

Frequently Asked Questions About the 2023 Build to Scale (B2S) Program

Updated June 23, 2023

1. ELIGIBILITY	4
a. Can organizations that have not yet formed (or have formed, but are not yet registered in the System for Award Management (SAM.gov)) still apply for a grant under this Notice of Funding Opportunity (NOFO)?	4
b. Which organizational types are eligible to apply for funding?	4
c. According to the list in 1(b), applications from certain entity types must be supported by a State or a political subdivision of a State. What is a political subdivision of a State? How should applicants demonstrate support of a State or a political subdivision of a State?	5
d. How can prospective applicants determine eligibility for organizational entity types not included in the list?	5
e. Do nonprofit organizations need to be legally organized as a 501(c)(3) in order to apply?	5
f. How does EDA evaluate the eligibility of a public-private partnership?	5
g. How can public-private partnerships apply for B2S?	6
h. Which documents should I submit to demonstrate my eligibility as an EDO or VDO?.....	6
i. What is a “federal laboratory”? What documents should I submit to demonstrate eligibility?.....	6
j. For the purposes of B2S, what is a consortium?	7
k. Is an Alaska Native Village or Regional Corporation an eligible recipient?	7
l. If a university system has branch campuses, each with their own Unique Entity Identifier, can campuses submit unique applications, or would they all be considered submissions from the university?	7
m. Are B2S or Regional Innovation Strategies (RIS) grantees with active grants eligible for new B2S awards?	7
n. Will any previous grants that EDA awarded to my organization affect my organization’s competitiveness for B2S?	8
o. What distress criteria must be met to be eligible for this funding?	8
2. PROGRAM INFORMATION	8
a. Are there other requirements that I need to know and that will impact these awards?	8
b. What are the differences between EDA’s Build to Scale and Tech Hubs programs?	8
c. Does participation in an EDA Tech Hubs Program application preclude my organization from applying for a B2S award?	9
3. ELIGIBLE USES OF AWARD FUNDS	9
a. Do award requirements, such as the Uniform Guidance, apply to cost share, too?	9
b. What costs are allowable or unallowable under this competition?	9

- c. Can EDA funds be used for a prize competition among program participants?..... 9
- d. Can a B2S grant capitalize a lending program or a seed fund? 9
- e. May award funds be transferred to companies served under an award? 9
- f. Can the B2S award fund construction projects? 10
- g. Are stipends, wages, and other payments to interns an allowable use of funds?..... 10
- 4. CO-APPLICANTS, SUBRECIPIENTS/SUBAWARDEES, AND CONTRACTORS 10**
 - a. Are co-applicants allowed? Must we designate a lead applicant for our application?..... 10
 - b. How do you determine whether an entity is a co-applicant? What forms are co-applicants required to submit? 10
 - c. What differentiates a subrecipient/subawardee from a co-recipient? 10
 - d. What differentiates a subrecipient/subawardee from a contractor?..... 11
- 5. BUDGET DOCUMENTATION & MATCH REQUIREMENTS..... 11**
 - a. Is a budget template available and am I required to use it?..... 11
 - b. The NOFO discusses a maximum amount for an EDA grant, but can applicants apply for less than that amount? 11
 - c. What is the maximum funding that can be requested for each level of both Challenges? 11
 - d. The NOFO indicates that applicants must include a budget narrative, but the required standard form SF- 424A (Budget Information for Non-Construction Programs) seems to cover that information. Are those the same?..... 11
 - e. What is the minimum matching share required? 12
 - f. What is required in a match commitment letter? 12
 - g. Does EDA allow program income to be considered in the project budget?..... 12
 - h. What can be considered an in-kind contribution? 12
 - i. Are there guidelines for the valuation of in-kind matching share? 13
 - j. May unrecovered indirect costs count towards the required matching share? 13
 - k. Is there a limit on the amount of indirect costs that an applicant can claim?..... 13
 - l. If matching funds come from a source that approves funding on an annual basis, but those funds have not been approved at the time of application, what documentation is necessary to establish eligibility? 13
 - m. May funds from other federal financial assistance awards serve as matching funds? 13
 - n. May providers of matching share serve as contractors under an award?..... 13
 - o. Is there a benefit to “over-matching?” Do applications that provide more than the minimum required cost share score higher? 14
- 6. APPLICATION MATERIALS AND SUBMISSION PROCESS..... 14**
 - a. Regarding new organizations and/or first-time applicants for EDA grant programs, what

