



2022 Northern Border Regional Commission (NBRC) State Economic and Infrastructure Development Investment Grant Program (SEID) Frequently Asked Questions

1. **Q: What is NBRC's CFDA #?**

A: NBRC's Catalog of Federal Domestic Assistance (CFDA) number is 90.601. The Title is: Northern Border Regional Development.

2. **Q: What is the maximum grant that can be made by the NBRC?**

A: The maximum grant amount for 2022 is \$1,000,000 for construction in support of "infrastructure," as categorized and defined in the 2022 SEID Application Manual which can be viewed and downloaded from at www.nbrc.gov/content/EID. For all non-infrastructure applications, the maximum amount is \$350,000. Multi-State awards may receive a maximum of \$1,000,000 grant award for construction in support of infrastructure projects and \$350,000 for non-infrastructure projects.

3. **Q: If I have previously received an NBRC SEID investment am I eligible to apply again?**

*A: If an applicant has an outstanding SEID investment with NBRC, they cannot receive additional NBRC SEID investments until their current project has both: submitted reimbursement requests totaling 75% or more of the project and demonstrated that 75% of the cost share has been expended by **April 15, 2022**. If the 75% expenditure cannot be met, the entity can apply for a waiver. The waiver must be submitted together with the Letter of Interest (LOI), which is due by April 22nd at 5:00 p.m. The waiver request will not be considered complete if it does not contain a fully executed Affidavit and supporting documentation. The waiver must be approved by the State(s) where the prior award(s) were made and NBRC for the applicant to be eligible to seek 2022 SEID funding. Please see NBRC's 2022 SEID Application Manual for additional information on this requirement.*

4. **Q: When is SEID program information available?**

A: NBRC typically announces funding for the SEID program in February/March of each year. Program materials, including the SEID program application manual, are typically available via NBRC's website by mid-March.

5. **Q: Can NBRC funds match other federal funds?**

*If a project uses funds from multiple federal sources (including the NBRC), no more than 80% of a total project cost can be comprised of federal grant funds (e.g., if an applicant receives \$100,000 from another federal source, such as the Economic Development Administration, and the total project cost is \$200,000, the total NBRC award could not exceed \$60,000). **It is equally important for applicants to check with other federal sources, as each federal agency may have its own restrictions.***

6. **Q: Are ARPA (American Rescue Plan Act) funds considered federal or non-federal funds?**

A: ARPA money is considered Federal money. It cannot be used as non-Federal match.

7. **What is the definition of 'construction'?**

A: "Construction" means construction, alteration, or repair (including dredging, excavating, and painting) of buildings, structures, or other real property. For purposes of this definition, the terms "buildings, structures, or other real property" include, but are not limited to, improvements of all types, such as bridges, dams, plants, highways, parkways, streets, subways, tunnels, sewers, mains, power lines, cemeteries, pumping stations, railways, airport facilities, terminals, docks, piers, wharves, ways, lighthouses, buoys, jetties, breakwaters, levees, canals, and channels. A project that includes planning and engineering when part of a larger construction implementation will be considered 'construction'; a project solely made up of planning and/or engineering will not be considered 'construction'. Construction in support of an eligible category of infrastructure is eligible for a maximum award of \$1,000,000. Construction in support of eligible category of non-infrastructure is eligible for a maximum award of \$350,000.

8. **Q: Is the planning and engineering for a potential telecommunications project considered infrastructure?**

A: No, this would be considered a planning or study not the physical infrastructure. If the planning is part of a grant that includes construction in support of telecommunications infrastructure, which is an eligible category of infrastructure, then yes.

