

Frequently Asked Questions About the 2018 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. Are there other statutes and policy requirements that I need to know and that will impact these awards?

Yes; as indicated in the [NOFO](#), EDA award recipients must comply with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (“Uniform Guidance”) as found in 2 C.F.R. part 200, the Department of Commerce Financial Assistance Standard Terms and Conditions, and the Pre-Award Notification Requirements for Grants and Cooperative Agreements. In addition, recipients must comply with applicable requirements of all other Federal laws, executive orders, regulations and policies governing this program. These include but are not limited to laws prohibiting discrimination on the basis of race, color, national origin, disability, age, religion, or sex.

c. 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

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)).

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

e. How should organizations submit an application under a public-private partnership?

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

1. The private entity that is party to the PPP submits an application on behalf of the PPP that includes the contractual agreement establishing the PPP, and that clearly documents the roles and responsibilities of each member of the PPP.
2. The public entity that is party to the PPP submits an application on behalf of the PPP that includes the contractual agreement establishing the PPP, and that clearly documents the roles and responsibilities of each member of the PPP.
3. The PPP submits an application 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 carrying out of the grant, 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.

See Question 1(d) of this document for additional guidance on establishing a PPP through a formalized contractual agreement.

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

³ 13 C.F.R. § 312.3 (2017).

f. 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.

g. 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 NOFO?

In order to be considered for funding, applicants must submit a complete application package by **11:59 p.m. Eastern Time on Wednesday, August 29, 2018**, 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 include obtaining a unique entity identifier (commonly referred to as the Data University Numbering System or DUNS number) and an active registration in SAM.gov, a process that can take up to **10 business days**. For further details, see Section D.8 of the [NOFO](#) and <https://www.grants.gov/web/grants/applicants/organization-registration.html>.

h. 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-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 regional innovation cluster served by the project.

i. 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 2017 i6 Challenge recipient cannot apply for a 2018 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).

j. 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 and/or carrying out of the grant, 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 [NOFO](#). 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 [NOFO](#) for specific requirements and a comprehensive checklist of the documents required for all co-applicants. All co-applicants must meet the eligibility requirements described above.

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 an agreement with a third party to accomplish a portion of a project's activities, then the third party is not considered a co-applicant. Third parties must be retained pursuant to an open and free competitive process that is in compliance with the Uniform Guidance. Application Materials and Submission Process

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

Applications should be submitted electronically via www.grants.gov (Grants.gov) and must be received by **11:59 p.m. Eastern Time on Wednesday, August 29, 2018**. 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.

d. 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.

e. 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 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.

⁵ 42 U.S.C. § 3121 et seq.

⁶ 15 U.S.C. § 3722.

f. 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/wp-content/uploads/2017/11/SPOC-Feb.-2018.pdf>. 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

3. FUNDING AND BUDGET

a. The NOFO 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 [NOFO](#). EDA encourages applicants to develop compelling proposals that efficiently use federal dollars.

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

The total grant awarded (up to \$750K for i6 Challenge, and \$300K for Seed) is based on the entire project period, not per year.

c. The NOFO 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 [NOFO](#) 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. All itemized valuations of any in-kind matching funds should be included in the Budget Narrative. All in-kind contributions must be eligible project costs and meet applicable Federal cost principles and uniform administrative requirements and will be evaluated by EDA in accordance with these requirements.

⁷ Office of Management and Budget, Intergovernmental Review (SPOC List), <https://www.whitehouse.gov/wp-content/uploads/2017/11/SPOC-Feb.-2018.pdf>.

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

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 whether a particular cost is allowable, 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-applicant's 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 well before the end of the application window. See Question 9(a) of this document or Section G of the [NOFO](#). Match Requirements

d. 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) is 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. 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.

e. 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 available, unencumbered, 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, or 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.

f. 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).

⁸ See 13 C.F.R. § 312.7(a)(9),(b)(3).

g. 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.

h. 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

4. 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.

5. PROJECT EVALUATIONS

a. How are applications reviewed?

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

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.

6. AWARD NOTIFICATION

a. When and how will applicants be notified?

All applicants should expect to receive grant award notification approximately 90-120 days from the application close date set forth in the [NOFO](#). 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.

⁹ See Subpart E of the Uniform Guidance.

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

EDA will conduct an informational webinar for prospective applicants 2-3 weeks following the release of the NOFO. Registration information will be made available via OIE's [RIS Program website](#).

8. 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	States Managed	RO RIS POC(s)	Email	Phone
Atlanta	AL, FL, GA, KY, MS, NC, SC, TN	Robin Cooley	rcooley@eda.gov	(803) 253-3640
Austin	AR, LA, NM, OK, TX	Chris Rys	crys@eda.gov	(512) 381-8157
Chicago	IL, IN, MI, MN, OH, WI	Don Kathan	dkathan@eda.gov	(312) 789-9765
Denver	CO, IA, KS, MO, MT, ND, NE, SD, UT, WY	Zac Graves	zgraves@eda.gov	(303) 844-4092
Philadelphia	CT, DE, DC, ME, MD, MA, NH, NJ, NY, PA, RI, VT, VA, WV, PR, VI	Chivas Grannum	cgrannum@eda.gov	(215) 597-8723
Seattle	AK, AZ, CA, HI, ID, NV, OR, WA, AS, MP, GU, FM, MH, PW	Brian Parker	bparker3@eda.gov	(206) 220-7675