for recreational use.

Sidewalks (03L): Improvements to sidewalks. (Only as a public safety improvement to meet American with Disability [ADA] Standards.) **For DTR, the sidewalks need to reside within the designated downtown district boundary.

Solid Waste Disposal Improvements (03H): Acquisition, construction, or rehabilitation of solid waste disposal facilities.

Street Improvements (03K): Installation or reconstruction of streets, street drains, storm drains, curbs and gutters.

Tornado Shelters Serving Private Mobile Home Parks (23): Costs associated with the construction or improvement of tornado-safe shelters for residents of manufactured housing parks. The construction of tornado shelters may be carried out in neighborhoods that may or may not contain a manufactured housing park, provided such a neighborhood contains not less than 20 manufactured housing units and the shelter is available to the manufactured housing residents.

Water/Sewer Improvements (03J): Costs associated with the installation or replacement of water lines, sanitary sewers, storm sewers, transmission lines, lift stations, sewage lagoons/ treatment facilities, water towers, water wells, and fire hydrants. Costs of street reconstruction (usually repaving) made necessary by water/sewer improvement activities are included under this activity.

Youth Centers (03D): Acquisition, construction, or rehabilitation of facilities intended primarily for young people aged 13 to 19. These include playgrounds and recreational facilities that are part of a youth center.

Part V. Glossary of Terms

Accomplishments

Awarded projects must report on accomplishments specific to project outcomes. For reporting purposes, at the time of application, the number of beneficiaries is considered “proposed” and upon completion of project activities, the accomplishments are considered “actual”.

Annual Action Plan (AAP)

The Annual Action Plan updates the Nebraska Housing and Community Development Consolidated Plan, a five-year plan addressing the state's housing and community development needs. View DED’s plans on the CDBG Reports page: <https://opportunity.nebraska.gov/programs/plans-reports/>.

Beneficiary

The ultimate consumer of HUD programs who receives benefits from a HUD recipient or subrecipient award.

CDBG Agreement

The legally binding agreement between the state and a subrecipient. It consists of the notice of award, special conditions to the contract, certifications to comply with applicable state and federal regulations, the project budget, and application guidelines/exhibits.

City, First Class

Defined by Nebraska Statue 16-101, all cities having more than five thousand and not more than one hundred thousand inhabitants as determined by the most recent federal decennial census or the most recent revised certified count by the United States Bureau of the Census shall be known as cities of the first class.

City, Second Class

Defined by Nebraska Statue 16-102, whenever any city of the second class attains a population of more than five thousand inhabitants as provided by section 16-101, the mayor of such city shall certify such fact to the Secretary of State who upon the filing of such certificate shall by proclamation declare such city to be a city of the first class.

Closeout

The process by that the department determines that the subrecipient and the department have completed all applicable administrative actions and all required work. A Certificate of Completion is issued by DED to the subrecipient once a project’s activities and requirements are completed.

Community Development Need

A demonstrated deficiency in housing stock, public facilities, economic opportunities, or other services that is necessary for developing or maintaining viable communities.

Comprehensive Strategic Approach

A comprehensive strategic approach is one that effectively utilizes community needs assessments, stakeholder participation, and planning processes. A comprehensive approach should include: significant needs identification, adopted or updated Comprehensive Plan, housing study, and capital improvement plan.

Consolidated Plan

The Nebraska Five-Year Consolidated Plan is a comprehensive planning document identifying the state's needs in housing, homelessness, community and economic development. The State is required by the U.S. Department of Housing and Urban Development (HUD) to complete a Consolidated Plan every five years to receive federal funds for the five formula programs: Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), National Housing Trust Fund (HTF), Housing Opportunities for Persons with AIDS (HOPWA), and Emergency Solutions Grant (ESG) programs. View DED's plans on the CDBG Reports page: <https://opportunity.nebraska.gov/programs/plans-reports/>.

Cost Per Beneficiary

The cost-per-beneficiary ratio for the proposed project is computed based on the state's annual allocation and CDBG funds requested. In 2025, the state removed the objective of \$3,000 maximum per beneficiary for LMA.

Department or DED

Nebraska Department of Economic Development. The state agency that administers the federal Community Development Block Grant State Program for communities under 50,000 population with funds allocated to the US Department of Housing and Urban Development. DED's website is <https://opportunity.nebraska.gov/>. To navigate to the CDBG main page, look for Programs > Community (Development), <https://opportunity.nebraska.gov/programs/community/cdbg/>.