requirements are necessary to initiate and submit an application on sfgrants.eda.gov (EDGE)?.. 14

b. When is the deadline for submission and where do I submit the application? 14

c. Where in EDGE does the FIPS template belong? 14

d. Which applications are subject to Executive Order (EO) 12372, “Intergovernmental Review of Federal Programs”? What if my state is not included in the SPOC list? 14

e. Where in EDGE do letters of support belong? 15

f. How many letters of support from State or a political subdivision of a State do consortium applicants need to provide? 15

g. Are applicants limited to submitting one application per challenge? 15

h. Are applicants required to submit a separate application for the Venture Challenge and Capital Challenge? 15

i. How are applications reviewed? 15

j. When and how will applicants be notified of application results? 15

k. Is there a way to preview the application prior to initiating submission in EDGE? 15

l. I have completed the application in EDGE but the submission button is “greyed out”, what do I do?16

7. CONTACT EDA 16

a. What is the best way to contact EDA with questions during the application process? 16

b. How can applicants request assistance with navigating the EDGE platform? 16

1. ELIGIBILITY

- a. **Can organizations that have not yet formed (or have formed, but are not yet registered in the System for Award Management (SAM.gov)) still apply for a grant under this Notice of Funding Opportunity (NOFO)?**

Applications will only be accepted electronically through the Economic Development Grants Experience (EDGE) at sfgrants.eda.gov. Applicants must obtain a unique entity identifier and demonstrate active registration in SAM.gov to access the application on EDGE. Completing SAM.gov registration is a process that can take weeks, and EDA strongly encourages applicants who are in the process of forming or have formed but are not yet registered in SAM.gov and EDGE to do so as soon as possible. For further details, see sections D.4 and D.5. (pp. 19-20) of the NOFO.

Only complete applications submitted by 11:59 p.m. Eastern Time on July 28, 2023 will be considered for funding.

- b. **Which organizational types are eligible to apply for funding?**

The following entities are eligible Build to Scale (B2S) grant recipients:

1. a State;
2. an Indian tribe;
3. a city or other political subdivision of a State;
4. an entity that—
 - a. is
 1. a nonprofit organization,
 2. an institution of higher education,
 3. a public-private partnership,
 4. a science or research park,
 5. a federal laboratory,
 6. a venture development organization (VDO), or
 7. an economic development organization (EDO) or similar entity that is focused primarily on improving science, technology, innovation, or entrepreneurship; **and**
 - b. has an application that is supported by a State or a political subdivision of a State; or a native organization; or
5. a consortium of any of the entities described in subparagraphs (1) through (4).

EDA has promulgated [regulations](#) that provide additional guidance on eligibility.¹

For-profit entities that are demonstrably institutions of higher education, parties to public-private partnerships, science or research parks, federal laboratories, or economic development organizations or similar entities are eligible for funding; however, EDA strongly encourages for-profit entities to read these FAQs and the 2023 B2S NOFO carefully, and to contact the Office of Innovation and Entrepreneurship (OIE) at oie@eda.gov for information pertaining to this question. Note that EDA is **NOT** authorized to provide grants to individuals under B2S.

¹ 13 CFR § 312.3.

c. According to the list in 1(b), applications from certain entity types must be supported by a State or a political subdivision of a State. What is a political subdivision of a State? How should applicants demonstrate support of a State or a political subdivision of a State?

A political subdivision of a State is a unit of government created by and under the authority of a State, such as a county or city. To demonstrate the support of a State or a political subdivision of a State, an applicant may include a letter from executive branch officials (e.g. State governors, State cabinet members, mayors, or other municipal executives) and State and local legislators (e.g. State legislators, city councilpersons). Note that applicants that are a State, Indian tribe, city or other political subdivision of a State, or an institution of higher education that is 100% publicly controlled, need not demonstrate the support of a State or a political subdivision of a State.

Generally, only one letter will be necessary so long as the letter demonstrates that the application is supported by a State, a political subdivision of a State (e.g., a county or a municipality), or a native organization that encompasses all or a substantial portion of the region served by the project.

d. How can prospective applicants determine eligibility for organizational entity types not included in the list?

