



INTERNATIONAL
ECONOMIC DEVELOPMENT
COUNCIL

APPLYING FOR AN EDA GRANT

A How-To Guide

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Introduction

The U.S. Economic Development Administration (EDA) has a long history of successfully supporting economic recovery and resiliency efforts after major disasters. At the heart of EDA's engagement in these efforts is the desire to help communities and businesses *build back better*.

When the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) provided EDA with \$1.5 billion to deploy for economic recovery assistance, many economic development organizations (EDOs) applied for an EDA grant for the first time.¹ In a recent sample of economic developers whose organizations have received an EDA award in the past 3 years, nearly half (46 percent) reported to be first-time awardees.²

With the American Rescue Plan Act of 2021 allocating another \$3 billion to EDA, it is anticipated even more EDOs will seek vital support from EDA to bring about economic recovery in their communities. IEDC has prepared this brief guide to help EDOs prepare an application package that positions their project for potential EDA investment. EDO staff who have little or no experience in applying for an EDA grant are the intended audience, but this guide may also provide refresher points for past EDA applicants as well.

A Note About Due Diligence

IEDC is pleased to provide this primer to you on your journey to partnering with the Economic Development Administration. It is based on the input of those who have worked with the agency now and in the past and the information contained here represents decades of experience. We believe the information contained here to be accurate. However, as with all things of a legal and financial nature, please consult your own counsel and financial advisors and controllers before embarking on any grant application process. This document does not now or at any time in the future supersede any statements or directions given by EDA regarding their application processes, procedures and decisions. We urge you to exercise due diligence when making any decision regarding your grant application.

¹ To assist EDOs, IEDC hosted a webinar in May 2020 entitled "Applying for EDA Funding Made Possible Through the CARES Act," for an audience of more than 150 economic developers representing communities throughout the nation. The webinar was deemed helpful in advising participants about the finer points of the EDA application process and in providing tips for a successful application process.

² Source: IEDC Sampling of Economic Developers with Successful EDA Grant Experience(s) (In April and May 2021, IEDC received input from 61 economic developers about their grant application experiences with EDA. Of these, 49 self-reported to have received an EDA award within the past 3 years.)

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About EDA

EDA's mission is "to lead the federal economic development agenda by promoting innovation and competitiveness, preparing American regions for growth and success in the worldwide economy." It is the only federal agency exclusively focused on economic development.³

Under the American Rescue Plan Act, EDA was allocated \$3 billion in supplemental funding to assist communities nationwide in their efforts to build back better by accelerating the economic recovery from the coronavirus pandemic and building local economies that will be resilient to future economic shocks.

American Rescue Plan funding enables EDA to provide larger, more transformational investments across the nation while utilizing its greatest strengths, including flexible funding to support community-led economic development.

To help facilitate regional economic development efforts in communities across the nation, EDA has six (6) regional offices. EDA's regional office staff serve as the principal points of contact for EDOs.

Each EDA Regional Office is led by a Regional Director and includes regional representatives who are assigned to serve one or more states in each region. The EDA representative is the point of contact your EDO should work with when developing a project and, upon assessing your project's fit for an EDA investment, the EDA representative provides technical assistance and offers funding recommendations to EDA's Investment Review Committee (IRC).

HINT: Involve your EDA representative early and often in your project development.

Says one economic developer: "Get all the expectations out on the table for discussion with EDA staff prior to grant writing."

Visit <https://www.eda.gov/contact/> to find points of contact in your region.

A Word About Economic Development Districts

Economic Development Districts (EDD) are multi-jurisdictional entities, commonly composed of multiple counties and sometimes crossing state borders. Approximately 244 EDDs are funded annually by EDA to help lead the locally based, regionally driven economic development planning process to establish a strategic blueprint known as the Comprehensive Economic Development Strategy (CEDS).⁴ The EDD can serve as a valuable resource partner for you. For example, if you do not already know your EDA Regional Office staff, your EDD can make introductions for you and guide you on the EDA grant application process. EDD staff can provide you valuable insights on past EDA investments in your region. And EDDs also help with grant writing and/or grant administration, which can be especially helpful for handling grant reporting requirements for major awards, such as construction projects.

³ See www.eda.gov.

⁴ Economic Development Districts are also referred to as District Organizations by EDA.

You can find the EDD serving your area via EDA's Economic Development Directory at <https://eda.gov/resources/directory/>.

HINT: Consult with your EDD as early as possible in the process.

The American Rescue Plan Act and EDA

The American Rescue Plan Act of 2021 became law on March 11, 2021. The act provides EDA with \$3 billion in supplemental funding to assist communities nationwide in their efforts to recover from the coronavirus pandemic and build more resilient economies. Like previous disaster supplementals, the funds are administered under the authority of EDA's flexible Economic Adjustment Assistance (EAA) program.⁵ This enables EDA to provide a wide range of financial assistance to help communities with expenses when responding to economic injury resulting from the coronavirus.

On July 22, 2021, EDA announced a series of programs to be funded through the American Rescue Plan, collectively known as Investing in America's Communities, and launched the programs with six (6) Notices of Funding Opportunity (NOFO), as follows:⁶

- **Build Back Better Regional Challenge** (\$1 billion): <https://eda.gov/arpa/build-back-better/>
- **Good Jobs Challenge** (\$500 million): <https://eda.gov/arpa/good-jobs-challenge/>
- **Economic Adjustment Assistance Challenge** (\$500 million): <https://eda.gov/arpa/economic-adjustment-assistance/>
- **Indigenous Communities Challenge** (\$100 million): <https://eda.gov/arpa/indigenous/>
- **Statewide Planning, Research, and Networks Grants** (\$90 million): <https://eda.gov/arpa/planning-grants/>
- **Travel, Tourism, and Outdoor Recreation Grants** (\$750 million): <https://eda.gov/arpa/travel-tourism/>

One-pagers for each of these programs and other related resources can be found at <https://eda.gov/arpa/resources/>.

Each program's webpage provides important information such as program purpose, eligibility, and deadline – and links to the program's NOFO through Grants.gov when clicking on the program name in the opening paragraph. In addition, all six (6) NOFOs can be found at <https://eda.gov/funding-opportunities/>. Each NOFO provides application and evaluation criteria associated with the program

⁵ Funds are allocated to the U.S. Department of Commerce for "economic adjustment assistance" – as authorized by sections 209 and 703 of the Public Works and Economic Development Act of 1965 – and deployed through EDA.

⁶ Regional Office allocations vary under each program. The program NOFO includes a breakdown of allocation by EDA region.

it represents. Note, some NOFOs have application requirements unique to the program in addition to the normal EDA grant requirements.⁷

HINT: Review the NOFO carefully to understand the program's criteria for investment and application requirements, some of which may be unique to a given program, to ensure you are describing your project adequately.

As part of the Investing in America's Communities programs, there is a commitment to invest \$300 million in American Rescue Plan funds to coal communities. This investment is intended to help these communities recover from the pandemic while creating new jobs and opportunities. More information on EDA's commitment to coal communities can be found at <https://eda.gov/arpa/coal-communities/>.

While application deadlines vary per program (as articulated in each NOFO), EDA's American Rescue Plan appropriations are available for making awards through September 30, 2022. The period of performance under the award may extend to no later than September 30, 2027.

Visit <https://eda.gov/arpa/> for complete information on EDA's American Rescue Plan programs.

⁷ For example, the Build Back Better Regional Challenge program requires a detailed project narrative that not only includes program description and scope of work, but also a discussion of regional industry assets and needs, a proposed solution, partners and program outreach, measurable goals and impacts, and a sustainability plan.

EDA Investment Priorities

All projects considered for EDA funding under the American Rescue Plan Act must be consistent with EDA's Recovery and Resiliency Investment Priority. Your applications should articulate how your project meets this priority.

Applicants also may demonstrate that a project is consistent with any of EDA's other Investment Priorities and may be considered more competitive as a result. Therefore, it would be ideal to determine whether your project may meet one or more of EDA's other priorities.

Following is a description of each of EDA's current investment priorities.⁸ The priorities may be updated from time to time. Any future revisions will be reflected on EDA's website on January 15, April 15, July 15, or October 15 of each year. The priorities are located at <https://eda.gov/about/investment-priorities/>.

1. **Equity:** Economic development planning or implementation projects that advance equity across America through investments that directly benefit 1) one or more traditionally underserved populations, including but not limited to women, Black, Latino, and Indigenous and Native American persons, Asian Americans, and Pacific Islanders or 2) underserved communities within geographies that have been systemically and/or systematically denied a full opportunity to participate in aspects of economic prosperity such as Tribal Lands, Persistent Poverty Counties, and rural areas with demonstrated, historical underservice.
2. **Recovery & Resilience:** Economic development planning or implementation projects that build economic resilience to and long-term recovery from economic shocks, like those experienced by coal and power plant communities, or other communities impacted by the decline of an important industry or a natural disaster, that may benefit from economic diversification-focused resilience.
3. **Workforce Development:** Economic development planning or implementation projects that support workforce education and skills training activities directly connected to the hiring and skills needs of the business community and that result in well-paying, quality jobs.
4. **Manufacturing:** Economic development planning or implementation projects that encourage job creation, business expansion, technology and capital upgrades, and productivity growth in manufacturing, including efforts that contribute to the competitiveness and growth of domestic suppliers or to the domestic production of innovative, high-value products and production technologies.
5. **Technology-Based Economic Development:** Economic development planning or implementation projects that foster regional knowledge ecosystems that support entrepreneurs and startups, including the commercialization of new technologies, that are creating technology-driven businesses and high-skilled, well-paying jobs of the future.
6. **Environmentally Sustainable Development:** Economic development planning or implementation projects that help address the climate crisis including through the development and implementation of green products, processes (including green infrastructure), places, and buildings.
7. **Exports & FDI:** Economic development planning or implementation projects that enhance or build community assets to support growth in US exports or increased foreign direct investment.

