

# KANSAS HOUSING

## Request for Proposals to serve as the Community Services Block Grant Eligible Entity and administer the Community Services Block Grant for 35 Western Kansas Counties

Questions regarding the application process may be submitted via electronic mail to [CSBG@kshousingcorp.org](mailto:CSBG@kshousingcorp.org) prior to March 12, 2026, 5:00 PM (CDT). Questions and answers will be posted at [www.kshousingcorp.org](http://www.kshousingcorp.org) on March 13, 2026, 5:00 PM (CDT).

### Questions Received & Answers Provided

#### **Question – Received 2/26/26 – Subject – RFP Release**

Can you tell me what audience this was released to, by chance? Thank you!

#### **Answer**

The RFP was sent to KHRC's full Constant Contact list which includes 3,689 email addresses. A notice was published in the Kansas Register on 3/5/26 at <https://sos.ks.gov/publications/Register/Volume-45/Issues/Issue-10/03-05-26-53924.html>. After the initial KHRC Constant Contact release, the email was forwarded to HHS-OCS, all current Kansas Eligible Entities, KACAP, Weatherization program contacts, Emergency Solutions Grant program contacts, Tenant Based Rental Assistance program contacts, and United Ways serving the western Kansas areas.

#### **Question - Received 3/2/26 - Subject - Board Requirements**

We are interested in applying for this Request for Proposal. However, under current Diocese rules, our board members are appointed by the Bishop. Because of this structure, we utilize separate advisory boards for grant requirements. These advisory boards meet independently and then minutes are provided to the Catholic Charities Board.

We would like to confirm whether this governance structure would be acceptable for meeting the board requirements outlined in the RFP.

#### **Answer**

Under the CSBG Act, eligible entities must be governed by a tripartite board. This structure ensures community representation, accountability, and balanced decision-making within organizations receiving CSBG funding. The requirement is found in [42 U.S.C. §9910](#).

#### **Question - Received 3/3/26 - Subject – Community Needs Assessment**

If we apply for all 35 counties, how many community needs assessments need completed? I know Stevens and Seward have recent CHNA completed, and Haskell is a few years old.

#### **Answer**

Eligible entities must conduct and publish a new Community Needs Assessment for the entire service area at least every three years to ensure planning remains relevant and reflective of current conditions.

**Question – Received 3/5/26 – Subject - CSBG Grant Awards**

We would like for the requirements related to subawards and/or contracts to be explained. We are especially interested in these items being discussed at the March 12th RFP for Western Counties meeting.

**Answer**

Thank you for the request. KHRC will cover the basics related to sub-awarding CSBG services during the March 12<sup>th</sup> public orientation hearing. Specifically, the content below.

**Sub Awarding CSBG Services**

[2 CFR 200.1](#)

Subaward means an award provided by a pass-through entity to a subrecipient for the subrecipient to contribute to the goals and objectives of the project by carrying out part of a Federal award received by the pass-through entity. It does not include payments to a contractor, beneficiary, or participant. A subaward may be provided through any form of legal agreement consistent with criteria in with [§ 200.331](#), including an agreement the pass-through entity considers a contract.

[2 CFR 200.331](#)

(a) **Subrecipients.** A subaward is for the purpose of carrying out a portion of the Federal award and creates a Federal financial assistance relationship with a subrecipient. See the definition of *Subaward* in [§ 200.1](#). Characteristics that support the classification of the entity as a subrecipient include, but are not limited to, when the entity:

- (1) Determines who is eligible to receive what Federal assistance;
- (2) Has its performance measured in relation to whether the objectives of a Federal program were met;
- (3) Has responsibility for programmatic decision-making;
- (4) Is responsible for adherence to applicable Federal program requirements specified in the Federal award; and
- (5) Implements a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity.

(b) **Contractors.** A contract is for the purpose of obtaining goods and services for the recipient's or subrecipient's use and creates a procurement relationship with a contractor. See the definition of *contract* in [§ 200.1](#). Characteristics that support a procurement relationship between the recipient or subrecipient and a contractor include, but are not limited to, when the contractor:

- (1) Provides the goods and services within normal business operations;
- (2) Provides similar goods or services to many different purchasers;
- (3) Normally operates in a competitive environment;
- (4) Provides goods or services that are ancillary to the implementation of a Federal program; and
- (5) Is not subject to compliance requirements of a Federal program as a result of the agreement. However, similar requirements may apply for other reasons.

**CAPLAW has Member Resources:**

- <https://caplaw.org/resources/members/nuts-and-bolts-of-subgrant-agreements>
- <https://caplaw.org/resources/sample-subaward-agreement>

**Question – Received 3/11/26 – Subject – RFP Questions**

Page 6 RFP - Where are KHRC's procurement policies and procedures located? I am unable to find them on the KHRC website. Are they the Kansas Department of Administration policies and procedures?

