POWER Initiative 2023 Request for Proposals

This request for proposals (RFP) gives an overview of the Appalachian Regional Commission's Partnerships for Opportunity and Workforce and Economic Revitalization (POWER) Initiative, and the requirements needed to complete a POWER grant application for Fiscal Year (FY) 2023.

RFP release date:	February 7, 2023
Application portal opens:	February 21, 2023
Virtual pre-application workshop:	February 21, 2023 **Register here.**
Southern Appalachia (Belden, MS) in-person workshop:	February 23, 2023 **Register here.**
Central Appalachia (Knoxville, TN) in-person workshop:	February 28, 2023 **Register here.**
Northern Appalachia (Pittsburgh, PA) in-person workshop:	March 2, 2023 **Register here.**
Letter of intent due:	March 8, 2023 (5 PM ET)
Proposal due date:	April 19, 2023 (5 PM ET)

More information about the POWER Initiative and further guidance on submission is available at www.arc.gov/POWER. Questions can be emailed to POWER@arc.gov.

The funding to be made available in this RFP is subject to the enactment of full-year FY 2023 appropriations by Congress.

Appalachian Regional Commission Overview

The Appalachian Regional Commission (ARC or the Commission) is a regional economic development agency that represents a partnership of federal, state, and local government. Established by an act of Congress in 1965 through the Appalachian Regional Development Act (ARDA) 40 U.S. Code § 14101–14704, ARC is composed of the governors of the 13 Appalachian states and a federal co-chair, who is appointed by the president of the United States. Local participation is also provided through multi-county local development districts (LDDs). ARC serves a 206,000-square-mile region of 26 million people that includes all of West Virginia and parts of twelve other states: Alabama, Georgia, Kentucky, Maryland, Mississippi, New York, North Carolina, Ohio, Pennsylvania, South Carolina, Tennessee, and Virginia.

ARC Strategic Investment Goals

As described in ARC's strategic plan, *Appalachia Envisioned: A New Era of Opportunity*, the Commission has identified five investment goals to advance its vision and mission and to guide its work through FY 2026. These goals reflect consensus among local, state, and federal partners on the most critical investment opportunities in the Appalachian Region (the Region). While the investment goals are distinct, they are also interdependent, with progress on one goal often requiring investment in another. All POWER Initiative applications must address one or more of these goals:

1. **Building Appalachian Businesses**: Strengthen and diversify the Region's economy through inclusive economic development strategies and investments in entrepreneurship and business development.

2. **Building Appalachia's Workforce Ecosystem**: Expand and strengthen community systems (education, healthcare, housing, childcare, and others) that help Appalachians obtain a job, stay on the job, and advance along a financially sustaining career pathway.

3. **Building Appalachia's Infrastructure**: Ensure that the residents and businesses of Appalachia have access to reliable, affordable, resilient and energy-efficient utilities and infrastructure in order to successfully live and work in the Region.

4. **Building Regional Culture and Tourism**: Strengthen Appalachia's community and economic development potential by preserving and investing in the Region's local cultural heritage and natural assets.

5. **Building Community Leaders and Capacity**: Invest in the capacity of local leaders, organizations, and communities to address local challenges by providing technical assistance and support to access resources, engage partners, identify strategies and tactics, and conduct effective planning and project execution.

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POWER Initiative

The Partnerships for Opportunity and Workforce and Economic Revitalization (POWER) Initiative makes up to $65 million available[1] in federal resources to help communities and regions affected by job losses in coal mining, coal power plant operations, and coal-related supply chain or logistics industries due to the changing economics of America's energy production and the coal economy. The POWER Initiative supports efforts to create a more vibrant economic future for coal-impacted communities by cultivating economic diversity, enhancing job training and reemployment opportunities, creating jobs in existing or new industries, and attracting new sources of investment. For coal-impacted communities to diversify their local and regional economies successfully, POWER prioritizes the allocation of federal resources to projects and activities with the following characteristics:

- Will produce diverse economic development outcomes, such as the following:
  - Diversify the commercial and industrial bases of local and regional economies.
  - Create high-quality, well-paying jobs in new and existing industries.
  - Attract new sources of public and private investment.
  - Provide a range of workforce services and skills training, including paid work- based learning opportunities, resulting in industry-recognized credentials for high-quality, in-demand jobs.
- Are specifically identified under state, local, and/or regional economic development plans.
- Have been collaboratively designed by a diverse blend of state, local, and regional stakeholders.

The POWER Initiative seeks to align and leverage complementary economic development resources to provide assistance through competitively awarded grants to partnerships anchored in coal-impacted communities. By aligning and leveraging multiple resources (federal, state, local, non-profit, and private sector), POWER solicits and prioritizes the selection of projects that integrate multiple economic development systems and support the implementation of existing economic development strategic plans.

Additionally, applicants to ARC's POWER Initiative should apply an equity lens to their projects. This may be done by including intentional strategies that aim to increase inclusion of underrepresented communities in their proposed work. Applicants should consider how their project will aim to expand access to and increase representation and participation of underrepresented communities in their proposed activities.

Coal Impact: Documentation of Economic Impact

Eligible POWER projects must be located within and targeted to communities or regions that have been recently impacted (or can reasonably demonstrate that they will be impacted

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[1] See Consolidated Appropriations Act, 2022, Pub. L. No. 117-103, Division D, Title IV: $3.6 million; and Consolidated Appropriations Act, 2023, Pub. L. No. 117-328, Division D, Title IV: $65 million.

in the near future) by coal-mining or coal-power-plant employment loss, or employment loss in the supply-chain or logistics industries of either sector.

Complete applications for a POWER FY 2023 grant must provide appropriate economic and demographic statistics in order to document the extent to which contractions in the coal economy have negatively impacted the project's proposed service area. In some instances, the inclusion of a region in a particular dataset may be adequate documentation of coal impact. If a particular region is not included in these referenced datasets, the applicant will need to cite reputable data sources that demonstrate impact. Economic indicators, labor market analyses, official announcements made by local and regional industries and firms, demographic data, and industry data are illustrative sources of data to demonstrate these impacts.

Applicants may use data that are available online at www.arc.gov/POWER and from other sources to demonstrate community and regional impacts of coal economy transitions.

Applicants are also encouraged to provide data (median income, coal mine closures, etc.) from other federal sources.