⁸ Source: <https://www.eda.gov/about/investment-priorities/>

Eligibility for Funds

Nationwide eligibility for these funds is consistent with the March 13, 2020, presidential proclamation of a national emergency concerning COVID-19 for all states, tribes, territories, local governments, and the District of Columbia.

Economic injury due to COVID-19 constitutes as a “special need” and establishes eligibility without reference to other criteria. That said, if your project serves an area that meets other distress criteria as well, this will boost your application’s competitiveness.⁹ Other distress criteria may include:

- Unemployment rate¹⁰ for most recent 24 month-period is at least 1 percent greater than national rate, or
- Per capita income¹¹ that is 80 percent or less of national average, or
- Other special need.

In reviewing past NOFOs for the Economic Adjustment Assistance programs, special needs have included:

- Closure or restructuring of industries or the loss of a major employer essential to the regional economy.
- Substantial out-migration or population loss.
- Underemployment, meaning employment of workers at less than full-time or at less skilled tasks than their training or abilities permit.
- Military base closures or realignments, defense contractor reductions-in-force, or Department of Energy defense-related funding reductions.
- Natural or other major disasters or emergencies.
- Extraordinary depletion of natural resources.
- Communities undergoing transition of their economic base as a result of changing trade patterns.
- Persistent poverty county
- Project i) is located in or ii) is proximate to and intended to directly and substantially benefit a designated “Qualified Opportunity Zone.”
- Project involves Assistance to Coal Communities and Nuclear Closure Communities

Individuals and private companies are not eligible to apply. Generally, eligible applicants include:¹²

- District Organization (EDA’s Economic Development Districts)
- Indian Tribe or consortium of Indian Tribes
- State, county, city, or other political subdivision of a State
- Institutions of higher education or a consortium of institutions of higher education
- Public or private non-profit organization or association acting in cooperation with officials of a political subdivision of a State.

HINT: All areas economically injured due to COVID-19 constitute a “special need” and are eligible for funding and geographies to be served that have one or more other distress criteria may have enhanced competitiveness.

⁹ The level of economic distress affecting your community can factor into EDA’s investment for projects where the grant rate can vary from 80 percent to up to 100 percent of the eligible project costs.

¹⁰ This is typically county-level data.

¹¹ This is typically county-level data.

¹² Individual NOFOs may have more specific eligibility requirements.

Types of EDA Grants

EDA American Rescue Plan grants are funded under the Economic Adjustment Assistance (EAA) program.¹³ EDA awards grants for construction and non-construction projects.

Construction awards are made for bricks-and-mortar projects ranging from water/wastewater systems, broadband infrastructure, and road improvements to business incubators, technology parks, and workforce training facilities. These awards are often highly visible projects for both EDA and the communities served by EDA, and multiple funders are sometimes involved. The ability of the project to create or save direct jobs and private investment is a key criteria EDA seeks in the projects funded by the agency. EDA normally does not engage in a construction project unless jobs and private investment can be clearly documented.¹⁴ The typical period of performance for a construction award ranges from 12 to 48 months.

Perhaps not as well-known as the bricks-and-mortar projects are the planning, technical assistance, business support, and other projects that EDA can support which are part of the daily work of an EDO. These non-construction project awards can be undertaken by EDO staff or contractors. Eighty-six percent of the economic developers sharing insights about their EDA experiences with IEDC indicated their organizations had received non-construction awards.¹⁵ A dozen of these economic developers (24 percent) indicated their organizations received funds to hire a Disaster Recovery Coordinator to work with businesses and community leaders on economic recovery and resiliency projects. The typical period of performance for a non-construction award ranges from 12 to 24 months.

Applications for construction projects must undergo a review process with EDA's engineering, legal, and environmental staff. Non-construction projects may be subject to a review process with EDA's legal and environmental staff. Either way, applicants should be prepared for an involved process.

Said one economic developer: "Plan well ahead and do your research. Allow enough time to prepare an application. A thorough application will take 150 or more staff hours to complete. Understand the approval process is long, a year or more. You will likely have to revise portions of your application prior to final approval."¹⁶

¹³ Funds are allocated to the U.S. Department of Commerce for "economic adjustment assistance" – as authorized by sections 209 and 703 of the Public Works and Economic Development Act of 1965 – and deployed through EDA.

¹⁴ Jobs and private investment are documented on the ED-900B form.

¹⁵ Source: IEDC Sampling of Economic Developers with Successful EDA Grant Experience(s)

¹⁶ Source: IEDC Sampling of Economic Developers with Successful EDA Grant Experience(s)

Match Requirements

Under the American Rescue Plan Act, the EDA grant rate varies by program as articulated in the program NOFO. EDA generally expects to fund “at least 80 and up to 100 percent” of the project costs for investments through the following programs:

- Build Back Better Regional Challenge (Phase II)
- Economic Adjustment Assistance Challenge
- Travel, Tourism, and Outdoor Recreation Grants (competitive awards only)

For the following programs, EDA generally expects to fund 100 percent of the project costs:

- Build Back Better Regional Challenge (Phase I)
- Good Jobs Challenge
- Indigenous Communities Challenge
- Statewide Planning, Research, and Networks Grants
- Travel, Tourism, and Outdoor Recreation Grants (non-competitive state awards only)

HINT: When in doubt about the grant rate and potential match requirements, consult with your EDA representative to confirm the anticipated grant rate for your project.

The grant rate range of “at least 80 percent and up to 100 percent” of the eligible project costs has become somewhat typical for projects funded through recent disaster supplementals. This means a match of up to 20 percent may be required. EDA’s Grants Officers – that is, the Regional Directors based in each Regional Office – will consider on a case-by-case basis whether a project may warrant a federal share above 80 percent. The applicant’s taxing or borrowing capacity, the extent of the economic impact of the pandemic on the region, or whether the region meets other economic distress thresholds for elevated need all factor into such consideration.

Of note, a match does show “skin in the game” and can provide EDA staff with a level of confidence that your organization has a vested commitment in the project. Therefore, projects with increased levels of match may be considered more competitive. The match can be cash or in-kind, and in-kind needs to be substantiated. In-kind can be allocation of staff or volunteer time or the contribution of space or equipment. An example of the former is when you have staff or volunteers contribute hours to conduct a workshop that is supported through EDA. In such case, you can calculate in-kind by providing the value per hour contributed. That said, in-kind is very difficult to justify for construction projects and EDA prefers that the nonfederal share be cash for such projects.

When committing a match, it is important to provide EDA with a letter from a person with authority to provide the match.

HINT: If the match letter does not include the specific language that the match is “unencumbered, unrestricted, committed, and available when needed,” the application may be delayed or possibly denied further review.

Generally, federal funds cannot be used as a match for an EDA grant. However, there are some instances that may be permissible. For example, you may be able to use U.S. Department of Agriculture (USDA) loans, U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant (CDBG) non-entitlement funds, or funds from the Appalachian Regional Commission or Delta Regional Authority in some cases. Your EDA representative can best advise you.

One note of advisement provided by an economic developer sharing recent experiences with IEDC: “It takes longer if you are working with multiple funding sources [such as] USDA. EDA and USDA [can] have incompatible or different requirements and all must be taken into consideration.”¹⁷

CEDS Connection

One of the questions you will be asked in the application is whether your project aligns with the region’s Comprehensive Economic Development Strategy (CEDS). Says EDA: “Economic development planning – as implemented through the CEDS – is not only a cornerstone of the EDA programs, but successfully serves as a means to engage community leaders, leverage the involvement of the private sector, and establish a strategic blueprint for regional collaboration.”

The CEDS is not simply a box to check off on the application. Rather, EDA intends the CEDS to be a vehicle for helping regional leaders discuss capacity-building efforts that would best serve a region’s economic development needs. (Absent a CEDS, EDA requires evidence of a similar regional strategic planning process to be in place. In such case, the alternative plan should be included as an attachment in your application package.)

EDA requires the CEDS to address economic resilience. According to EDA, economic resilience is defined as inclusive of three primary abilities: to recover quickly from a shock, to withstand a shock, and to avoid a shock altogether. At a minimum, EDA advises the CEDS should identify the region’s key vulnerabilities and resilience-building goals, measurable objectives, and/or projects in the action plan. Therefore, you should be able to check the “yes” box on this question when applying for American Rescue Plan funds because your project should be furthering the economic resilience within your community in the aftermath of COVID-19.

HINT: Be sure to describe how your project aligns with your region’s CEDS or other EDA-approved economic development plan.

¹⁷ Source: IEDC Sampling of Economic Developers with Successful EDA Grant Experience(s)

Examples of Recent EDA Investments

Nearly half (46 percent) of the economic developers sharing successful EDA grant experience(s) with IEDC indicated that their organization was a first-time awardee.¹⁸

- Just over one-in-five (23 percent) received 2 to 3 grants in the past 10 years.
- Nearly one-in-five (19 percent) received 4 to 5 grants in the past 10 years.
- More than one-in-10 (13 percent) received over 6 grants in the past 10 years.

As you prepare your application, it may be helpful to review examples of recent EDA grant awards. A review of EDA-funded projects as shared by economic developers reveals the following grant purposes.¹⁹

- Construction of Facility (e.g., entrepreneur center, training center)
- Disaster Recovery Coordinator
- Disaster Recovery and Resiliency Plan
- Economic Development Plan or Strategy
- Economic Development Study
- Infrastructure (e.g., road, rail, water, sewer, or stormwater)
- Revolving Loan Fund
- Technical Assistance Program

One EDO reported hiring four Disaster Recovery Coordinators in the past three years.