Please contact OIE at oie@eda.gov for additional guidance on the documentation necessary to establish eligibility under this NOFO. Ultimately, a determination of award eligibility is dependent on EDA's review of an organization's documentation (e.g., for a non-profit organization, documentation includes articles of incorporation, a certificate of good standing, and bylaws). An invitation to apply does not affirm an organization's eligibility for award.

e. Do nonprofit organizations need to be legally organized as a 501(c)(3) in order to apply?

No. Any entity applying as a nonprofit must provide documentation that demonstrates its status as a nonprofit organization, including articles of incorporation, a certificate of good standing, bylaws, and, if applicable, proof of tax-exempt status.

f. How does EDA evaluate the eligibility of a public-private partnership?

EDA defines a public-private partnership (PPP) as a relationship formalized by contractual agreement between a public agency and a private-sector entity that reasonably defines the terms of collaboration in the delivery and financing of a public project.²

EDA will typically review agreements for items such as the purpose and objectives of the partnership, the binding/contractual nature of the relationship, the duties and responsibilities of each party, and the duration of the agreement. The scope of the relationship documented in the agreement may be limited to the proposal set forth in a given partnership's grant application or may encompass a broader program, initiative, or other set of activities or goals. In most cases, a letter of support from a public entity alone, without additional documentation demonstrating a formal, binding relationship between the parties, will be found insufficient to establish eligibility under this entity category.

EDA reserves the right to request additional information from applicants to establish eligibility, as

² 13 CFR § 312.3.

necessary.

g. How can public-private partnerships apply for B2S?

Organizations that plan to apply as a public-private partnership (PPP) may submit their applications in one of four ways:

1. A private entity that is a party to the PPP applies on behalf of the PPP. The applicant private entity must include in the application the contractual agreement establishing the PPP, which agreement must clearly document the roles and responsibilities of each member of the PPP.
2. A public entity that is a party to the PPP applies on behalf of the PPP. The applicant public entity must include in the application the contractual agreement establishing the PPP, which agreement must clearly document the roles and responsibilities of each member of the PPP.
3. The PPP applies as a single entity if:
 - a. the PPP is an established entity, independent of the parties to the PPP and with its own organizational structure and clearly defined management team; and
 - b. the application includes the contractual agreement establishing the PPP, and clearly documents the roles and responsibilities of each member of the PPP.
4. If the public and private partners are equally involved in the management and/or implementation of the proposed project, then the entities of the PPP should submit as co-applicants. The application should include the contractual agreement establishing the PPP, and clearly document the roles and responsibilities of each member of the PPP.

Note that regardless of the approach taken to submitting an application, each party to the PPP will be considered jointly and severally responsible for fulfilling the terms of the award, including post-award reporting and all documentation requirements.

h. Which documents should I submit to demonstrate my eligibility as an EDO or VDO?

EDA defines an EDO as an organization whose primary purpose is to support the economic development of a community or region. A VDO is a State or nonprofit organization that contributes to regional or sector-based economic prosperity by providing services for the purposes of accelerating the commercialization of research.³

In order to demonstrate eligibility status under this category, EDA will review the applicant's articles of incorporation, charter, resolutions, bylaws, and/or other documents that may be relevant to establish the primary purpose of the organization. Applicants are encouraged to submit all relevant documentation to EDA for evaluation. EDA reserves the right to request additional information from applicants to establish eligibility, as necessary.

i. What is a "federal laboratory"? What documents should I submit to demonstrate eligibility?

To begin, many federal laboratories are eligible to apply under B2S as a nonprofit organization or an institution of higher education. EDA strongly encourages such entities to apply under B2S using those entity types.

³ 15 U.S.C. § 3722(a)(4).

To demonstrate eligibility as a federal laboratory, an entity must include documentation that substantiates that the entity is a federal laboratory. This may include the entity's articles of incorporation, bylaws, certificate of good standing, and authorizing statute and/or contract to operate a federal laboratory.

EDA retains the discretion to determine whether an entity is eligible as a federal laboratory for purposes of B2S in making this determination, EDA will review the documentation listed above. EDA often looks to the definition of "laboratory" at 15 U.S.C. § 3710a(d)(2), but EDA has not officially adopted that language as the definition of "federal laboratory" for B2S. Instead, EDA makes a case-by-case determination as to whether an entity is eligible as a federal laboratory under B2S.