POWER Investment Priorities

As adopted by the Commission, the POWER investment priorities build upon ARC's strategic investment goals. ARC's POWER Initiative for FY 2023 will continue to focus on investments that are regional, strategic, and focused on the economic revitalization of coal-impacted communities and regions.

Project proposals need not include all the following POWER investment priorities to be considered for funding; however, all applications will be reviewed for their ability to address at least one of these priority areas.

1. Fostering Entrepreneurial Activities

   o **Access to capital.** ARC seeks to increase private investment capital available to small and medium-sized businesses across the Region through the POWER program. ARC supports the formation, operation, and capitalization of a range of development finance activities. ARC encourages investment made with the intent of generating measurable social or environmental returns and a financial return (also known as impact investing).

      — All access-to-capital projects must supply additional information as outlined in APPENDIX A: Additional Guidelines for Access-to-Capital Projects.

   o **Creation, support, and growth of entrepreneurial ecosystems.** ARC research has identified several key components of strong entrepreneurial ecosystems: market access, capital, talent, business assistance, infrastructure, and culture/community leadership. Projects should target and strengthen multiple components in a region. ARC's research on entrepreneurship can be found at http://arceco.creconline.org/.

   o **Development and deployment of entrepreneurship education programs** that seek to lay the groundwork for a shift in a region's entrepreneurial culture, especially those that work in concert with science, technology, engineering, and math (STEM)

initiatives.

- o **Invest in a region's natural and cultural assets** and creative enterprises through activities that increase entrepreneurship. Project activities in this area should be integral to a region's overall economic development strategy and result in realistic, measurable economic benefits.

  — Proposals to use POWER funds for tourism-related capital investments, including construction and acquisition, must meet ARC's Policy for the Development of the Travel and Tourism Industry, found in [ARC Project Guidelines](#), Appendix A.

2. Developing Industry Clusters in Communities

- o **Supporting small manufacturing companies for product and market diversification and expansion.** Project activities in this area should be designed to help communities cultivate an environment where new and existing manufacturers create well-paying jobs through increased private investment and acceleration of the resurgence of manufacturing. Examples include but are not limited to supply chain improvements, bringing connectivity and interoperability to the manufacturing facility, export assistance, energy efficiency improvements, and improved access to capital for the Region's small and mid-sized manufacturers.

- o Bolstering entrepreneurial, technical, academic, and scientific talent that **supports the creation of strategic industry clusters**, such as food systems or high-tech manufacturing, which yield high-quality businesses and jobs.

3. Building a Competitive Workforce

- o Projects investing in workforce training should stress the potential for **upward mobility** for the participants. This can be accomplished through upskilling, retooling, and establishing clear, defined career pathways in training programs that accommodate continued growth.

- o Workforce projects should aim to **increase labor participation rates** by not only targeting underemployed workers, but also through recruiting and training people who have dropped out of the workforce.

- o Proposals for training programs should be **supported with evidence that indicates a demand** for that particular skillset in the area to be served. Evidence can include letters from local businesses and business groups expressing a need or analyses of local and regional labor markets.

4. Broadband

- o Up to one-third of available funds provided for the POWER FY 2023 program will be available to fund broadband deployment projects that enhance access to broadband service. Broadband is a critical infrastructure component needed by all segments of the community: for business development; job creation; health care services, including telemedicine; and to help rural areas compete with more densely populated areas.

- o Understanding that broadband deployment projects can be capital intensive, grant requests for deployment projects can be up to $2.5 million, with priority given to

projects with evidence of leveraged funding for the overall project. **To qualify for broadband deployment funding, at least 65% of the project's budget must be directed to the physical deployment of broadband infrastructure. Projects whose budgets direct more than 35% of their funds toward activities not directly associated with deployment of broadband infrastructure will follow the same guidelines as implementation projects and will not qualify for broadband deployment funding.**

o   Broadband applicants must provide additional information as outlined within the application and in APPENDIX B: Broadband Project Requirements.

For the 2023 application cycle, applications with a substance use disorder (SUD) response **focus** should apply for ARC's INSPIRE Initiative. While the POWER Initiative accepts applications with SUD response **components**, the proposal must address one of the above investment priorities.

Prior to submission of the application, **every applicant is required to contact the state program managers** of the states to be impacted by the project proposal. The state officials will ensure that the proposals are also in alignment with their respective state Appalachian economic development plans and strategy statements.

Grant Types

Implementation Grants

Implementation grants awarded under the POWER FY 2023 RFP are for the support of programmatic delivery. Applicants may also request funding to support construction incidental to their project.

The Commission will make individual implementation grants in amounts between $400,000 and $1,500,000 for each project it awards within the congressionally defined Appalachian Region, with exceptions for broadband deployment projects, which have a range of $400,000 to $2,500,000. Specific award guidelines may vary by type of project. Special guidance on capital finance and broadband deployment projects can be found in APPENDIX A: Additional Guidelines for Access-to-Capital Projects and APPENDIX B: Broadband Project Requirements.

Applicants can determine the required time period necessary to meet the objectives of their projects. The period of performance for non-construction activities within implementation projects awarded under this RFP may be a minimum of 12 months and a maximum of 36 months. If a project includes construction activities, then a maximum period of performance of 48 months is allowable for those activities.

Note: The project budget should reflect the full funding request with that amount allocated across the project period.

Planning Grants

In addition to implementation grants, ARC will also award smaller planning grants in amounts up to $50,000. These grants will assist coal-impacted communities and regions in

the Appalachian Region in the development of plans, strategies, and feasibility studies targeted to the diversification and growth of their economies. Planning awards should result in grantees better understanding their resources, identifying strengths and needs, and helping focus their future efforts through cost/benefit analyses.

The objective of the planning projects is to assist entities with the development of an implementation project following their completion; therefore, no activities in the scope of work can include the delivery of a program or services. Planning grantees are encouraged to follow up with a POWER implementation application, but there is no guarantee of funding. Planning grantees should, within the context of their work, identify other possible sources of programmatic funding.

For POWER planning awards, applicants can determine the period of performance necessary to meet the objective of their project, which may be up to 12 months (depending on the scope of work).

Note: The project budget should reflect the full funding request with that amount allocated across the project period.

Please see APPENDIX C: Planning Grants for the review criteria and more guidance on planning grants.