Visit www.eda.gov/success-stories to learn more about recent EDA investments.

¹⁸ Source: IEDC Sampling of Economic Developers with Successful EDA Grant Experience(s)

¹⁹ What the EDOs shared is largely in line with the EDA awards made under recent Disaster Supplemental Appropriations pre-COVID-19. See <https://eda.gov/disaster-recovery/supplemental/>.

Ideas for Capacity Building Projects

The intent of the American Rescue Plan is to provide funds for businesses and communities to build back better as soon as possible. EDA's ability to fund non-construction projects is a valuable tool for building capacity within the community to do so. Here are some ideas for potential projects based upon what EDA has invested in before and what is needed in communities today.

- **Pandemic Disaster Recovery Coordinator:** If your project involves adding a Disaster Recovery Coordinator to your team, consider whether this involves repurposing an existing position or creating a new position. For example, if your team has a Business Retention and Expansion Professional, in a post-disaster era, that professional will find him or herself almost entirely dedicated to helping businesses recover from the disaster and build back better. If your team is short-staffed, EDA funds can be used to hire new personnel to carry out this role.
- **Disaster Recovery and Resiliency Plan:** If your community does not already have one, you should develop an economic recovery plan that helps your community tap into the resources of your partners at the local, state, and federal levels to mitigate future hazards and foster greater community resiliency. If your community has a plan in place, EDA funds can be used to update the plan to better position your community to respond to future disasters.
- **Revolving Loan Fund:** If appropriate, consider creating a RLF to expand access to capital for small businesses, or work with a partner who administers an existing RLF to help increase their reach. While a RLF can provide support for short-term business recovery, it is a useful tool beyond the recovery period.
- **Technical Assistance Program:** You could consider creating a new program to provide technical assistance to small business owners struggling to continue operations due to the impacts of COVID-19, or a program that supports the creation of new businesses through entrepreneurship to help diversify the local economy. Either program could help business owners develop business continuity, mitigation, and recovery strategies when faced with future disasters. EDA funds can help support salaries for your staff to execute such programs.

HINT: The NOFOs provide detailed examples of projects considered fundable by EDA under each program. This is EDA's description of the types of projects it seeks to fund, so is worth due consideration.

Project Development

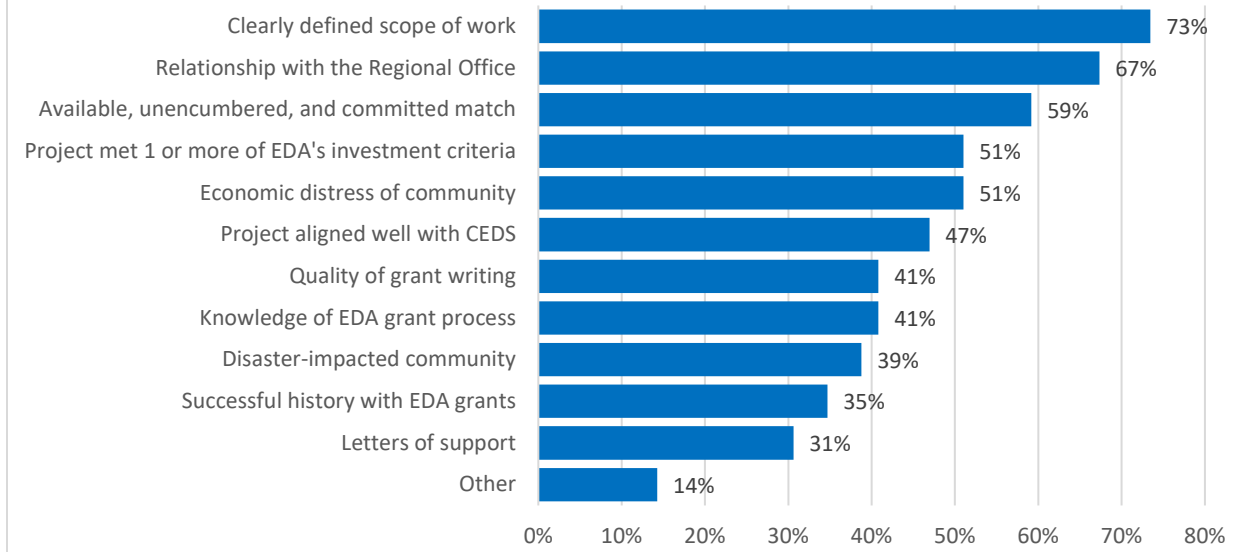
It may be that you are seeking an EDA investment to support a project already in development or that you are working to create something new with EDA funds. Whatever the case, there are some key initial questions to consider before you submit your application.

TECHNICAL QUESTIONS	PARTNER QUESTIONS
Have you had any necessary studies or reviews completed to support your application? (This pertains to applications for RLFs and construction projects.)	Has your EDA representative advised you on your project development?
How will your project support your community’s pandemic recovery and future economic resilience?	Have you consulted with your EDA representative about the match requirements?
Does your project meet the EDA Recovery and Resiliency Investment Priority? Does your project address any of EDA’s other investment priorities?	Has your EDA Economic Development District (if your area is located within one) reviewed the project idea and provided you a letter with how well it aligns with the regional CEDS?
Does your project have a clearly defined scope that will generate outcomes to build back better soon?	Has the project been endorsed by the relevant political subdivision of your state? (This is good to do for generating buy-in in general and is required for nonprofits.)
Do you have data that supports the need for your project?	Do you have business champions for your project?
Do you have adequate capacity to support the project?	Have you engaged an inclusive group of regional partners in your project development and attained their support for the project?

When asked what factors most significantly contributed to a successful application with EDA, nearly three-quarters (73 percent) of economic developers sharing their experiences with IEDC indicated a “clearly defined scope of work and expected outcomes” more than any other factor.²⁰ The second most-indicated factor was “relationship with the Regional Office” (67 percent) followed by having an “available, unencumbered, and committed match” (59 percent). More than half (51 percent) of the economic developers indicated that their project met one or more of EDA’s investment criteria and indicated that the economic distress of the community is a significant factor. The following chart points to additional factors that play a role.

²⁰ Source: IEDC Sampling of Economic Developers with Successful EDA Grant Experience(s)

Factors Most Significantly Contributing to a Successful EDA Application: What Economic Developers Say



In terms of other factors, economic developers noted the importance of partnerships at the local, regional, state, and federal levels; engagement with the EDD or Council of Governments; and expertise within the EDD. For construction projects, they noted having a fully developed application with a Preliminary Engineering Report (PER) and Environmental Narrative and having a sound, supported concept.

Preparing to Apply for EDA Funds

Over half (57 percent) of the economic developers sharing insights with IEDC indicated that their internal staff have written their grant applications for EDA in the past three years.²¹ Of note, outsourcing the work to a grant writer has not been a common practice among these EDOs. In other words, you can do it!

That said, more than one-third (43 percent) of the economic developers reported that they engaged their EDD or Regional Planning Agency to write a grant application for them. These agencies often have staff and/or disaster recovery coordinators with experience and capacity for federal grant writing as well as for grant administration, which can be helpful when it comes to meeting EDA's reporting requirements post-award.²² Agency staff are often in regular communication with EDA's EDA representatives and can assist you with introductions and discussions.

Whether you write the grant application yourself or engage the help of an outside party, this guide will help you become familiar with the grant application and administration process.

Initial Basics

There are some basic and non-time-consuming to-dos that when left undone can slow down the application review process. For example:

- Make sure you know your organization's full legal name.
- Make sure your [SAM](#) (System for Award Management) registration to do business with the U.S. government is up-to-date and not about to expire through Sam.gov. As part of your registration in SAM, you will be assigned a Commercial And Government Entity (CAGE) code. The CAGE code is a five-character ID number used within the U.S. federal government. You will need your CAGE code for the application. Go to [SAM.gov](#) to register.
- Make sure you know your organization's [DUNS \(Data Universal Numbering System\) number](#) and [Employer Identification Number/Tax Identification Number](#) EIN/TIN).
- Register and set up an organizational profile in [Grants.gov](#).
- Double-check your entity's record on [FAPIS \(Federal Awardee Performance and Integrity Information System\)](#).
- Have most recent audit ready to share (if not uploaded to the [Federal Audit Clearinghouse](#)).²³
- Identify an Authorized Organization Representative (AOR) who will be authorized to submit applications and respond to inquiries from EDA staff.
- Identify a Single Point of Contact for GPRA (Government Performance and Results Act) follow up to address grant reporting needs, etc.
- If you intend to include indirect costs in the budget, make sure you include a copy of the cognizant agency Indirect Cost Agreement.

²¹ Source: IEDC Sampling of Economic Developers with Successful EDA Grant Experience(s)

²² To find your EDD and other economic development partners for your area or region, go to <https://eda.gov/resources/directory/>.

²³ A recent audit (e.g., conducted within the last 2 to 3 years) should be provided.

Nonprofit Applicants

Non-governmental applicants, except for public universities and certain EDDs, are required to provide documentation that further confirms their status for receiving EDA funds to serve the area or region. This documentation includes:

- Certificate of Good Standing from the state in which you are incorporated (active registration with the secretary of state)
- Nonprofit verification (IRS letter)
- Articles of Incorporation and bylaws²⁴
- Resolution passed by a general-purpose political subdivision of a state (e.g., local government entity) or a letter signed by an authorized representative of a local government acknowledging that the applicant is acting in cooperation with officials of the political subdivision
- For construction and RLF investments, comments from the appropriate general purpose governmental authority after a minimum review period of 15 days

Developing Your EDA Application Package

There are several application documents to become familiar with when applying for EDA funds. It is a good idea to read through these documents before beginning work on the application. The full application package can be found at Grants.gov.