9. **Q: If my project is approved by NBRC, can the grant agreement be signed before I have evidence of full funding (match) for the project?**

*A: Yes. A SEID grantee has until September 30th of the year following award, to secure all matching funds for their project. While NBRC issues grant agreements in September/October each year to get federal funds obligated as promptly as possible, a grantee does not have authorization to begin their project until they are issued a Notice to Proceed. **A Notice to Proceed will not be issued until all match is secured and documented and all other items that are listed in the grant agreement are completed.***

10. **Q: What happens if I am approved for NBRC funding but am unable to secure matching funds?**

A: If match is not secured and documented by September 30th following the year of the award, unless there are extraordinary circumstances, the Federal Co-Chair may de-obligate the funds and award them to other projects. A project should be able to put its funding together within a year, if this is not the case, the project is considered premature for funding.

11. **Q. In completing the SF424cbw (Budget) form, where should I note NBRC funds?**

*A. The SF424cbw is a federal form that has fields which cannot be modified. The NBRC share of funds should be noted in the column entitled **HUD share**. The budget form should be completed referencing all project related costs in the appropriate category with corresponding amounts in the appropriate columns. For example, if the project will involve site work for a total of \$500,000 and \$250,000 is being paid for with NBRC funds and \$250,000 is being for with local match, site work should be noted in the appropriate section of the budget and the amounts listed in the correct columns. The SF424cbw Budget and Instructions template, provided on the SEID page of NBRC's website, also provides a SF424cbw summary that may be easier to complete before completing the detailed budget. **The details and summary (first two tabs of template) are what must be provided in support of the SEID LOI and application.***

12. **Q: If approved for an NBRC grant how will I receive the funds?**

A: After evidence of all matching funds has been provided and an agreement between the recipient and NBRC has been signed, and the project has received a Notice to Proceed, they can begin to commit and expend eligible project costs. NBRC funds are reimbursement only. Following the Notice to Proceed, a grantee may request reimbursement of NBRC funds for eligible project costs. Demonstration of required match must also occur in alignment with requesting NBRC funds. Note: Any NBRC funds or matching funds committed or expended prior to the issuance of a Notice to Proceed are not eligible to be reimbursed nor counted as match. Please see NBRC's Grant Administration and Compliance Manual available to download from <http://www.nbrc.gov/content/resources> for more information.

13. **Q: What is the difference between startup funds and cost of operations?**

A: NBRC will not provide funding for ongoing operations of organizations. The rationale is that NBRC funds cannot be relied upon from year to year and sustaining organizations is not in the mission of the NBRC, nor is it in the interest of efficient use of public dollars. NBRC will however provide startup costs for projects and/or facilities. For example: if a nonprofit were to create a program that trained individuals to be ready with new skill sets for potential businesses in the area NBRC could provide funds in the following ways. NBRC could cover the costs associated with the development of training courses, development of programmatic initiatives to complete training and even potentially pay for training of individuals if there was a specific end goal that could demonstrate that jobs were waiting for those individuals. NBRC could also pay instructors for a specified time-period as a pilot or to get the program off the ground. NBRC would not however pay for the instructors for a course that has

already been developed and up and running for the past few years. If these types of applications are submitted the applicant should clearly outline how continued funding of the program will be sustainable in the future, absent NBRC funds.

14. Q: What is the maximum timeframe for an NBRC funded project?

A: The investment period (time that the project shall be completed) shall be 3 years, beginning on October 1st of the year award funded through September 30th, three years later. As a reminder, SEID award announcements are not typically made until mid-late August of each year.

15. Q: If staff time is included in the cost of the project, what is the rate that our organization can charge; can we charge our Indirect Cost Rate?

A: Entities that have a Federal Cognizant Agent can submit with their application the letter from such entity demonstrating their Indirect Cost Rate, and budget their project accordingly. Those entities without an Indirect Cost Rate determination may use the regular pay of staff plus 10% as their Indirect Cost Rate for purposes of budgeting for the project. The federally approved indirect cost rate, in place at time of application, will be the indirect cost rate for the entirety of the project, and will be referenced in the grant agreement issued for the project. A range of indirect cost rates is not allowed, nor will the indirect cost rate be adjusted, up or down, during the lifecycle of the project.