Eligibility

Organization Type

Eligible applicants for ARC's POWER Initiative are the following:

- Local development districts (LDDs)
- Indian tribes or a consortium of Indian tribes
- States, counties, cities, or other political subdivision of a state, including a special purpose unit of a state or local government engaged in economic or infrastructure development activities, or a consortium of political subdivisions
- Institutions of higher education or a consortium of institutions of higher education
- Public or private nonprofit organizations or associations

Previous and Current POWER Grantees

Please note that current POWER grantees are eligible to apply for POWER FY 2023 funds only if the applicant's scope of work is new and does not overlap with a current open POWER grant. For grantees with awards scheduled to be completed before October 1, 2023, new applications should include an expansion of geography, increased scope of work with an existing concept, or a proposal with a new concept. In their application, current or previous POWER grantees must provide a thorough status update on their existing project(s) as well as demonstrate sufficient organizational capacity to administer multiple awards.

Workforce Opportunities for Rural Communities (WORC) Grantees

Please note that current WORC grantees are eligible to apply for POWER FY 2023 funds only if the applicant's scope of work is new and does not overlap with an open WORC grant. In their application, WORC grantees must provide a thorough status update on their existing projects. Applications should include an expansion of geography, increased scope of work with an existing concept, or a proposal with a new concept.

INvestments Supporting Partnerships in Recovery Ecosystems (INSPIRE) Grantees

Please note that current INSPIRE grantees are eligible to apply for POWER FY 2023 funds only if the applicant's scope of work is new and does not overlap with an open INSPIRE grant. INSPIRE grantees must provide a thorough status update on their existing projects within the application. Applications should include an expansion of geography, increased scope of work with an existing concept, or a proposal with a new concept.

Appalachian Regional Initiative for Stronger Economies (ARISE) Grantees

Please note that current ARISE grantees are eligible to apply for POWER FY 2023 funds only if the applicant's scope of work is new and does not overlap with an open ARISE grant. In their application, ARISE grantees must provide a thorough status update on their existing projects. Applications should include an expansion of geography, increased scope of work with an existing concept, or a proposal with a new concept.

Project Geography

Projects must serve and benefit a portion of the Appalachian Region as defined by the Appalachian Regional Development Act (ARDA) of 1965, as amended. The Appalachian Region includes certain counties in Alabama, Georgia, Kentucky, Maryland, Mississippi, New York, North Carolina, Ohio, Pennsylvania, South Carolina, Tennessee, Virginia, and all of West Virginia. If projects extend beyond the Appalachian Region as defined by the ARDA of 1965, only that portion that is within the Region is eligible for ARC funding. A map of the Appalachian Region is available online at https://www.arc.gov/appalachian-counties-served-by-arc/.

Coal Impact

Eligible POWER projects must also be located within and targeted to communities or regions that have been recently impacted (or can reasonably demonstrate that they will be impacted in the near future) by coal-mining or coal-power plant employment loss, or employment loss in the coal-related supply-chain or logistics industries of either sector. More details on demonstrating coal impact can be found in the section of this document titled Coal Impact: Documentation of Economic Impact

Application Review Criteria for Implementation Grants

Applications must meet the minimum criteria in the table below and will receive a score of up to 100.

Further guidance immediately follows. **Applications for access to capital and broadband deployment will require additional narrative. Please see Appendix A and B respectively for guidance. See Appendix C for review criteria for planning grants.**

	POINTS AVAILABLE
Project Description	**15 points**
Project plan summary	8
Timeline	2
Geographic scale	5
Coal Impact	**15 points**
Coal impact data	10
Coal impact narrative	5
Rationale	**34 points**
Alignment with ARC investment goals and priorities	**5**
State and regional priorities	**5**
Direct impact to coal-related job losses	3
Planning and supporting assessments	4
Market analysis	4
Addresses needs of the project area	4
Evidence of local demand	5
Sustainability	4
Project Team	**12 points**
Partnerships	5
Organizational capacity	5
Readiness	2
Projected Outputs and Outcomes	**10 points**
Relevant, realistic outputs and outcomes; return on investment	5
Methodology	5
Match and Budget Evaluation	**12 points**
Match	4
Budget	4
Budget narrative	4
Application Completeness	**2 points**
TOTAL	**Up to 100**

Project Description (up to 15 points)

- **Project plan summary**: Clearly and fully describe the proposed project's scope of work.

- **Timeline:** Include a full timeline of the project's proposed activities and milestones. Applicants should list the Project Activity, lead partner responsible, date to be completed, and key deliverable(s). Please note that the grant period will likely start on October 1, 2023.

- **Geographic scale:** Identify the proposed project area, highlighting geographic areas of focus. (If a multi-state project is proposed, there must be a project partner located in each of the states served. Please note the project's partners in the Partnership section of the narrative.)

Coal Impact (up to 15 points)

- **Coal impact data:** This review criterion will be calculated based on coal impact data for the counties selected in the Project Geography.

- **Coal impact narrative:** Provide supporting documentation and a written narrative of how the proposed project area has been impacted by the decline of the coal economy.

Rationale (up to 34 points)

- **Alignment with ARC investment goals and priorities:** Explain how the proposed scope of work and the project's goals align with one or more of the ARC Strategic Investment Goals as well as one or more of the POWER Investment Priorities. Discuss how the proposal will apply an equity lens by utilizing intentional strategies that expand access, participation, and representation to underrepresented communities in the services or benefits of the project.

- **State and regional priorities:** Demonstrate how your proposal aligns with or ties into the appropriate state ARC strategy statements or state economic development plans.

- **Direct impact to coal-related job losses:** Indicate how your proposal addresses the direct impacts of coal-related job losses in the project area and is best suited to do so.

- **Planning and support assessments:** Provide documentation in the form of feasibility studies, business planning, or other research and analysis that speaks directly to the proposed project's design and how that aligns with existing regional economic development priorities.

- **Market analysis:** Describe how the proposal is a complement to existing initiatives (if applicable) and is not duplicative of any ongoing efforts in the project area, including previous POWER grants. Any survey data should directly show end-user participation needs.

- **Needs of the project area:** Describe how the proposed project is the best suited to address outstanding needs and represents progress toward addressing a regional goal, including, if relevant, how it responds to COVID-19 impacts.

- **Evidence of local demand:** Show beneficiaries and key community stakeholders' demand for the project. Letters from stakeholders should validate demand and

demonstrate strong input from and engagement with the broader community in planning and project design. Note: The submission of form letters will result in a deduction of points.