Like all B2S applicants, an entity that wishes to apply as a federal laboratory should verify, prior to applying, that the entity is authorized to receive federal grants and is also authorized to perform the scope of work of a B2S grant. The method to verify this will vary by entity, but often includes reviewing the entity's articles of incorporation and, if applicable, government contract to operate a federal laboratory.

Lastly, a federal laboratory should pay special attention to the general rule that federal funds may not be used as matching share under B2S discussed in section D.2.iii.c. (pp. 18-19) of the NOFO. While there are some exceptions (including federal grants made available under a federal statute that authorizes use of funds as match for other federal grant programs), funds appropriated by Congress to operate a federal laboratory will generally not be allowable as matching share. This includes in-kind matching share funded with federal monies. A federal laboratory wishing to use federal funds as matching share must include with its B2S application documentation that verifies the funds may be used as matching share under a federal grant; however, EDA retains discretion in determining whether any such funds may be used as matching share under a B2S award.

j. For the purposes of B2S, what is a consortium?

A consortium is two or more eligible entities jointly applying for an award as co-applicants.

k. Is an Alaska Native Village or Regional Corporation an eligible recipient?

Yes, Alaska Native Villages or Regional Corporations (as defined in or established under the Alaska Native Claims Settlement Act) are eligible for award under B2S.

l. If a university system has branch campuses, each with their own Unique Entity Identifier, can campuses submit unique applications, or would they all be considered submissions from the university?

Applicants must have their own Unique Entity Identifier (UEI) to be considered a distinct applicant. As long as an individual UEI is provided for each application, applications can be submitted for different branch campuses.

m. Are B2S or Regional Innovation Strategies (RIS) grantees with active grants eligible for new B2S awards?

To be eligible for the 2023 Venture Challenge, current Venture Challenge, i6 Challenge, and Industry Challenge – Blue Economy recipients must have completed all activities within their current award's scope of work and must have fulfilled their final reporting requirements by October 1, 2023.

To be eligible for the 2023 Capital Challenge, current Capital Challenge and Seed Fund Support recipients,

must have completed all activities within their current award's scope of work and must have fulfilled their final reporting requirements by October 1, 2023.

The aforementioned stipulations for award do not apply to Build to Scale or Regional Innovation Strategies grantees with active awards that submit an application for a different challenge.

n. Will any previous grants that EDA awarded to my organization affect my organization's competitiveness for B2S?

No, unless your organization has an active B2S or RIS grant (please see question 1(m) in this document). However, the Grants Officer may take past performance into consideration when selecting applications for award.

o. What distress criteria must be met to be eligible for this funding?

Unlike most of EDA's other programs which are authorized under the Public Works and Economic Development Act of 1965,⁴ B2S is authorized under section 27 of the Stevenson-Wydler Technology Innovation Act of 1980 (section 27).⁵ Section 27 does not require applicants to meet specific regional distress criteria to be eligible for award under B2S.

2. PROGRAM INFORMATION

a. Are there other requirements that I need to know and that will impact these awards?

Yes, EDA award recipients must comply with the following:

1. Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards at 2 CFR part 200 ("Uniform Guidance");
2. the Department of Commerce Financial Assistance Standard Terms and Conditions;
3. the Pre-Award Notification Requirements for Grants and Cooperative Agreements; and,
4. EDA Specific Award Conditions.

In addition, recipients must comply with applicable requirements of all other federal laws, executive orders, regulations, and policies governing B2S.

Consistent with Executive Order 13985, Advancing Racial Equity and Support for Underserved Communities through the Federal Government⁶, and EDA's Equity Investment Priority⁷, EDA expects projects to advance equity to underserved populations to the greatest extent practicable. While EDA encourages efforts to reach historically underserved populations and geographies (see section E.1.vi. of the NOFO), to be considered for award, those efforts must not discriminate based on race, color, national origin, disability, age, religion, or sex.

b. What are the differences between EDA's Build to Scale and Tech Hubs programs?

⁴ 42 U.S.C. § 3121, et seq.

⁵ 15 U.S.C. § 3722.

⁶ <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/>.

⁷ <https://www.eda.gov/funding/investment-priorities>.

