

NEBRASKA

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) APPLICATION GUIDELINES

State of Nebraska

2026 | 1.0

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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		
2026 Program Year		
1.0	6/2026	<ol style="list-style-type: none"> 1. Added 2.5.12 Application Amendment section 2. Updates to 2.5.5 Application Threshold and added Project Specific 3. Significant changes to opportunity scoring criteria 4. Added Pre-Award Compliance Section 5. Added Opportunity Zone & CRA Achievements 6. HUD removed Target Area Definition 7. TD: Increased Project Activity maximum from \$450,000 to \$600,000; included quarterly review scoring. 8. ED: Decrease max threshold to \$500,000; and minimum to \$105,000; included quarterly review scoring
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 2.5.5 Application Thresholds. 4. Added subsections 2.5.6 Priority Applicant & 2.5.7 Curing an Incomplete Application. 5. ED: Added 17C as eligible activity; Added LMA, LMC and S/B as eligible National Objectives; Removed Targeted Industry section, which was derived from the <i>Imagine Nebraska Act</i>; clarified eligibility of Non-Profit businesses. 6. Planning: Added S/B as eligible National Objective (SBA only). 7. PW: Increased Project Activity maximum from \$450,000 to \$600,000. 8. TD: Significant changes to scoring section. 9. 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. 10. Added Application Budget User Guide section. 11. 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 (O3F) removed as eligible activity.

		5. PWF: HUD Matrix 03F Parks, Recreational Facilities added <i>priority will <u>not</u> 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	<ol style="list-style-type: none"> 1. Second round of funding for 2022 Public Works Opportunity announced.
1.0	6/2022	<ol style="list-style-type: none"> 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	<ol style="list-style-type: none"> 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/Euna)
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

Nicole Bartels, Community Development Division Administrator |

Tourism Development | Planning402-314-5852

Gina Doose, Financial Packager | *Downtown Revitalization*.....402-471-4668

Chelsea Egenberger, Community Consultant | *Public Works*402-471-3369

Laura Hart, Program Dev. Consultant | *Consolidated Plan Coordinator*308-202-0177

Tom Stephens, Financial Packager | *Economic Development*402-471-6587

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
Planning (PP)	Individual or Joint	July 1 <i>Potential 2nd cycle tbd</i>	September 15**	Nicole Bartels
Public Works Facilities (PWF) or Infrastructure (PWI)	Individual or Joint	July 1 <i>Potential 2nd cycle tbd</i>	September 15**	Chelsea Egenberger
Economic Development (ED)*	Individual or Joint	July 1	Open cycle through June 30, 2026; reviewed quarterly	Tom Stephens
Tourism Development (TD)**	Individual or Joint	July 1	Open cycle through June 30, 2026; reviewed quarterly r	Nicole Bartels

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

**TD Projects require a Pre-Application

*** Awards are typically announced mid-November.

Open cycles. These funding opportunities (ED, TD) accept applications throughout the program year (July 1, 2026 – June 30, 2027). An applicant can receive more than one award during the program year. A separate application is required. Visit DED’s **CDBG home page** (<https://opportunity.nebraska.gov/programs/community/cdbg/>) to request pre-application assistance in a virtual meeting or reach out to the CDBG program representative.

The following funding opportunities are made available through the CDBG Program for 2026 Program Year (July 1, 2026 – June 30, 2027):

CDBG Opportunity Chart 2026

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
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</i> Section 3.3.2 (PWF) Section 3.4.2 (PWI)		\$250,000	\$600,000	10% or \$25,000	\$5,000*
Economic Development (ED)	LMJ LMA LMC SBA SBS <i>Priority Activities: 18A Econ. Dev. Direct Financial Assistance to For-Profit Business</i>		100%	\$105,000	\$500,000	\$10,000 (flat amount)
Tourism Development (TD)	LMA LMC LMJ SBA SBS <i>Priority Activities: Refer to Part III, Section 4.2.2.</i>	25%	\$250,000	\$600,000	10% or \$25,000	\$5,000

*flexibility to adjust threshold for cause through a project wavier

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

2.1.1 | 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 [Section 2.1.3 – Special Policies for Applicants](#).

2.1.2 | 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.

2.1.3 | 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 [Nebraska Secretary of State - Corporation and Business Entity Searches - Search](#)
- b) System for Awards Management (SAM), <https://sam.gov/>
- c) Agreement (*if applicable*)
- d) Memorandum of Understanding (MOU) (*if applicable*)

- 5) Eligible applicants may provide CDBG funds to a subrecipient Neighborhood-based Nonprofit Organization or **Nonprofit Development Organization (NDO)**. If an application requires **participation of an NDO** they must provide written assurance that it concurs with the project and is committing its resources, if any, as stated in the application. An MOU 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 MOU is required before release of funds.

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

- a) Proof of Secretary of State Registration [Nebraska Secretary of State - Corporation and Business Entity Searches - Search](#)
- b) System for Awards Management (SAM), <https://sam.gov/>
- c) Memorandum of Understanding (MOU) (*if applicable*)

- 6) **Economic Development.** As allowed within *Section 2.1.3 (4) and (5)*, this funding opportunity allows the eligible applicant, as identified in *Section 2.1.1*, 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 *Section 2.3.2*), NDOs are generally not involved.

For more information regarding NDOs reach out to a DED Program Representative.

2.1.4 | Applicant Account: Grant Management System

DED utilizes the grant management system (GMS) known as **AmpliFund/Euna**. This system will be used to submit applications and, if awarded, serves as the tool for ongoing grant management by the subrecipient. If the applicant does not have an account portal, please refer to [DED Grants Help Center](#) for guidance. If the applicant already has an account and needs to add a new user, please visit to [DED Grants Help Center](#).

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. *Upload file sizes are limited to 1GB.*

Section 2: Funding Summary

2.2.1 | National Objectives Defined

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 and “Blight” has the same meaning as blighted areas as defined in Nebraska Community Development Law⁵. The focus of activities under the Prevention/Elimination of Slums and Blight (S/B) 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)**⁶. 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*⁷ 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.

⁵ Neb Rev Stat. §18-2103 et seq

⁶ Refer to the CDBG Manual, Chapter 3 and Exhibit F1-F2 for eligibility requirements

⁷ 24 CFR 570.483(b)(5)

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 2.2.4 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.

2.2.3 | 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.

2.2.4 | 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

2.3.1 | 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**.* Applicants are required to identify and document the national objective(s) selected to qualify their project for CDBG funding.

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*. **Funding priority will be provided to the applicant meeting the national objective benefitting low- and moderate-income persons.**

Under the CDBG Program, subrecipients may use funds to undertake a variety of public facilities and public improvement projects. In general, public facilities and public improvements are interpreted to include all facilities and improvements that are publicly owned, or that are owned by a nonprofit and open to the general public⁸.

2.3.2 | 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

⁸ [Basically CDBG Chapter 6 Public Facilities](#)

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.

2.3.3 | Special Policies for Activities

Special policies affecting CDBG eligible activities listed in *Section 2.3.1* are:

- 1) **Facilities containing both eligible and ineligible uses**⁹. 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**¹⁰. 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.

⁹ 24 C.F.R. § 570.200(b)(1)

¹⁰ [24 CFR 570.200\(b\)\(2\)](#)

3.3.4 | 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

2.4.1 | Grant Amount and Matching Funds

Matching funds are funds that must be contributed by the applicant and are required in most instances. 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.

2.4.2 | 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.

2.4.3 | 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. DED has identified two types of **project (activity)** delivery costs are: 1) **project** delivery costs (i.e. general administration) and 2) **supporting** delivery costs (i.e. construction management). 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

2.5.1 | Application Development and Use of Consultants

NOTE: *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.

2.5.2 | 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/>.

2.5.3 | 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 2026 CDBG applications on July 1, 2026.

Applicants may submit 2026 applications until June 30, 2027 (by 11:59PM CT), or as otherwise directed by the department for these opportunities:

- Economic Development
- Tourism Development

The 2026 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, 2026**
- Planning Due: **September 15, 2026**
Additional Cycles: TBD
- Public Works – Facilities..... Due: **September 15, 2026**
Additional Cycles: TBD
- Public Works – Infrastructure Due: **September 15, 2026**
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

2.5.4 | Application Criteria

Refer to each opportunity's Application Criteria section.

2.5.5 | Application Thresholds

The 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 *Section 2.1.1*.
- 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) Applicant has secured matching funds and met the required match percentage threshold at time of application (excludes Downtown Revitalization and project specific waiver)
- f) Activities are eligible and are identified as a State CDBG Priority. See *Section 2.3.1*.

Project-Specific Application Thresholds:

- a) As applicable, applicant met the Public (Area) Benefit Test for Low-and Moderate Area (LMA) projects (See Project Eligibility Section).
- b) As applicable, applicant has identified and provided specific targeted population and justification for Low-Moderate-Clientele (LMC) group as National Objective (See Project Impact Section).
- c) As applicable, applicant for Tourism Opportunity provided an explanation that the attraction meets the 2,500 visits or more annually from origins of at least 100 miles away (See Project Impact Section).
- d) As applicable, applicant applying for O3E Neighborhood facilities for a library is accredited through the Nebraska Public Library Accreditation program

2.5.6 | 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 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.

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

2.5.7 | 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.

2.5.8 | Application Threshold Review and Selection Process

All applications will be reviewed by the CDBG program representative to ensure that threshold requirements identified in *Section 2.5.5* 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, *Section 2.5.7*. 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 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.

2.5.9 | 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.

2.5.10 | 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.

2.5.11 | 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 Certification

This is a required exhibit for all CDBG applications, as indicated within 24 CFR Part 42. This is a certification that the UGLG has adopted the states plan or created their own plan. A certification must be submitted for each CDBG award. 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 **clienteles**, 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.

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.

2.5.12 | Application Amendment(s)

Under CDBG requirements, an applicant may not implement a substantial change to an approved project without first following applicable amendment procedures and obtaining any required approval from DED. Changes are generally considered substantial when they alter the project's *purpose, scope, location, scale, activities, or beneficiaries*. Such amendments typically require compliance with citizen participation requirements and formal review before implementation. HUD regulations and CDBG program guidance consistently recognize that significant project modifications – including new activities or material changes to approved applications – must be reviewed and approved through appropriate amendment process before CDBG funds can be awarded for the revised activity.

2.5.13 | Application Withdrawal

Applicants may withdraw their application voluntarily at any point before official award if they decide not to proceed or cannot meet eligibility requirements through written notice to DED.

Section 6: Pre-Award Compliance

Consideration should be given to a variety of Federal and State regulations that applicants must not undertake, commit funds to, or authorize any activity before receiving an award.

1. **Conflict of Interest:** Disclosure of potential conflicts involving elected officials, employees, consultants, or beneficiaries. Resolution of any conflicts before grant award.
2. **Environmental Review and Choice-Limiting Actions:** Applicants are prohibited from undertaking any choice-limiting actions prior to the completion of the environmental review process and receipt of required environmental clearances. Choice-limiting actions include activities that could have an adverse environmental impact or restrict the consideration of reasonable alternatives, such as acquisition of property, demolition, construction, site preparation, or execution of construction contracts. Any project costs incurred in violation of this requirement may be deemed ineligible for CDBG reimbursement.
3. **National Historic Preservation Act (Section 106)** for projects involving buildings, districts, or areas with potential historic significance. No construction activities should begin until historic preservation review is completed.

Section 7: 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*. 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. 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.

3. Anti-Displacement Regulations (*Application Exhibit D*)

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.

4. 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.

5. 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.

6. 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.

7. Engineering and Architecture Act - NEW

For public works projects an engineer and architect is required if project is over \$144,000 which went into effect on July 1, 2024.

8. 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.

9. 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.

10. 2 CFR §200 Subpart F

Local governments and nonprofits that expend \$1,000,000 or more of federal funds must conduct a single audit of federal and local funds.

11. Procurement (CDBG Readiness/Special Conditions)

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.

12. Section 3 (24 CFR Part 75)

Section 3 is a provision of the Housing and Urban Development Act of 1968. The purpose of Section 3 is to ensure that employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing Federal, State, and local laws and regulations, be directed to low- and very low-income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low- and very low-income persons. 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 the Section 3 threshold.

13. 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 – COMPETITIVE CYCLE

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

Opportunity 1: Downtown Revitalization (DTR)

3.1.1 | DTR Purpose

CDBG funds can be utilized for downtown revitalization projects. The purpose of the Downtown Revitalization (DTR) opportunity is to leverage investments that support the revitalization and redevelopment of downtown infrastructure, strengthen community growth capacity, and address health, safety, and commercial needs within traditional business centers of Nebraska communities. The DTR funding opportunity has evolved over time and is formally documented as a distinct funding category in Nebraska since at least 2008. DTR 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.

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).

3.1.2 | DTR Priority Activity

Eligible activities must be located within the downtown area. The Priority Activity¹¹ 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), abatement of asbestos hazards, lead-based paint hazard evaluation and reduction, and the correction of code violations¹². 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.

3.1.3 | DTR Eligible Activities

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

¹¹ Priority meaning that 50% of the funding request must benefit the Commercial Rehab activity.

¹² 24 CFR 570.202(a)(3)

- 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)***¹³: Supporting Activities related to removal of architectural barriers that restrict 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.

3.1.4 | DTR Ineligible Activities

- a) Nonprofit-owned nonresidential buildings and improvements are not eligible under §570.201(c) .
- 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) Pursuant to 24 CFR 570.207(b)(1)(iii), CDBG funds may not be used for furnishings and personal property. This prohibition includes equipment, fixtures, furnishings, or other personal property that are not integral structural fixtures.
- e) Refer to *Section 2.3.2 – Ineligible Activities*.

¹³ ***NOTE: Proceed with caution if using this activity and refer to CDBG Manual, Chapter 3 on National Objective eligibility.

3.1.5 | 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.)

3.1.6 | 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	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 P	Program Guidelines	
Exhibit Q	Budget and Local Cost-Share Documentation	
Exhibit R	Preliminary Project Description & Level of Review	

3.1.7 | 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 40 points is required and some criteria require a minimum score as noted below.

Selection Criteria Matrix	Maximum	Threshold Minimum
1. Project Need	30	15
2. Project Impact	20	10
3. Project Readiness	30	10
4. Community Support	10	5
5. Achievements	10	-
Total points	100 points	40 points
On-Site Review (Conducted at DED discretion. NOTE: No points awarded, in supplement of Application only.)		