- **Sustainability:** Speak directly to the commitment of the proposed project stakeholders to sustain the project's activities beyond ARC's investment through robust planning. In addition, indicate whether your project encompasses other factors that would make it sustainable, e.g., the project will generate revenue.

Project Team (up to 12 points)

- **Partnerships:** Identify key project partners and describe each partner's role in the proposed project. Partners should be able to clearly articulate their role in the proposal via partner engagement letters. Project proposals should have multiple stakeholders engaged in project implementation from multiple sectors and from multiple disciplines.
    - o If a multi-state project is proposed, it is required that at least one partner is physically located in each state within the proposed service area.

- Overall project team membership can comprise, but is not limited to, the following types of organizations:
    - o State, regional, and local economic development organizations
    - o Local governments
    - o Planning organizations and development districts
    - o Labor unions and labor-management apprenticeship programs
    - o State and local workforce agencies
    - o Institutions of higher education, including (but not limited to) community colleges and other job training and adult education providers
    - o Not-for-profit and community-based organizations
    - o Chambers of commerce, industry and trade associations, local and regional business owners, and other representatives from the private sector

- **Organizational capacity:** Demonstrate the ability for the project team to undertake/accomplish the proposed scope of work including, but not limited to, the project teams' qualifications and experience managing large grants and federal awards; familiarity with federal grant regulations; and organizational policies, procedures, and systems.
    - o If you are a current POWER, ARISE, INSPIRE, or WORC grantee, please upload a current status report for your active grant. Describe the project team's capacity to successfully administer multiple grants, if awarded.

- **Readiness:** Describe the readiness of the project team to begin work once a grant is awarded (estimated start date of October 1, 2023). Highlight whether or not significant hiring is required, and what additional expertise is needed, for implementation of the proposed scope of work. Proposals that do not go to contract by December 1, 2023, are

subject to disqualification.

Projected Outputs and Outcomes (up to 10 points)

- Identify the **proposed project outputs and outcomes** that are aligned with the scope of work; reviewers will assess whether they appear relevant, realistic, and achievable. Reviewers will also gauge the potential return on investment based on the correlation between the amount of funding requested, the overall scope of work, and the stated outputs and outcomes. Please review ARC's Performance Measurement document.

- **Methodology:** Explain the methodology and reasoning used to determine the estimated outputs and outcomes.

Match and Budget Evaluation (up to 12 points)

- **Match:** Identify resources to be leveraged as match and the status of that match (confirmed, pending, etc.) Resources listed as match should be confirmed or accessible within 60 days of the contract date. Applicants should demonstrate community and regional commitment to the proposed project by combining ARC resources with a diverse array of match types (cash, in-kind, loans, etc.) and sources (public, private, philanthropic, etc.). Please attach the appropriate match letters to your application. Additionally, if real property is being utilized as match, please attach a MAI (Member, Appraisal Institute) appraisal of the property's value.

- Submit complete and detailed **budget** and **budget narratives:**

  - All items included in the budget and budget narrative must align with each other.

  - All items included in the budget and budget narrative—including personnel, fringe benefits, travel, equipment, supplies, contractual, minor construction, other and indirect charges—must align with the project as described.

  - All items in the budget narrative are detailed and reflected in the budget.

- Complete the appropriate federal Standard Forms (SF-424).

- **Note:** The project budget should reflect the full funding request with that amount allocated across the project period.

Application Completeness (up to 2 points)

- Applications may be awarded up to 2 points for completeness. Applications missing pieces of required documentation will not receive the maximum points possible.

Review Process

POWER applications will first be reviewed by the states in which the project's proposed activities and impacts are located. This initial review will ensure that the project's scope of work is strategic and compatible with the state's existing economic development priorities.

ARC federal program staff, state ARC officials, and outside subject matter experts will jointly review and score applications based on the criteria set out in this document.

Next, applicants will be notified of their application's status. Those recommended to move forward in the process will be assigned an ARC project coordinator who will work with the applicants to review and finalize their proposal.

During the review stages, ARC reserves the right to negotiate the budget costs with applicants that have been selected to receive awards, which may include requesting that the applicant remove or adjust certain proposed costs.

Additionally, ARC may request that the applicant modify objectives or work plans and provide supplemental information pertaining to any aspect of the application. ARC also reserves the right to reject an application where information is uncovered that raises a reasonable doubt as to the applicant's ability to successfully fulfill the objectives and requirements of the grant award.

The Appalachian Regional Commission, in its complete and sole discretion, may select for award some, all, or none of the applications received under this competitive solicitation. The final approval of selected applications and issuance of awards will be by the ARC federal co-chair and the respective state ARC official(s). The award decision of the ARC federal co-chair and the respective state ARC official(s) is final.

Post-award modifications to POWER grants are considered on an individual basis. Modifications due to unforeseen circumstances beyond the control of the applicant, such as severe weather or a health emergency, will be considered. As these applications were competitively scored, modifications that would have likely affected that score will not be considered. ARC recommends that all potential applicants have strong confidence in their ability to complete their proposed scope of work and achieve projected impacts with the project budget as submitted.

Cost Sharing and Match

Under POWER FY 2023, applicants for an ARC grant must demonstrate a matching share from non-ARC sources that is identified and forthcoming to the project. Matching sources may be non-federal, other federal, or a combination of sources, including in-kind sources. Applicants are encouraged to consider also applying for other federal sources, such as U.S. Department of Labor grant programs for workforce development. The maximum share of ARC assistance is determined by the ARC classification of the county (or all counties) served by the proposed activity. Applicants may request up to 80% of the total project cost when the county served by a project has been designated as economically "distressed" according to ARC's FY 2023 classification. A table summarizing ARC's economic designations and the maximum ARC share for each Appalachian county can be found online at https://www.arc.gov/match-requirements-for-arc-grants/.

To determine the match rate for an ARC multi-county POWER project, special matching rules apply:

- If there is a distressed county in the project and:
  - At least half of the counties are distressed, the project may be funded at up to 80% of project costs;
  - At least half of the counties are some combination of distressed and at-risk, ARC

assistance can be the higher of 70% of project costs or the average percentage applicable to the various counties in the project;

- o Fewer than half the counties are distressed, ARC assistance can be the higher of 50% of project costs or the average percentage applicable to the various counties in the project.