EDA's Tech Hubs program seeks to enable regions to become global leaders in a core technology area through multiple, coordinated, large investments in workforce development, technology advancement, business and capital supports, and infrastructure. B2S is different in that it makes targeted investments to increase regional capacity to specifically support technology entrepreneurs and strengthen the ecosystems in which those entrepreneurs thrive.

c. Does participation in an EDA Tech Hubs Program application preclude my organization from applying for a B2S award?

Concurrent applications to both programs are allowed; however, each program has unique goals, requirements, and eligibility criteria that applicants need to consider when applying.

3. ELIGIBLE USES OF AWARD FUNDS

a. Do award requirements, such as the Uniform Guidance, apply to cost share, too?

Yes, non-federal matching funds are governed by the same regulations and requirements as EDA funds. As an example, EDA property regulations at 13 CFR part 314 apply both to equipment purchased with EDA funds and equipment donated as match.

b. What costs are allowable or unallowable under this competition?

Cost principles at 2 CFR part 200, subpart E, outline general criteria that determine whether costs are allowable. All costs (including match) charged to a B2S award must be allowable under these cost principles.

In addition, section D.7. of the NOFO describes certain unallowable costs, e.g., costs for construction, equity investments and loans, subsidies to participant firms, advertising and marketing, internships and wages/stipends, and cloud service credits. These costs are not allowed to be charged to the federal share or to the matching share.

c. Can EDA funds be used for a prize competition among program participants?

No, prizes and stipends given directly to program participants are not an allowable use of B2S funds.

d. Can a B2S grant capitalize a lending program or a seed fund?

EDA funds awarded under B2S cannot be used to capitalize a lending program or a seed fund (i.e., EDA funds and matching funds cannot be used to invest in startups or any other companies).

The technical assistance and operational costs funded by EDA can jumpstart the creation or expansion of a seed fund by funding operations to raise capital for a fund, to market the fund to potential startups and investors, and to educate potential seed fund investors.

e. May award funds be transferred to companies served under an award?

Award funds may not be transferred or "passed through" directly to companies or private beneficiaries (i.e., startups and individuals) being served by the applicant organization, and award funds may not be used to subsidize such companies' expenses that are unrelated to program activities, including general operating expenses. B2S awards may only fund operational and programmatic costs related to developing and

supporting regional innovation initiatives.

f. Can the B2S award fund construction projects?

Construction activities are not allowable, except in limited circumstances related to equipment installation. For the purposes of an award made pursuant to this NOFO, construction includes any activity that disturbs the ground or modifies a structure.

The purchase of equipment and equipment-related modifications or renovations of a facility are allowable, but only to the extent that such equipment and any related modifications or renovations are used to support another eligible activity under the award.⁸

g. Are stipends, wages, and other payments to interns an allowable use of funds?

As described in section D.7 “Funding Restrictions,” establishing and administering an internship or similar work experience program is not an allowable activity under B2S. In other words, B2S cannot subsidize startup intern wages, nor can it fund student training. However, recipients may use B2S funds or match to pay the wages of contingent, short-term, or part-time personnel whose work is directly aligned with the grant-funded project.

4. CO-APPLICANTS, SUBRECIPIENTS/SUBAWARDEES, AND CONTRACTORS

a. Are co-applicants allowed? Must we designate a lead applicant for our application?

Co-applicants are allowed. It is not necessary to designate a lead applicant at the time of application. However, in the event of an award, one of the recipients will need to serve as the fiscal agent for the grant and distribute funds to the co-recipient. It is not possible for more than one recipient to draw down award funds.

b. How do you determine whether an entity is a co-applicant? What forms are co-applicants required to submit?

If another entity will be partnered with the lead applicant in managing and implementing the scope of work of an award, then that entity may be considered a co-applicant (see section C.2.ii. of the NOFO). Each co-applicant must be an eligible entity under the NOFO. Generally, co-recipients are required to submit the same application materials. However, if one co-applicant is a public entity and the other is a non-public entity, then the requirement to demonstrate State support does not apply. See Appendix B of the NOFO for a comprehensive checklist of the documents necessary to demonstrate co-applicant eligibility.

c. What differentiates a subrecipient/subawardee from a co-recipient?

Co-recipients jointly manage and implement the scope of work of an award. In contrast, subrecipient/subawardees carry out a portion of project activities on behalf of the recipient(s). EDA prefers funding projects that use subrecipients rather than co-recipients. For more information on determining whether a third-party is a subrecipient/subawardee, see 2 CFR § 200.331 (Subrecipient and contractor determinations).