For each of the following sections, a project narrative must be provided directly into the GMS and additional information may be supplemented as noted within each individual criterion. **#6 Supplemental Materials allows uploads of additional documentation.**

1. Project Need

Up to 30 points is possible. A minimum of 15 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.*

POINTS IN THIS SECTION INCLUDE:	
1	<u>Community Needs Assessment/Survey (Yes or No)</u> Has the community completed a Needs Assessment/Survey?
Up to 2	<u>Community Needs Assessment/Survey Explanation</u> If yes, please explain how the community needs assessment was conducted (in-person, US mail or on-line), including the response rate.
1	<u>Community Priority List (Yes or No)</u> Has the community developed a priority list using needs assessment, survey, public meetings, a 1- and 5-year Action Plan, etc.?
Up to 2	<u>Community Priority Explanation including Community, Housing, and Economic Development Efforts</u> If yes, applicants shall explain community, housing, and economic development efforts conducted within the past five (5) years that involved significant citizen participation and addressed identified community priorities. Examples may include, but are not limited to: <ul style="list-style-type: none"> 1. Comprehensive planning processes 2. Housing studies 3. Capital improvement planning 4. LB840 programs 5. Business retention and expansion surveys 6. Fundraising or strategic planning initiatives

	<p>Responses should demonstrate how these efforts inform, support, or connect to the proposed project and how public input has shaped community priorities. Some of these areas will be further explained in the Project Readiness and Community Support sections.</p>
up to 5	<p><u>Proposed Project Explanation</u></p> <p><u>Documentation of Need and Cause of the Problem</u></p> <p>Applicants must clearly describe the specific problem the project is intended to address. The narrative should include:</p> <ol style="list-style-type: none"> 1. The underlying cause(s) of the problem 2. How long the issue has existed 3. Who or what is affected (e.g., residents, businesses, public facilities, infrastructure systems) 4. The geographic area impacted <p>Responses must be supported by factual documentation such as photographs, data, inspection reports, engineering assessments, code violations, or other credible sources that demonstrate the existence and scope of the problem. If needed, include documents in and upload in Section 6 Supplemental Materials.</p> <p><u>Severity, Urgency, and Regulatory Compliance</u></p> <p>Applicants must document the severity and urgency of the need. This may include:</p> <ol style="list-style-type: none"> 1. Evidence of deteriorating conditions 2. Health and safety concerns 3. Service disruptions or capacity deficiencies 4. Risk of further damage or escalating costs if not addressed 5. Identification of any state or federal regulations that are currently being violated or are at risk of violation <p>Applications that clearly demonstrate immediate or pressing concerns—particularly those involving health, safety, or regulatory compliance will receive higher scores.</p>
Up to 4	<p><u>Relative Importance Within Overall Community Needs</u></p> <p>Applicants must describe how the proposed project ranks among other community needs. The response should explain:</p> <ol style="list-style-type: none"> 1. Why is this project important to the community? 2. How addressing this issue will advance broader community goals <p>Scoring will prioritize applications that present well-documented, data-driven evidence of need; clearly demonstrate urgency and impact; and show how the project aligns with the community’s overall development strategy. If this proposed project is not identified as a high priority, the application should explain how funding this project would enable other resources to be redirected toward higher-priority needs. For example, CDBG funds may used to fund a street improvement, allowing local funds to be allocated to a park project on the priority list.</p> <p>Where relevant, applicants should include financial information demonstrating long-term impact (e.g., reduced maintenance or operating costs, increased efficiency, cost savings redirected to other community priorities, leveraged funding, or revenue generation).</p>
Up to 2	<p><u>Past Efforts</u></p> <p>Applicants must demonstrate sustained efforts over the previous five (5) years to address identified community needs. Responses should clearly describe actions taken to improve infrastructure, public</p>

	<p>facilities, and overall quality of life, including but not limited to street improvements, water and sewer system upgrades, senior center enhancements, ADA compliance initiatives, and other community development activities. The narrative should explain how the proposed project fits within and builds upon these prior efforts.</p> <p>Applicants should also detail any past fundraising activities that increased public awareness of the project and generated financial resources to be used as matching funds. This may include local budget allocations, capital campaigns, grants, in-kind contributions, partnerships, or other funding mechanisms that demonstrate financial commitment and community support.</p>
Up to 2	<p><u>Alternatives</u></p> <p>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.</p>
1	<p><u>Community Plan (Yes or No)</u></p> <p>Is the project connected to a community plan?</p> <p>Examples:</p> <ol style="list-style-type: none"> 1) Public Works Water/Wastewater project is connected to a Preliminary Engineering Report. 2) Community Facility is part of a Comprehensive Plan
Up to 5	<p><u>Community Planning Explanation</u></p> <p><u>Alignment with Adopted Community Long-Range Plans</u></p> <p>Applicants must briefly explain how the project scope is consistent with the goals and objectives of one or more formally adopted or approved community long-range plans (e.g., Comprehensive Plan, Community Redevelopment Plan, Capital Improvements Plan, Strategic Plan, or similar planning document). Responses should clearly identify the specific plan(s), reference relevant goals or priority areas, and describe how the proposed project advances those objectives.</p> <p>Scoring will prioritize projects that show strong plan alignment, documented need supported by formal analysis, and a demonstrated track record of coordinated planning and community engagement.</p> <p><u>Evidence-Based Solution and Supporting Documentation</u></p> <p>Applicants must indicate whether a formal study (e.g. Predevelopment Study/Downtown Revitalization Plan, engineering or feasibility studies, etc.) or report has been completed that recommends the proposed solution. <i>As applicable</i>, the response must identify:</p> <ol style="list-style-type: none"> 1. The name and type of study/report 2. The entity that completed the study 3. The date of completion 4. The date of adoption 5. The date of last update to formal plan <p>If a formal study is identified include the formal study or report as an upload in Section 6 Supplemental Materials.</p>

Up to 5	<p><u>Sustainably / Continued Use</u> (For guidance see supplementary attachment)</p> <p>Describe how the project will remain active and beneficial after completion (Duration of Benefit). Explain how the target population (e.g., low- and moderate-income (LMI) residents) will continue to benefit (Community Impact Longevity) and how the asset, service, or infrastructure will be maintained over time (Operational Sustainability).</p>
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2. 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 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.*

POINTS IN THIS SECTION INCLUDE:	
2	<p><u>Project Eligibility</u></p> <p>Does the project meet the National Objective eligibility? (Yes or No)</p> <p>Provide explanation as applicable:</p> <ul style="list-style-type: none"> • LMI – <u>Exhibit E/Exhibit E1-E2</u> (Census Tract/block group or approved income survey) <ul style="list-style-type: none"> ○ Is the project activity under LMA, at least 51% of the residents in the service area meet LMI? Explain. • LMI – <u>Exhibit E3</u> (method of determining beneficiary income, etc.) <ul style="list-style-type: none"> ○ Does the project benefit a clientele group (HUD defined 8 groups) that is presumed to be principally low- and moderate-income persons? Explain. • S/B – <u>Exhibit F SBA</u> (local designation) <ul style="list-style-type: none"> ○ Do at least 25% of the properties throughout the area experience or more of the conditions? Or, public improvements through the area are in a general state of deterioration. Explain. ○ Designated within 10 years? • S/B – <u>Exhibit F SBS</u> (local designation) <ul style="list-style-type: none"> ○ Does the project eliminate specific conditions detrimental to public health and safety? Explain.
Up to 3	<p><u>Project Eligibility Explanation</u> (For guidance see supplementary attachment)</p> <p>Provide a clear narrative demonstrating how project meets a national objective, with supporting data and methodology and explaining compliance with the CDBG eligibility category.</p>
Up to 10	<p><u>Project Outcome Explanation</u> (For guidance see supplementary attachment)</p> <p><u>Community Benefit and Benefit to LMI Persons</u></p> <p><i>As applicable</i>, applicants must describe how the completed project activities will benefit the community as a whole, with specific emphasis on benefits to low- and moderate-income (LMI) persons. Responses should clearly explain:</p> <ol style="list-style-type: none"> 1. The nature and scope of the anticipated benefits

	<p>2. How LMI individuals or households will directly or indirectly benefit</p> <p>3. The extent to which the project addresses documented community needs</p> <p>Projects that demonstrate substantial, direct, and lasting benefit to LMI persons will receive higher consideration.</p> <p><u>Measurable Outcomes and Impact on Identified Needs</u></p> <p>Applicants must describe the proposed project outcomes in <i>measurable units</i> (e.g., number of persons served, jobs created or retained, infrastructure improvements completed, etc.). The application should:</p> <ol style="list-style-type: none"> 1. Quantify expected accomplishments during the implementation period 2. Explain how these outcomes will reduce or eliminate the identified need(s) 3. Describe any remaining unmet needs and outline plans to address them, if applicable <p>Higher scores will be awarded to projects with clear, realistic, and data-driven outcomes that demonstrate meaningful progress toward resolving identified needs.</p>
Up to 5	<p><u>Project Area Explanation</u> (For guidance see supplementary attachment)</p> <p>Explain how the Project Service Area Map – Exhibit M (defined service boundaries) meets the eligibility?</p> <p>NOTE: this is not the same as project description.</p>

3. Project Readiness

Up to 30 points possible. A minimum of 10 points is required in this section to meet threshold. This section gives the applicant the opportunity to describe a workplan for solutions to the problems/needs and impact 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.*

POINTS IN THIS SECTION INCLUDE:	
10	<p>CDBG Ready Certification (<i>this can be submitted prior to application submission</i>)</p> <ul style="list-style-type: none"> • SAM.gov Active – Exhibit N • Verification of Adopted Procurement Procedures (federal/state/local review) • Verification of Adopted Code of Conduct • Verification of Financial Management Internal Control (Uniform Guidance) • Adopted Citizen Participation Plan (<i>project specific</i>) – Exhibit C2 • Residential-Anti Displacement Relocation Assistance Plan Certification (<i>project specific</i>) – Exhibit D • Excessive Force Certification • Self-Assessment for Section 504 completed • Other CDBG Readiness (<u>For guidance see supplementary attachment</u>)
Up to 10	<p><u>CDBG Readiness Explanation</u></p> <p><u>Project Timeline and Readiness to Proceed</u></p> <p>Applicants must provide a detailed project timeline or milestone outline that clearly demonstrates readiness to initiate the project within ninety (90) days of award. The timeline should include key</p>

	<p>phases such as procurement, environmental review (if applicable), design, bidding, construction start (typically within six months of award, if construction is involved), project completion, and closeout. The response should:</p> <ol style="list-style-type: none"> 1. Identify major milestones and anticipated completion dates 2. Demonstrate that necessary pre-development activities (e.g., planning, engineering, site control, permitting, funding commitments) are complete or substantially underway 3. Explain any potential barriers to implementation and how they will be mitigated <p>Higher scores will be awarded to projects that present a realistic, well-sequenced timeline and demonstrate strong readiness to proceed.</p> <p>FOR <u>DTR projects</u>, this section is incorporated into Exhibit P.</p> <p><u>Capacity and Commitment</u></p> <p>Applicants must describe their capacity and commitment to successfully implement and complete the project in accordance with the proposed work plan and schedule. This includes:</p> <ol style="list-style-type: none"> 1. Demonstrating financial and administrative capacity 2. Identifying systems in place for project oversight, compliance, and reporting 3. Describing prior experience managing similar projects (scope, size, or funding source) <p>Applications that show a proven track record of completing projects on time and within budget will receive stronger consideration.</p> <p><u>Roles, Responsibilities, and Key Staff Experience</u></p> <p>Applicants must clearly identify project-specific roles and responsibilities, including staff, consultants, engineers, administrators, or contractors involved in planning and implementation. The response should:</p> <ol style="list-style-type: none"> 1. Define each key role and its responsibilities 2. Describe the relevant knowledge, certifications, and experience of key staff 3. Demonstrate familiarity with regulatory requirements, procurement standards, financial management, and reporting obligations <p>Scoring will prioritize applicants that present a qualified, experienced team with clearly defined responsibilities and the demonstrated ability to manage, implement, and complete the project successfully and in compliance with program requirements.</p>
Up to 5	<p><u>Project Financial Explanation</u></p> <p><u>Project Budget Detail and Eligibility of Expenses</u></p> <p>Applicants must provide a detailed description of overall project expenses. The narrative should clearly identify and explain all anticipated costs, including but not limited to:</p> <ol style="list-style-type: none"> 1. Supplies and materials 2. Engineering and design costs 3. Labor costs (For <i>construction projects</i>, applicants must indicate whether Davis-Bacon wage rates have been considered and incorporated into cost estimates, where applicable) 4. Construction costs 5. Administrative or professional services 6. Any other related or indirect project costs 7. Acquisition of property <p>The proposed budget (i.e cost estimates) should be itemized, clearly justified, and aligned with the proposed scope of work. Higher scores will be awarded to applications that present realistic, well-</p>

	<p>supported cost estimates consistent with industry standards and regulatory requirements. Please upload any prepared cost estimates in Section 6 Supplemental Materials.</p> <p>FOR <u>DTR projects</u>, this section is incorporated into Exhibit P.</p> <p><u>Project Matching Funds</u> Applicant must describe if the matching funds are secured (i.e., cash on-hand) in the application exhibit (Exhibit Q). Matching funds are funds that must be contributed by the applicant. The proposed match must be towards CDBG-eligible activities directly related to the proposed project(s). Consideration for the match may be given for such sources as public and/or private funds. An all-cash match is preferable.</p> <p>FOR <u>DTR projects</u>, this section is incorporated into Exhibit P.</p> <p><u>Leveraging Additional Funding and Community Effort</u> <i>As applicable</i>, applicants must describe efforts made to secure additional funding (e.g. non-CDBG resources) and demonstrate local financial commitment to the project. The narrative should identify funding sources that have been contacted or pursued, which may include, but are not limited to:</p> <ol style="list-style-type: none"> 1. The United States Department of Agriculture Community Facilities Program 2. Programs through USDA Rural Development 3. Local government resources (e.g. Sales Taxes) 4. Foundations (e.g. Community Foundations & The Nebraska Community Foundation) 5. Local fundraising initiatives or private contributions 6. Grants <p>Applicants should specify which funding sources were contacted, the status of those requests (secured, pending, denied, or planned), and the amount of funding committed or anticipated.</p>
Up to 5	<p><u>Project Description Explanation</u></p> <p><u>Project Description and Scope Clarity</u> (For guidance see supplementary attachment)</p> <p>Applicants must provide a clear and detailed description of the proposed project (Exhibit R), including the location, scope of work, and any site-specific considerations. The description should be sufficiently detailed to demonstrate feasibility and alignment with the proposed budget and timeline.</p> <p><u>Environmental Review and Potential Delays</u></p> <p>Applicants must disclose any known environmental concerns that could delay or affect the project. This includes, but is not limited to:</p> <ol style="list-style-type: none"> 1. Required environmental reviews or clearances 2. Floodplain considerations 3. Historic preservation concerns 4. Hazardous materials or contamination issues 5. Wetlands or other regulated environmental features <p>If environmental issues are identified, the applicant must explain the nature of the concern, its potential impact on the timeline, and the steps planned to address or mitigate the issue.</p> <p>Projects with no known environmental barriers, or with clearly identified mitigation plans and realistic timelines, will score more favorably.</p>

4. Community Support

Up to 10 points is possible. A minimum of 5 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.*

POINTS IN THIS SECTION INCLUDE:	
Up to 5	<p><u>Community Engagement Explanation</u></p> <p><u>Meaningful Engagement of Community Residents</u> (For guidance see supplementary attachment) Applicants must demonstrate that community citizens were meaningfully engaged in identifying needs and shaping the proposed project. The response should describe the engagement process, including:</p> <ol style="list-style-type: none"> 1. Public meetings, hearings, surveys, workshops, or other outreach activities 2. Dates and locations of each activity 3. Whether meetings were held at accessible times and locations 4. The number of attendees at public meetings 5. Any complaints, documented concerns, or identified problems (e.g., infrastructure deficiencies, housing needs, service gaps) 6. Adjustments made to the project in response to citizen input <p><i>As applicable</i>, applicants should also describe the availability of translation services, ADA accommodations, or other measures taken to ensure inclusive participation.</p> <p><u>Targeting and Inclusion of LMI Persons</u></p> <p><u>NOTE:</u> <i>This section does not pertain to Slum/Blight projects</i></p> <p><i>As applicable</i>, applicants must demonstrate specific strategies used to reach and involve low- and moderate-income households in project planning and development. The narrative should explain:</p> <ol style="list-style-type: none"> 1. Outreach methods used to engage LMI residents 2. The level and nature of LMI participation 3. How LMI feedback influenced project design and priorities <p>Projects that document direct input from LMI beneficiaries and demonstrate intentional outreach strategies will receive higher scores.</p> <p>Scoring will prioritize projects that demonstrate robust, inclusive, and well-documented community engagement—particularly among LMI residents—along with strong local partnerships and broad community support.</p> <p><u>Documentation of Citizen Participation</u> Applicants are required to include supporting documentation of citizen participation activities, such as meeting notices, sign-in sheets, meeting minutes, survey summaries, photographs, or public hearing records (Exhibit A). If included additional information that was not part of Exhibit A, upload in Section 6 Supplemental Materials.</p>