- If there is no competitive county or attainment county in a project, and at least half the counties are at-risk, the project may be funded at up to 70% of project costs.

- All other multi-county projects shall be funded at the average percentage applicable to the various counties in the project (i.e., 80%, 70%, 50%, 30%, or 0%); except that the portion of a project that is attributable to an attainment county in a project that does not include a distressed county shall be considered ineligible for ARC assistance and may not be considered for matching purposes.

- Please see APPENDIX A: Additional Guidelines for Access-to-Capital Projects and APPENDIX B: Broadband Project Requirements for additional guidance on cost sharing and match for capital finance and broadband projects.

Application and Submission Information

Important Dates

RFP release date:	February 7, 2023
Application portal opens:	February 21, 2023
Virtual pre-application workshop:	February 21, 2023 **Register here.**
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State Program Manager Outreach

Before submitting an application, every applicant is required to contact the state program managers of the states impacted by the project proposal. The state officials will ensure that the proposals are in alignment with their state Appalachian economic development plans and strategy statements. If this action is not completed, then the application will not be moved forward in the review process. A list of all ARC program managers is available at https://www.arc.gov/state_partner_role/state-program-manager/.

Letter of Intent (LOI)

A letter of intent (LOI) is required for both implementation applications and planning grant applications. Applicants are required to submit a LOI via an **online form** by **March 8, 2023, at 5PM ET.** The LOI form will be available at www.arc.gov/power on February 07, 2023.

Applicants will use this online form to identify contact information and briefly describe the scope of the proposed project, key partners, geographic scope, and funding request amount. When the LOI is received, ARC state program managers of each state impacted by the proposal will be notified of your intent to apply. Applicants who meet basic eligibility requirements will receive an email with confirmation of receipt and instructions on how to submit their application at power.arc.gov.

Submitted applications for POWER FY 2023 funding that substantially differ from the information included on the received LOI will be disqualified during the review process.

NOTE: Submission of the LOI does not replace or satisfy the requirement that applicants must contact the appropriate state program managers. Additionally, ARC staff will not provide programmatic feedback on LOIs prior to submission.

Full Application

When the submitted LOI is accepted, ARC staff will create the application based on the information provided. The primary contact listed on the LOI will receive an email with a notification that their application has been created as well as an access link to the full POWER application via the application portal (power.arc.gov). Additional members of the project team can access the application when the Primary Contact updates the Contact Info page in the application portal.

Answer every question in full and upload all relevant attachments as PDFs on the File Upload page with the appropriate labels (e.g., Match Letter, Budget Narrative, etc.). If narrative responses refer to a larger document, please extract the relevant pages and attach those as appropriate.

Applications are limited to narrative responses of 15 pages and 100 pages of file uploads. Applicants must provide a comprehensive narrative that addresses all of the criteria and priorities noted in this RFP, including the Review Criteria section. Only applications that meet the following criteria will be scored:

- Applicants must meet eligibility requirements.

- Applications must meet the ARC cost-share matching requirement for the proposed service area.

- Applicant has contacted ARC state program manager(s).

- A **letter of intent (LOI)** must be submitted to ARC. Submission instructions for the LOI:

  o Submit answers via the **online form by March 8, 2023, at 5 PM (ET)**.

  o Once receipt of LOI is confirmed, it will be forwarded to the respective state program managers. AGAIN: This step does not satisfy the requirement that applicants must contact state program managers.

- o Submitted applications for funding that substantially differ from the information included on the received LOI are subject to disqualification during the review process.
- **Applications** must be completed and submitted via the application portal (power.arc.gov) **no later than 5 PM (ET) on April 19, 2023.**
- Further guidance on submission can be found at www.arc.gov/POWER.

Applications will be considered fully submitted when the Authorized Representative digitally certifies and signs the Signature and Submission page. ARC will not accept applications in any other format or medium.

Unique Entity Identifier and System for Award Management (SAM)

As required by the Federal Funding Accountability and Transparency Act of 2006 and 2 CFR §200, Appendix I, applicants are required to meet the following criteria:

- Be registered in the System for Award Management (SAM) before submitting their application (sam.gov);
- Provide a valid Unique Entity ID (UEI) in their application; and
- Continue to maintain an active SAM registration with current information at all times during which they have an active federal award or an application or plan under consideration by a federal awarding agency.

Funding Restrictions

POWER FY 2023 grant awards funded in part or in whole with ARC program funds are subject to the same program funding restrictions of other ARC grants. More information on funding restrictions may be found in Chapter 8 of the ARC Code (www.arc.gov/arc-code)

Indirect Costs

Applicants must use one of the following indirect cost rates:

- If you have a Negotiated Indirect Cost Rate Agreement (NICRA), provide an explanation of how the indirect costs are calculated in the Match and Budget Evaluation section of the application narrative. This explanation should include which portion of each line item, along with the associated costs, are included in your cost allocation base. Also, provide a current version of the NICRA.

- Pursuant to revised grants regulations that became effective on November 12, 2020, any organization that does not currently have a federally negotiated indirect cost rate, except for those entities described in Appendix VII to 2 CFR §200, may elect to charge a de minimis rate of 10% based on modified total direct costs, as defined in 2 CFR §200. No documentation is required to justify the 10% de minimis indirect cost rate, which may be used indefinitely. However, costs must be consistently charged as either indirect or direct costs, and may not be double-charged or inconsistently charged as both. If you choose this option, this methodology must be used consistently for all federal awards until such

time as you choose to negotiate for an indirect cost rate, for which you may apply at any time. (See 2 CFR §200.414[f] for more information on use of the de minimis rate.)

Award Administration

General

Administration of ARC awards is subject to the same regulations, restrictions, and requirements as other federal awards. These include but are not limited to *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards at 2 CFR §200*, as currently updated; Freedom of Information Act (FOIA); past performance and non-compliance; restrictions on making awards to corporations convicted of felony criminal violations and unpaid federal tax liabilities; environmental and historic preservation; and national policy requirements, including but not limited to those protecting free speech, religious liberty, public welfare, the environment, and prohibiting discrimination, e.g., Equal Employment Opportunity and the Americans with Disabilities Act (ADA).

ARC reserves the right to change the reporting time periods and, depending on the nature of the project, may request additional relevant data. In addition, ARC requires grantees to cooperate with post-award evaluations, which require maintaining records for at least three years after project closeout. All ARC awards are subject to audit.