HINT: If you have never used Grants.gov before, or need a refresher on the federal grant application process, Grants.gov provides helpful videos to get you started at <https://www.grants.gov/web/grants/applicants/applicant-training.html>.

The screenshot shows the Grants.gov website interface. At the top, there is a navigation menu with links for HOME, LEARN GRANTS, SEARCH GRANTS, APPLICANTS, GRANTORS, SYSTEM-TO-SYSTEM, FORMS, CONNECT, and SUPPORT. A search bar is located in the top right corner. The main content area is titled 'VIEW GRANT OPPORTUNITY' and displays details for the grant opportunity EDA-2021-ARPAEAA. The synopsis section is active, showing general information such as the document type, funding opportunity number, title, and closing dates. The page also includes 'Apply' and 'Subscribe' buttons.

²⁴ Nonprofits with an active EDA grant can provide a revised copy of their Articles of Incorporation or Bylaws or a statement certifying no changes have been made to these documents since their last application.

Requirements for All Projects

The SF-424

The federal government uses a “Standard Form” for all grants, regardless of agency. Completing the SF-424 is relatively easy if you have some key information at hand.

Triple-check that the basic information on your organization (full legal name, EIN/TIN, DUNS Number, etc.) and the funding opportunity (Catalog of Federal Domestic Assistance (CFDA) Number²⁵ and Funding Opportunity Number²⁶ appears correctly on the SF-424. Any error can slow down the application review process.²⁷

OMB Number: 4040-0004
Expiration Date: 12/31/2022

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): _____ * Other (Specify): _____
* 3. Date Received: Completed by Grants.gov upon submission.	4. Applicant Identifier: _____	
5a. Federal Entity Identifier: _____	5b. Federal Award Identifier: _____	
State Use Only:		
6. Date Received by State: _____	7. State Application Identifier: _____	
8. APPLICANT INFORMATION:		
* a. Legal Name: _____		
* b. Employer/Taxpayer Identification Number (EIN/TIN): _____	* c. Organizational DUNS: _____	

The ED-900

The ED-900 is the application specifically for EDA grants. Pages 10 to 15 of the ED-900 include detailed instructions for completing the application. Another factor that can slow down the timeline between application submittal and notification of EDA’s investment decision is when these instructions are not followed carefully.

HINT: Reading the application instructions line-by-line before you begin completing the application will save you time. It will reduce the chances of the application needing time-consuming corrections

²⁵ The CFDA for Economic Adjustment Assistance (EAA) projects is 11.307. The CFDA for Public Works (PW) projects is 11.300. The American Rescue Plan is being deployed through the EAA program so the CFDA is 11.307.
²⁶ The Funding Opportunity Number will appear in the NOFO.

²⁷ Grants.gov provides detailed instructions for completing the SF-424. These instructions are included in the Appendices of this guide.

after submittal or possible rejection due to critical errors or missing documentation. It may be best to draft the application offline, print, and review and then proceed to completing it online.

OMB Number: 0610-0094
Expiration Date: 11/30/2021



ED-900 – General Application for EDA Programs

A. Applicant Information

A.1. EDA Application Identifier (if available):

A.2. Please identify all applicants for this project:

	Name	SAM.gov CAGE Code	SAM.gov Registration Expiration Date	Fiscal Year End Date (mm/dd)
Lead Applicant				
Co-Applicant 1				

Tips for the ED-900

- Make sure you provide your organization’s full legal name, as provided on the SF-424, on the ED-900. Your name should appear in the exact same way on both forms. The same is true for any co-applicant. You (and any co-applicant) will need to provide evidence of your SAM.gov registration. (See ED-900, A.2.)
- If your application is for a project other than a “strategy grant,” then the ED-900 asks you to indicate whether your project is in a region with a CEDS or whether there is an alternative strategic planning document in place that governs the investment. (See ED-900, B.3.) In other words, you will be asked to provide some evidence that your project aligns with the region’s economic development strategy.
- Be prepared to describe the economic conditions of your region and the needs that your project will address. (See ED-900, B.3.b.) Here is the place to note any of the EDA distress criteria or special needs that apply. (See the “Eligibility for Funds” section in this document for guidance.) Note that you will be asked to further confirm your eligibility in Section C of the ED-900.

A WORD ABOUT CO-APPLICANTS

If your project includes one or more co-applicant(s), some forms will need to be completed by each co-applicant. This typically includes the SF424, SF-424B, ED-900A, CD-511, and SF-LLL. Each co-applicant will also need to have an up-to-date SAM registration, clean FAPIIS record, and recent audit ready to share.

Nonprofit co-applicants will need to provide nonprofit verification and board resolutions.

Co-applicants for construction projects will need to complete the Applicant Certification Clause for environmental concerns.

HINT: If your application will have co-applicants, consult with your EDA representative to confirm what documentation should be provided by each co-applicant.

- The potential for successful project execution is one of the qualities that EDA seeks in a grant application. (See ED-900, B.4.) It is important to describe your capacity to carry out the project. For example, if you are seeking funds to provide technical assistance to existing businesses recovering from COVID-19 through your staff engaged in business retention and expansion (BRE), then designate a staff person to serve as project manager for said project. Or, if your project involves an economic development feasibility study and you plan to engage an outside party to conduct the work, note that partner's capacity and expertise to be engaged. (See ED-900, B.5.)
- Be prepared to discuss how your project aligns with one or more of EDA's investment priorities. (See ED-900, B.6.) The more investment priorities are impacted by your project, the more competitive your project will be. Visit <https://eda.gov/about/investment-priorities/> to learn more.
- Projects with an anticipated economic impact are attractive to EDA for showing return on investment when performance metrics are measured. (See ED-900, B.8.) If you note estimated jobs (created or retained) or private investment in your application, you will be asked to have the source(s) for those estimates to complete an ED-900B form. The form should be completed by a person with executive authority to sign on behalf of the organization, and you should plan your application development process to allow for the time it takes to have the form completed.
- Make sure that job and investment totals for the beneficiaries match the estimates provided in ED-900, B.8. (See ED-900, B.9.)
- You will be asked to ensure that any non-EDA funds that you are proposing as a match are committed, available as needed, and not conditioned or encumbered in any way that would preclude their use consistent with the purpose of the project. (See ED-900, B.10.a.)

HINT: EDA is seeking a "Yes" answer to this question.

- In the application (see ED-900, B.10.b.), you will be asked to identify the source, amount, and date of availability for the non-EDA funds. For each source, EDA will seek documentation ("match letter") from the source, signed by a person with authority to sign on behalf of the organization, stating the match is committed, available, and not encumbered and to confirm the amount and date of availability.
- If you are planning to use contractors to complete the project and plan to pursue a sole source procurement, you will need to provide a justification for why you are not awarding the work by competitive bid. Be prepared to provide reasons for why the contractor may be uniquely qualified to do the work and you will be asked to do a cost analysis to show that the contractor's rates are reasonable. Generally, using a sole source procurement is not encouraged and can slow the process down. (See ED-900, B.11.)
- If you are planning to purchase equipment with EDA funds, consult with your EDA representative on what equipment is permissible prior to including in your application. (See ED-900, B.12.)

- If your area or region is experiencing economic distress in line with EDA's distress criteria or has a special need, be prepared to cite the data source upon which you are determining your eligibility and provide documentation. (See ED-900, C.1., C.2., C.3.) Whenever possible, it is best to use federal data as available through the U.S. Census Bureau or other sources. This data can be easily found through StatsAmerica (www.statsamerica.org), a portal for U.S. data tools developed through EDA. The data tool, Measuring Distress (www.statsamerica.org/distress/distress.aspx), is particularly useful for finding data on per capita income and unemployment rate for the most recent 24-month period as requested by EDA.
- If your area or region does not meet any of EDA's economic distress or special needs criteria, you will need to explain how your project provides a substantial direct benefit to the residents of an area within an area of an Economic Development District (EDD) that does meet the distress criteria. (See ED-900, C.4.)
- For non-construction projects, you will be asked to complete a budget justification in the ED-900.²⁸ The budget justification must clearly articulate how the funds in each line item on the SF-424A will be used to support your project. Any planned indirect charges will need to be fully explained. Line items for Indirect, Equipment, Contractual, and Other will be reviewed carefully by EDA staff. (See ED-900, D.1.)
- Regarding indirect costs on non-construction projects, it is best to consult with your EDA representative on what percentage is acceptable with the Regional Director.²⁹ (See ED-900, D.2.) Generally, an indirect cost rate of 10 percent is considered a de minimis rate that does not require approval from EDA. EDA gives priority to budgets that most directly fund elements that assist in achieving project outcomes. Any indirect cost rate above 10 percent will receive greater scrutiny and require documentation, such as a copy of the current Indirect Cost Rate Agreement your organization has in place with its cognizant federal agency and a budget plan that shows the items included as indirect costs. All indirect cost rate charges must be based on an actual approved indirect cost rate from a federal agency. In some cases, the applicant may ask to waive the indirect costs and use them as a match.
- Non-construction projects are expected to have key applicant staff who will have their time charged to the federal and non-federal portions of the project budget, with the non-federal portions serving as the project match if a match is committed. (See ED-900, D.3.) Professional biographies should be provided for each staff member undertaking and completing project activities, articulating their knowledge, organizational experience, and expertise for conducting the work.
- You will be asked to agree to comply with all applicable civil rights requirements and certify that identified "Other Parties" – businesses creating or saving 15 or more jobs – will also agree to comply with such requirements. (See ED-900, E.1 and E.2). Each other party will need to complete an Assurances form (ED-900A), signed off by a person with executive authority to sign on behalf of the organization.

²⁸ Construction and Design and Engineering (without a construction component) projects require a budget narrative that clearly identifies and justifies how funds in each line of the budget (on the SF-424C form) will be used to support the proposed project. In lieu of a separate budget narrative, this information may be included in the PER.