	<p>Partnerships and Collaboration Applicants should describe any collaboration with organizations that serve LMI populations, such as nonprofit service providers, housing authorities, community action agencies, or other community-based organizations. The response should identify partners, describe their role in the project, and explain how collaboration strengthens outcomes for LMI residents.</p> <p>Letters of Support and Demonstrated Community Backing Applicants should indicate whether letters of support (Exhibit L) have been obtained and included in the application. Letters from community members, partner organizations, local officials, or other stakeholders demonstrating commitment to the project will strengthen the application, upload in Section 6 Supplemental Materials.</p> <p>DTR ONLY: Business Letters of Support: Refer to supplementary attachment.</p>
Up to 5	<p>Ongoing Engagement Plan</p> <p>Applicants must describe how they will continue to engage community members—particularly low- and moderate-income (LMI) residents—throughout the implementation phase of the project. The response should outline a clear and structured plan that includes:</p> <ol style="list-style-type: none"> 1. Methods of ongoing communication (e.g., public meetings, project updates, website postings, social media, mailings, surveys, or community briefings) 2. Frequency and timing of engagement activities 3. Strategies to ensure accessibility (e.g., ADA-compliant locations, accessible formats, translation services if applicable) 4. Procedures for receiving, documenting, and responding to citizen comments or complaints 5. Identification of staff responsible for community outreach and communication <p>Applicants should also describe how community feedback received during implementation will be incorporated into project adjustments, where appropriate, and how progress and outcomes will be shared with stakeholders.</p> <p>Higher scores will be awarded to applicants that present a proactive, transparent, and inclusive engagement strategy demonstrating continued accountability to residents—especially LMI beneficiaries—throughout the life of the project.</p>

5. 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:

POINTS IN THIS SECTION INCLUDE:	
5	<p>Economic Development Certified Community (EDCC).</p> <p>For a complete list of communities and additional information, visit the DED website at: https://opportunity.nebraska.gov/programs/community/edcc/</p> <p>UPLOAD: Certifications or other documentation provided by DED that recognizes <i>status</i></p>
	<p>DED Leadership Certified Community (LCC)</p> <p>For a complete list of communities and additional information, visit the DED website at: https://opportunity.nebraska.gov/programs/community/lcc/</p>

	UPLOAD: Certifications or other documentation provided by DED that recognizes <i>status</i>
5	<p>Community Redevelopment Agency (CRA) or Economic Development Organization</p> <p>A CRA is established to improve specific areas, known as Community Redevelopment Areas (CRAs), which are identified as blighted or economically distressed due to unsafe conditions, disinvestment, or neglect. A CRA is local government body decided to revitalizing blighted or underdevelopment urban area through planning , redevelopment projects, and public-private investment.</p> <p>Or if the community doesn't have a CRA, but the community has a Redevelopment Authority or other downtown/business/community/economic development organization that is operational and functioning within the community.</p> <p>To receive points for this criterion, the applicant shall include a letter from the organization that verifies the presence of such organization in the community <u>and</u> provides a description of how the organization has played an active role. Moreover, the letter must describe how the organization, applicant, and general public collaborate in terms of the proposed project.</p> <p>UPLOAD: Organization Letter & Narrative</p>
Bonus +5	<p>Opportunity Zones</p> <p>Originally established by Congress¹⁴ through the Tax Cuts and Jobs Act (TCJA) of 2017, the Federal Opportunity Zones Program was made permanent with the passage of the One Big Beautiful Bill Act (OBBBA) of 2025. The purpose of the program is to promote investment and drive economic growth in low-income and/or economically disadvantaged communities. Opportunity Zones: Investing in Communities - HUD Exchange</p> <p>The OBBBA authorized the governor of each U.S. state and territory to nominate a certain number of qualifying census tracts as "Opportunity Zones."</p> <p>Is this project located within an eligible Nebraska Opportunity Zone? (Yes or No)</p> <p>Opportunity Zones - Nebraska Department of Economic Development</p>

6. Supplemental Materials UPLOAD

Depending on the nature and scope of the project activities proposed, the following information shall be **included** and **UPLOADED** to support the application:

- a) **Project Need:** Project Photographs , Formal Study/report, etc.
- b) **Project Impact:** Water/Wastewater User Fees, Tourism event participation documentation, etc.
- c) **Project Readiness:** Facility Floor Plan, ERR Preparation, Ownership verification, 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, Cost estimates, Parcel data, etc.
- d) **Community Support:** Citizen Participation documentation, etc.

¹⁴ [Map of Opportunity Zones | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](#)

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: Planning (PP)

3.2.1 | PP Purpose

CDBG funds can be utilized for planning projects. Implemented in 2005, 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.

3.2.2 | 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.

3.2.3 | 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.

3.2.4 | 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 plans¹⁵.
- b) Refer to [Section 2.3.2](#) for other Ineligible Activities.

3.2.5 | 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

¹⁵ §570.205(a)(4)(iii)

	<ul style="list-style-type: none"> ▪ 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.
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3.2.6 | 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	if applicable
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	

3.2.7 | 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	Points Possible	Threshold Minimum
1. Project Need	30	10
2. Project Impact	30	10
3. Project Readiness	30	10
4. Community Support	10	-
Total Points	100	30

For each of the following sections, a project narrative must be provided directly into the GMS.

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.*

Points in this section include:	
Up to 10	<p>Overall Purpose Describe the plan and include the existing or imminent problem based on existing, identifiable problems, and conditions. How would the plan address it? How were the problems determined? If this project is to address disaster mitigation, please explain.</p>
Up to 5	<p>Goals & Objectives. The goal is the ultimate end point. The objectives are precise actions/steps taken to get there – i.e. specific, measurable, tangible. If awarded, describe the community’s goal for the project. Describe what objectives will be set to ensure project success.</p>
Up to 5	<p>Accomplishment Will the community impact be measurable? (Yes or No). If yes, explain the degree to which the accomplishments within project implementation (after plans have been completed) will reduce or eliminate the need(s). How does the community plan to eliminate what needs remain?</p>
Up to 5	<p>Past Efforts What has the community done previously to resolve the problem stated above? Has the community completed any past formal or informal planning efforts to resolve the problem? (Yes or No). If yes, please explain the formal or informal planning efforts.</p>
Up to 5	<p>Alternatives Other than CDBG, were any alternative resources considered? (Yes or No). If yes, explain.</p>

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.*

Points in this section include:	
Up to 10	<p>Project Eligibility Does the project meet the National Objective eligibility? (Yes or No) Provide explanation as applicable:</p> <ul style="list-style-type: none"> • LMI – Exhibit E/Exhibit E1-E2 (Census Tract/block group or approved income survey) <ul style="list-style-type: none"> ○ Is the project activity under LMA, at least 51% of the residents in the service area meet LMI? Explain. • LMI – Exhibit E3 (method of determining beneficiary income, etc.) <ul style="list-style-type: none"> ○ Does the project benefit a clientele group (HUD defined 8 groups) that is presumed to be principally low- and moderate-income persons? Explain. • S/B – Exhibit F SBA (local designation)

	<ul style="list-style-type: none"> ○ Do at least 25% of the properties throughout the area experience or more of the conditions? Or, public improvements through the area are in a general state of deterioration. Explain. ○ Designated within 10 years?
Up to 15	<p><u>Project Outcome Explanation</u> (For guidance see supplementary attachment)</p> <p><u>Community Benefit and Benefit to LMI Persons</u> <i>As applicable</i>, applicants must describe how the completed project activities will benefit the community as a whole, with specific emphasis on benefits to low- and moderate-income (LMI) persons. Responses should clearly explain:</p> <ol style="list-style-type: none"> 1. The nature and scope of the anticipated benefits. 2. How LMI individuals or households will directly or indirectly benefit. 3. The extent to which the project addresses documented community needs. <p>Projects that demonstrate substantial, direct, and lasting benefit to LMI persons will receive higher consideration.</p> <p><u>Measurable Outcomes and Impact on Identified Needs</u> Applicants must describe the proposed project outcomes in <i>measurable units</i> (e.g., number of persons served, etc.). The application should:</p> <ol style="list-style-type: none"> 1. Quantify expected accomplishments during the implementation period. 2. Explain how these outcomes will reduce or eliminate the identified need(s). 3. Describe any remaining unmet needs and outline plans to address them, if applicable.
Up to 5	<p><u>Project Area Explanation</u> (For guidance see supplementary attachment)</p> <p>Explain how the Project Service Area Map – Exhibit M (defined service boundaries) meets the eligibility?</p> <p>NOTE: this is not the same as project description.</p>

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 1,300 characters.*

Points in this section include:	
10	<p>CDBG Ready Certification (<i>this can be submitted prior to application submission</i>)</p> <ul style="list-style-type: none"> ● SAM.gov Active – Exhibit N ● Verification of Adopted Procurement Procedures (federal/state/local review) ● Verification of Adopted Code of Conduct ● Verification of Financial Management Internal Control (Uniform Guidance) ● Adopted Citizen Participation Plan (<i>project specific</i>) – Exhibit C2 ● Residential-Anti Displacement Relocation Assistance Plan Certification (<i>project specific</i>) – Exhibit D ● Excessive Force Certification ● Self-Assessment for Section 504 completed

Up to 10	<p><u>CDBG Readiness Explanation</u></p> <p><u>Project Timeline and Readiness to Proceed</u> Applicants must provide a detailed project timeline or milestone outline that clearly demonstrates readiness to initiate the project within ninety (90) days of award. The timeline should include key phases such as procurement, environmental review (if applicable), project completion, and closeout. The response should:</p> <ol style="list-style-type: none"> 1. Identify major milestones and anticipated completion dates. 2. Demonstrate that necessary pre-development activities (e.g., planning, engineering, site control, permitting, funding commitments) are complete or substantially underway 3. Explain any potential barriers to implementation and how they will be mitigated. <p><u>Capacity and Commitment</u> Applicants must describe their capacity and commitment to successfully implement and complete the project in accordance with the proposed work plan and schedule. This includes:</p> <ol style="list-style-type: none"> 1. Demonstrating financial and administrative capacity. 2. Identifying systems in place for project oversight, compliance, and reporting. 3. Describing prior experience managing similar projects (scope, size, or funding source). <p>Applications that show a proven track record of completing projects on time and within budget will receive stronger consideration.</p> <p><u>Roles, Responsibilities, and Key Staff Experience</u> Applicants must clearly identify project-specific roles and responsibilities, including staff, consultants, engineers, administrators, or contractors involved in planning and implementation. The response should:</p> <ol style="list-style-type: none"> 1. Define each key role and its responsibilities. 2. Describe the relevant knowledge, certifications, and experience of key staff. 3. Demonstrate familiarity with regulatory requirements, procurement standards, financial management, and reporting obligations. <p>Scoring will prioritize applicants that present a qualified, experienced team with clearly defined responsibilities and the demonstrated ability to manage, implement, and complete the project successfully and in compliance with program requirements.</p>
Up to 10	<p><u>Project Financial Explanation</u></p> <p><u>Project Budget Detail and Eligibility of Expenses</u> Applicants must provide a detailed description of overall project expenses. The narrative should clearly identify and explain all anticipated costs, including but not limited to:</p> <ol style="list-style-type: none"> 1. Engineering and architecture costs. 2. Administrative or professional services. <p>The proposed budget should be itemized, clearly justified, and aligned with the proposed scope of work. Higher scores will be awarded to applications that present realistic, well-supported cost estimates consistent with industry standards and regulatory requirements.</p> <p><u>Project Matching Funds</u> Applicant must describe if the matching funds are secured (i.e., cash on-hand) in the application exhibit (Exhibit Q). Matching funds are funds that must be contributed by the applicant. The proposed match must be towards CDBG-eligible activities directly related to the proposed project(s). Consideration for the match may be given for such sources as public and/or private funds. An all-cash match is preferable.</p>

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 1,300 characters.*

Points in this section include:	
Up to 5	<p><u>Community Engagement Explanation</u></p> <p><u>Meaningful Engagement of Community Residents</u> (For guidance see supplementary attachment) Applicants must demonstrate that community citizens were meaningfully engaged in identifying needs and shaping the proposed project. The response should describe the engagement process, including:</p> <ol style="list-style-type: none"> 1. Public meetings, hearings, surveys, workshops, or other outreach activities. 2. Dates and locations of each activity. 3. Whether meetings were held at accessible times and locations. 4. The number of attendees at public meetings. 5. Any complaints, documented concerns, or identified problems (e.g., infrastructure deficiencies, housing needs, service gaps). 6. Adjustments made to the project in response to citizen input. <p><i>As applicable</i>, applicants should also describe the availability of translation services, ADA accommodations, or other measures taken to ensure inclusive participation.</p> <p><u>Targeting and Inclusion of LMI Persons</u></p> <p><u>NOTE:</u> <i>This section does not pertain to Slum/Blight projects</i></p> <p><i>As applicable</i>, applicants must demonstrate specific strategies used to reach and involve low- and moderate-income households in project planning and development. The narrative should explain:</p> <ol style="list-style-type: none"> 1. Outreach methods used to engage LMI residents. 2. The level and nature of LMI participation. 3. How LMI feedback influenced project design and priorities. <p>Projects that document direct input from LMI beneficiaries and demonstrate intentional outreach strategies will receive higher scores.</p> <p>Scoring will prioritize projects that demonstrate robust, inclusive, and well-documented community engagement—particularly among LMI residents—along with strong local partnerships and broad community support.</p> <p><u>Documentation of Citizen Participation</u> Applicants are required to include supporting documentation of citizen participation activities, such as meeting notices, sign-in sheets, meeting minutes, survey summaries, photographs, or public hearing records (Exhibit A). If included additional information that was not part of Exhibit A, upload in Section 5 Supplemental Materials.</p> <p><u>Partnerships and Collaboration</u> Applicants should describe any collaboration with organizations that serve LMI populations, such as nonprofit service providers, housing authorities, community action agencies, or other community-based organizations. The response should identify partners, describe their role in the project, and explain how collaboration strengthens outcomes for LMI residents.</p>

Up to 5	<p>Ongoing Engagement Plan</p> <p>Applicants must describe how they will continue to engage community members—particularly low- and moderate-income (LMI) residents—throughout the implementation phase of the project. The response should outline a clear and structured plan that includes:</p> <ol style="list-style-type: none"> 1. Methods of ongoing communication (e.g., public meetings, project updates, website postings, social media, mailings, surveys, or community briefings). 2. Frequency and timing of engagement activities. 3. Strategies to ensure accessibility (e.g., ADA-compliant locations, accessible formats, translation services if applicable). 4. Procedures for receiving, documenting, and responding to citizen comments or complaints. 5. Identification of staff responsible for community outreach and communication. <p>Applicants should also describe how community feedback received during implementation will be incorporated into project adjustments, where appropriate, and how progress and outcomes will be shared with stakeholders.</p> <p>Higher scores will be awarded to applicants that present a proactive, transparent, and inclusive engagement strategy demonstrating continued accountability to residents—especially LMI beneficiaries—throughout the life of the project.</p>
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5. Supplemental Materials UPLOAD

Depending on the nature and scope of the project activities proposed, the following information shall be **included** and **UPLOADED** to support the application:

- a) **Project Need:** Project Photographs , Formal Study/report, etc.
- b) **Project Impact:** Water/Wastewater User Fees, Tourism event participation documentation, etc.
- c) **Project Readiness:** Facility Floor Plan, ERR Preparation, Ownership verification, 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, Cost estimates, Parcel data, etc.
- d) **Community Support:** Citizen Participation documentation, etc.

Opportunity 3: Public Works – Facilities (PWF)

3.3.1 | 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 which was split from public works infrastructure in 2022, 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).

3.3.2 | 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).
- 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)***¹⁶: Supporting Activities related to removal of architectural barriers that restrict 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.

3.3.3 | 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.

3.3.4 | 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 [Section 2.3.2](#) for other Ineligible Activities.

¹⁶ ***NOTE: Proceed with caution if using this activity and refer to CDBG Manual, Chapter 3 on National Objective eligibility.