If your organization has been subject to a federal audit within the past five years, please note within your application the recommendations made and your subsequent responses to those recommendations.

Non-Construction

General management and administration requirements for non-construction projects are contained in the *ARC Grant Administration Manual for Non-Construction Grant Agreements*.

Construction

All ARC construction projects, including projects that include both construction and non-construction components, must be administered by a registered federal agency or state basic agency, and are subject to the Build America, Buy America Act (part of the Infrastructure Investment and Jobs Act enacted on November 15, 2021) and ARC's Buy America Guidelines. While a Basic Agency Agreement is not required at the time of application submission, applicants must indicate what agency they intend to work with and provide the status of those discussions in their application materials.

Additionally, ARC must have an agreement in place with the basic agency before the project can be approved. Utilizing an agency that does not yet have an agreement with ARC can result in substantial delays. A list of agencies with agreements in place with ARC can be found here: https://www.arc.gov/basic-agency-partners/.

ARC State Program Managers

Prior to submission of the application, every applicant is required to contact the ARC State Program Managers of the states impacted by the project proposal. The state officials will ensure that the proposals are in alignment with their state Appalachian economic development priorities. State program managers also serve as a resource regarding any questions that applicants have about the POWER Initiative in general or about the use of agency funds to support projects in their communities and regions.

Applicants with additional questions may submit them to POWER@arc.gov.

General Legal Disclosures

POWER FY 2023 Initiative awards will be made only to the extent that funds are available. Publication of this RFP does not obligate ARC to award any specific grant or cooperative agreement or to obligate all or any part of available funds. Applicants intending to contract with a specific individual, consulting group, or organization with ARC funding must have and use a competitive procurement policy that conforms to procurement standards at 2 CFR §200.317–327.

This RFP does not commit ARC to make any specific award. Notwithstanding any other provisions of the RFP, ARC reserves the right to award grants, cooperative agreements, or contracts to communities or regions that best meet the requirements of the RFP. ARC solely reserves the right to accept or reject any or all responses received as a result of this request; to negotiate with all qualified sources; or to cancel in part or in its entirety this RFP if it is in the interests of ARC to do so.

Please note that ARC will not reimburse any other costs associated with the preparation of a response to this RFP. Consultants and consultant teams that are legally barred from receiving federal contracts or contract payments will not be considered for work with communities or regions under this RFP.

APPENDIX A:
Additional Guidelines for Access-to-Capital Projects

Application Content

Applicants must follow all ARC application guidelines and checklists specific to access-to-capital projects. Applicants must include the following in their narrative proposals:

1. SF-424a Form: The applicant will show the private capital raise in the "Other" line item in the application's budget forms (SF-424a) and budget narrative as part of the application.

2. Project Description:

    a. Provide a brief statement that describes the project's primary purpose, main activities, and expected impacts.

    b. Describe in detail what activities and processes the project will engage in, who will conduct the activities, and who will participate.

    c. Outline the proposed financial products and/or services.

    d. Describe one or two sample projects and how the deals might be structured.

    e. Detail technical assistance to be provided to borrowers.

3. Strategic Rationale:

    a. Describe the gaps in currently available capital for the targeted communities. Summarize local and regional demand, including the number of projects, types of projects, and total dollars needed.

    b. If applicable, provide the deployment rate for currently available assets and outline restricted and unrestricted asset allocation.

    c. Upload a document (no more than one page) outlining a pipeline of loan or equity investment opportunities, including the type of business (e.g., retail, restaurant, manufacturing, etc.), amount requested (if available), and brief description (1–4 sentences) of the intended use of financing.

    d. Include any feasibility studies or other assessments substantiating the demand for this project.

    e. Provide at least two letters of demand from businesses and other community stakeholders that attest to the need and impact of the proposed project.

    f. Describe traditional sources of financing or financial services available to the target communities and how the proposed product/services are superior or complementary.

4. Regional Strategy/Plan

    a. Explain how the proposed project represents progress toward addressing a regional strategy, such as a comprehensive economic development strategy or a local visioning process.

b. Describe other project benefits likely to result from the project (e.g., positive impact on future economic development activity in the area).

5. Collaborative Partnerships

    a. Describe any partnerships or collaborations with other local community, state, regional, and federal partners in developing the proposal, particularly outlining key organizations within the Region's entrepreneurial ecosystem that will support effective service delivery.

    b. Describe the applicant's ownership, including the following information if applicable: For organizations that have affiliated companies (e.g., parents, affiliates, subsidiaries), please provide a list of the individual owners with their contact information of those entities. Briefly describe the relationship between the applicant and these other entities and individuals, including management and products/services exchanged.

    c. Briefly describe the applicant's capacity to manage the funds and conduct associated programmatic activities effectively. Describe the applicant's experience with similar activities and length of time involved.

    d. Provide an overview of underwriting/investment guidelines and portfolio management systems. Please upload underwriting and investment guidelines and policies.

    e. Discuss whether the applicant is a member of any finance associations or organizations and the level of involvement.

    f. If the applicant is an existing financial organization, please provide historical financial statements prepared according to Generally Accepted Accounting Principles (GAAP) for the past three years, including income statements and balance sheets and a current balance sheet and income statement according to GAAP and dated within 90 days of the application.

6. Organizational Experience

    a. Grants Management: Describe ability to adhere to grant compliance and reporting requirements by describing any (1) experience in managing a previous grant(s); (2) familiarity with federal grants regulations; and/or (3) experience managing federal awards.

    b. Staff Qualifications: Briefly describe the qualifications of key individuals who will manage and operate the project including staff and the members of the investment committee. Attach position descriptions (if not hired) or brief resumes of these individuals.

    c. Please attach the loan and/or investment operating plan.

7. Outside Personnel Qualifications: If you plan to procure the services of contractors or consultants to conduct any part of the project, describe the competitive procedures that will be used to select them. (You will be required to submit qualifications of all consultants and subcontractors once procured.)

8. Project Sustainability: Explain how the project will achieve long-term sustainability once ARC support is no longer available. Include a plan and timeline of efforts to secure other sources of support for future operations.

9. Please upload a five-year pro forma balance sheet that reflects the use of the loan proceeds or grant award. Indicate the necessary start-up capital, operating capital, and short-term credit as well as the projected cash flow and income statements for five years, supported by a list of assumptions showing the basis for the projections.

