

Frequently Asked Questions About the 2017 Regional Innovation Strategies (RIS) Program

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1. ELIGIBILITY

a. Who is eligible to apply for funding?

The following entities are eligible RIS Program investment assistance recipients:

1. a State;
2. an Indian tribe;
3. a city or other political subdivision of a State;
4. an entity that—
 - a. is
 - i. a nonprofit organization,
 - ii. an institution of higher education,
 - iii. a public-private partnership,
 - iv. a science or research park,
 - v. a Federal laboratory, **or**
 - vi. an economic development organization or similar entity; **and**
 - b. has an application that is supported by a State or a political subdivision of a State; 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 Note that EDA is **NOT** authorized to provide grants to individuals.

b. In order to apply as a nonprofit organization must I be legally organized as a 501(c)(3)?

No; however because EDA has adopted the definition of nonprofit organization as set forth in 2 C.F.R. Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) at §200.70, any entity applying as a nonprofit must provide information that the organization is: (1) operated primarily for scientific, educational, service, charitable, or similar purposes in the public interest; (2) not organized primarily for profit; and (3) uses its net proceeds to maintain, improve, or expand the operations of the organization.²

c. What is a public-private partnership and what documents should I submit to EDA to demonstrate my eligibility?

EDA defines a public-private partnership 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.³ 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 likely be found insufficient to establish eligibility under this entity category. EDA reserves the right to request additional information from applicants to establish eligibility, as necessary. If applicants have further questions concerning these documentation requirements, they should

¹ 13 C.F.R. §§ 312.3, .6 (2017).

² 13 C.F.R. § 312.3 (2017) (referencing 2 C.F.R. § 200.70 (2017)).

³ 13 C.F.R. § 312.3 (2017).

contact their regional Point of Contact (POC). See Question 9(a) of this document or Section G of the [NOFA](#).

d. What is an economic development organization (EDO) and what documents should I submit to EDA to demonstrate my eligibility?

EDA defines an EDO as an organization whose primary purpose is to support the economic development of a community or region.⁴ In order to demonstrate eligibility status under this category, EDA will look to the organization'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. If applicants have further questions concerning these documentation requirements, they should contact their regional POC.

e. My organization has not yet formed, or we have formed, but the organization is not yet registered in the System for Award Management (SAM.gov) or on Grants.gov. May the organization still apply for a grant under this NOFA?

In order to be considered for funding, applicants must submit a complete application package by 11:59 p.m. Eastern Time on Friday, June 23, 2017, which includes demonstrating eligibility and Grants.gov registration. As a result, EDA strongly encourages applicants who are in the process of forming, or have formed but are not yet registered on Grants.gov, to do so **as soon as possible**. Full application registration requirements such as obtaining a unique entity identifier and System for SAM.gov and Data Universal Numbering System (DUNS) number can take up to **23 days**. For further details, see Section D.8 of the [NOFA](#) and <https://www.grants.gov/web/grants/applicants/organization-registration.html>.

f. How many letters of support from State or a political subdivision of a State are necessary if I'm applying as part of a consortium?

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

g. Can previous RIS Program grant recipients be eligible for this competition?

Entities operating within the performance period of a previously-awarded RIS Program grant are not eligible for award under that same competition but may be eligible under a different competition (e.g. a 2016 i6 Challenge recipient cannot apply for a 2017 i6 Challenge grant, but can apply for a Seed Fund Support (SFS) grant). This restriction applies to all applicants, including both sole applicants and co-applicants.

Notwithstanding the above, RIS grantees operating within the performance period of a RIS Program award under a prior year's competition may apply for a grant under that same competition if the organization is part of a distinct entity, such as a public-private partnership or a consortium so long as that partnership, consortium, or other distinct entity is not itself operating within the performance period of an active RIS program award under that same competition.

⁴ 13 C.F.R. § 312.3 (2017).

h. What distress criteria must be met in order to be eligible to receive EDA funding?

Unlike most of EDA's other programs which are authorized under the Public Works and Economic Development Act of 1965, as amended (PWEDA)⁵, the RIS Program is authorized under Section 27 of the Stevenson-Wydler Technology Innovation Act of 1980, as amended⁶. This authorization does not require applicants to meet the distress criteria to be considered eligible.

2. CO-APPLICANTS

a. How do you determine who the co-applicant is and what forms are they required to submit?