3.3.5 | 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 ¹⁷
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.

3.3.6 | 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	

¹⁷ This opportunity is eligible for a project specific supplemental funding waiver, please reach out to your program representative.

3.3.7 | PWF Application Criteria

The matrix below outlines the numerical scoring for each selection criterion within the opportunity. Applications may receive a maximum total of 100 points. Certain criteria also require applicants to meet specified minimum scores, as noted below.

Selection Criteria Matrix	Maximum	Threshold Minimum
1. Project Need	30	15
2. Project Impact	20	10
3. Project Readiness	30	10
4. Community Support	10	5
5. Achievements	10	-
Total	100 points	40 points

For each of the following sections, a project narrative must be provided directly into the GMS and additional information may be supplemented as noted within each individual criterion. **#6 Supplemental Materials allows uploads of additional documentation.**

1. Project Need

Up to 30 points is possible. A minimum of 15 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.*

POINTS IN THIS SECTION INCLUDE:	
1	<u>Community Needs Assessment/Survey (Yes or No)</u> Has the community completed a Needs Assessment/Survey?
Up to 2	<u>Community Needs Assessment/Survey Explanation</u> If yes, please explain how the community needs assessment was conducted (in-person, US mail or on-line), including the response rate.
1	<u>Community Priority List (Yes or No)</u> Has the community developed a priority list using needs assessment, survey, public meetings, a 1- and 5-year Action Plan, etc.?
Up to 2	<u>Community Priority Explanation (including community, housing, and economic development Efforts)</u> If yes, applicants shall explain community, housing, and economic development efforts conducted within the past five (5) years that involved significant citizen participation and addressed identified community priorities. Examples may include, but are not limited to: <ol style="list-style-type: none"> 1. Comprehensive planning processes. 2. Housing studies.

	<ol style="list-style-type: none"> 3. Capital improvement planning. 4. LB840 programs. 5. Business retention and expansion surveys. 6. Fundraising or strategic planning initiatives. <p>Responses should demonstrate how these efforts inform, support, or connect to the proposed project and how public input has shaped community priorities. Some of these areas will be further explained in the Project Readiness and Community Support sections.</p>
up to 5	<p><u>Proposed Project Explanation</u></p> <p><u>Documentation of Need and Cause of the Problem</u> Applicants must clearly describe the specific problem the project is intended to address. The narrative should include:</p> <ol style="list-style-type: none"> 1. The underlying cause(s) of the problem. 2. How long the issue has existed. 3. Who or what is affected (e.g., residents, businesses, public facilities, infrastructure systems). 4. The geographic area impacted. <p>Responses must be supported by factual documentation such as photographs, data, inspection reports, engineering assessments, code violations, or other credible sources that demonstrate the existence and scope of the problem. If needed, include documents in and upload in Section 6 Supplemental Materials.</p> <p><u>Severity, Urgency, and Regulatory Compliance</u> Applicants must document the severity and urgency of the need. This may include:</p> <ol style="list-style-type: none"> 1. Evidence of deteriorating conditions. 2. Health and safety concerns. 3. Service disruptions or capacity deficiencies. 4. Risk of further damage or escalating costs if not addressed. 5. Identification of any state or federal regulations that are currently being violated or are at risk of violation. <p>Applications that clearly demonstrate immediate or pressing concerns—particularly those involving health, safety, or regulatory compliance will receive higher scores.</p>
Up to 4	<p><u>Relative Importance Within Overall Community Needs</u> Applicants must describe how the proposed project ranks among other community needs. The response should explain:</p> <ol style="list-style-type: none"> 1. Why is this project important to the community? 2. How addressing this issue will advance broader community goals <p>Scoring will prioritize applications that present well-documented, data-driven evidence of need; clearly demonstrate urgency and impact; and show how the project aligns with the community’s overall development strategy. If this proposed project is not identified as a high priority, the application should explain how funding this project would enable other resources to be redirected toward higher-priority needs. For example, CDBG funds may used to fund a street improvement, allowing local funds to be allocated to a park project on the priority list.</p> <p>Where relevant, applicants should include financial information demonstrating long-term impact (e.g., reduced maintenance or operating costs, increased efficiency, cost savings redirected to other community priorities, leveraged funding, or revenue generation).</p>

Up to 2	<p>Past Efforts</p> <p>Applicants must demonstrate sustained efforts over the previous five (5) years to address identified community needs. Responses should clearly describe actions taken to improve infrastructure, public facilities, and overall quality of life, including but not limited to street improvements, water and sewer system upgrades, senior center enhancements, ADA compliance initiatives, and other community development activities. The narrative should explain how the proposed project fits within and builds upon these prior efforts.</p> <p>Applicants should also detail any past fundraising activities that increased public awareness of the project and generated financial resources to be used as matching funds. This may include local budget allocations, capital campaigns, grants, in-kind contributions, partnerships, or other funding mechanisms that demonstrate financial commitment and community support.</p>
Up to 2	<p>Alternatives</p> <p>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.</p>
1	<p>Community Plan (Yes or No)</p> <p>Is the project connected to a community plan?</p> <p>Examples: 1) Public Works Water/Wastewater project is connected to a Preliminary Engineering Report. 2) Community Facility is part of a Comprehensive Plan</p>
Up to 5	<p>Community Planning Explanation</p> <p><u>Alignment with Adopted Community Long-Range Plans</u></p> <p>Applicants must briefly explain how the project scope is consistent with the goals and objectives of one or more formally adopted or approved community long-range plans (e.g., Comprehensive Plan, Community Redevelopment Plan, Capital Improvements Plan, Strategic Plan, or similar planning document). Responses should clearly identify the specific plan(s), reference relevant goals or priority areas, and describe how the proposed project advances those objectives.</p> <p>Scoring will prioritize projects that show strong plan alignment, documented need supported by formal analysis, and a demonstrated track record of coordinated planning and community engagement.</p> <p><u>Evidence-Based Solution and Supporting Documentation</u></p> <p>Applicants must indicate whether a formal study (e.g. Predevelopment Study/Downtown Revitalization Plan, engineering or feasibility studies, etc.) or report has been completed that recommends the proposed solution. <i>As applicable</i>, the response must identify:</p> <ol style="list-style-type: none"> 1. The name and type of study/report. 2. The entity that completed the study. 3. The date of completion. 4. The date of adoption . 5. The date of last update to formal plan. <p>If a formal study is identified include the formal study or report as an upload in Section 6 Supplemental Materials.</p>

Up to 5	<p><u>Sustainably / Continued Use</u> (For guidance see supplementary attachment)</p> <p>Describe how the project will remain active and beneficial after completion (Duration of Benefit). Explain how the target population (e.g., low- and moderate-income (LMI) residents) will continue to benefit (Community Impact Longevity) and how the asset, service, or infrastructure will be maintained over time (Operational Sustainability).</p>
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2. 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 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.*

POINTS IN THIS SECTION INCLUDE:	
2	<p><u>Project Eligibility</u></p> <p>Does the project meet the National Objective eligibility? (Yes or No)</p> <p>Provide explanation as applicable:</p> <ul style="list-style-type: none"> • LMI – <u>Exhibit E/Exhibit E1-E2</u> (Census Tract/block group or approved income survey) <ul style="list-style-type: none"> ○ Is the project activity under LMA, at least 51% of the residents in the service area meet LMI? Explain. • LMI – <u>Exhibit E3</u> (method of determining beneficiary income, etc.) <ul style="list-style-type: none"> ○ Does the project benefit a clientele group (HUD defined 8 groups) that is presumed to be principally low- and moderate-income persons? Explain.
Up to 3	<p><u>Project Eligibility Explanation</u> (For guidance see supplementary attachment)</p> <p>Provide a clear narrative demonstrating how project meets a national objective, with supporting data and methodology and explaining compliance with the CDBG eligibility category.</p>
Up to 10	<p><u>Project Outcome Explanation</u> (For guidance see supplementary attachment)</p> <p><u>Community Benefit and Benefit to LMI Persons</u></p> <p><i>As applicable</i>, applicants must describe how the completed project activities will benefit the community as a whole, with specific emphasis on benefits to low- and moderate-income (LMI) persons. Responses should clearly explain:</p> <ol style="list-style-type: none"> 1. The nature and scope of the anticipated benefits. 2. How LMI individuals or households will directly or indirectly benefit. 3. The extent to which the project addresses documented community needs. <p>Projects that demonstrate substantial, direct, and lasting benefit to LMI persons will receive higher consideration.</p>

	<p>Measurable Outcomes and Impact on Identified Needs</p> <p>Applicants must describe the proposed project outcomes in <i>measurable units</i> (e.g., number of persons served, jobs created or retained, infrastructure improvements completed, etc.). The application should:</p> <ol style="list-style-type: none"> 1. Quantify expected accomplishments during the implementation period. 2. Explain how these outcomes will reduce or eliminate the identified need(s). 3. Describe any remaining unmet needs and outline plans to address them, if applicable. <p>Higher scores will be awarded to projects with clear, realistic, and data-driven outcomes that demonstrate meaningful progress toward resolving identified needs.</p>
Up to 5	<p>Project Area Explanation (For guidance see supplementary attachment)</p> <p>Explain how the Project Service Area Map – Exhibit M (defined service boundaries) meets the eligibility?</p> <p>NOTE: this is not the same as project description.</p>

3. Project Readiness

Up to 30 points possible. A minimum of 10 points is required in this section to meet threshold. This section gives the applicant the opportunity to describe a workplan for solutions to the problems/needs and impact 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.*

POINTS IN THIS SECTION INCLUDE:	
10	<p>CDBG Ready Certification (<i>this can be submitted prior to application submission</i>)</p> <ul style="list-style-type: none"> • SAM.gov Active – Exhibit N • Verification of Adopted Procurement Procedures (federal/state/local review) • Verification of Adopted Code of Conduct • Verification of Financial Management Internal Control (Uniform Guidance) • Adopted Citizen Participation Plan (<i>project specific</i>) – Exhibit C2 • Residential-Anti Displacement Relocation Assistance Plan Certification (<i>project specific</i>) – Exhibit D • Excessive Force Certification • Self-Assessment for Section 504 completed • Other CDBG Readiness (<i>For guidance see supplementary attachment</i>)
Up to 10	<p>CDBG Readiness Explanation</p> <p>Project Timeline and Readiness to Proceed</p> <p>Applicants must provide a detailed project timeline or milestone outline that clearly demonstrates readiness to initiate the project within ninety (90) days of award. The timeline should include key phases such as procurement, environmental review (if applicable), design, bidding, construction start (typically within six months of award, if construction is involved), project completion, and closeout. The response should:</p> <ol style="list-style-type: none"> 1. Identify major milestones and anticipated completion dates.

	<p>2. Demonstrate that necessary pre-development activities (e.g., planning, engineering, site control, permitting, funding commitments) are complete or substantially underway.</p> <p>3. Explain any potential barriers to implementation and how they will be mitigated.</p> <p>Higher scores will be awarded to projects that present a realistic, well-sequenced timeline and demonstrate strong readiness to proceed.</p> <p><u>Capacity and Commitment</u></p> <p>Applicants must describe their capacity and commitment to successfully implement and complete the project in accordance with the proposed work plan and schedule. This includes:</p> <ol style="list-style-type: none"> 1. Demonstrating financial and administrative capacity. 2. Identifying systems in place for project oversight, compliance, and reporting. 3. Describing prior experience managing similar projects (scope, size, or funding source). <p>Applications that show a proven track record of completing projects on time and within budget will receive stronger consideration.</p> <p><u>Roles, Responsibilities, and Key Staff Experience</u></p> <p>Applicants must clearly identify project-specific roles and responsibilities, including staff, consultants, engineers, administrators, or contractors involved in planning and implementation. The response should:</p> <ol style="list-style-type: none"> 1. Define each key role and its responsibilities. 2. Describe the relevant knowledge, certifications, and experience of key staff. 3. Demonstrate familiarity with regulatory requirements, procurement standards, financial management, and reporting obligations. <p>Scoring will prioritize applicants that present a qualified, experienced team with clearly defined responsibilities and the demonstrated ability to manage, implement, and complete the project successfully and in compliance with program requirements.</p>
Up to 5	<p><u>Project Financial Explanation</u></p> <p><u>Project Budget Detail and Eligibility of Expenses</u></p> <p>Applicants must provide a detailed description of overall project expenses. The narrative should clearly identify and explain all anticipated costs, including but not limited to:</p> <ol style="list-style-type: none"> 1. Supplies and materials. 2. Engineering and design costs. 3. Labor costs (For <i>construction projects</i>, applicants must indicate whether Davis-Bacon wage rates have been considered and incorporated into cost estimates, where applicable). 4. Construction costs. 5. Administrative or professional services. 6. Any other related or indirect project costs. 7. Acquisition of property. <p>The proposed budget (i.e cost estimates) should be itemized, clearly justified, and aligned with the proposed scope of work. Higher scores will be awarded to applications that present realistic, well-supported cost estimates consistent with industry standards and regulatory requirements. Please upload any prepared cost estimates in Section 6 Supplemental Materials.</p>

	<p><u>Project Matching Funds</u> Applicant must describe if the matching funds are secured (i.e., cash on-hand) in the application exhibit (Exhibit Q). Matching funds are funds that must be contributed by the applicant. The proposed match must be towards CDBG-eligible activities directly related to the proposed project(s). Consideration for the match may be given for such sources as public and/or private funds. An all-cash match is preferable.</p> <p><u>Leveraging Additional Funding and Community Effort</u> <i>As applicable</i>, applicants must describe efforts made to secure additional funding (e.g. non-CDBG resources) and demonstrate local financial commitment to the project. The narrative should identify funding sources that have been contacted or pursued, which may include, but are not limited to:</p> <ol style="list-style-type: none"> 1. The United States Department of Agriculture Community Facilities Program. 2. Programs through USDA Rural Development. 3. Local government resources (e.g. Sales Taxes). 4. Foundations (e.g. Community Foundations & The Nebraska Community Foundation). 5. Local fundraising initiatives or private contributions. 6. Grants. <p>Applicants should specify which funding sources were contacted, the status of those requests (secured, pending, denied, or planned), and the amount of funding committed or anticipated.</p> <p><u>Funding Gaps and Financial Feasibility (For guidance see supplementary attachment)</u></p> <p>Applicants must clearly state whether any funding gaps exist (Exhibit Q). If a gap is identified, the application must describe:</p> <ol style="list-style-type: none"> 1. The amount of the gap. 2. The plan and timeline to secure remaining funds. 3. The impact on project implementation if funds are not secured.
Up to 5	<p><u>Project Description Explanation</u></p> <p><u>Project Description and Scope Clarity (For guidance see supplementary attachment)</u></p> <p>Applicants must provide a clear and detailed description of the proposed project (Exhibit R), including the location, scope of work, and any site-specific considerations. The description should be sufficiently detailed to demonstrate feasibility and alignment with the proposed budget and timeline.</p> <p><u>Environmental Review and Potential Delays</u></p> <p>Applicants must disclose any known environmental concerns that could delay or affect the project. This includes, but is not limited to:</p> <ol style="list-style-type: none"> 1. Required environmental reviews or clearances. 2. Floodplain considerations. 3. Historic preservation concerns. 4. Hazardous materials or contamination issues. 5. Wetlands or other regulated environmental features. <p>If environmental issues are identified, the applicant must explain the nature of the concern, its potential impact on the timeline, and the steps planned to address or mitigate the issue.</p>

	Projects with no known environmental barriers, or with clearly identified mitigation plans and realistic timelines, will score more favorably.
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4. Community Support

Up to 10 points is possible. A minimum of 5 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.*