10. If the applicant has a business plan, please attach it to the application.

Performance Measures

All ARC projects must have documented output and outcome performance measures. Estimated measures are included in project applications and actual measures are reported in the project closeout reports. Every ARC project must have at least one output measure and one outcome measure from the lists below. Some output measures can be used with a range of outcome measures (these are called "standalone measures"), and some output measures must be used with specific outcome measures (these are called "paired measures"). Projects that have paired output and outcome measures may also have a stand-alone output or outcome measure with no corresponding measure.

Typical performance measures include the following:

1. Businesses served – The number of businesses served by an ARC project. This includes businesses receiving technical assistance or participating in training, entrepreneurship, export, or other business development and improvement programs. Additionally, with access to capital grants, a borrower and an investee may be counted as a business served.

2. Businesses improved – The number of businesses with a measurable improvement as a result of an ARC project. The grant applicant and ARC project manager must agree on what constitutes "measurable improvement" and a method for measuring the degree of improvement must be provided. Typically, this may include jobs created, revenue generated, new customers, new markets, and other measures. For each project, this number is always a subset of, or the same as, the "businesses served" output measure.

3. Businesses created – The number of new businesses created as a result of an ARC project. This measure should only be used to measure new business creation, not the number of existing businesses recruited or otherwise relocated from other areas. The grant applicant should estimate how many new businesses will be created within three years of the project end date.

4. Leveraged private investment (LPI) – The dollar amount of private-sector financial commitments, outside of project costs that result from an ARC project, measured during the project period and up to **three years** after the project end date. Committed private investment partners should provide letters of intent. Private capital raised should be reflected in this measure.

5. Jobs created – The number of jobs created (direct hires, excluding construction jobs) because of an ARC project, measured during the project period and up to **three years** after the project end date. Part-time and seasonal jobs should be converted to full-time

equivalents and rounded up to whole numbers. Applicants should estimate the number of jobs that will be created by the organizations expected to benefit from the project.

6. Jobs retained –The number of jobs retained as a result of an ARC project. These are existing jobs that would be lost or relocated if the ARC project were not undertaken. Grant applicants should estimate the number of existing jobs that would be at risk, due to relocation or loss of competitiveness, without the ARC-funded project.

APPENDIX B: Broadband Project Requirements

Up to one-third of the funds provided for the FY 2023 POWER Initiative will be available to fund broadband deployment projects that enhance access to broadband services.

Broadband is a critical infrastructure component needed by all segments of the community: for business development; job creation; health care services, including telemedicine; and to help rural areas compete with more densely populated areas.

Understanding that broadband deployment projects can be capital intensive, grant requests for deployment projects can be up to $2.5 million, with priority given to projects with evidence of leveraged funding for the overall project. **To qualify for broadband deployment funding, at least 65% of the project's budget must be directed to the physical deployment of broadband infrastructure. Projects whose budgets direct more than 35% of their funds toward activities not directly associated with deployment of broadband infrastructure will follow the same guidelines as implementation projects.**

Below are specific requirements and guidance for broadband deployment grant applications:

Fiber Deployment Projects

- ARC will not support sole fiber-to-the-home projects.

- Priority will be given to the following:

  o Projects with a completed feasibility study that provides preliminary project design and cost estimates (see section titled Broadband Feasibility Studies below).

  o Broadband fiber deployment in central-business-district designated areas and industrial parks.

  o Networks and projects that will be operational upon the completion of construction.

- To determine adequate broadband availability, applicants must provide evidence of the need for high-capacity broadband service in the proposed service area. For areas where internet service already exists, the applicant must demonstrate that the available service is insufficient to support robust economic development activities. Types of evidence include, but are not limited to, electric pole attachment maps, state broadband maps, and speed tests from broadband demand crowdsourcing surveys.

- ARC will not support deployment in areas that already have adequate broadband availability. For the purposes of achieving robust economic development, ARC's minimum threshold for adequate service is 100/100 symmetrical service for businesses and 50/10 service for households. If existing service providers fail to meet either threshold, then ARC is willing to consider broadband grant applications for that service area.

- Applicants must determine if the proposed coverage area already has a state or federally subsidized grant award for broadband deployment. While ARC will judge each application on its individual merits, it is not our intent to subsidize an area that will also receive a government subsidy from a different source. ARC funds should not be used to overlay existing areas that have adequate service or provide unfair competition. Some of the federal funding sources for broadband include the FCC's Connect America Fund

(CAF) and Rural Digital Opportunities Fund (RDOF), the USDA's ReConnect Initiative and Community Connect Program, the USDA's ReConnect program, and the NTIA Broadband Equity, Access, and Deployment (BEAD) and Digital Equity Programs.

- **NOTE: Applicants must 1) notify existing service providers of their intent to use federal assistance to deploy broadband in the intended service area in advance of the grant application and 2) upload documentation verifying their correspondence in their application.** Correspondence should be in writing (letter or email), dated, and addressed to the appropriate individual (regional manager, government affairs director, etc.). Applications that do not provide documentation of correspondence with incumbent internet service providers (ISPs) and/or evidence that the project area is unserved will not be considered for funding.

- **NOTE: Applicants must also 1) notify their state broadband offices of their intent to apply and include specific information about the geographic area the project plans to serve and 2) upload documentation verifying their correspondence in their application. Applications that do not include this documentation of correspondence will not be considered for funding.**

- Applicants are also encouraged to explore the option to partner with a competitively selected ISP on an application for contracted broadband services (versus broadband network deployment). This could include, but is not limited to, an electric utility contracting with an existing provider to manage its last- mile broadband services. It could also include a middle-mile fiber provider contracting with multiple providers to deliver last-mile broadband services.

Wireless Deployment Projects

- Priority will be given to the following:

  o Projects with a completed feasibility study that provide preliminary project design and cost estimates (see the section titled Broadband Feasibility Studies, below)

  o Projects for business and mixed-use deployment

  o Networks and projects that will be operational upon the completion of construction

- ARC will not support deployment in areas that already have adequate broadband availability. Applicants must provide evidence of the need for broadband service in the proposed service area. ARC will not consider wireless deployment projects in areas where 25/3 or better service is already available.