²⁹ For the most part, indirect costs are not permitted for EDA construction awards.

- You and any co-applicant will need to certify that federal funds have not been used and will not be used for lobbying in connection with the request for federal financial assistance from EDA. (See ED-900, E.2.) In addition to confirming this in the ED-900, you and any co-applicant will need to complete Form CD-511. If non-federal funds have been or are planned to be used for lobbying in connection with the request, Form SF-LLL must also be completed.
- If you are in a state that requires your project to be reviewed by a State Clearinghouse, also known as your State Single Point of Contact (SPOC), you will need to build in time in your application process for this review to take place. (See ED-900, E.3.) This review is in line with Executive Order 12372 that calls for state and local government coordination and review of proposed federal financial assistance and direct federal development. However, states have the option to waive their right to review projects. See www.whitehouse.gov/wp-content/uploads/2020/04/SPOC-4-13-20.pdf for the list of states that have chosen to participate in the intergovernmental review process.

HINT: Your State Clearinghouse can advise you if a review is required. Some states opt to review all projects; some states opt to review only certain types of projects; some states opt to not review any projects. If your state requires this review, it can take 30 days or longer to be done.

- If your organization is a nonprofit, you will need to show that your project has the support of your local governing authority. (See ED-900, F.3.) Construction and RLF projects require providing the local governing authority at least 15 days to review and comment on your project. (See ED-900, F.4.)

HINT: It is best to consult your local governing authority at the earliest stages of your application development to get their buy-in and allow them time to pass a resolution or develop a letter in support of your project.

Other Documents for All Projects

- ED-900A:** You will need to certify that you understand that attorney and consultant fees for securing or obtaining EDA investment assistance are not eligible costs; that conflicts of interest or appearances of conflicts of interest are prohibited; that there is a need to comply with the reporting requirements under the Government Performance and Results Act (GPRA); and other provisions specific for construction or non-construction investments.
- Documentation of Matching Share:** The documentation should attest to the availability of matching funds from each matching share source and may come in the form of a commitment letter, board resolution, proof of bonding authority, or similar document, as applicable.
- Budget Narrative:** The narrative should clearly identify and justify how funds in each line item of the budget (Form SF-424C) will be used to support the proposed project. The Budget Narrative should specifically address each budget line item (including both the

Federal Share and matching non-Federal Share). It is best to review the NOFO guidelines for what to include in this narrative to ensure it meets EDA's expectations.³⁰

- CD-511:** You will need to make a certification regarding lobbying – that is, that no Federal appropriated funds have been used to influence (or attempt to influence) the awarding of any Federal contract.
- SF-LLL:** You will complete this form only if you have used funds other than Federal appropriated funds to influence the awarding of the Federal grant in question.

Requirements for Construction Projects

Following is a discussion of forms to complete or documentation required for construction projects only.

Applying for EDA funds for construction projects tends to be a lengthy process for both the applicant in terms of preparing the application package as well as EDA in terms of review. There is considerable documentation required to accompany the application and this documentation is usually dependent upon the assistance of experts outside of your organization. If your application is selected for further consideration, application materials may undergo an extensive review by an EDA Investment Review Committee comprised of Regional Office leadership, engineering staff, an Environmental Officer, legal counsel and your EDA representative.

HINT: Your EDA representative can confirm what documentation (studies, plans, reports, maps, drawings, etc.) may be required to include in your application package. It is best to gather this documentation prior to beginning, or early in, your application process.

COMPLETE LIST OF FORMS REQUIRED FOR CONSTRUCTION PROJECTS

- SF-424 (Application for Federal Assistance)*
- SF-424C (Budget)
- ED-900 (General Application for EDA)*
- ED-900A (Assurances)*
- ED-900B (Beneficiaries)
- ED-900C (Application Supplement for Construction Programs)
- ED-900D (Design and Engineering Only)
- ED-900E (Relocation and Land Acquisition Expenses)
- CD-511 (Certification Regarding Lobbying)*
- SF-LLL (Disclosure of Lobbying Activities)*

*Form required for all projects.

The ED-900C

³⁰ For Construction projects, in lieu of a separate Budget Narrative, this information may be included in the Preliminary Engineering Report (PER) as required by Section C of the ED-900C. For non-construction projects, the Budget Narrative information should be consistent with the budget justification information provided in the ED-900 (See ED-900, D.1.) and address the additional details requested in the NOFO.

In addition to the ED-900, construction projects require the completion of the ED-900C, the application supplement for construction projects.

Tips for the ED-900C

- If your project involves the development of a hospital, airport, library, water supply and distribution facility, sewage and waste treatment, highways, transportation facilities, water, or land conservation within a metropolitan statistical area (MSA), EDA requires you to request comments from the metropolitan area clearinghouse agency. (See ED-900C, A.) By federal definition, a MSA has at least one urbanized area of 50,000 or more inhabitants. Often the metropolitan review agency also serves as the Economic Development District (EDD) for your area and region. When this is not the case, the EDD should be able to connect you with the right agency. The receipt of comments is not required, but you will need to provide evidence that you submitted the request. Check with your EDA representative on your Regional Office's preference for when this requirement needs to be met – e.g., prior to application submittal or while EDA staff are reviewing your application for further consideration.³¹

HINT: The metropolitan review agency can take up to 60 days to provide comments (or refrain from providing comments), so it is best to request comments as early in your application preparation as possible.

- It is not uncommon for an applicant to have a EDD administer the project for grants management, when the administration of the project is beyond the capacity of your current staff.³² (See ED-900C, B.) This may be more relevant for construction projects versus non-construction projects. For example, there are certain reporting requirements to maintain with an EDA staff engineer. Should you decide to have a EDD administer your project, the agency should be able to administer the project in a cost-effective manner given its experience with EDA and existing capacity to carry out the work. In such cases, a reasonable cost to include in the budget under Administration (SF-424C), may be in the \$20,000 to \$35,000 range, but it is best to double-check with your EDA representative on what is deemed acceptable in current conditions.
- EDA has some general expectations with respect to title requirements for properties that will be improved upon through EDA's investment assistance, all of which are carefully reviewed by EDA staff, including legal counsel. These include:
 - Applicant holds title to all project facilities, underlying land, necessary easements, and rights-of-way. (See ED-900C, D.1.)
 - Applicant will provide EDA with a security interest and/or covenant of use in the real property or significant items of tangible personal property acquired or improved with EDA investment assistance. (See ED-900C, D.2.)
 - The real property or project facilities to be acquired or improved with EDA investment assistance will not be mortgaged or used to collateralize any type of financing. (See ED-900C, D.3.)

³¹ See section on the Application Review Process in this guide.

³² EDDs are regional entities designated to represent EDA's Economic Development Districts (EDDs).

- Applicant will acquire any required state permits, easements, rights-of-way, or leases necessary to construct, operate, or maintain the project. (See ED-900C, D.4.)
- Applicant's property is free of restrictions that limits the applicant's use of the property. (See ED-900C, D.5.)
- Applicant should note whether project will be located on a property that once served as a military or Department of Energy installation. (See ED-900C, D.6.)
- Applicant should be prepared to explain whether the project involves construction within a railroad's right-of-way or over a railroad crossing. (See ED-900C, D.7.)
- Applicant should be prepared to explain whether project includes construction of a highway owned by a state or local government (other than the applicant). (See ED-900C, D.8.)

In the ED-900C, you will be asked several questions about the purpose of your project. Your responses to these questions are reviewed carefully by EDA staff, including legal counsel. If you plan to sell, lease, transfer, dedicate, or otherwise convey any interest in the project facilities, underlying land, or any land improved with EDA investment assistance, EDA will seek an explanation and will need to approve such activity. (See ED-900C, E.1.) Beyond this, EDA will seek the following information:

- Do you plan to construct facilities to serve as an industrial or commercial park or sites you own and then sell or lease to private parties? (See ED-900C, E.2.) If yes, it is best to consult with your EDA representative on how to ensure your project will continue to meet EDA's requirements after any sale or lease. EDA may require documentation to show that its requirements are continually being met.
- Are you planning to construct facilities to serve a private owned industrial or commercial park or sites for sale or lease? (See ED-900C, E.3.) If yes, you will need to explain how EDA's requirements will continue to be met after the sale or lease. Such requirements are attached to the property and will survive any sale or transfer of the property. The private party must have title to the park or site prior to sale or lease. EDA may request additional assurances from the private party.
- For privately owned land improved by the proposed project, is the private owner willing to enter into an agreement to limit the sale price of the improved land to its fair market value before the improvements for a reasonable period? (See ED-900C, E.4.)
- Is the purpose of the project to construct, renovate, or purchase a building? (See ED-900C, E.5.)
- Will the building be leased in whole or in part? (See ED-900C, E.5.a.)
- Is the purpose of the building to provide incubator space to new companies? (See ED-900C, E.5.b.)
- Will there be limitations on the length of the lease term? (See ED-900C, E.5.c.)
- Is the purpose of the project to provide building space to a single user or multiple users? (See ED-900C, E.5.d.)
- What are the terms of any proposed lease? (See ED-900C, E.5.e.)

Regardless of whether you believe historic or archaeological artifacts are present, you will be required to work with your State Historic Preservation Officer (SHPO). (See ED-900C, F.) State requirements for SHPO review of project plans vary. You should consult with your EDA representative to learn your Regional Office's preference for whether this requirement should be met before application submittal or while your other application materials are in

review. Whatever the case, EDA cannot finish processing your application without clearance from SHPO.

HINT: Depending upon the state requirements, the SHPO clearance process can be lengthy (at least 30 to 60 days), so it is best to work with SHPO early in your application preparation.