**Snippet Below**

CSBG funds can be utilized to collaborate with other entities on projects and/or to subcontract for client services. Through the use of subcontracts, a CSBG eligible entity can expand their ability to provide a wide array of services to meet the needs of low-income people, especially those aimed at enabling families and individuals to work towards the achievement of self-sufficiency. KHRC understands that with limited time to apply for funding, plans to subcontract for services may be limited at the time of application. All subcontracts will need to follow KHRC's procurement rules and Office of Management and Budget Regulations.

**Answer**

KHRC's procurement rules specifically related to CSBG can be found in the Kansas CSBG Policy and Procedure Manual, Section 9001 referencing Uniform Guidance, and the applicable Community Action Agency's (Eligible Entity's) procurement procedures.

**Snippet Below**

*Effective 10/1/24, HHS adopted eight key changes from 2 CFR Part 200 to all new and active awards. These eight changes add flexibility and reduce applicant/recipient burden. HHS will adopt the rest of 2 CFR Part 200 on 10/1/25 at which time 45 CFR Part 75 will be rescinded.*

9001. Each Community Action Agency must maintain a fiscal operation manual, preferably digital, detailing all fiscal policies and procedures for the entity, including maintenance of records, procedures for disbursement, maintenance of property records, procurement procedures and all other relevant policies and procedures.

**Question – Received 3/11/26 – Subject – RFP Questions**

Page 8 RFP -What does KHRC define as "be operating broad-based in all designated county service areas".

**Snippet Below**

In order to be considered, the applicant cannot be delinquent in its submission of the Single Audit to the Federal Audit Clearinghouse (if required) at the time of application, or at the time of the award. Additionally, in accordance with 42 U.S.C. 9909(b), KHRC may, but is not required to, give priority in granting the designation for the applicable counties to current eligible entities that are providing related services in the unserved area, consistent with the needs identified by a community-needs assessment. To be considered for this priority, current eligible entities must not have been subject to a Quality Improvement Plan (QIP) within six (6) months of applying under this RFP, must not have any outstanding audit findings, and must be operating broad-based in all designated county service areas.

### **Answer**

KHRC defines "be operating broad-based in all designated county service areas" as ensuring that CSBG services remain deeply connected to the people and priorities of every county served, allowing the Eligible Entity to respond effectively to local needs, build on community strengths, and improve outcomes for low-income individuals and families throughout the full Kansas service area. Such as partnerships, linkages, and/or services touching each county.

### **Question – Received 3/11/26 – Subject – RFP Questions**

Page 8 RFP- Indicates services provided are "consistent with the needs identified by a community needs assessment". Does this mean it could be a community needs assessment completed by a currently non-funded CSBG entity, (local hospitals, Kansas Children's Cabinet, KDHE, University of Kansas Center for Community Health & Wellness, United Way, etc.)? What CNA time frame will be accepted?

### **Snippet Below**

In order to be considered, the applicant cannot be delinquent in its submission of the Single Audit to the Federal Audit Clearinghouse (if required) at the time of application, or at the time of the award. Additionally, in accordance with 42 U.S.C. 9909(b), KHRC may, but is not required to, give priority in granting the designation for the applicable counties to current eligible entities that are providing related services in the unserved area, consistent with the needs identified by a community-needs assessment. To be considered for this priority, current eligible entities must not have been subject to a Quality Improvement Plan (QIP) within six (6) months of applying under this RFP, must not have any outstanding audit findings, and must be operating broad-based in all designated county service areas.

### **Answer**

Please see Section 7000 of the Kansas CSBG Policy and Procedure Manual for details. Yes, it could be a Community Needs Assessment completed by a non-funded CSBG entity. A Community Needs Assessment must be completed at least once every three years. KHRC will allow reasonable time for the preparation of a Community Needs Assessment for the 35-county service area and has access to the former Eligible Entity's Community Needs Assessment.

### **Snippet Below**

## **7000 COMMUNITY ASSESSMENT**

7001. As required by the Coats Human Services Reauthorization Act of 1998 and as a condition of funding, Community Action Agencies must produce and maintain a Community Needs Assessment.