Disability

Any condition or characteristic that renders a person an "individual with disabilities" as defined in 24 CFR §8.3. An "individual with disabilities" means any person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment; or is regarded as having such impairment.

Elderly

For purposes of this program and qualifying a project as meeting the low- and moderate-income national objective by principally benefitting seniors, a senior citizen is a person aged 62 or older.

Eligible Activity

Those activities authorized in Section 105(a) of the amended 1974 Housing and Community Development Act. CDBG Eligible Activities are listed in *Part II Section 3.1*. However, the State and local participants have developed Priority Activities, listed in each opportunity's *X.2 sub-section*, that best serve their interests and increase the likelihood of being funded.

Equipment

Tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000.

Family

A family is defined as all persons living in the same household who are related by birth, marriage, or adoption. An individual living in a housing unit that contains no other person(s) related to him/her is considered to be a one-person for this purpose. A dependent child who is living outside of the home (e.g. students living in a dormitory or other student housing), is considered for these purposes to be part of the family upon which he/she is dependent, even though he/she is living in another housing unit.

Firm Public or Private Commitment

An agreement by a private or public party to take part in a local community development project. The party must demonstrate the capacity to carry out the activity specified in the CDBG application. The agreement may take the form of a city council or county board resolution, a letter from a governmental agency, or a letter of credit from a private lending institution.

Flood and Drainage

Facilities designed to influence or affect the flow in a natural water course (such as a river, stream, lake, or intermittent stream) and excluding storm sewers.

FTE - Full Time Equivalent

FTE measures how many full-time or part-time employees add up to full-time employees for a company.

Household

All the persons who occupy a housing unit. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

Housing and Community Development Needs Assessment

A statement by the applicant that lists the community's development needs, including housing needs and needs of low- and moderate-income persons and strategies to address the needs. Required of all applicants to be eligible for CDBG funding under Title I of the Housing and Community Development Act.

Income

The total gross income (before taxes) of all members of a family who are aged 15 or older. Income includes all monies received by all members of the family such as gross wages and salaries, bonuses, tips, interest, dividends, social security, other retirement, supplemental security income, welfare, disability, VA payments, unemployment, alimony, other. A family that is involved in a business where the finances are interrelated with the family budget (such as a farmer) should consider their income as net after expenses, as reported to the Internal Revenue Service.

Language Assistance Plan (LAP)

A written implementation plan that addresses identified needs of the LEP persons served.

Limited English Proficient Person (LEP)

Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English because of national origin.

Low- and Moderate-Income

For CDBG, a person is considered to be of **low income** only if he or she is a member of a household whose income would qualify as "very low income" under the Section 8 Housing Assistance Payments program. Generally, these Section 8 limits are based on 50% of area median. Similarly, CDBG **moderate income** relies on Section 8 "lower income" limits, which are generally tied to 80% of area median.

Low- and Moderate-Income Person

A member of a family having an income as described under the Low- and Moderate-Income definition.

Lower-Income Person

A member of a family having an income equal or less than the Section 8 “lower income” limit established by HUD (80% or less of the area median). Unrelated individuals shall be considered as one-person families for this purpose.

Neighborhood

A geographic location with the jurisdiction of a UGLG (but not the entire jurisdiction) designated in comprehensive plans, ordinances, or other local documents such as a neighborhood, village, or similar geographical designation; or the entire jurisdiction of a UGLG that is under 25,000 population.

Neighborhood-based nonprofit organization

An association or corporation duly organized to promote and undertake community development activities on a not-for-profit basis within a neighborhood. To be considered neighborhood-based, the majority of the organization’s membership, clientele, or governing body are residents of the neighborhood where activities assisted with CDBG funds are to be carried out.

Project “Activity” Delivery Cost (ADC)

Costs related to implementing and carrying out specific CDBG-eligible activities. This cost does not include costs associated with program administration costs (i.e., General Administration) or supporting delivery project costs (i.e., Construction Management).

Project Costs

The proposed total project budget includes all costs for project delivery and program administration. Two types of **project delivery** costs are: 1) **project** delivery costs and 2) **supporting** delivery costs.

Program Administration Costs (PAC)

Costs related to overall program planning and CDBG grant administration.

QCT - Qualified Census Tract

Any census (or equivalent geographic area defined by the Census Bureau) in which at least 50% of households have an income less than 60% of the Area Median Gross Income (AMGI).