⁸ See 13 CFR § 312.7(a)(9) and (b)(3).

d. What differentiates a subrecipient/subawardee from a contractor?

Unlike contractors, subrecipients/subawardees must conform with the same eligibility requirements as the recipient(s). In addition, subrecipients/subawardees may have responsibility for programmatic decision-making and are responsible for adherence to applicable federal program requirements such as the Uniform Guidance.

In contrast, contractors are entities that provide goods and services for the recipient's own use and are subject to competitive procurement requirements outlined in 2 CFR §§ 200.317-327. For more information on determining whether a third party is a contractor, see 2 CFR § 200.331 (Subrecipient and contractor determinations).

5. BUDGET DOCUMENTATION & MATCH REQUIREMENTS**a. Is a budget template available and am I required to use it?**

The "Optional Budget Narrative and Staffing Template" is provided at <https://www.eda.gov/funding/programs/build-to-scale>. Applicants are encouraged but not required to use the budget template.

b. The NOFO discusses a maximum amount for an EDA grant, but can applicants apply for less than that amount?

EDA encourages applicants to develop compelling proposals that efficiently use federal dollars. Applicants can apply for less than the maximum amount stated in the NOFO. However, there are minimum funding requests for the Venture Challenge at the Scale level and for the Capital Challenge at the Deploy level.

c. What is the maximum funding that can be requested for each level of both Challenges?

The federal grant amounts under Build to Scale awards are as follows:

Venture Challenge

1. Between \$750,000 up to \$2,000,000 for Venture Challenge at the Scale level
2. Up to \$750,000 for Venture Challenge at the Build level
3. Up to \$300,000 for Venture Challenge at the Ignite level

Capital Challenge

1. Between \$400,000 and \$750,000 for Capital Challenge at the Deploy level
2. Up to \$400,000 for Capital Challenge at the Form level

These funding levels are based on the entire project period, not per year.

d. The NOFO indicates that applicants must include a budget narrative, but the required standard form SF- 424A (Budget Information for Non-Construction Programs) seems to cover that information. Are those the same?

No, the budget narrative and the SF-424A (Budget Information for Non-Construction Programs) are separate and distinct required documents. The SF-424A identifies the totals per budget line item. The budget narrative identifies and justifies how the funds in each budget line item will be used to support the proposed project and links each line item to its relevant commitment letter or funding source. Budget narrative line items and whole budget totals should mathematically match the total project costs listed in the appropriate “totals” fields of the SF-424A and question 18, line g (“TOTAL”) of the SF-424. Applicants are strongly encouraged to review the “Application and Submission Information” (section D) in the NOFO for further information. Applicants are encouraged to use the “Optional Budget Narrative and Staffing Template” on EDA’s website at <https://www.eda.gov/funding/programs/build-to-scale>.

e. What is the minimum matching share required?

Applicants must provide a minimum of one-to-one (i.e., 50 percent of the **TOTAL** project budget) in matching share under both challenges. The budget narrative, SF-424A, and commitment letters should clearly and consistently document the total project budget and should delineate and substantiate matching share, both cash and in-kind, including appropriate valuations.

f. What is required in a match commitment letter?

Applicants must submit match commitment letters or equivalent documents for all matching funds (whether cash or in-kind) and from all sources, including internally provided funds. Applicants must demonstrate that this matching share (cash, in-kind, or a combination of cash and in-kind contributions) is available as needed, unencumbered, and committed to the project. Applicants should also consider the nature and source of the matching share, as funds from federal sources generally cannot be considered as matching funds for other federal projects (see section D.2.iii.c.). Commitment letters must be signed by a person with the authority to execute documents and to obligate and expend funds on behalf of their respective organizations.

Each matching share commitment letter must:

- i. state whether the contribution is cash or in-kind;
- ii. if in-kind, provide a valuation for each in-kind contribution;
- iii. state whether the contribution is from a non-federal source or from a federal source that is explicitly authorized by statute to be used as matching share; and
- iv. state that, at the time of award, the matching share
 1. is committed to the project,
 2. will be available as needed, and
 3. is neither conditioned nor encumbered in any way that would preclude its use consistent with the requirements of EDA investment assistance

g. Does EDA allow program income to be considered in the project budget?