- You will need to understand the potential environmental impacts of your project. (See ED-900C, G.) Federal agencies are required by law, through the National Environmental Policy Act (NEPA), to assess the impacts of any proposed federal action. You will be asked to complete an environmental narrative as well as an Application Certification Clause attesting to the environmental conditions of your project site.³³ There is also a checklist of other environmental review documents that should be submitted with the application, if available, to help expedite the review process. EDA's Environmental Officer is charged with reviewing all your documentation and assessing whether and how the project may affect the environment. The Environmental Officer will need to sign off on the project before an EDA investment is possible.

- If your project involves constructing or renovating a business incubator, accelerator, commercialization center, or similar project, you will need to have a feasibility study done that demonstrates the need for the project and how the project reflects industry best practices (financial, technical, management, etc.) for ensuring an ongoing successful operation. (See ED-900C, H.) The feasibility study should establish the market demand for the specific start-up companies proposed for incubation and the presence of necessary resources and community support. The study should be conducted by an outside expert (e.g., university, credible consulting firm).

HINT: For incubator and related projects, it is ideal to have this feasibility study done before you begin preparing your application for EDA and to consult with your EDA representative to ensure the study's scope meets EDA's requirements. The study can take 90 days or longer to complete.

The Preliminary Engineering Report (PER)

In addition to the ED-900C, you will need to submit a completed Preliminary Engineering Report (PER) along with your application. The PER should be done by a credible engineering firm. Be sure to allow time to have a PER completed before you submit your application package to EDA. Page 2 of the ED-900C includes a checklist of informational items required in the PER. The PER may include information beyond this list, but every PER should at a minimum include the items listed on Page 2.

HINT: Depending upon the complexity of your project, the PER can take 60 to 90 days or longer to complete.

³³ A template for the Application Certification Clause and Environmental Narrative can be found at http://www.eda.gov/files/012_Environmental_Narrative_Template.zip. This includes a checklist of additional documentation to provide, can be found at

All construction project applications are reviewed by a staff engineer with EDA. Projects to be funded through EDA require an EDA engineer's approval. The engineer uses the PER to determine project feasibility and the likelihood of project success. When reviewing the PER, the EDA engineer may identify questions that need to be addressed prior to deciding whether to recommend the project for funding. Those questions may lead to further documentation needed. Ensure the PER is as thorough as possible in addressing the items on Page 2 of the ED-900C.

Having a PER done for your project is a substantial cost that is not reimbursable through EDA. When selecting an engineering firm to conduct the PER, you will not be able to use the same firm to work on your project, with their expenses covered through the EDA grant, unless the firm was selected through a competitive process. Sole sourcing is not permitted. Also, only firms that are deemed qualified according to the Brooks Act (Selection of Architects and Engineers Statute) can be selected to develop the PER.

HINT: Working with an engineering firm that has prior experience in developing the PER for EDA or another federal funding agency can help ensure that the PER is developed to meet federal agency expectations.

Business Incubator/Accelerator/Commercialization Center Projects

EDA requires the following additional documentation for business incubator and related projects beyond the PER, such as:

- Feasibility Study:** The study should establish the market demand for the specific start-up companies proposed for incubation (technology, general business, biotech, manufacturing, etc.) and the presence of necessary resources and community support.
- Documentation on Financial Capacity:** The documentation should provide a detailed demonstration of the financial capacity to operate the facility and reach a positive cash flow within a reasonable period, which EDA generally expects to be three years.
- Management Plan:** The plan should include, at a minimum, a tenant/client selection policy, tenant lease or license agreement, business assistance policy, staffing plan, tenant graduation policy, and performance plan.

HINT: The NOFO provides details about what EDA seeks in the management plan. Ensure that your plan includes each item listed in the NOFO.

The SF-424C

For construction projects, you will complete the SF-424C form. This form should be used for projects to build or renovate infrastructure (e.g., road, rail, water, sewer, or stormwater), facilities (e.g., entrepreneur center, training center), or develop or redevelop real property.

The budget is carefully reviewed by EDA engineering staff for justifiable expenses. Should the project be awarded an EDA investment, the EDA engineer will also monitor expenses during project implementation against the approved budget. Generally, your project budget should align with what is recommended in your PER. Any deviation will need to have documentation providing justification and will need approval from your EDA engineer.

Tips for the SF-424C

- The bulk of your budget should be devoted toward project execution (e.g., site work, demolition/removal, or construction expenses).
- Administrative and legal expenses are a common component of construction projects. You should ask your EDA representative to advise you on the acceptable percentage of budget that can be devoted to administrative and legal expenses.
- Architectural and engineering expenses may be permitted depending on the purpose.³⁴ Your EDA representative can advise you on the expenses that qualify and the acceptable percentage of the budget that can be devoted toward such expenses.
- Construction projects often have contingencies to plan for in the budget. You should ask your EDA representative to advise you on the acceptable percentage of budget that can be devoted to contingencies.
- If you use the line item for miscellaneous, discuss this line item with your EDA representative prior to application submittal to learn what is permissible. (Oftentimes, expenses placed in miscellaneous may fit in another line-item category.)
- There may be costs not allowable for EDA or federal participation. Your EDA representative can best advise you on such costs.
- If your project will yield some type of income (e.g., lease or sales), you should be prepared to provide this information in this form.

HINT: As you prepare your project budget, it is best to consult with your EDA representative on allowable expenses outside of site preparation and construction activities.

³⁴ Expenses to develop the PER are not a permissible expense.

Other Documents Specific to Construction Projects

Additional documentation that EDA will ask you to provide in your application package includes:

- SF-424D (Assurances – Construction Programs):** This form is for the applicant and any co-applicant(s) to provide basic assurances as required by federal law.
- ED-900B (Beneficiary Information Form):** Each beneficiary – as listed in the ED-900 – should complete this form if they are creating or saving 15 or more permanent jobs.
- ED-900E (Calculation of Estimated Relocation and Land Acquisition Expenses):** EDA projects typically do not include relocation and land acquisition expenses. EDA still requires you to complete this form and confirm that the project will not cause the displacement of families, businesses, or farms.
- Environmental Narrative:** The narrative should show how the EDA investment will comply with NEPA requirements. A narrative outline of required components may be accessed in EDA's website at: http://www.eda.gov/files/012_Environmental_Narrative_Template.zip.
- Map of Project Site:** The map should clearly illustrate project details. For example, if the proposed project is to build a sewer line, the map should show the exact route of the line with nearby roadways and other geographic details.

Design and Engineering Assistance Projects

When the purpose of the sought-after EDA investment is to accomplish only the design and engineering work required for the construction of a complex or environmentally sensitive public works or development facility, applicants should use the ED-900D. The ED-900D form is for applications for design and engineering assistance only (without a construction component). Applicants should use all the other documents that are normally included in Construction application package, except for a map of the project site.

HINT: Design and Engineering Assistance only projects are not common among EDA investments. If you are planning such a project, it is best to consult with your EDA representative to determine if your project will be competitive for an EDA investment.

Requirements for Non-Construction Projects

Following is a discussion on forms to complete or documentation to provide for non-construction projects only.

The SF-424A

The SF-424A is the form you will use to provide your budget details. You will be asked to share budget details by activity (e.g., each task in your project scope of work) and by specific expense categories (e.g., personnel, fringe benefits, travel, etc.).

The SF-424A form should be used for applications to hire Disaster Recovery Coordinators as well as planning, technical assistance, studies, RLFs, and other non-construction projects.

Tips for the SF-424A

- Given you are applying for a non-construction project, personnel and fringe will likely account for a good portion of your budget request. (Despite construction being a line item in the SF-424A, with rare exception, you should not have any construction expenses. If your project involves such expenses, it is best to consult with your EDA representative prior to application submittal to determine suitability.)
- Expenses for Equipment, Contractual, and the Other class categories in Section B will be reviewed carefully by EDA staff. Justification for such expenses should be explained in your budget justification section of the ED-900 and your Budget Narrative.
- Consult with your EDA representative on what is generally acceptable for indirect charges. Indirect charges over 10 percent will require EDA approval.
- If you will be expecting any program income (e.g., RLF, training program with registration fees), be prepared to provide this information in Section B.
- Make sure that the totals in Section A and Section B match for each activity (e.g., task in your scope of work).

COMPLETE LIST OF FORMS REQUIRED FOR NON-CONSTRUCTION PROJECTS

- SF-424 (Application for Federal Assistance)*
- SF-424A (Budget)
- SF-424B (Assurances for Non-construction)
- ED-900 (General Application for EDA)*
- ED-900A (Assurances)*
- ED-900F (Supplement for Revolving Loan Fund applications)
- CD-511 (Certification Regarding Lobbying)*
- SF-LLL (Disclosure of Lobbying Activities)*

*Form required for all projects.

Other Documents Specific to Non-Construction Projects

- SF-424B:** This form is for the applicant and any co-applicant(s) to provide additional assurances when it comes to EDA investments in non-construction projects.

Requirements for Revolving Loan Funds

The ED-900F

In addition to the ED-900, applications to create a Revolving Loan Fund require the completion of the ED-900F, the application supplement for RLF projects. The ED-900F includes only a few questions.

EDA-supported RLFs have long been a valuable tool for providing businesses, especially small businesses, with access to capital. Amid COVID-19, access to capital through a RLF has become akin to life support for many businesses. In the recent sample of EDOs cited earlier in this guide, one-fifth (20.4 percent) of the EDOs who received an EDA award in the past three years reported receiving an RLF grant from EDA.³⁵ Together, these EDOs received EDA investments to capitalize or recapitalize 10 RLFs.