16. Q: Does use of NBRC funds require compliance with Davis-Bacon re: prevailing wage rates?

A: No, not for funds Congress has appropriated to NBRC. However, if the project is also using funds from another federal agency that do require Davis-Bacon compliance, the entire project will be subject to those rates.

17. Q: Can funds be used to purchase a conservation easement?

A: Yes, however, a case must be made for how it is an economic development driver for the region. Each State may prioritize this differently, and it will be up to the States to determine how competitive this type of application is compared to applications that produce jobs. You are strongly encouraged to speak with your state Program Manager within your state. See www.nbrc.gov

18. Q: Do I submit the SEID investment application online via Grant.gov?

A: No. Once the SEID program is announced each year, NBRC will post the date on our website that the NBRC application portal will be available for access. NBRC's application portal address will be provided to entities invited to apply. SEID applications must be made through NBRC's portal to be eligible for review and scoring.

19. Q: If a Municipality/Applicant is being given land to use as match for a project, can the value of the land be used as match?

*A: For land or other donated real property, a Letter of Intent from the current property owner stating that they will provide the land to the project stating the sale and 'appraised' value of the land, the anticipated date of transaction, and identification of the property. Even if the property is being donated, a professional appraisal is required. **NOTE: A municipal assessment is NOT an appraisal.** An appraisal of the property must have been completed within the past 18 months, or an appraisal must be made prior to issuing a Notice to Proceed if the project is being donated.*

20. **Q: Can NBRC funds be used as cost share for other federal grant or loan programs, even programs that specifically stipulate that other sources of federal funds cannot be used as a source of match or cost share?**

A: Statutory provisions for NBRC allow NBRC to be used to match/cost share other federal grants. However, NBRC funds still maintain their federal status and must be counted toward the 80% ceiling of federal funds being expended for any one project. If the federal funds are in the form of a loan, they do not count toward the 80% federal ceiling. Note: If another federal agency prohibits using federal funds for cost-share then you may not use NBRC funds. Both agencies must allow the use of federal funds – think lowest common denominator.

21. **Q: Can staff time be used as part of a match or cost share requirement?**

A: Yes, with the following exceptions: time that is used to match other programs cannot be used (counted twice, etc.); time must be recorded; cannot use federal employees' time; are not included in any other federal grants; are part of the project budget.

22. **Q: What is an Indirect Rate?**

A: Indirect rates are the 'overhead' that is incurred for employees of the entity applying for funds or volunteers for the project. Typically, an indirect rate is a % of the wages and fringe.

23. **Q: Can we use indirect costs as part of staff time for projects?**

A: You may use indirect cost rate from an approved Federal Cognizant Agent with the submission of those documented amounts. If you do not have a Federal Cognizant Agent (generally most non-profits) you may use 10% as your indirect (overhead) costs.

24. **Q: If volunteers are being used, and their time is being tracked for in-kind match for the project, what rate do we use to budget the project?**

*A: Volunteer rate should be consistent with the national average.
http://www.independentsector.org/volunteer_time. As with question 13, volunteers may not be counted for the same activity in a different project (counted twice) or be federal employees.*

25. **Q: We already have funds available for the project that we are proposing. Can these funds be part of our match if we start and/or complete the work before a NBRC grant would be awarded?**

*A: No. Eligible project expenses (match and NBRC funds) are **only those incurred after execution of the investment agreement and after the Notice to Proceed has been issued.** No matching funds or*

NBRC funds can be committed or expended prior to the project receiving a Notice to Proceed from NBRC.

26. Q: Can we submit our SEID application via e-mail or in hard copy vs through the NBRC application portal?

A: No. Applications submitted via hard copy or via email will not be eligible to be reviewed and scored. SEID applications must be submitted through NBRC's portal.

27. Q: Who should I contact if I will need assistance in administering this grant, should the project be awarded funding?