POINTS IN THIS SECTION INCLUDE:	
Up to 5	<p><u>Community Engagement Explanation</u></p> <p><u>Meaningful Engagement of Community Residents</u> (For guidance see supplementary attachment) Applicants must demonstrate that community citizens were meaningfully engaged in identifying needs and shaping the proposed project. The response should describe the engagement process, including:</p> <ol style="list-style-type: none"> 1. Public meetings, hearings, surveys, workshops, or other outreach activities. 2. Dates and locations of each activity. 3. Whether meetings were held at accessible times and locations. 4. The number of attendees at public meetings. 5. Any complaints, documented concerns, or identified problems (e.g., infrastructure deficiencies, housing needs, service gaps). 6. Adjustments made to the project in response to citizen input. <p><i>As applicable</i>, applicants should also describe the availability of translation services, ADA accommodations, or other measures taken to ensure inclusive participation.</p> <p><u>Targeting and Inclusion of LMI Persons</u></p> <p><u>NOTE:</u> <i>This section does not pertain to Slum/Blight projects</i></p> <p><i>As applicable</i>, applicants must demonstrate specific strategies used to reach and involve low- and moderate-income households in project planning and development. The narrative should explain:</p> <ol style="list-style-type: none"> 1. Outreach methods used to engage LMI residents. 2. The level and nature of LMI participation. 3. How LMI feedback influenced project design and priorities. <p>Projects that document direct input from LMI beneficiaries and demonstrate intentional outreach strategies will receive higher scores.</p> <p>Scoring will prioritize projects that demonstrate robust, inclusive, and well-documented community engagement—particularly among LMI residents—along with strong local partnerships and broad community support.</p> <p><u>Documentation of Citizen Participation</u></p> <p>Applicants are required to include supporting documentation of citizen participation activities, such as meeting notices, sign-in sheets, meeting minutes, survey summaries, photographs, or public</p>

	<p>hearing records (Exhibit A). If included additional information that was not part of Exhibit A, upload in Section 6 Supplemental Materials.</p> <p>Partnerships and Collaboration Applicants should describe any collaboration with organizations that serve LMI populations, such as nonprofit service providers, housing authorities, community action agencies, or other community-based organizations. The response should identify partners, describe their role in the project, and explain how collaboration strengthens outcomes for LMI residents.</p> <p>Letters of Support and Demonstrated Community Backing Applicants should indicate whether letters of support (Exhibit L) have been obtained and included in the application. Letters from community members, partner organizations, local officials, or other stakeholders demonstrating commitment to the project will strengthen the application.</p>
Up to 5	<p>Ongoing Engagement Plan</p> <p>Applicants must describe how they will continue to engage community members—particularly low- and moderate-income (LMI) residents—throughout the implementation phase of the project. The response should outline a clear and structured plan that includes:</p> <ol style="list-style-type: none"> 1. Methods of ongoing communication (e.g., public meetings, project updates, website postings, social media, mailings, surveys, or community briefings). 2. Frequency and timing of engagement activities. 3. Strategies to ensure accessibility (e.g., ADA-compliant locations, accessible formats, translation services if applicable). 4. Procedures for receiving, documenting, and responding to citizen comments or complaints. 5. Identification of staff responsible for community outreach and communication. <p>Applicants should also describe how community feedback received during implementation will be incorporated into project adjustments, where appropriate, and how progress and outcomes will be shared with stakeholders.</p> <p>Higher scores will be awarded to applicants that present a proactive, transparent, and inclusive engagement strategy demonstrating continued accountability to residents—especially LMI beneficiaries—throughout the life of the project.</p>

5. 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:

POINTS IN THIS SECTION INCLUDE:	
5	<p>Economic Development Certified Community (EDCC).</p> <p>For a complete list of communities and additional information, visit the DED website at: https://opportunity.nebraska.gov/programs/community/edcc/</p> <p>UPLOAD: Certifications or other documentation provided by DED that recognizes <i>status</i></p>
	<p>DED Leadership Certified Community (LCC)</p> <p>For a complete list of communities and additional information, visit the DED website at: https://opportunity.nebraska.gov/programs/community/lcc/</p>

	UPLOAD: Certifications or other documentation provided by DED that recognizes <i>status</i>
5	<p>Community Redevelopment Agency (CRA) or Economic Development Organization</p> <p>A CRA is established to improve specific areas, known as Community Redevelopment Areas (CRAs), which are identified as blighted or economically distressed due to unsafe conditions, disinvestment, or neglect. A CRA is local government body decided to revitalizing blighted or underdevelopment urban area through planning , redevelopment projects, and public-private investment.</p> <p>Or if the community doesn't have a CRA, but the community has a Redevelopment Authority or other downtown/business/community/economic development organization that is operational and functioning within the community.</p> <p>To receive points for this criterion, the applicant shall include a letter from the organization that verifies the presence of such organization in the community <u>and</u> provides a description of how the organization has played an active role. Moreover, the letter must describe how the organization, applicant, and general public collaborate in terms of the proposed project.</p> <p>UPLOAD: Organization Letter & Narrative</p>
Bonus +5	<p>Opportunity Zones</p> <p>Originally established by Congress¹⁸ through the Tax Cuts and Jobs Act (TCJA) of 2017, the Federal Opportunity Zones Program was made permanent with the passage of the One Big Beautiful Bill Act (OBBBA) of 2025. The purpose of the program is to promote investment and drive economic growth in low-income and/or economically disadvantaged communities. Opportunity Zones: Investing in Communities - HUD Exchange</p> <p>The OBBBA authorized the governor of each U.S. state and territory to nominate a certain number of qualifying census tracts as "Opportunity Zones."</p> <p>Is this project located within an eligible Nebraska Opportunity Zone? (Yes or No)</p> <p>Opportunity Zones - Nebraska Department of Economic Development</p>

6. Supplemental Materials **UPLOAD**

Depending on the nature and scope of the project activities proposed, the following information shall be **included** and **UPLOADED** to support the application:

- a) **Project Need:** Project Photographs , Formal Study/report, etc.
- b) **Project Impact:** Water/Wastewater User Fees, Tourism event participation documentation, etc.
- c) **Project Readiness:** Facility Floor Plan, ERR Preparation, Ownership verification, 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, Cost estimates, Parcel data, etc.
- d) **Community Support:** Citizen Participation documentation, etc.

¹⁸ [Map of Opportunity Zones | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](#)

Opportunity 4: Public Works — Infrastructure (PWI)

3.4.1 | 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. A form of this funding opportunity has been in place since 2005, 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.

3.4.2 | 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)***¹⁹: Supporting Activities related to removal of architectural barriers that restrict mobility and accessibility to sites/facilities.

3.4.3 | 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.

3.4.4 | 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 [Section 2.3.2](#) for other Ineligible Activities.

¹⁹ ***NOTE: Proceed with caution if using this activity and refer to CDBG Manual, Chapter 3 on National Objective eligibility.

3.4.5 | 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.

3.4.6 | 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	

3.4.7 | PWI Application Criteria

The matrix below outlines the numerical scoring for each selection criterion within the opportunity. Applications may receive a maximum total of 100 points. Certain criteria also require applicants to meet specified minimum scores, as noted below.

Selection Criteria Matrix	Maximum	Threshold Minimum
6. Project Need	30	15
7. Project Impact	20	10
8. Project Readiness	30	10
9. Community Support	10	5
10. Achievements	10	-
Total	100 points	40 points

For each of the following sections, a project narrative must be provided directly into the GMS and additional information may be supplemented as noted within each individual criterion. **#6 Supplemental Materials allows uploads of additional documentation.**

1. Project Need

Up to 30 points is possible. A minimum of 15 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.*

POINTS IN THIS SECTION INCLUDE:	
1	<u>Community Needs Assessment/Survey (Yes or No)</u> Has the community completed a Needs Assessment/Survey?
Up to 2	<u>Community Needs Assessment/Survey Explanation</u> If yes, please explain how the community needs assessment was conducted (in-person, US mail or on-line), including the response rate.
1	<u>Community Priority List (Yes or No)</u> Has the community developed a priority list using needs assessment, survey, public meetings, a 1- and 5-year Action Plan, etc.?
Up to 2	<u>Community Priority Explanation (including community, housing, and economic development efforts)</u> If yes, applicants shall explain community, housing, and economic development efforts conducted within the past five (5) years that involved significant citizen participation and addressed identified community priorities. Examples may include, but are not limited to: <ol style="list-style-type: none"> 1. Comprehensive planning processes. 2. Housing studies.

	<ol style="list-style-type: none"> 3. Capital improvement planning. 4. LB840 programs. 5. Business retention and expansion surveys. 6. Fundraising or strategic planning initiatives. <p>Responses should demonstrate how these efforts inform, support, or connect to the proposed project and how public input has shaped community priorities. Some of these areas will be further explained in the Project Readiness and Community Support sections.</p>
up to 5	<p><u>Proposed Project Explanation</u></p> <p><u>Documentation of Need and Cause of the Problem</u> Applicants must clearly describe the specific problem the project is intended to address. The narrative should include:</p> <ol style="list-style-type: none"> 1. The underlying cause(s) of the problem. 2. How long the issue has existed. 3. Who or what is affected (e.g., residents, businesses, public facilities, infrastructure systems). 4. The geographic area impacted. <p>Responses must be supported by factual documentation such as photographs, data, inspection reports, engineering assessments, code violations, or other credible sources that demonstrate the existence and scope of the problem. If needed, include documents in and upload in Section 6 Supplemental Materials.</p> <p><u>Severity, Urgency, and Regulatory Compliance</u> Applicants must document the severity and urgency of the need. This may include:</p> <ol style="list-style-type: none"> 1. Evidence of deteriorating conditions. 2. Health and safety concerns. 3. Service disruptions or capacity deficiencies. 4. Risk of further damage or escalating costs if not addressed. 5. Identification of any state or federal regulations that are currently being violated or are at risk of violation. <p>Applications that clearly demonstrate immediate or pressing concerns—particularly those involving health, safety, or regulatory compliance will receive higher scores.</p>
Up to 4	<p><u>Relative Importance Within Overall Community Needs</u> Applicants must describe how the proposed project ranks among other community needs. The response should explain:</p> <ol style="list-style-type: none"> 1. Why is this project important to the community? 2. How addressing this issue will advance broader community goals. <p>Scoring will prioritize applications that present well-documented, data-driven evidence of need; clearly demonstrate urgency and impact; and show how the project aligns with the community’s overall development strategy. If this proposed project is not identified as a high priority, the application should explain how funding this project would enable other resources to be redirected toward higher-priority needs. For example, CDBG funds may used to fund a street improvement, allowing local funds to be allocated to a park project on the priority list.</p> <p>Where relevant, applicants should include financial information demonstrating long-term impact (e.g., reduced maintenance or operating costs, increased efficiency, cost savings redirected to other community priorities, leveraged funding, or revenue generation).</p>

Up to 2	<p>Past Efforts</p> <p>Applicants must demonstrate sustained efforts over the previous five (5) years to address identified community needs. Responses should clearly describe actions taken to improve infrastructure, public facilities, and overall quality of life, including but not limited to street improvements, water and sewer system upgrades, senior center enhancements, ADA compliance initiatives, and other community development activities. The narrative should explain how the proposed project fits within and builds upon these prior efforts.</p> <p>Applicants should also detail any past fundraising activities that increased public awareness of the project and generated financial resources to be used as matching funds. This may include local budget allocations, capital campaigns, grants, in-kind contributions, partnerships, or other funding mechanisms that demonstrate financial commitment and community support.</p>
Up to 2	<p>Alternatives</p> <p>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.</p>
1	<p>Community Plan (Yes or No)</p> <p>Is the project connected to a community plan?</p> <p>Examples: 1) Public Works Water/Wastewater project is connected to a Preliminary Engineering Report. 2) Community Facility is part of a Comprehensive Plan</p>
Up to 5	<p>Community Planning Explanation</p> <p>Alignment with Adopted Community Long-Range Plans</p> <p>Applicants must briefly explain how the project scope is consistent with the goals and objectives of one or more formally adopted or approved community long-range plans (e.g., Comprehensive Plan, Community Redevelopment Plan, Capital Improvements Plan, Strategic Plan, or similar planning document). Responses should clearly identify the specific plan(s), reference relevant goals or priority areas, and describe how the proposed project advances those objectives.</p> <p>Scoring will prioritize projects that show strong plan alignment, documented need supported by formal analysis, and a demonstrated track record of coordinated planning and community engagement.</p> <p>Evidence-Based Solution and Supporting Documentation</p> <p>Applicants must indicate whether a formal study (e.g. Predevelopment Study/Downtown Revitalization Plan, engineering or feasibility studies, etc.) or report has been completed that recommends the proposed solution. <i>As applicable</i>, the response must identify:</p> <ol style="list-style-type: none"> 1. The name and type of study/report. 2. The entity that completed the study. 3. The date of completion. 4. The date of adoption. 5. The date of last update to formal plan. <p>If a formal study is identified include the formal study or report as an upload in Section 6 Supplemental Materials.</p>

Up to 5	<p><u>Sustainably / Continued Use</u> (For guidance see supplementary attachment)</p> <p>Describe how the project will remain active and beneficial after completion (Duration of Benefit). Explain how the target population (e.g., low- and moderate-income (LMI) residents) will continue to benefit (Community Impact Longevity) and how the asset, service, or infrastructure will be maintained over time (Operational Sustainability).</p>
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2. 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 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.*

POINTS IN THIS SECTION INCLUDE:	
2	<p><u>Project Eligibility</u></p> <p>Does the project meet the National Objective eligibility? (Yes or No)</p> <p>Provide explanation as applicable:</p> <ul style="list-style-type: none"> • LMI – <u>Exhibit E/Exhibit E1-E2</u> (Census Tract/block group or approved income survey) <ul style="list-style-type: none"> ○ Is the project activity under LMA, at least 51% of the residents in the service area meet LMI? Explain. • LMI – <u>Exhibit E3</u> (method of determining beneficiary income, etc.) <ul style="list-style-type: none"> ○ Does the project benefit a clientele group (HUD defined 8 groups) that is presumed to be principally low- and moderate-income persons? Explain.
Up to 3	<p><u>Project Eligibility Explanation</u> (For guidance see supplementary attachment)</p> <p>Provide a clear narrative demonstrating how project meets a national objective, with supporting data and methodology and explaining compliance with the CDBG eligibility category.</p>
Up to 10	<p><u>Project Outcome Explanation</u> (For guidance see supplementary attachment)</p> <p><u>Community Benefit and Benefit to LMI Persons</u></p> <p><i>As applicable</i>, applicants must describe how the completed project activities will benefit the community as a whole, with specific emphasis on benefits to low- and moderate-income (LMI) persons. Responses should clearly explain:</p> <ol style="list-style-type: none"> 1. The nature and scope of the anticipated benefits. 2. How LMI individuals or households will directly or indirectly benefit. 3. The extent to which the project addresses documented community needs. <p>Projects that demonstrate substantial, direct, and lasting benefit to LMI persons will receive higher consideration.</p>

	<p>Measurable Outcomes and Impact on Identified Needs</p> <p>Applicants must describe the proposed project outcomes in <i>measurable units</i> (e.g., number of persons served, jobs created or retained, infrastructure improvements completed, etc.). The application should:</p> <ol style="list-style-type: none"> 1. Quantify expected accomplishments during the implementation period. 2. Explain how these outcomes will reduce or eliminate the identified need(s). 3. Describe any remaining unmet needs and outline plans to address them, if applicable. <p>Higher scores will be awarded to projects with clear, realistic, and data-driven outcomes that demonstrate meaningful progress toward resolving identified needs.</p>
Up to 5	<p>Project Area Explanation (For guidance see supplementary attachment)</p> <p>Explain how the Project Service Area Map – Exhibit M (defined service boundaries) meets the eligibility?</p> <p>NOTE: this is not the same as project description.</p>

3. Project Readiness

Up to 30 points possible. A minimum of 10 points is required in this section to meet threshold. This section gives the applicant the opportunity to describe a workplan for solutions to the problems/needs and impact 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.*

POINTS IN THIS SECTION INCLUDE:	
10	<p>CDBG Ready Certification (<i>this can be submitted prior to application submission</i>)</p> <ul style="list-style-type: none"> • SAM.gov Active – Exhibit N • Verification of Adopted Procurement Procedures (federal/state/local review) • Verification of Adopted Code of Conduct • Verification of Financial Management Internal Control (Uniform Guidance) • Adopted Citizen Participation Plan (<i>project specific</i>) – Exhibit C2 • Residential-Anti Displacement Relocation Assistance Plan Certification (<i>project specific</i>) – Exhibit D • Excessive Force Certification • Self-Assessment for Section 504 completed • Other CDBG Readiness (<i>For guidance see supplementary attachment</i>)
Up to 10	<p>CDBG Readiness Explanation</p> <p>Project Timeline and Readiness to Proceed</p> <p>Applicants must provide a detailed project timeline or milestone outline that clearly demonstrates readiness to initiate the project within ninety (90) days of award. The timeline should include key phases such as procurement, environmental review (if applicable), design, bidding, construction start (typically within six months of award, if construction is involved), project completion, and closeout. The response should:</p> <ol style="list-style-type: none"> 1. Identify major milestones and anticipated completion dates.