No. Since matching share must be available as needed, unencumbered, and committed at the time of award, EDA does not allow program income to be considered as matching share.

h. What can be considered an in-kind contribution?

In-kind contributions may be used to meet the required non-federal share of the total project costs. In-kind contributions are non-cash contributions directly related to the proposed project, and typically include

items such as space, equipment, or services. Itemized valuations for all in-kind contributions must be included in the budget narrative. All in-kind contributions must be eligible project costs and be valued in accordance with 2 CFR § 200.306 and the Cost Principles at 2 CFR part 200, subpart E.

i. Are there guidelines for the valuation of in-kind matching share?

To allow EDA to verify the value of in-kind matching share, applicants must provide an explanation of how in-kind matching share is valued and calculated within the budget narrative and/or provide supporting documentation. In-kind matching share must be valued pursuant to the provisions of the Uniform Guidance at 2 CFR § 200.306. See also 2 CFR § 200.434 for cost principles related to contributions and donations.

j. May unrecovered indirect costs count towards the required matching share?

In accordance with 2 CFR § 200.306, unrecovered indirect costs may only be applied toward the matching share with EDA's prior approval. Therefore, applicants seeking to apply unrecovered indirect costs to the matching share should seek EDA's guidance early in the application process.

k. Is there a limit on the amount of indirect costs that an applicant can claim?

The maximum dollar amount of allocable indirect costs for which EDA will reimburse a recipient will be the lesser of the (i) line-item amount for the federal share of indirect costs contained in the EDA approved budget for the award, or (ii) federal share of the total allocable indirect costs of the award based on either

- the indirect cost rate approved by EDA (or applicable cognizant federal agency), provided that the cost rate is current at the time the costs were incurred and provided that the rate is approved on or before the award end date, or
- other acceptable documentation as indicated in the NOFO.

For additional information for claiming indirect costs under an EDA award, please see D.2.iv.b.3 of the NOFO (pp. 18-19) and visit: <https://www.eda.gov/grant-resources/grantee-guidance/indirect-costs>.

l. If matching funds come from a source that approves funding on an annual basis, but those funds have not been approved at the time of application, what documentation is necessary to establish eligibility?

EDA requires matching funds to be committed, available, and unencumbered at the time of application. Therefore, only funds that have been committed at the time of application can count towards match. Because funding levels and allocations can change by year, funding that would be approved annually (rather than at the time of application) would not count towards match.

m. May funds from other federal financial assistance awards serve as matching funds?

Funds from other federal financial assistance awards can serve as matching share funds only if authorized by statute, which may be determined by EDA's reasonable interpretation of the statute. An applicant must identify the authorizing statute in the matching funds commitment letter. See section D.2.iii.c of the NOFO.

n. May providers of matching share serve as contractors under an award?

As provided in section D.2.iii.c of the NOFO, a provider of matching share, including an entity providing cash

or in-kind contributions, may **NOT** serve as a contractor under an award for which it provides matching share. Thus, an entity providing matching share may not be paid with award funds to provide goods or services to the award recipient.

- o. Is there a benefit to “over-matching?” Do applications that provide more than the minimum required cost share score higher?**

While over-matching is allowed, providing more matching share than is required will not cause an application to score more favorably in merit review.

6. APPLICATION MATERIALS AND SUBMISSION PROCESS

- a. Regarding new organizations and/or first-time applicants for EDA grant programs, what requirements are necessary to initiate and submit an application on sfgrants.eda.gov (EDGE)?**

EDGE requires organizations to designate an Authorized Representative to submit the application on sfgrants.eda.gov. This person will be listed on the application as the primary respondent to inquiries from EDA program staff. Applicants are responsible for maintaining the credentials necessary to designate an Authorized Representative.

Active SAM registration is required at the time of application and throughout the period of performance. Also, all non-federal entities are required to have a unique entity identifier (UEI) that is used to apply for, receive, and report on federal awards. The technical requirements and systems associated with generating these credentials require confirmation at each step and can be lengthy—especially for organizations without a UEI. The process could require interaction with multiple organizations outside of EDA. EDA recommends beginning registration as soon as possible to allow sufficient time for each step in the process.

- b. When is the deadline for submission and where do I submit the application?**

Applications should be submitted electronically via sfgrants.eda.gov (EDGE) and must be received by 11:59 p.m. Eastern Time on July 28, 2023. EDA will not accept paper, facsimile or email transmissions of applications for this program except as provided in the NOFO. Applications received after the closing date and time will not be considered for funding.