A: Each NBRC award recipient is required to utilize a local development district (LDD) in its region to administer the grant, unless they are a department of State government or have requested and been approved for an LDD waiver. LDD's are compensated, through reimbursement for their administrative work, based on a maximum of 2% of the grant award. Grant administration may not be sole sourced to an entity other than an LDD and is an allowable grant expense. Please see the 2022 SEID Application Manual or the NBRC website for more information on the Local Development District requirement.

28. Q: Who reviews and scores my SEID application?

A: SEID applications are reviewed and scored by the State(s) where the project will occur. If the project is a multi-state project, it will be reviewed and scored by each State where the project will occur. It is possible for a multi-state project to be funded in some states and not in others. In that scenario, the grantee would be requested to provide a revised project scope and project budget to align with the reduced funding.

29. Q: Who makes the final determination of which projects are awarded SEID funding?

A: States put forth a slate of the projects they have been selected for funding. Once all States have put forth their slate of selected projects, they are brought to the Commission for a full vote. Voting members consist of the Federal Co-Chair and the Governor's Alternates for each State.

30. Q: When will I be notified as to whether my application has been approved for NBRC funding?

A: It is planned that all recipients will be notified if their project has been selected for funding, or not, each year by August 31st.

31. Q: What are the rules on funding religious activity with Federal money?

A. The United States Supreme Court has said that faith-based organizations may not use direct government support to support "inherently religious" activities. Basically, it means you cannot use any part of a direct Federal grant to fund religious worship, instruction, or proselytization. Instead, organizations may use government money only to support the non-religious social services that they provide. Therefore, faith-based organizations that receive direct governmental funds should take steps to separate, in time or location, their inherently religious activities from the government-funded services that they offer.

Such organizations should also carefully account for their use of all government money. This does not mean your organization can't have religious activities. It simply means you can't use taxpayer dollars to fund them. Some faith-based organizations set up separate charitable organizations (so-called "501(c)(3) corporations") to keep programs that receive government money separate from those that engage in inherently religious activities.

32. Q: Am I required to have a DUNS # to apply for federal funding?

*A. All applicant organizations need an identifier for federal awards processes. On April 4, 2022, that identifier **changed from the Data Universal Number System Number DUNS number to the Unique Entity ID (UEI), issued by SAM.gov.** The Unique Entity ID is a 12-character alphanumeric ID assigned to an entity by SAM.gov. As part of this transition, the DUNS Number has been removed from SAM.gov. Entity registration, searching, and data entry in SAM.gov now require use of the new Unique Entity ID. Existing registered entities can find their Unique Entity ID by visiting SAM.gov and following the steps outlined. New entities can get their Unique Entity ID at SAM.gov and, if required, complete an entity registration. Current NBRC grantees will be contacted and requested to provide their Unique Entity ID number so this required information is on file.*

33. Q: If my project is not selected for SEID funding, who should I contact to receive feedback on our application?

A: If your project is not selected for funding, you may contact the State Program Manager to receive feedback on your application. If your project is a multi-state project, you will want to contact each State Program Manager for feedback specific to each state.

34. Q: I have programmatic questions regarding the SEID program, who should I contact?

A: Programmatic questions, such as eligibility of entity, use of funds, etc. should be directed to NBRC Program Director Andrea Smith (603) 369-3001 x3 or asmith@nbrc.gov.

35. Q: Where can I find more information on NBRC?

A: www.nbrc.gov for information about NBRC, including contact information for staff, Governor's Alternates and State Program Managers as well as prior projects funded under the SEID program by state

www.nbrc.gov/content/impact-reporting to view NBRC's Annual Reports

www.nbrc.gov/content/eid for detailed SEID program information

www.nbrc.gov/content/resources for more information on NBRC, program materials LDD resource list, etc.

www.nbrc.gov/content/administration to view and download NBRC's Grant Administration and Compliance Manual and various federal form templates