If the other entities in question will be partnered with the lead applicant in the management of the grant, will perform a significant or integral part of the grant, and/or will have direct access to the grant award funds in the form of direct transfers of the proceeds of the award then that entity may be considered a co-applicant. For assistance identifying co-applicants, please reach out to your **regional POC**. See Question 9(a) of this document or Section G of the [NOFA](#). Co-applicants are generally required to submit the same forms that the primary applicant must provide. See Section D.2 and Appendix D of the [NOFA](#) for specific requirements and a comprehensive checklist of the documents required for all co-applicants.

b. What if my organization plans to engage a third party that is not a co-applicant to perform a portion of the project activities? Is the third party considered a co-applicant?

If your organization intends to enter into a contractual relationship to accomplish a portion of a project's activities, then only the organization that is responsible for the overall project is required to submit application forms and documents. However, third parties must be retained pursuant to an open and free competitive process that is in compliance the Uniform Guidance. A third party would not be considered a co-applicant unless its responsibility or role in the overall project rises to the level of that of an applicant, as described in Question 2.a., above.

3. APPLICATION MATERIALS AND SUBMISSION PROCESS

a. When is the deadline for submission and where do I submit the application package?

The closing date for receipt of applications for this program is June 23, 2017. Applications should be submitted electronically via www.grants.gov (Grants.gov) and must be received by 11:59 p.m. Eastern Time on Friday, June 23, 2017. EDA will not accept paper, facsimile or email transmissions of applications for this program except as provided in the [NOFA](#). Applications received after the closing date and time will not be considered for funding.

b. Are applicants required to submit a separate application for each competition?

If you do plan to apply to more than one competition, you must submit a separate application packet for each competition. Applicants may submit proposals for more than one competition under the RIS Program.

c. Are applicants limited to submitting one proposal per competition?

Technically, there are no limits to the amount of proposals an organization may submit; however, applicants should clearly indicate that they are submitting multiple different proposals, rather than changes to a previously submitted application. Organizations intending to submit multiple applications should also keep in mind that the Grants Officer will take into consideration the extent to which the project supports EDA's

⁵ 42 U.S.C. § 3121 et seq.

⁶ 15 U.S.C. § 3722.

goals of geographic balance in distribution of program funds, project types, organizational type, and the overall portfolio of awards when making final selections; therefore, multiple proposals from the same organization are not likely to be funded.

d. Where can I access the most up-to-date State Single Point-of-Contact (SPOC) list related to Executive Order 12372, “Intergovernmental Review of Federal Programs”?

The most recent list is available at https://www.whitehouse.gov/omb/grants_spoc. Note that “States that are not listed on [the Intergovernmental Review (SPOC List)] page 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, you may send application materials directly to a Federal awarding agency.”⁷

4. FUNDING AND BUDGET

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

Yes, an applicant can apply for less than the maximum amount stated in the [NOFA](#).

b. Are maximum grant amounts allotted by year or for the entire project period?

The total maximum grant amounts (\$500K for i6 Challenge, \$300K for Seed) are based on amounts for the entire project period.

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

No, the Budget Narrative and the SF-424A (Budget Information 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 [NOFA](#) for further guidance.

d. What can be considered in-kind contributions?

In-kind contributions provided by the applicant may be used to meet the required non-Federal share of the total project costs. In-kind contributions consist of non-cash contributions directly related to the proposed project, and typically include items such as space, equipment, or services. The market value of space can be used as in-kind contribution for the life of the project.

e. Can the RIS Program fund construction projects?

There is no funding available for construction projects under this program, including projects related to the design or renovation of buildings. However, certain structural modifications may be eligible in some circumstances.⁸

⁷ Office of Management and Budget, Intergovernmental Review (SPOC List), https://www.whitehouse.gov/omb/grants_spoc.

⁸ See 13 C.F.R. § 312.7(a)(9),(b)(3).

f. How do you determine allowable expenses that can be charged to the award?

Allowable costs incurred are subject to [Subpart E of the Uniform Guidance](#). If applicants have questions concerning the allowability of a particular cost, they should contact their regional POC.

g. Is there a limitation on the amount of indirect costs I may claim?