- c. Where in EDGE does the FIPS template belong?**

Please complete the FIPS template provided at <https://www.eda.gov/funding/programs/build-to-scale> and upload the spreadsheet to the “Project Service Area” section of the application.

- d. Which applications are subject to Executive Order (EO) 12372, “Intergovernmental Review of Federal Programs”? What if my state is not included in the SPOC list?**

Only States that are listed on the current Intergovernmental Review State Single Point of Contact (SPOC) list are participants in the EO 12372 intergovernmental review process: <https://www.whitehouse.gov/wp-content/uploads/2020/04/SPOC-4-13-20.pdf>.

In the event that the applicant's location is different from the State(s) where the project will be performed, applicants are advised to conform with the SPOC requirements for the primary location for the project.

If your state is on the list, you must submit documentation demonstrating compliance with the State's or those States' processes. See NOFO section D.2.iv.b.1 on p.17.

States not on the SPOC list have chosen not to participate in the intergovernmental review process, and therefore do not have a SPOC. If you are located within a State that does not have a SPOC, intergovernmental review is not required.

e. Where in EDGE do letters of support belong?

Letters of support, including letters demonstrating State support, should be uploaded to the "Letters of Support" section in EDGE.

f. How many letters of support from State or a political subdivision of a State do consortium applicants need to provide?

Generally, only one letter will be necessary so long as the letter demonstrates that the applicant's or co-applicant's application is supported by a State or a political subdivision of a State (e.g., a county or a municipality) that encompasses all or a substantial portion of the region served by the project.

g. Are applicants limited to submitting one application per challenge?

Yes, applicants are generally limited to submitting one application per challenge. However, an entity may also apply to the same challenge as part of a separate and distinct entity or group of entities, such as a public-private partnership or a consortium. However, that separate and distinct entity or group of entities may not submit more than one application per challenge.

h. Are applicants required to submit a separate application for the Venture Challenge and Capital Challenge?

Applicants may apply to either or both competitions under the B2S program. Applicants seeking to apply to more than one challenge under the NOFO must submit unique applications, including separate match commitment letters.

i. How are applications reviewed?

Applications will be reviewed based on the process and evaluation criteria outlined in section E of the NOFO.

j. When and how will applicants be notified of application results?

OIE will notify applicants via email using the email addresses provided for the Authorized Representative and application point-of-contact on the SF-424 form. All applicants should expect to receive grant award notification approximately 90-120 days from the application close date set forth in the NOFO.

k. Is there a way to preview the application prior to initiating submission in EDGE?

Yes, this funding opportunity is listed on Grants.gov. To locate the application, navigate to "Search Grants."

In either the “BASIC SEARCH CRITERIA” field on the left or the “Grant Opportunities” search option at the top, type EDA-B2S-2023. Select the link in the “Opportunity Number” field and navigate to the “RELATED DOCUMENTS” tab. The Folder designated “Full Announcement – B2S NOFO and Forms” contains the standard forms that are replicated in EDGE.

I. I have completed the application in EDGE but the submission button is “greyed out”, what do I do?

First, make sure each section that is marked “required” is complete. Second, it is most likely that you are not assigned as the “Authorized Representative” in EDGE. Only the Authorized Representative can submit the application. To check your application roles, click on the “Application Team” tab, click the “add team member” button, and follow the prompts to assign your Authorized Representative. To make yourself the Authorized Representative, you follow the same process and add yourself as a team member with the same email, which will assign you two roles in EDGE.

7. CONTACT EDA

a. What is the best way to contact EDA with questions during the application process?

Please note, to support a fair, national competition, EDA cannot provide strategic advice or partnership development support during the competition and must limit support efforts to administrative and technical concerns about the competition and application process.

EDA encourages applicants to contact the applicable EDA Economic Development Representative (EDR) listed at <https://eda.gov/contact/> under “Find Local Contacts.” Due to the high volume of inquiries during the competition phase, immediate responses may be challenging to provide. If you require immediate support, or have unique technical questions, please contact the program office by email at oie@eda.gov.

b. How can applicants request assistance with navigating the EDGE platform?

Inquires for EDGE technical support may be emailed to the help desk at GrantHDSupport@eda.gov