Tips for the ED-900F

- Be prepared to explain the need for a public lending program. If your planned lending area is the same as the geographic area you described in the ED-900, then the need for the RLF should already be demonstrated by the information you provided on the economic conditions and how your project addresses EDA's economic distress criteria. However, if your planned area differs from the information you provided in the ED-900 (e.g., serves a particular neighborhood or specific zip codes), then you will need to explain this in the ED-900F. (See ED-900F, 1.b.) Include any relevant information on the economic distress of the area you plan to serve.
- Know whether others are operating an EDA-funded RLF in your anticipated lending area. (See ED-900F, 1.c.) If you do not know this information readily, your EDA representative or EDD can likely advise you. You can find RLFs serving your state via EDA's resources page at <https://eda.gov/resources/directory/>.
- EDA will ask about your targeted borrowers and industry sectors. (See ED-900-F, 1.d.) Targets should be based on a reasonable understanding of your economic base, especially those industries that are bringing in dollars from outside your local economy. Because such understanding is important for the overall success of your RLF, you may wish to engage an expert (e.g., university, credible consulting firm) to do an economic base analysis for you if you have not already done so to inform your RLF plans.
- You will be asked to describe your capacity for managing lending activities as well as connecting the businesses you serve with other financial providers. (See ED-900-F, 2.a.) If your organization manages other lending programs, this will help speak to your capacity to manage an EDA-funded RLF and you can list such programs in your application. (See ED-900-F, 2.b.)

Draft RFP Plan

³⁵ Source: IEDC Sampling of Economic Developers with Successful EDA Grant Experience(s) (In April and May 2021, IEDC received input from 61 EDOs about their grant application experiences with EDA. Of the 61 EDOs, 49 self-reported to have received an EDA award within the past 3 years.)

If you receive an EDA investment to create a RLF or recapitalize an existing one, your RLF will need to be managed by a RLF plan approved by EDA.³⁶ Your plan will need to include:

- **Part I: Revolving Loan Fund Strategy** – This part of the plan should summarize your region’s CEDS (or EDA-approved economic development plan) and your business development objectives for the RLF. It should also describe your RLF financing strategy, policy, and portfolio standards.
- **Part II: Operational Procedures** – This part of the plan should serve as your RLF’s internal operating manual and describe the administrative procedures for operating the RLF in a manner that is consistent with “Prudent Lending Practices” as defined in the Code of Federal Regulations (CFR).

Summary of Forms Needed Per Project Type

Construction*	Design and Engineering	Non-Construction	Revolving Loan Fund
SF-424	SF-424	SF-424	SF-424
SF-424C	SF-424C	SF-424A	SF-424A
Budget Narrative	Budget Narrative	Budget Narrative	Budget Narrative
SF-424D	SF-424D	SF-424B	SF-424B
ED-900	ED-900	ED-900	ED-900
ED-900A	ED-900A	ED-900A	ED-900A
ED-900B	ED-900D	Documentation of Matching Share	ED-900F
ED-900C	Documentation of Matching Share	CD-511	Documentation of Matching Share
ED-900E	Environmental Narrative	SF-LLL	Draft RLF Plan
Documentation of Matching Share	Applicant Certification Clause		CD-511
Environmental Narrative	CD-511		SF-LLL
Applicant Certification Clause	SF-LLL		
CD-511			
SF-LLL			
Map of Project Site			

³⁶ See 13 CFR § 307.9.

Submitting Your Application

All EDA applications must be submitted online through [Grants.gov](https://www.grants.gov). If you do not already have an account with Grants.gov, you will need to register and create an organization applicant profile. You will also need to register at least one Authorized Organization Representative (AOR) with Grants.gov. AORs have the authority to submit applications on behalf of your organization at Grants.gov and organizations can have multiple AORs.

To create an organization profile, you will need to have an active registration with the System for Award Management (SAM.gov), which means your organization is registered to do business with the federal government. New SAM.gov registrants will need to provide a DUNS (Data Universal Numbering System) Number and Employer Identification Number (EIN).³⁷ Note, it can take 7 to 10 days to register with SAM.gov. For both SAM.gov and Grants.gov, you should use your full legal business name and this name should appear the same way in both places.

You will want to spend some time reviewing Grants.gov early in your application process. Said one economic developer who shared their insights with IEDC recently: “Pay careful attention to the instructions and give yourself plenty of time to learn how to navigate and use the grant management web-based platform.”³⁸

For questions on the federal grant process, visit the Grants Learning Center (<https://www.grants.gov/web/grants/learn-grants.html>), which provides a gateway to the federal grant world.

HINT: Take advantage of the online Grants Learning Center available through Grants.gov. Here you will find information on the basics of the grant lifecycle and management, detailed guidance on how to apply for a federal grant, and more.

³⁷ According to the U.S. General Services Administration: The federal government has used services from Dun and Bradstreet to both identify (using the DUNS® number) and validate/verify federal contractors since 1978. By April 2022, the federal government will stop using the DUNS number. At that point, entities doing business with the federal government will use a Unique Entity Identifier (UEI) which will be created in SAM.gov. The transition to the UEI began in July 2019.

³⁸ Source: IEDC Sampling of Economic Developers with Successful EDA Grant Experience(s)

The Application Review Process

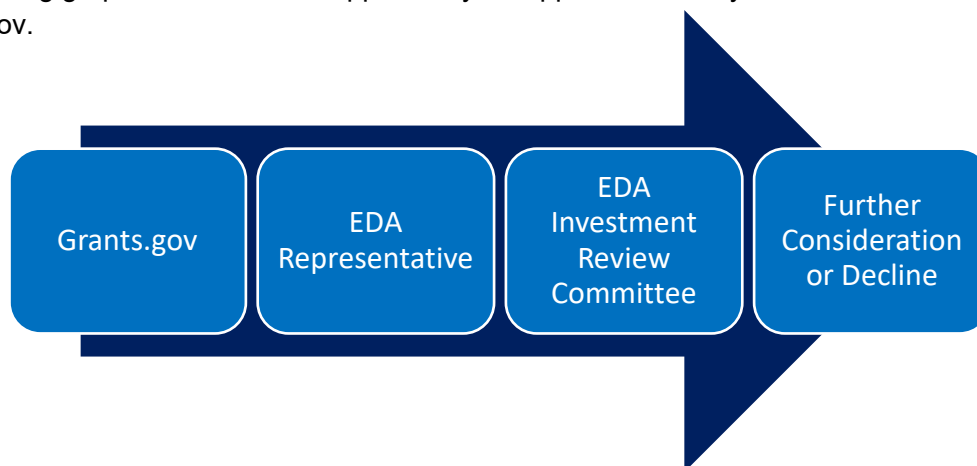
Once your application has been submitted, it will undergo a competitiveness review process that begins with your EDA representative and may also be reviewed by other EDA staff in your Regional Office.³⁹ Application packages will not be considered if the project is found not responsive to the NOFO, if critical information is missing, or eligibility requirements are not met.

If the project is determined as competitive for an EDA investment, an Investment Review Committee (IRC), comprised of Regional Office staff, reviews each application package in depth, hears a presentation from the EDA representative recommending the project, and then votes on whether to recommend the project to the Regional Director. In addition to meeting the EDA investment criteria, other factors that play a role in the IRC's decision is the availability of funding and the project's competitiveness compared to other proposed projects in the region.

Following the recommendation of the IRC, the Regional Director – that is, EDA's Grants Officer for your area – decides whether to recommend the project for the *further consideration* stage.

HINT: Let your EDA representative know when your application has been submitted through Grants.gov and make a point to check in with your EDA representative periodically for an update on your application's progress.

The following graphic shows what happens to your application after your submittal through Grants.gov.



Review of Projects Meriting Further Consideration

If the IRC has recommended your application for further consideration, committee members usually identify supporting materials that are still needed to include in the review process, based upon the type of project, if necessary. If the Regional Director concurs with the recommendation of the IRC, you will receive what is referred to as a Further Consideration Letter. The letter will clearly describe

³⁹ The NOFO for the Economic Adjustment Assistance Challenge program requires at least two (2) EDA staff to review the application package to determine competitiveness.

any additional supporting materials needed to advance your application and provide a deadline to follow for submittal to your EDA representative.

HINT: Generally speaking, if your application has made it to this stage in the review process, your project has a strong chance of receiving an EDA investment.

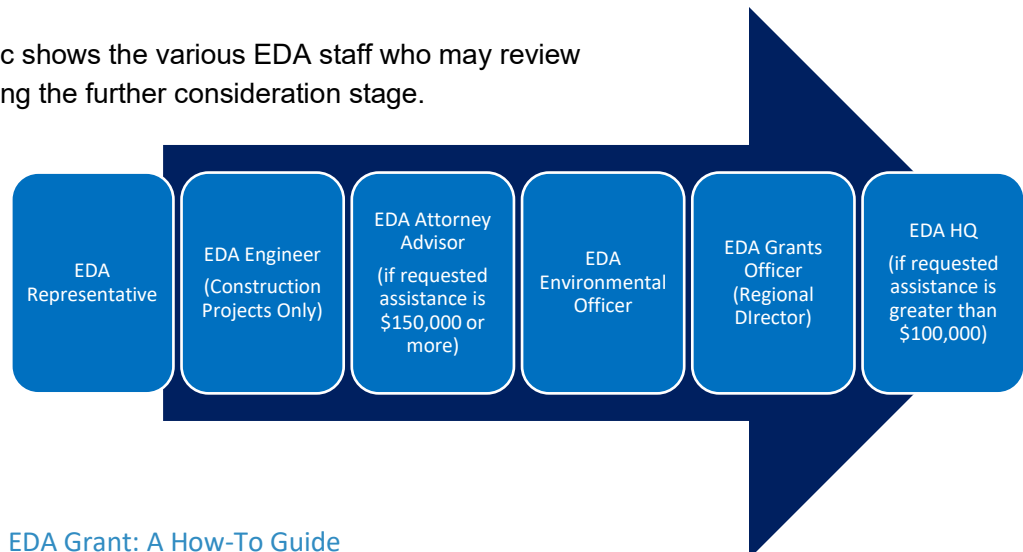
While not always the case, often the supporting materials you will be requested to provide are documents that need review by EDA's Environmental Officer and Attorney Advisor and have not already been provided in the application package. Examples of materials that may be requested include:

- Copy of most recently completed audit or financial statements
- Documentation on estimated useful life of improvements if further clarification is needed beyond what is in the PER*
- Documentation that applicant provided public notice that meets the National Environmental Policy Act (NEPA) requirements*
- Documentation that applicant requested comments from the State Historic Preservation Officer (SHPO) and comments received*
- Match letter that states match is available, unencumbered, and committed
- Documentation of clear title for ownership or assurances for public use
- Plans for ownership, operation, maintenance, and management of project facilities*
- Proof of CEDS compliance (e.g., letter from EDD)
- Resolution from applicant's board authorizing submission of application and acceptance of award
- [For nonprofits] Legal opinion that applicant is properly formed and able to do business with EDA and in its state
- [For projects potentially involving endangered species] Documentation that applicant requested comments from the U.S. Fish and Wildlife Service and comments received*
- [For Tribal areas] Documentation that applicant requested comments from the Tribal Historic Preservation Officer (THPO) and comments received*

*Construction projects only

HINT: Gathering these materials as part of your application process can help expedite the investment review process.