	<p>2. Demonstrate that necessary pre-development activities (e.g., planning, engineering, site control, permitting, funding commitments) are complete or substantially underway .</p> <p>3. Explain any potential barriers to implementation and how they will be mitigated.</p> <p>Higher scores will be awarded to projects that present a realistic, well-sequenced timeline and demonstrate strong readiness to proceed.</p> <p><u>Capacity and Commitment</u></p> <p>Applicants must describe their capacity and commitment to successfully implement and complete the project in accordance with the proposed work plan and schedule. This includes:</p> <ol style="list-style-type: none"> 1. Demonstrating financial and administrative capacity. 1. Identifying systems in place for project oversight, compliance, and reporting. 2. Describing prior experience managing similar projects (scope, size, or funding source). <p>Applications that show a proven track record of completing projects on time and within budget will receive stronger consideration.</p> <p><u>Roles, Responsibilities, and Key Staff Experience</u></p> <p>Applicants must clearly identify project-specific roles and responsibilities, including staff, consultants, engineers, administrators, or contractors involved in planning and implementation. The response should:</p> <ol style="list-style-type: none"> 1. Define each key role and its responsibilities. 2. Describe the relevant knowledge, certifications, and experience of key staff. 3. Demonstrate familiarity with regulatory requirements, procurement standards, financial management, and reporting obligations. <p>Scoring will prioritize applicants that present a qualified, experienced team with clearly defined responsibilities and the demonstrated ability to manage, implement, and complete the project successfully and in compliance with program requirements.</p>
Up to 5	<p><u>Project Financial Explanation</u></p> <p><u>Project Budget Detail and Eligibility of Expenses</u></p> <p>Applicants must provide a detailed description of overall project expenses. The narrative should clearly identify and explain all anticipated costs, including but not limited to:</p> <ol style="list-style-type: none"> 1. Supplies and materials. 2. Engineering and design costs. 3. Labor costs (For <i>construction projects</i>, applicants must indicate whether Davis-Bacon wage rates have been considered and incorporated into cost estimates, where applicable). 4. Construction costs. 5. Administrative or professional services. 6. Any other related or indirect project costs. 7. Acquisition of property. <p>The proposed budget (i.e cost estimates) should be itemized, clearly justified, and aligned with the proposed scope of work. Higher scores will be awarded to applications that present realistic, well-supported cost estimates consistent with industry standards and regulatory requirements. Please upload any prepared cost estimates in Section 6 Supplemental Materials.</p>

	<p><u>Project Matching Funds</u> Applicant must describe if the matching funds are secured (i.e., cash on-hand) in the application exhibit (Exhibit Q). Matching funds are funds that must be contributed by the applicant. The proposed match must be towards CDBG-eligible activities directly related to the proposed project(s). Consideration for the match may be given for such sources as public and/or private funds. An all-cash match is preferable.</p> <p><u>Leveraging Additional Funding and Community Effort</u> <i>As applicable</i>, applicants must describe efforts made to secure additional funding (e.g. non-CDBG resources) and demonstrate local financial commitment to the project. The narrative should identify funding sources that have been contacted or pursued, which may include, but are not limited to:</p> <ol style="list-style-type: none"> 1. The United States Department of Agriculture Community Facilities Program. 2. Programs through USDA Rural Development. 3. Local government resources (e.g. Sales Taxes). 4. Foundations (e.g. Community Foundations & The Nebraska Community Foundation). 5. Local fundraising initiatives or private contributions. 6. Grants. <p>Applicants should specify which funding sources were contacted, the status of those requests (secured, pending, denied, or planned), and the amount of funding committed or anticipated.</p> <p><u>Funding Gaps and Financial Feasibility (For guidance see supplementary attachment)</u></p> <p>Applicants must clearly state whether any funding gaps exist (Exhibit Q). If a gap is identified, the application must describe:</p> <ol style="list-style-type: none"> 1. The amount of the gap. 2. The plan and timeline to secure remaining funds. 3. The impact on project implementation if funds are not secured.
Up to 5	<p><u>Project Description Explanation</u></p> <p><u>Project Description and Scope Clarity (For guidance see supplementary attachment)</u></p> <p>Applicants must provide a clear and detailed description of the proposed project (Exhibit R), including the location, scope of work, and any site-specific considerations. The description should be sufficiently detailed to demonstrate feasibility and alignment with the proposed budget and timeline.</p> <p><u>Environmental Review and Potential Delays</u></p> <p>Applicants must disclose any known environmental concerns that could delay or affect the project. This includes, but is not limited to:</p> <ol style="list-style-type: none"> 1. Required environmental reviews or clearances. 2. Floodplain considerations. 3. Historic preservation concerns. 4. Hazardous materials or contamination issues. 5. Wetlands or other regulated environmental features. <p>If environmental issues are identified, the applicant must explain the nature of the concern, its potential impact on the timeline, and the steps planned to address or mitigate the issue.</p> <p>Projects with no known environmental barriers, or with clearly identified mitigation plans and realistic timelines, will score more favorably.</p>

4. Community Support

Up to 10 points is possible. A minimum of 5 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.*

POINTS IN THIS SECTION INCLUDE:	
Up to 5	<p><u>Community Engagement Explanation</u></p> <p><u>Meaningful Engagement of Community Residents</u> (For guidance see supplementary attachment) Applicants must demonstrate that community citizens were meaningfully engaged in identifying needs and shaping the proposed project. The response should describe the engagement process, including:</p> <ol style="list-style-type: none"> 1. Public meetings, hearings, surveys, workshops, or other outreach activities. 2. Dates and locations of each activity. 3. Whether meetings were held at accessible times and locations. 4. The number of attendees at public meetings. 5. Any complaints, documented concerns, or identified problems (e.g., infrastructure deficiencies, housing needs, service gaps). 6. Adjustments made to the project in response to citizen input. <p><i>As applicable</i>, applicants should also describe the availability of translation services, ADA accommodations, or other measures taken to ensure inclusive participation.</p> <p><u>Targeting and Inclusion of LMI Persons</u></p> <p><u>NOTE:</u> <i>This section does not pertain to Slum/Blight projects</i></p> <p><i>As applicable</i>, applicants must demonstrate specific strategies used to reach and involve low- and moderate-income households in project planning and development. The narrative should explain:</p> <ol style="list-style-type: none"> 1. Outreach methods used to engage LMI residents. 2. The level and nature of LMI participation. 3. How LMI feedback influenced project design and priorities. <p>Projects that document direct input from LMI beneficiaries and demonstrate intentional outreach strategies will receive higher scores.</p> <p>Scoring will prioritize projects that demonstrate robust, inclusive, and well-documented community engagement—particularly among LMI residents—along with strong local partnerships and broad community support.</p> <p><u>Documentation of Citizen Participation</u> Applicants are required to include supporting documentation of citizen participation activities, such as meeting notices, sign-in sheets, meeting minutes, survey summaries, photographs, or public hearing records (Exhibit A). If included additional information that was not part of Exhibit A, upload in Section 6 Supplemental Materials.</p>

	<p>Partnerships and Collaboration</p> <p>Applicants should describe any collaboration with organizations that serve LMI populations, such as nonprofit service providers, housing authorities, community action agencies, or other community-based organizations. The response should identify partners, describe their role in the project, and explain how collaboration strengthens outcomes for LMI residents.</p> <p>Letters of Support and Demonstrated Community Backing</p> <p>Applicants should indicate whether letters of support (Exhibit L) have been obtained and included in the application. Letters from community members, partner organizations, local officials, or other stakeholders demonstrating commitment to the project will strengthen the application.</p>
Up to 5	<p>Ongoing Engagement Plan</p> <p>Applicants must describe how they will continue to engage community members—particularly low- and moderate-income (LMI) residents—throughout the implementation phase of the project. The response should outline a clear and structured plan that includes:</p> <ol style="list-style-type: none"> 1. Methods of ongoing communication (e.g., public meetings, project updates, website postings, social media, mailings, surveys, or community briefings) 2. Frequency and timing of engagement activities 3. Strategies to ensure accessibility (e.g., ADA-compliant locations, accessible formats, translation services if applicable) 4. Procedures for receiving, documenting, and responding to citizen comments or complaints 5. Identification of staff responsible for community outreach and communication <p>Applicants should also describe how community feedback received during implementation will be incorporated into project adjustments, where appropriate, and how progress and outcomes will be shared with stakeholders.</p> <p>Higher scores will be awarded to applicants that present a proactive, transparent, and inclusive engagement strategy demonstrating continued accountability to residents—especially LMI beneficiaries—throughout the life of the project.</p>

5. 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:

POINTS IN THIS SECTION INCLUDE:	
5	<p>Economic Development Certified Community (EDCC).</p> <p>For a complete list of communities and additional information, visit the DED website at: https://opportunity.nebraska.gov/programs/community/edcc/</p> <p>UPLOAD: Certifications or other documentation provided by DED that recognizes <i>status</i></p>
	<p>DED Leadership Certified Community (LCC)</p> <p>For a complete list of communities and additional information, visit the DED website at: https://opportunity.nebraska.gov/programs/community/lcc/</p> <p>UPLOAD: Certifications or other documentation provided by DED that recognizes <i>status</i></p>
5	<p>Community Redevelopment Agency (CRA) or Economic Development Organization</p>

	<p>A CRA is established to improve specific areas, known as Community Redevelopment Areas (CRAs), which are identified as blighted or economically distressed due to unsafe conditions, disinvestment, or neglect. A CRA is local government body decided to revitalizing blighted or underdevelopment urban area through planning , redevelopment projects, and public-private investment.</p> <p>Or if the community doesn't have a CRA, but the community has a Redevelopment Authority or other downtown/business/community/economic development organization that is operational and functioning within the community.</p> <p>To receive points for this criterion, the applicant shall include a letter from the organization that verifies the presence of such organization in the community <u>and</u> provides a description of how the organization has played an active role. Moreover, the letter must describe how the organization, applicant, and general public collaborate in terms of the proposed project.</p> <p>UPLOAD: Organization Letter & Narrative</p>
<p>Bonus +5</p>	<p><u>Opportunity Zones</u></p> <p>Originally established by Congress²⁰ through the Tax Cuts and Jobs Act (TCJA) of 2017, the Federal Opportunity Zones Program was made permanent with the passage of the One Big Beautiful Bill Act (OBBBA) of 2025. The purpose of the program is to promote investment and drive economic growth in low-income and/or economically disadvantaged communities. Opportunity Zones: Investing in Communities - HUD Exchange</p> <p>The OBBBA authorized the governor of each U.S. state and territory to nominate a certain number of qualifying census tracts as "Opportunity Zones."</p> <p>Is this project located within an eligible Nebraska Opportunity Zone? (Yes or No)</p> <p>Opportunity Zones - Nebraska Department of Economic Development</p>

6. Supplemental Materials *UPLOAD*

Depending on the nature and scope of the project activities proposed, the following information shall be **included** and **UPLOADED** to support the application:

- e) **Project Need:** Project Photographs , Formal Study/report, etc.
- f) **Project Impact:** Water/Wastewater User Fees, Tourism event participation documentation, etc.
- g) **Project Readiness:** Facility Floor Plan, ERR Preparation, Ownership verification, 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, Cost estimates, Parcel data, etc.
- h) **Community Support:** Citizen Participation documentation, etc.

²⁰ [Map of Opportunity Zones | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](#)

PART IV. CDBG APPLICATION OPPORTUNITIES – OPEN CYCLE

Each of the following opportunities **require** a Pre-Application.

Opportunity 1: Economic Development (ED)

4.1.1 | 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).

4.1.2 | 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.

4.1.3 | 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.

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

In addition to ineligible activities listed at [Section 2.3.2](#), note these business types which are also *not eligible*²¹ 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).

4.1.5 | ED Grant Amount and Matching Funds

Economic Development – Key Minimums, Maximums, and Requirements	
Maximum CDBG Project Costs	\$500,000
Minimum CDBG Project Costs	\$105,000
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

²¹ The state has aligned the ineligible list with the Nebraska Advantage Act guidelines.

4.1.6 | ED Application Thresholds

In addition to the application thresholds identified in *Section 2.5.4*, 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

4.1.7 | 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	

4.1.8 | 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 EDA job category descriptions (as shown). This category will agree with the proposed job creation summary found in Exhibit E4. This form should be completed by the business (and the job applicant) when job creation is involved in the project. 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 Local Unit of Government must keep on file to document LMI status of each job applicant, and the Local Unit of Government must maintain a file copy of all certifications.

- 1) Does the project include national objective LMJ? (Y or N)
- 2) UPLOAD: 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 2: Tourism Development (TD)

4.2.1 | TD Purpose

CDBG funds will be used for economic development tourism focused projects. Implemented in 1997, 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 benefiting low- and moderate-income persons.

4.2.2 | 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. The building must meet applicable historic designation criteria (24 CFR 570.202(d)).
- b) Neighborhood Facilities (03E)²²: 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)^{*** 23}: Supporting Activities related to removal of architectural barriers that restrict mobility and accessibility to sites/facilities.

²² Under **24 CFR 570.201(c)** (Public Facilities and Improvements), CDBG funds are for **facilities that are publicly owned or primarily serve a public purpose.**

²³ *****NOTE:** Proceed with caution if using this activity and refer to CDBG Manual, Chapter 3 on National Objective eligibility.

4.2.3 | TD Eligible Activities

1) Public Facilities and Improvements²⁴

- 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) 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.

4.2.4 | TD Ineligible Activities

- a) Retail Businesses or Operation 25 (eating and drinking establishments, commercial lodging, gas stations, commercial rest areas, and gift shops.)
- b) Pursuant to 24 CFR 570.207(b)(1)(iii), CDBG funds may not be used for furnishings and personal property. This prohibition includes equipment, fixtures, furnishings, or other personal property that are not integral structural fixtures.
- c) Refer to Section 2.3.2 for other Ineligible Activities.

²⁴ Eligible Tourism activities under this section fall under 24 CFR 570.201(c), Any public facilities and improvements activity, the regulation does **not authorize direct assistance to private, for-profit businesses** under this category and instead that is under Economic Development (18A).

²⁵ Aligns with the Nebraska Advantage Act guidelines

4.2.5 | TD Grant Amount and Matching Funds

Tourism Development – Key Minimums, Maximums, and Requirements	
Minimum CDBG Project Costs	\$250,000
Maximum CDBG Project Costs	\$600,000
General Administration	10% of CDBG Project Costs, not to exceed \$25,000
Construction Management	\$5,000 ²⁶
Local Matching Funds	25% of CDBG Project Costs
Public Benefit Standards per FTE – Maximum	\$35,000 (LMJ Only)

4.2.6 | 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	

4.2.6 | TD Application Thresholds

In addition to the application thresholds identified in *Section 2.5.4*, the following items apply.

²⁶ This opportunity is eligible for a project specific supplemental funding waiver, please reach out to your program representative.