Service Area

Area within the community designated to benefit from the project.

Single Purpose Project

One or more activities designed to meet a specific community development need.

Supporting (Project) Delivery Costs

Costs that support project delivery costs (ex. Construction Management). Regarding reporting purposes, beneficiaries are not reported separately rather they are associated with the most appropriate activity.

Target Area

A defined geographic area within which an applicant has determined that, based on community plans or other studies, a need for community development activities exists. A target area may be a neighborhood of 100 or more families in a community or an entire community. The target area must encompass the entire area served by the project. See *Special Policies for Activities* section.

Threshold

The minimum that an applicant must score to be considered for funding. For example, “*A project scoring less than 25 points does not meet the minimum threshold for further consideration by the Project Review Committee*” means that if the application does not score at least 25 points, the application will not be funded.

Vital Document

Any document that is critical for ensuring meaningful access to the Recipient’s major activities and programs by beneficiaries generally and LEP persons specifically.

Part VI. Appendices, Addendums, & Other Additional Materials

This section includes supplemental information about the CDBG program. Depending on the year of your application or award, the information may or may not apply to your entity. Review the information carefully.

Appendices

Appendices include details about statutory changes, typically triggered by legislative action, that impact the eligibility under the program for a limited time. *A copy of the Press Releases can be requested from DED.*

- I. **CDBG Press Release: Nebraska CDBG Program Update - HUD Released Updates to LMISD Federal Changes.** This appendix describes census updates; June 27, 2024.

Addendum

Materials included in the addendum are additional announcements or notices regarding application cycles and awards of the CDBG program. Information included in these materials is often special to federal change that addresses the *long-term* requirements of the program, information about the grant schedule, relevant instruction or information to potential applicants, etc. Where appropriate, the changes announced therein are incorporated into the relevant section(s) of these guidelines and so recorded in the Record of Change. *A copy of the Press Releases can be requested from DED.*

- I. **DED Press Release:** Department of Economic Development to Host Community Development Block Grant (CDBG) Webinar; May 14, 2025
- II. **DED Press Release:** Department of Economic Development to Host Community Development Block Grant (CDBG) Webinar; May 13, 2024
- III. **DED Press Release:** Nebraska Department of Economic Development to Host Webinar for 2023 Community Development Block Grant Program; May 16, 2023
- IV. **DED Press Release:** Nebraska Department of Economic Development Announces 2nd Round of Funding for 2022 Public Works Opportunity; November 7, 2022
- V. **DED Press Release:** Department of Economic Development to Host Community Development Block Grant (CDBG) Application Webinar Series; June 1, 2022
- VI. **DED Press Release:** Department of Economic Development to Host Community Development Block Grant (CDBG) Application Webinar Series; May 21, 2021
- VII. **DED Press Release:** DED Publishes Information, Guidelines for Community Development Block Grant Coronavirus (CDBG-CV) Funding; July 1, 2020

Frequently Asked Questions

We have another grant to help with gap financing, can that be used for match?

Please consult with DED if you plan to layer funding.

Can we use ARPA funding with the CDBG project?

The general rule is that ARPA funds cannot be used as match for federal awards. There is an exception when the ARPA funds received were for *government services*. ARPA distributed funds to states and local units of government if they were able to show a revenue loss in government operations/service because of COVID-19. Those funds are not considered ARPA “grant funds” rather those are a replacement of lost revenue. ARPA funds that were received to replace government revenues due to COVID-19 can be used for match. Even if the ARPA funds were received for government services the recipient is required to check with the federal agency to make sure there (1) is no waiver granted for the program, (2) no other circumstances under 2 CFR 200.306(a) limit the use of funds, and (3) there is no other statutory or regulatory impediment to using the funds for the match or cost-share. See Final Rule on page 368-369. [SLFRF-Final-Rule.pdf \(treasury.gov\)](#)

I’m helping multiple communities apply for multiple DED grants in AmpliFund. How do I navigate between applications?

Once logged in to AmpliFund, click **your name** (top right corner) > **Applicant Portal**. A list of all applications to which community(-ies) have granted you access will appear, along with their status, important dates, and amount information.

What is the process of having a library accredited?

The Public Library Accreditation program is managed by the Nebraska Library Commission. Please reach out to <http://nlc.nebraska.gov/grants/index.aspx> or call (402) 471-2045 for more information.