The following graphic shows the various EDA staff who may review your application during the further consideration stage.



The Road to Working an EDA-Supported Project

The road from project conception to project closeout and performance monitoring is a lengthy one, with markers along the way. While this guide has largely focused on how to apply for an EDA grant and what to expect in the application review process (steps 1 to 3 below), should you be successful in receiving an award, it would be good to be aware of each marker, summarized below.

1. **Project Development:** Work with your EDA representative (and EDD if your project is within an EDD) to ensure your project meets the EDA investment criteria and is in line with the regional CEDS (or other EDA-approved plan).
2. **Application Submission:** Submit your application via grants.gov.
3. **Application Review:** The application is reviewed by EDA's Regional Office IRC, and if the IRC and Regional Director recommend further consideration, you will be notified about any additional supporting materials are needed to advance the application. You will be provided with a deadline to follow for submittal to your EDA representative.
4. **Award Processing:** The application package has met EDA's requirements and is deemed satisfactory for an EDA investment if funds are available to obligate. The Regional Director has signed off on a Reservation of Funds form (ED-735) and this form is sent off to NOAA's Accounting Office, which provides fiscal management support for EDA.
5. **Grantee Registration:** If you are not already an existing vendor with the Federal government, you will need to register as a vendor. Your EDA representative or another member of the Regional Office team will let you know if this is the case.
6. **Public Notification:** Once the funds are reserved, information is posted in the Congress Business System (CBS). EDA's Public Relations Office will prepare a Notice of Investment Award to share with Congress and other stakeholders.
7. **Obligation of Funds:** The Regional Director will sign off on a Financial Assistance Award form (CD-450) to obligate the funds. The date this form is signed becomes the official award date.
8. **Notice of Grant Acceptance:** The Regional Director will sign and send an Award Agreement to the grantee. Along with this agreement will be Special Award Conditions (SAC) which include specific requirements for the grantee to meet post-award. The SAC may include additional certifications or stipulations the grantee will need to make to proceed with the award.⁴⁰
9. **Grantee Acceptance:** Within 30 days, the grantee must sign and return the Award Agreement (CD-450) to EDA to finalize it. The agreement will need to be signed by the single point of contact with authority to sign on behalf of the organization.

⁴⁰ For example, recipients of EDA's American Rescue Plan funds will need to adhere to a specific award condition relating to EDA's non-relocation policy.

10. **Project Kickoff:** The Project Officer, a member of the Regional Office team, has an initiation call with the awardee.
11. **Reimbursement/Disbursement Requests:** Grantee submits requests for expense reimbursement (for non-construction grants) or disbursement (for construction grants) using an approved form provided by EDA.
12. **Recipient Reporting:** Grantee provides required financial, progress, and performance reports which vary based on the type of assistance received. These are specified in the SAC.⁴¹
13. **Project Monitoring and Reporting:** The Regional Office provides reports to EDA Headquarters on a periodic basis and upon request.
14. **Project Closeout:** Projects are closed out within 90 days of the grant end date. No reimbursements may occur after project closeout.
15. **Performance Monitoring:** The grantee is responsible for reporting project outcomes as required by EDA and per the Government Performance and Results Act (GPRA). This could be required for up to five (5) years after the EDA grant award. EDA is responsible for reporting performance to Congress per the GPRA.

⁴¹ Recipients that expend \$750,000 or more of federal funds during the recipient's fiscal year will be required to conduct a single or program-specific audit in accordance with the requirements set out in the Uniform Guidance.

Summary of Third-Party Reviews Required

As detailed in this guide, there are multiple items you may need to receive from others in order to apply for an EDA grant. It is recommended that you start working on these items before or early in your discussions with EDA. These include:

ALL APPLICATIONS

- CEDS letter
- Resolution authorizing application by local governing body
- Letter endorsing project from local government
- Other letters of support from partner organizations
- Match commitment letter
- State Point of Contact / State Clearinghouse Review (if required)*

CONSTRUCTION PROJECTS ONLY

- Preliminary Engineering Report (PER)*
- Request for Metropolitan Review Agency comments**
- State Historic Preservation Office (SHPO) Review*
- Environmental Review documentation (if required)*
- Ownership Clear Title documentation or assurances of public use
- Other local or state required reviews

PROJECT-USE SPECIFIC

- [For Incubators] Feasibility assessment*
- [For Revolving Loan Funds] RLF Plan*

*This review can take 60 days or longer.

**Comments are not required but evidence must be provided that a request for comments was submitted and the metropolitan review agency had up to 60 days to provide comments.

Tips for Success: What Economic Developers Say

In support of the development of this guide, several economic developers shared some helpful tips to best position your organization for potential grant application success.⁴² On behalf of communities throughout the United States, IEDC extends its gratitude to these economic developers. Some of their insights have been shared in earlier sections of this guide. Following are examples of additional insights shared:

Read the NOFO. Not skim, read. Be sure to address every aspect of the NOFO using language found in the NOFO, not yours.

Work with your EDA representative and Regional Office. The representatives are extremely helpful and will ensure your project meets the criteria of EDA and your application is complete. Work with them to clearly define the scope of work and outcomes and meet EDA investment criteria.

Work with your Economic Development District; they should have a solid knowledge base and understanding of the application process and in many cases can be engaged in grant administration should you find success in applying for your grant.

Read the CEDS and ensure your project is in line with the CEDS. If not, work with your EDD to adjust.

Learn more from other entities and communities who have applied and successfully received funding from EDA.

Look at the history of what EDA has funded in the past. Does your organization look like those who they have funded? Does your project resemble what they have funded in the past?

Review the criteria for funding and use it rigorously to develop your narrative. Spell out the criteria and why this submittal meets or exceeds expectations. Review this narrative with your EDA representative before submitting the proposal.

Explore all possible avenues of private sector expansion and wage improvement and document these with sound and solid demonstration.

Allow enough time to prepare an application package. It takes considerable time to complete.

Write your application first in Microsoft Word (or something similar) and then copy into Grants.gov. This will enable you to avoid losing your writing in the event of technical hiccups.

Avoid presumptions of support and ask for letters of partnership and commitment that are relative to the project's implementation and sustainability.

⁴² Source: IEDC Sampling of Economic Developers with Successful EDA Grant Experience(s)

Realize it is not a one-shot process. You will have time to finesse and adjust if you work with your EDA representative.

Prepare for a lengthy review process. It could take 9 months or longer.

Assess and ensure your organization has the operational capacity to manage a federal grant, project, and reporting requirements.

Understand all the post grant requirements, particularly with public works grants which are heavily laden with requirements that applicants should understand before undertaking an application.

Do not be afraid! Each submission is a good learning experience. Ask the Regional Office staff for feedback on every submission.

In Closing

IEDC has prepared this guide to provide economic developers with sound guidance on how to apply for EDA funds and prepare an application package that meets EDA investment criteria. Overall, the best way to position your application for potential success with EDA is to have a clearly defined scope of work and expected outcomes and an effective relationship with your Regional Office, beginning with your EDA representative. Beyond this, it is our hope this guide is helpful to you.

Acronym Glossary

- **AOR:** Authorized Organization Representative
- **CAGE:** Commercial And Government Entity
- **CDBG:** Community Development Block Grant
- **CDFA:** Catalog of Federal Domestic Assistance
- **CEDS:** Comprehensive Economic Development Strategy
- **DUNS:** Data Universal Numbering System
- **EAA:** Economic Adjustment Act
- **EDA:** Economic Development Administration
- **EDD:** Economic Development District for EDA
- **EDO:** Economic Development Organization
- **EDR:** Economic Development Representative
- **EIN:** Employer Identification Number
- **FAPIIS:** Federal Awardee Performance and Integrity Information System
- **GPRA:** Government Performance and Results Act
- **HUD:** U.S. Department of Housing and Urban Development
- **IEDC:** International Economic Development Council
- **IRC:** Investment Review Committee
- **NEPA:** National Environmental Policy Act
- **NOFO:** Notice of Funding Opportunity
- **PER:** Preliminary Engineering Report
- **RLF:** Revolving Loan Fund
- **SAM:** System for Award Management
- **SF:** Standard Form
- **SHPO:** State Historic Preservation Officer
- **SPOC:** Single Point of Contact
- **THPO:** Tribal Historic Preservation Officer
- **TIN:** Tax Identification Number
- **UEI:** Unique Entity Identifier
- **USDA:** U.S. Department of Agriculture