****NOTE**:** The applicant 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.

4.2.7 | TD Application Criteria

The matrix below outlines the numerical scoring for each selection criterion within the opportunity. Applications may receive a maximum total of 100 points. Certain criteria also require applicants to meet specified minimum scores, as noted below.

Selection Criteria Matrix	Maximum	Threshold Minimum
11. Project Need	30	15
12. Project Impact	20	10
13. Project Readiness	30	10
14. Community Support	10	5
15. Achievements	10	-
Total	100 points	40 points

For each of the following sections, a project narrative must be provided directly into the GMS and additional information may be supplemented as noted within each individual criterion. **#6 Supplemental Materials allows uploads of additional documentation.**

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

Up to 30 points is possible. A minimum of 15 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.*

POINTS IN THIS SECTION INCLUDE:	
1	Community Needs Assessment/Survey (Yes or No) Has the community completed a Needs Assessment/Survey?
Up to 2	Community Needs Assessment/Survey Explanation If yes, please explain how the community needs assessment was conducted (in-person, US mail or on-line), including the response rate.

1	<p><u>Community Priority List (Yes or No)</u></p> <p>Has the community developed a priority list using needs assessment, survey, public meetings, a 1- and 5-year Action Plan, etc.?</p>
Up to 2	<p><u>Community Priority Explanation (including community, housing, and economic development Efforts)</u></p> <p>If yes, applicants shall explain community, housing, and economic development efforts conducted within the past five (5) years that involved significant citizen participation and addressed identified community priorities. Examples may include, but are not limited to:</p> <ol style="list-style-type: none"> 1. Comprehensive planning processes. 2. Housing studies. 3. Capital improvement planning. 4. LB840 programs. 5. Business retention and expansion surveys. 6. Fundraising or strategic planning initiatives. <p>Responses should demonstrate how these efforts inform, support, or connect to the proposed project and how public input has shaped community priorities. Some of these areas will be further explained in the Project Readiness and Community Support sections.</p>
up to 5	<p><u>Proposed Project Explanation</u></p> <p><u>Documentation of Need and Cause of the Problem</u></p> <p>Applicants must clearly describe the specific problem the project is intended to address. The narrative should include:</p> <ol style="list-style-type: none"> 1. The underlying cause(s) of the problem. 2. How long the issue has existed. 3. Who or what is affected (e.g., residents, businesses, public facilities, infrastructure systems). 4. The geographic area impacted. <p>Responses must be supported by factual documentation such as photographs, data, inspection reports, engineering assessments, code violations, or other credible sources that demonstrate the existence and scope of the problem. If needed, include documents in and upload in Section 6 Supplemental Materials.</p> <p><u>Severity, Urgency, and Regulatory Compliance</u></p> <p>Applicants must document the severity and urgency of the need. This may include:</p> <ol style="list-style-type: none"> 1. Evidence of deteriorating conditions. 2. Health and safety concerns. 3. Service disruptions or capacity deficiencies. 4. Risk of further damage or escalating costs if not addressed. 5. Identification of any state or federal regulations that are currently being violated or are at risk of violation. <p>Applications that clearly demonstrate immediate or pressing concerns—particularly those involving health, safety, or regulatory compliance will receive higher scores.</p>
Up to 4	<p><u>Relative Importance Within Overall Community Needs</u></p> <p>Applicants must describe how the proposed project ranks among other community needs. The response should explain:</p> <ol style="list-style-type: none"> 1. Why is this project important to the community?

	<p>2. How addressing this issue will advance broader community goals</p> <p>Scoring will prioritize applications that present well-documented, data-driven evidence of need; clearly demonstrate urgency and impact; and show how the project aligns with the community's overall development strategy. If this proposed project is not identified as a high priority, the application should explain how funding this project would enable other resources to be redirected toward higher-priority needs. For example, CDBG funds may used to fund a street improvement, allowing local funds to be allocated to a park project on the priority list.</p> <p>Where relevant, applicants should include financial information demonstrating long-term impact (e.g., reduced maintenance or operating costs, increased efficiency, cost savings redirected to other community priorities, leveraged funding, or revenue generation).</p>
Up to 2	<p><u>Past Efforts</u></p> <p>Applicants must demonstrate sustained efforts over the previous five (5) years to address identified community needs. Responses should clearly describe actions taken to improve infrastructure, public facilities, and overall quality of life, including but not limited to street improvements, water and sewer system upgrades, senior center enhancements, ADA compliance initiatives, and other community development activities. The narrative should explain how the proposed project fits within and builds upon these prior efforts.</p> <p>Applicants should also detail any past fundraising activities that increased public awareness of the project and generated financial resources to be used as matching funds. This may include local budget allocations, capital campaigns, grants, in-kind contributions, partnerships, or other funding mechanisms that demonstrate financial commitment and community support.</p>
Up to 2	<p><u>Alternatives</u></p> <p>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.</p>
1	<p><u>Community Plan (Yes or No)</u></p> <p>Is the project connected to a community plan?</p> <p>Examples:</p> <ol style="list-style-type: none"> 1) Public Works Water/Wastewater project is connected to a Preliminary Engineering Report. 2) Community Facility is part of a Comprehensive Plan
Up to 5	<p><u>Community Planning Explanation</u></p> <p><u>Alignment with Adopted Community Long-Range Plans</u></p> <p>Applicants must briefly explain how the project scope is consistent with the goals and objectives of one or more formally adopted or approved community long-range plans (e.g., Comprehensive Plan, Community Redevelopment Plan, Capital Improvements Plan, Strategic Plan, or similar planning document). Responses should clearly identify the specific plan(s), reference relevant goals or priority areas, and describe how the proposed project advances those objectives.</p> <p>Scoring will prioritize projects that show strong plan alignment, documented need supported by formal analysis, and a demonstrated track record of coordinated planning and community engagement.</p>

	<p><u>Evidence-Based Solution and Supporting Documentation</u></p> <p>Applicants must indicate whether a formal study (e.g. Predevelopment Study/Downtown Revitalization Plan, engineering or feasibility studies, etc.) or report has been completed that recommends the proposed solution. <i>As applicable</i>, the response must identify:</p> <ol style="list-style-type: none"> 1. The name and type of study/report 2. The entity that completed the study 3. The date of completion 4. The date of adoption 5. The date of last update to formal plan <p>If a formal study is identified include the formal study or report as an upload in Section 6 Supplemental Materials.</p>
Up to 5	<p><u>Sustainably / Continued Use</u> (For guidance see supplementary attachment)</p> <p>Describe how the project will remain active and beneficial after completion (Duration of Benefit). Explain how the target population (e.g., low- and moderate-income (LMI) residents) will continue to benefit (Community Impact Longevity) and how the asset, service, or infrastructure will be maintained over time (Operational Sustainability).</p>

2. 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.*

POINTS IN THIS SECTION INCLUDE:	
2	<p><u>Project Eligibility</u></p> <p>Does the project meet the National Objective eligibility? (Yes or No)</p> <p>Provide explanation <i>as applicable</i>:</p> <ul style="list-style-type: none"> • LMI – Exhibit E/Exhibit E1-E2 (Census Tract/block group or approved income survey) <ul style="list-style-type: none"> ○ Is the project activity under LMA, at least 51% of the residents in the service area meet LMI? Explain. • LMI – Exhibit E3 (method of determining beneficiary income, etc.) <ul style="list-style-type: none"> ○ Does the project benefit a clientele group (HUD defined 8 groups) that is presumed to be principally low- and moderate-income persons? Explain. • LMI – Exhibit E4 (Job Creation/Retention) <ul style="list-style-type: none"> ○ Are jobs being created or retained? Explain. • S/B – Exhibit F SBA (local designation) <ul style="list-style-type: none"> ○ Do at least 25% of the properties throughout the area experience or more of the conditions? Or, public improvements through the area are in a general state of deterioration. Explain. ○ Designated within 10 years? • S/B – Exhibit F SBS (local designation)

	<ul style="list-style-type: none"> ○ Does the project eliminate specific conditions detrimental to public health and safety? Explain.
Up to 3	<p>Project Eligibility Explanation (For guidance see supplementary attachment)</p> <p>Provide a clear narrative demonstrating how project meets a national objective, with supporting data and methodology and explaining compliance with the CDBG eligibility category.</p>
Up to 10	<p>Project Outcome Explanation (For guidance see supplementary attachment)</p> <p>Community Benefit and Benefit to LMI Persons <i>As applicable</i>, applicants must describe how the completed project activities will benefit the community as a whole, with specific emphasis on benefits to low- and moderate-income (LMI) persons. Responses should clearly explain:</p> <ol style="list-style-type: none"> 1. The nature and scope of the anticipated benefits. 2. How LMI individuals or households will directly or indirectly benefit. 3. The extent to which the project addresses documented community needs. <p>Projects that demonstrate substantial, direct, and lasting benefit to LMI persons will receive higher consideration.</p> <p>Measurable Outcomes and Impact on Identified Needs Applicants must describe the proposed project outcomes in <i>measurable units</i> (e.g., number of persons served, jobs created or retained, infrastructure improvements completed, etc.). The application should:</p> <ol style="list-style-type: none"> 1. Quantify expected accomplishments during the implementation period. 2. Explain how these outcomes will reduce or eliminate the identified need(s). 3. Describe any remaining unmet needs and outline plans to address them, if applicable. <p>Higher scores will be awarded to projects with clear, realistic, and data-driven outcomes that demonstrate meaningful progress toward resolving identified needs.</p>
Up to 5	<p>Project Area Explanation (For guidance see supplementary attachment)</p> <p>Explain how the Project Service Area Map – Exhibit M (defined service boundaries) meets the eligibility?</p> <p>NOTE: this is not the same as project description.</p>

3. Project Readiness

Up to 30 points possible. A minimum of 10 points is required in this section to meet threshold. This section gives the applicant the opportunity to describe a workplan for solutions to the problems/needs and impact 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.*

POINTS IN THIS SECTION INCLUDE:	
10	<p>CDBG Ready Certification (<i>this can be submitted prior to application submission</i>)</p> <ul style="list-style-type: none"> • SAM.gov Active – Exhibit N • Verification of Adopted Procurement Procedures (federal/state/local review)

	<ul style="list-style-type: none"> • Verification of Adopted Code of Conduct • Verification of Financial Management Internal Control (Uniform Guidance) • Adopted Citizen Participation Plan (<i>project specific</i>) – Exhibit C2 • Residential-Anti Displacement Relocation Assistance Plan Certification (<i>project specific</i>) – Exhibit D • Excessive Force Certification • Self-Assessment for Section 504 completed • Other CDBG Readiness (<u>For guidance see supplementary attachment</u>)
Up to 10	<p><u>CDBG Readiness Explanation</u></p> <p><u>Project Timeline and Readiness to Proceed</u></p> <p>Applicants must provide a detailed project timeline or milestone outline that clearly demonstrates readiness to initiate the project within ninety (90) days of award. The timeline should include key phases such as procurement, environmental review (if applicable), design, bidding, construction start (typically within six months of award, if construction is involved), project completion, and closeout. The response should:</p> <ol style="list-style-type: none"> 1. Identify major milestones and anticipated completion dates. 2. Demonstrate that necessary pre-development activities (e.g., planning, engineering, site control, permitting, funding commitments) are complete or substantially underway. 3. Explain any potential barriers to implementation and how they will be mitigated. <p>Higher scores will be awarded to projects that present a realistic, well-sequenced timeline and demonstrate strong readiness to proceed.</p> <p><u>Capacity and Commitment</u></p> <p>Applicants must describe their capacity and commitment to successfully implement and complete the project in accordance with the proposed work plan and schedule. This includes:</p> <ol style="list-style-type: none"> 1. Demonstrating financial and administrative capacity. 2. Identifying systems in place for project oversight, compliance, and reporting. 3. Describing prior experience managing similar projects (scope, size, or funding source). <p>Applications that show a proven track record of completing projects on time and within budget will receive stronger consideration.</p> <p><u>Roles, Responsibilities, and Key Staff Experience</u></p> <p>Applicants must clearly identify project-specific roles and responsibilities, including staff, consultants, engineers, administrators, or contractors involved in planning and implementation. The response should:</p> <ol style="list-style-type: none"> 1. Define each key role and its responsibilities. 2. Describe the relevant knowledge, certifications, and experience of key staff. 3. Demonstrate familiarity with regulatory requirements, procurement standards, financial management, and reporting obligations. <p>Scoring will prioritize applicants that present a qualified, experienced team with clearly defined responsibilities and the demonstrated ability to manage, implement, and complete the project successfully and in compliance with program requirements.</p>
Up to 5	<p><u>Project Financial Explanation</u></p> <p><u>Project Budget Detail and Eligibility of Expenses</u></p> <p>Applicants must provide a detailed description of overall project expenses. The narrative should clearly identify and explain all anticipated costs, including but not limited to:</p>

	<ol style="list-style-type: none"> 1. Supplies and materials. 2. Engineering and design costs. 3. Labor costs (For <i>construction projects</i>, applicants must indicate whether Davis-Bacon wage rates have been considered and incorporated into cost estimates, where applicable). 4. Construction costs. 5. Administrative or professional services. 6. Any other related or indirect project costs. 7. Acquisition of property. <p>The proposed budget (i.e cost estimates) should be itemized, clearly justified, and aligned with the proposed scope of work. Higher scores will be awarded to applications that present realistic, well-supported cost estimates consistent with industry standards and regulatory requirements. Please upload any prepared cost estimates in Section 6 Supplemental Materials.</p> <p><u>Project Matching Funds</u> Applicant must describe if the matching funds are secured (i.e., cash on-hand) in the application exhibit (Exhibit Q). Matching funds are funds that must be contributed by the applicant. The proposed match must be towards CDBG-eligible activities directly related to the proposed project(s). Consideration for the match may be given for such sources as public and/or private funds. An all-cash match is preferable.</p> <p><u>Leveraging Additional Funding and Community Effort</u> <i>As applicable</i>, applicants must describe efforts made to secure additional funding (e.g. non-CDBG resources) and demonstrate local financial commitment to the project. The narrative should identify funding sources that have been contacted or pursued, which may include, but are not limited to:</p> <ol style="list-style-type: none"> 1. The United States Department of Agriculture Community Facilities Program. 2. Programs through USDA Rural Development. 3. Local government resources (e.g. Sales Taxes). 4. Foundations (e.g. Community Foundations & The Nebraska Community Foundation). 5. Local fundraising initiatives or private contributions. 6. Grants. <p>Applicants should specify which funding sources were contacted, the status of those requests (secured, pending, denied, or planned), and the amount of funding committed or anticipated.</p> <p><u>Funding Gaps and Financial Feasibility</u> (For guidance see supplementary attachment)</p> <p>Applicants must clearly state whether any funding gaps exist (Exhibit Q). If a gap is identified, the application must describe:</p> <ol style="list-style-type: none"> 1. The amount of the gap. 2. The plan and timeline to secure remaining funds. 3. The impact on project implementation if funds are not secured.
Up to 5	<p><u>Project Description Explanation</u></p> <p><u>Project Description and Scope Clarity</u> (For guidance see supplementary attachment)</p> <p>Applicants must provide a clear and detailed description of the proposed project (Exhibit R), including the location, scope of work, and any site-specific considerations. The description should be sufficiently detailed to demonstrate feasibility and alignment with the proposed budget and timeline.</p>

	<p><u>Environmental Review and Potential Delays</u></p> <p>Applicants must disclose any known environmental concerns that could delay or affect the project. This includes, but is not limited to:</p> <ol style="list-style-type: none"> 1. Required environmental reviews or clearances. 2. Floodplain considerations. 3. Historic preservation concerns. 4. Hazardous materials or contamination issues. 5. Wetlands or other regulated environmental features. <p>If environmental issues are identified, the applicant must explain the nature of the concern, its potential impact on the timeline, and the steps planned to address or mitigate the issue.</p> <p>Projects with no known environmental barriers, or with clearly identified mitigation plans and realistic timelines, will score more favorably.</p>
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4. Community Support

Up to 10 points is possible. A minimum of 5 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.*

POINTS IN THIS SECTION INCLUDE:	
Up to 5	<p><u>Community Engagement Explanation</u></p> <p><u>Meaningful Engagement of Community Residents</u> (For guidance see supplementary attachment) Applicants must demonstrate that community citizens were meaningfully engaged in identifying needs and shaping the proposed project. The response should describe the engagement process, including:</p> <ol style="list-style-type: none"> 1. Public meetings, hearings, surveys, workshops, or other outreach activities. 2. Dates and locations of each activity. 3. Whether meetings were held at accessible times and locations. 4. The number of attendees at public meetings. 5. Any complaints, documented concerns, or identified problems (e.g., infrastructure deficiencies, housing needs, service gaps). 6. Adjustments made to the project in response to citizen input. <p><i>As applicable</i>, applicants should also describe the availability of translation services, ADA accommodations, or other measures taken to ensure inclusive participation.</p> <p><u>Targeting and Inclusion of LMI Persons</u></p> <p><u>NOTE:</u> <i>This section does not pertain to Slum/Blight projects</i></p> <p><i>As applicable</i>, applicants must demonstrate specific strategies used to reach and involve low- and moderate-income households in project planning and development. The narrative should explain:</p> <ol style="list-style-type: none"> 1. Outreach methods used to engage LMI residents. 2. The level and nature of LMI participation.