Indirect costs are allowed based on the rate approved by your cognizant agency; EDA requires copies of the applicant's or co-applicants' currently approved indirect cost rate agreement or agreements, if any, at the time of application. If applicants are new to the Federal grant process, or do not have a current indirect cost rate, we encourage them to discuss this process with their designated EDA regional POC. See Question 9(a) of this document or Section G of the [NOFA](#). EDA has experienced this to be one of the more complicated parts of the budget plan and strongly encourages applicants not to wait until the end of the application window to discuss this with their regional POC.

5. MATCH REQUIREMENTS**a. What is the minimum match required?**

Applicants must provide a minimum of one-to-one (i.e. 50 percent) in matching share for both the i6 Challenge and the SFS Grants competition. Applicants must demonstrate that this matching share (cash, in-kind, or a combination of cash and in-kind contributions), which must be available, unencumbered, and committed to the project. Applicants should also consider the nature and source of the matching share, as funds from Federal sources often cannot be considered as matching funds for other Federal projects; some exceptions do apply. 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.

b. What is required for a Commitment Letter?

A Commitment Letter must demonstrate that matching share (whether cash or in-kind) referenced in the SF-424, SF-424A, Project and Budget Narratives, and elsewhere in the application will be unencumbered, unrestricted and committed at the time of the award and that is signed by the authorized representatives of the respective organization providing the matching funds (e.g., the applicant, co-applicant, third-party organization). Where an application relies on multiple organizations for matching share, multiple Commitment Letters—one from each organization providing match—are required. Commitment Letters do not count towards the Budget Narrative's 4-page limit; these letters can be uploaded as attachments in Grants.gov.

c. Does EDA allow program income to be considered match or an addition to the award?

Because EDA requires that matching share must be available, unencumbered, and committed at the time of award, EDA does not allow for program income to be considered as matching share (i.e., matching share cannot consist of funds that may be collected at a future date).

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

In accordance with 2 C.F.R. 200.306(c), unrecovered indirect costs may only be applied toward the matching share with EDA's prior approval, and therefore applicants seeking to apply unrecovered indirect costs to the matching share should seek EDA's guidance early in the application process.

e. Are matching funds subject to grant usage restrictions?

Non-Federal matching funds are governed by the same principles and requirements as the Federal/EDA funds.⁹

6. ADDITIONAL INFORMATION ON SEED FUND SUPPORT (SFS) GRANTS**a. Can we use an SFS grant to support/market a small loan program?**

Unfortunately, the Seed Fund Support competition is looking for proposals that support or take equity in the business they will support. Projects must focus on investing in equity capital rather than debt; therefore loan or revolving loan programs would not meet that criteria and would not qualify for a grant. However, funds that deploy convertible notes as part of their investment strategy do qualify as equity-based, because those debt instruments are intended to convert to equity.

b. Can the grant funding be used to capitalize the seed fund?

EDA funds cannot capitalize 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, to educate potential seed fund investors about seed fund investing, or to evaluate potential investments in startup companies.

7. PROJECT EVALUATIONS**a. How are applications reviewed?**

Applications will be reviewed based on the process and evaluation criteria outlined in Section E of the [NOFA](#).

b. Will any previous grants that EDA awarded my organization affect my organization's competitiveness for these new competitions?

No; however, the Grants Officer may take into consideration past performance on previous awards when making final selections.

8. INFORMATIONAL WEBINAR**a. Will EDA conduct an informational webinar?**

EDA conducted an informational webinar for prospective applicants on May 22, 2017. A recording of this webinar will be made available via OIE's [RIS Program website](#).

9. CONTACT US**a. What is the easiest way to contact the Office of Innovation and Entrepreneurship (OIE)?**

If you require additional information, please contact OIE by email at oie@eda.gov and/or reach out to your regional points-of-contact (listed below).

Regional Office	RO RIS POC(s)	Email	Phone
Atlanta	Robin Cooley	rcoolley@eda.gov	(803) 253-3640

⁹ See Subpart E of the Uniform Guidance.

Austin	Chris Rys	crys@eda.gov	(512) 381-8157
Chicago	Greg Becker	gbecker@eda.gov	(312) 789-9765
Denver	Zac Graves	zgraves@eda.gov	(303) 844-4092
Philadelphia	Chivas Grannum	cgrannum@eda.gov	(215) 597-8723
Seattle	Brian Parker	bparker2@eda.gov	(206) 220-7675