7002. A full community assessment must be completed, and a report issued, at a minimum, once every three years (Organizational Standard 3.1); updates addressing significant variances must be provided in intervening years. The full assessment must include elements identified within Organizational Standards including:

- A. A statistical profile (charts, graphs, maps, . . .) including current data specific to poverty and its prevalence related to gender, age, and race/ethnicity for their service area(s). (Organizational Standard 3.2)
- B. Both qualitative and quantitative data on the geographic service area(s) which may include community perspectives (common themes, key quotes, . . .). (Organizational Standard 3.3)
- C. Customer satisfaction data and customer input. (Organizational Standard 6.4)
- D. Key findings on the causes and conditions of poverty and the needs of the communities assessed. (Organizational Standard 3.4)

7003. Legislation allows that the assessment may be coordinated with community assessments conducted for other programs. An assessment so conducted must contain all elements listed in Item 7002; it must address the entire service area and be clearly applicable to the work of the eligible entity.

7004. Community Action Agencies must, on the submission of the annual Organizational Standards, ensure that KHRC is in possession of a current, dated copy of the community assessment. An update detailing significant variances, if any, must be provided in intervening years.

7005. The Community Needs Assessment must be published within the three-year period.

### **Question – Received 3/11/26 – Subject – RFP Questions**

Page 2 - Application Under Geographic Location, if an entity is contiguous but does not provide CSBG services outside of currently funded CSBG catchment area, what would other entity "related services provided in the same county(ies)" for which application is being submitted be considered?

### **Answer**

KHRC cannot locate this information on page 2 of the RFP, however, will attempt to answer the question. To serve an unserved area under CSBG, an organization must be capable of addressing poverty, be located near the area, already provide related services there, be willing to adjust its board to represent the new area, and ensure its services align with identified community needs.

**Question – Received 3/11/26 – Subject – RFP Questions**

What is required of the funded entity if subawards or contracts are utilized for service delivery?

**Answer**

If subawards or contracts are used for service delivery, the funded entity must maintain oversight, monitor compliance, and remain legally and programmatically responsible for the use of the CSBG funds and the outcomes of the services delivered. Please see [2 CFR 200.332](#) for requirements of pass through entities.

**Question – Received 3/12/26 – Subject – Questions**

Could you please provide recommendations for forming a tripartite board with a 35-county service area? Additionally, I'd like to know the composition of the Tripartite board of Harvest America, if available.

**Answer**

Please see slide deck and recording from 3/12/26 CSBG Orientation and Public Hearing for more information about Tripartite Board. The composition of Harvest America Corporation's Board of Directors was a Tripartite Board, as the slide deck indicated.

**Question – Received 3/12/26 – Subject – Questions**

Could you kindly submit an example of a needs assessment used by another CAP organization?

**Answer**

Please feel free to look at the current Eligible Entity's websites for their Community Needs Assessments.

**Question – Received 3/12/26 – Subject – Questions**

Could you clarify the definition of accessibility for each county? Specifically, do you mean within an hour's drive that an eligible entity representative is available, or is it more of a distance accessibility? Alternatively, is it a phone conversation accessibility?

**Answer**

The Eligible Entity determines their definition of accessibility and can inform KHRC within the application.

**Question – Received 3/12/26 – Subject – Questions**

What are your staff's recommendations for managing a service area of this size? Do you assign a specific number of counties to each staff member? Is there a designated staff person for each help area (e.g., one staff member for rental assistance, one for LIEAP and Utility, and another for GED/job readiness)?

**Answer**

The Eligible Entity determines how to manage the service area.

**Question – Received 3/12/26 – Subject – Questions**

Could you please provide another CAA-approved budget?

**Answer**

Consider reaching out to current Eligible Entities to ask if they would share their budget.

**Questions from Chat During 3/12/26 Public Meeting**

**Question** - Will the slides be shared?

**Answer** - Yes, the slide deck and recording are available at [www.kshousingcorp.org](http://www.kshousingcorp.org).

**Question** - Can the board be a separate board from our agency board?

**Answer** - No, the Tripartite Board must be the Eligible Entity's Board of Directors and not an Advisory Board.

**Question** - Is there required statewide or national travel for eligible entities?

**Answer** - Statewide or national travel is not required. However, Eligible Entities are encouraged to participate and attend training or conference opportunities. CSBG funds can be used for this purpose.

**Question** - Is there a designated amount for administrative costs to carry out activities in the 35 counties?

**Answer** - Subrecipients that do not have a current Federal negotiated indirect cost rate (including provisional rate) may elect to charge a de minimis rate of up to 15 percent of modified total direct costs (MTDC) or through a rate identified within a written approved cost allocation plan. An organization's cost allocation plan describes how the agency recovers shared costs through direct allocation. These methods for direct allocation of shared costs must be based on principles contained in the Uniform Guidance.

**Question** - If announcements are made 5/22, when does funding begin?

**Answer** - Please see page 4 of the RFP. A contract/agreement and funding could begin June 1, 2026. The normal annual cycle is April 1 for 18 months, each year.