	<p>3. How LMI feedback influenced project design and priorities. Projects that document direct input from LMI beneficiaries and demonstrate intentional outreach strategies will receive higher scores.</p> <p>Scoring will prioritize projects that demonstrate robust, inclusive, and well-documented community engagement—particularly among LMI residents—along with strong local partnerships and broad community support.</p> <p><u>Documentation of Citizen Participation</u> Applicants are required to include supporting documentation of citizen participation activities, such as meeting notices, sign-in sheets, meeting minutes, survey summaries, photographs, or public hearing records (Exhibit A). If included additional information that was not part of Exhibit A, upload in Section 6 Supplemental Materials.</p> <p><u>Partnerships and Collaboration</u> Applicants should describe any collaboration with organizations that serve LMI populations, such as nonprofit service providers, housing authorities, community action agencies, or other community-based organizations. The response should identify partners, describe their role in the project, and explain how collaboration strengthens outcomes for LMI residents.</p> <p><u>Letters of Support and Demonstrated Community Backing</u> Applicants should indicate whether letters of support (Exhibit L) have been obtained and included in the application. Letters from community members, partner organizations, local officials, or other stakeholders demonstrating commitment to the project will strengthen the application.</p>
Up to 5	<p>Ongoing Engagement Plan</p> <p>Applicants must describe how they will continue to engage community members—particularly low- and moderate-income (LMI) residents—throughout the implementation phase of the project. The response should outline a clear and structured plan that includes:</p> <ol style="list-style-type: none"> 1. Methods of ongoing communication (e.g., public meetings, project updates, website postings, social media, mailings, surveys, or community briefings). 2. Frequency and timing of engagement activities. 3. Strategies to ensure accessibility (e.g., ADA-compliant locations, accessible formats, translation services if applicable). 4. Procedures for receiving, documenting, and responding to citizen comments or complaints. 5. Identification of staff responsible for community outreach and communication. <p>Applicants should also describe how community feedback received during implementation will be incorporated into project adjustments, where appropriate, and how progress and outcomes will be shared with stakeholders.</p> <p>Higher scores will be awarded to applicants that present a proactive, transparent, and inclusive engagement strategy demonstrating continued accountability to residents—especially LMI beneficiaries—throughout the life of the project.</p>

5. 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:

POINTS IN THIS SECTION INCLUDE:	
5	<p>Economic Development Certified Community (EDCC).</p> <p>For a complete list of communities and additional information, visit the DED website at: https://opportunity.nebraska.gov/programs/community/edcc/</p> <p>UPLOAD: Certifications or other documentation provided by DED that recognizes <i>status</i></p> <hr/> <p>DED Leadership Certified Community (LCC)</p> <p>For a complete list of communities and additional information, visit the DED website at: https://opportunity.nebraska.gov/programs/community/lcc/</p> <p>UPLOAD: Certifications or other documentation provided by DED that recognizes <i>status</i></p>
5	<p>Community Redevelopment Agency (CRA) or Economic Development Organization</p> <p>A CRA is established to improve specific areas, known as Community Redevelopment Areas (CRAs), which are identified as blighted or economically distressed due to unsafe conditions, disinvestment, or neglect. A CRA is local government body decided to revitalizing blighted or underdevelopment urban area through planning , redevelopment projects, and public-private investment.</p> <p>Or if the community doesn't have a CRA, but the community has a Redevelopment Authority or other downtown/business/community/economic development organization that is operational and functioning within the community.</p> <p>To receive points for this criterion, the applicant shall include a letter from the organization that verifies the presence of such organization in the community <u>and</u> provides a description of how the organization has played an active role. Moreover, the letter must describe how the organization, applicant, and general public collaborate in terms of the proposed project.</p> <p>UPLOAD: Organization Letter & Narrative</p>
Bonus +5	<p>Opportunity Zones</p> <p>Originally established by Congress²⁷ through the Tax Cuts and Jobs Act (TCJA) of 2017, the Federal Opportunity Zones Program was made permanent with the passage of the One Big Beautiful Bill Act (OBBBA) of 2025. The purpose of the program is to promote investment and drive economic growth in low-income and/or economically disadvantaged communities. Opportunity Zones: Investing in Communities - HUD Exchange</p> <p>The OBBBA authorized the governor of each U.S. state and territory to nominate a certain number of qualifying census tracts as "Opportunity Zones."</p> <p>Is this project located within an eligible Nebraska Opportunity Zone? (Yes or No)</p> <p>Opportunity Zones - Nebraska Department of Economic Development</p>

²⁷ [Map of Opportunity Zones | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](#)

6. Supplemental Materials **UPLOAD**

Depending on the nature and scope of the project activities proposed, the following information shall be **included** and **UPLOADED** to support the application:

- a) **Project Need:** Project Photographs , Formal Study/report, etc.
- b) **Project Impact:** Water/Wastewater User Fees, Tourism event participation documentation, etc.
- c) **Project Readiness:** Facility Floor Plan, ERR Preparation, Ownership verification, 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, Cost estimates, Parcel data, etc.
- d) **Community Support:** Citizen Participation documentation, etc.

PART V. 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. Select “+” the budget line item you are wanting to add.
2. Enter the total amount of project in the “Direct Costs” fields (Direct costs = Grant Funded + Cash Match).
3. Change “Calculate Match” to “Yes” and enter your match dollar amount.
4. “Grant-Funded” is your requested amount of CDBG funds.
5. 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 restrict 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 VI. 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 approval, 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 State Statute §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 State Statute §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 and \$10,000 per beneficiary for daycare.

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 (24 CFR 5.403).

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 \$10,000²⁸.

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.

²⁸ 89 FR 30046

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.

Memorandum of Understanding (MOU)

A MOU is an agreement between two parties that is not legally binding, but which outlines the responsibilities of each of the parties to the agreement.

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** activity 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.

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 VII. 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) Application Webinar for 2026-2027 Program Year; May 15, 2026
- II. **DED Press Release:** Department of Economic Development to Host Community Development Block Grant (CDBG) Webinar; May 14, 2025
- III. **DED Press Release:** Department of Economic Development to Host Community Development Block Grant (CDBG) Webinar; May 13, 2024
- IV. **DED Press Release:** Nebraska Department of Economic Development to Host Webinar for 2023 Community Development Block Grant Program; May 16, 2023
- V. **DED Press Release:** Nebraska Department of Economic Development Announces 2nd Round of Funding for 2022 Public Works Opportunity; November 7, 2022
- VI. **DED Press Release:** Department of Economic Development to Host Community Development Block Grant (CDBG) Application Webinar Series; June 1, 2022
- VII. **DED Press Release:** Department of Economic Development to Host Community Development Block Grant (CDBG) Application Webinar Series; May 21, 2021
- VIII. **DED Press Release:** DED Publishes Information, Guidelines for Community Development Block Grant Coronavirus (CDBG-CV) Funding; July 1, 2020

PART VIII. FREQUENTLY ASKED QUESTIONS

1. What can we do if our community is not 51% or more LMI?

To meet the LMI national objective subcategory of LMA, your service area must be 51% or greater LMI. Current census or income survey data must show the service area to be 51% or greater LMI. As with applying to the CDBG program, you may complete an income survey if you believe the census data is inaccurate. Income surveys can be costly, time consuming, and may not result in the desired outcome. For more information about income survey methodology and recordkeeping requirements, see the *CDBG Manual, Appendix Section 1*.

2. What are some ways to inform the public of an income survey?

Here is a helpful tool: [CDBG Income Survey Toolkit - HUD Exchange](#). I would draw your attention to the Income Survey Flyer (Outreach Materials) and use the language provided.

3. We started an income survey prior to the limits being updated, would the HUD income limit updates invalidate the results of the survey?

When conducting the survey, utilize the same income limit amounts from the year you started the survey. This will ensure to keep the income verification consistent across the sample. The year the income limits were used is also the year the survey was conducted.

4. 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 \(treasury.gov\)](#)

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

Once logged into the GMA, 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.

6. 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.

7. How does LMC meet the National Objective?

LMC (Limited Clientele) are specifically defined groups (e.g., elderly or disabled) that are *presumed* low- and moderate-income persons. Activities meeting LMC must benefit those identified persons, not the general public.

8. We would like to seek Tourism Development (TD) funding and we're considering using LMC to qualify the project. How *can* State CDBG funding be used?

Any time you seek to qualify a project using LMC, remember that 51% or more of the beneficiaries must be LMI, and if that objective is *not* met by the project's conclusion, the national objective would *not* be fulfilled, and the full CDBG award amount would need to be repaid to DED. Furthermore, we are commonly asked whether CDBG TD funds can be used to support park projects (such as baseball, pickleball, camping, or basketball courts construction or renovation), and these activities are *not* eligible under TD because the project activity for Parks, Recreational Facilities (03F) is *not* eligible under TD. The only way a ballpark or park facility could be assisted using CDBG funds is if the park is community-owned, then the community could apply for a Public Works Facilities (PWF) project using LMC and request financial assistance to make restrooms, sidewalks etc. ADA accessible.

9. How is LMC used as a National Objective for Senior or Day-Care Centers?

Most public facilities and Privately-Owned Utilities improvements are intended to benefit all of the residents of an area. *Highly specialized facilities, such as senior centers and day-care centers, are an exception.* LMC is allowed when the improvement will be used for an activity designed to benefit a particular group of persons at least 51% of whom are LMI persons. To document the LMC national objective, follow these guidelines:

- 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.
- Include intake applications from families on income and family size (comparable to qualifying a person under LMJ) to determine LMI status, or applicant family demonstrates receiving benefits from a federal/ state program which requires meeting a similar or more restrictive LMI test.

10. Do safety improvements such as fire systems (sprinkler, alarm, etc.) qualify as an eligible activity for LMC?

No, these types of activities can only be done under the slum/blight national objectives. The beneficiaries of such safety systems (in publicly owned buildings) are all citizens and does not benefit solely LMC persons. Slum/blight is not allowed for RLF projects.

11. How does our 504 Transition Plan help?

Your 504 Transition Plan describes what the city will plan to do to address ongoing ADA improvements. This plan may offer a list of Public Works (e.g., public infrastructure and facility) needs in your community. The plan should be reviewed every three years.

12. What kinds of ADA improvements are allowable?

Consider projects that provide public safety and ADA improvements, such as:

- Replacing brick sidewalks or addition of sidewalks where none exist.
- Replacement of “coal chute” (hollowed) sidewalks.
- Addition of ADA park or playground equipment.
- Install ADA access to public park or other public facility.
- Reconstruct public park restroom facilities for ADA compliance, including replacement of an existing non-ADA accessible bathroom with an ADA-accessible bathroom.
- Install sidewalk crossing cuts for pedestrians that are barriers for the elderly.
- Improvements to government buildings for removal of architectural barriers and materials that restrict access and used by the elderly and adults disabled (LMC). This may include restrooms, drinking fountains, parking, exterior walks, ramps, counter heights, stair rails, lighting, automatic doors, seating, benches, and other improvements or enhancements meeting American with Disabilities Act (ADA).
- Removal of the architectural barriers and material that restrict ADA access:
 - There must be an existing facility or infrastructure (for barrier removal) to meet a LMC national objective. Generally, LMC is met by improvements or reconstruction to an existing structure.
 - LMA projects may include new construction.

13. Do sidewalks and ADA improvements need to be in census blocks with at least 51% LMI?

Not if the community-wide census data meets the LMA threshold. If that is not the case, there are some restrictions and considerations. Where benefit can be adequately demonstrated, LMC projects can be carried out in communities that have census tract(s) or block group(s) that are 51% or more. However, you must be able to meet “the smell test”:

- *Where the improvements benefit the entire community, you cannot assign benefit to block groups meeting the 51% threshold.*
- *You must be able to demonstrate and document that the improvements are for LMC.* For example, installing ADA-accessible parking at a public park is likely eligible under LMC. In contrast, costs associated with paving the rest of the parking lot is a benefit to all in the community and not predominately those with a disability.
- A census tract or block group can be used to justify improvements targeted to that area (e.g., paving a residential street in an area that is LMI), but not necessarily a street that is proximal or auxiliary to that LMI area (e.g., arterial or main road used by all residents).
- There must be clear correlation between the census tract or block group benefitting and the project activities.

14. Is there a size limit on the sidewalks we build? Can they be 10 feet wide?

There are no DED-imposed limits on sidewalk design. You must follow your engineering plans.

15. We have inadequate funding to maintain the roads in our HOA subdivision, can CDBG funds assist?

Repairing, operating, or maintaining infrastructure are ineligible activities. Another factor is that the status of an HOA precludes the subdivision from being eligible for government backed grant/loan assistance, especially since the road do not serve a community-side function.

16. We have a project that is outside of an entitlement community. Can State CDBG funding be used?

If the project is within the extra-territorial jurisdiction (ETJ) boundaries and not within the city proper it still would not be eligible.

17. What are jurisdictional issues with using CDBG Economic Development funds and waivers from DED?

CDBG funds are restricted to benefitting persons primarily within the jurisdictional control of the local government on the account, i.e., if the city is the account owner, then city's residents must be the beneficiaries of funds. A complete discussion of jurisdictional limits can be found in the *CDBG Application Guidelines*. If the local government provides a compelling basis for waiving the jurisdictional requirement, DED may issue a waiver when this restriction may block an otherwise reasonable and responsible proposal.

- Examples of Jurisdictional issues: (1) Assisting a business located just outside of town (that falls in the County's jurisdiction) but primarily benefits citizens of the town; or (2) A County assisting a business or housing project within the jurisdictional boundary of a town.

18. What are some examples of activities ineligible or not allowed?

Funds generated from CDBG-funded activities are subject to CDBG regulations. Ineligible are:

- Repair or "maintenance" type activities (e.g., filling potholes, mowing weeds, etc.).
- Expenses associated with "repairing, operating, or maintaining public facilities, improvements, and services"
 - Swimming pool improvements, including re-painting, new covers for drain and jets or new lights
 - Ball Field improvements including new updated lighting (e.g., a complete overhaul, poles, fixtures, wiring)
 - Grandstands repaired and covered
 - Shelter House with sidewalks and electric outlets, lights and a camera/security system
 - Portable ice skating rink (e.g., a portable electric system with mats that you plug in to keep the ice froze)
 - RV Park with sewer hookups, electrical and water hookups, and a lift station
- Park improvements involving Construction, improvements, or replacement of a non-ADA accessible bathroom with a non-ADA accessible bathroom.