- Applicants must determine if the proposed coverage area already has a state or federally subsidized grant award for broadband deployment. While ARC will judge each application on its individual merits, it is not our intent to subsidize an area that will also receive a government subsidy from a different source. ARC funds should not be used to overlay existing areas that have adequate service or provide unfair competition. Some of the federal funding sources for broadband include the FCC's Connect America Fund (CAF) and Rural Digital Opportunities Fund (RDOF) and USDA's ReConnect Initiative and Community Connect Program.

- **NOTE: Applicants must 1) notify existing internet service providers (ISPs) of their intent to use federal assistance to deploy broadband in the intended service area in advance of the grant application and 2) upload documentation verifying their correspondence in their application.** Correspondence should be in writing (letter or email), dated, and addressed to the appropriate individual (regional manager, government affairs director, etc.). Applications that do not provide documentation of correspondence with incumbent ISPs and/or evidence that the project area is unserved will not be considered for funding.

- **NOTE: Applicants must also 1) notify their state broadband offices of their intent to apply and include specific information about the geographic area the project plans to serve and 2) upload documentation verifying their correspondence in their application. Applications that do not include this documentation of correspondence will not be considered for funding.**

Broadband Feasibility Studies

POWER Initiative FY 2022 will also accept applications—through POWER planning grants up to $50,000—for projects designed to demonstrate the feasibility of broadband deployment in coal-impacted communities. Potential broadband planning grants could fund projects that accomplish the following:

- Define unserved and underserved areas that are eligible for various grant programs.

- Assess community broadband requirements for bandwidth needs.

- Determine best technologies to meet the coal-impacted community needs. Provide cost estimates for different deployment strategies.

- Provide a study/analysis of alternative deployment routes.

  o This should include an analysis of existing providers who may already have ownership interests in proposed routes and, if relevant, an assessment of pole attachment costs for those routes.

  o If the area already has service, the study must also include an analysis of what speeds are currently available from existing providers. The study should also address any partnerships that the applicant plans to form to deliver broadband services.

Other Broadband Project Considerations

POWER applications for projects that seek to utilize existing broadband service or increase its adoption through community outreach efforts or innovative economic development initiatives will follow the same funding guidelines as other implementation projects, with grant amounts up to $1.5 million that are not drawn from the available broadband deployment funds. Examples of these include the following:

- Business technical assistance on how to best utilize broadband services

- Community outreach efforts to increase broadband use and adoption

- Unique distance-learning and other telecom-oriented health practice enhancements

APPENDIX C: Planning Grants

	POINTS AVAILABLE
Project Description	**18 points**
Project plan summary	10
Timeline	3
Geographic scale	5
Coal Impact	**15 points**
Coal impact data	10
Coal impact narrative	5
Rationale	**30 points**
Alignment with ARC investment goals and priorities	6
State and regional priorities	6
Addresses needs of the project area	**9**
Evidence of local demand	9
Project Team	**10 points**
Partnerships	4
Organizational capacity	**4**
Readiness	2
Projected Outputs and Outcomes	**13 points**
Transition to implementation	10
Visualizes long-term impacts to community/region	3
Match and Budget Evaluation	**12 points**
Match	4
Budget	4
Budget narrative	4
Application Completeness	**2 points**
TOTAL	**Up to 100**

Project Description (up to 18 points)

- Clearly and fully describe the proposed project's scope of work.

- Include a full timeline of the project's proposed activities and milestones. Please note that the grant period will likely start on October 1, 2023.

- Identify the proposed project area, highlighting geographic areas of focus.

Coal Impact (up to 15 points)

- **Coal impact data:** This review criterion will be calculated based on coal impact data for the counties selected in the Project Geography.

- **Coal impact narrative:** Provide supporting documentation and a written narrative of how the proposed project area has been impacted by the decline of the coal economy.

Rationale (up to 30 points)

- Explain how the proposed scope of work and the project's goals align with one or more of the ARC Strategic Investment Goals, as well as one or more of the POWER Investment Priorities. Discuss how the proposal will apply an equity lens by utilizing intentional strategies that expand access, participation, and representation to underrepresented communities in the services or benefits of the project.

- Demonstrate how your proposal aligns with or ties into the appropriate state ARC strategy statements or state economic development plans.

- Describe how the proposed project is the best suited to explore outstanding needs in the project area and represents progress toward addressing a regional goal.

- Show beneficiaries and key community stakeholders' demand for the project. Letters from stakeholders should validate demand and demonstrate strong input and engagement of the broader community in planning and project design. Note: The submission of form letters will result in a deduction of points.

Project Team (up to 10 points)

- Identify key project partners and describe each partner's role in the proposed project and project design.
  - If a multi-state project is proposed, it is required that at least one partner is physically located in each state within the proposed service area.

- Overall project team membership can comprise, but is not limited to, the following types of organizations:
  - State, regional, and local economic development organizations
  - Local governments
  - Planning organizations and development districts, including metropolitan planning organizations
  - Labor unions and labor-management apprenticeship programs
  - State and local workforce agencies
  - Institutions of higher education, including (but not limited to) community colleges and other job training and adult education providers
  - Not-for-profit and community-based organizations
  - Chambers of commerce, industry and trade associations, local and regional business owners, and other representatives from the private sector

- Demonstrate the ability for the project team to undertake/accomplish the proposed scope of work including, but not limited to, the project teams' qualifications (upload résumés, sample request for qualifications, etc.) and experience managing federal awards.

- Describe the readiness of the project team to begin work once a grant is awarded (estimated start date of October 1, 2023). Highlight whether or not significant hiring is required for implementation of the proposed scope of work.

Project Outputs and Outcomes (up to 13 points)

- Demonstrate how pursuing the outlined scope of work will help facilitate the formulation of a potential implementation project. Include discussion of where and how the potential funding could be found beyond the ARC POWER Initiative.

- Include a description of how project stakeholders envision the proposed project transforming and furthering the long-term community and economic development of the project region.

Match and Budget Evaluation (up to 12 points)

- Identify resources to be leveraged as match and the status of that match (confirmed, pending, etc.) Resources listed as match should be confirmed or accessible within 60 days of the contract date. Applicants should demonstrate community and regional commitment to the proposed project by combining ARC resources with a diverse array of match types (cash, in-kind, loans, etc.) and sources (public, private, philanthropic, etc.).

- Submit complete and detailed budget and budget narratives:
  - All items included in the budget and budget narrative must align with each other.

  - All items included in the budget and budget narrative (including personnel, fringe benefits, travel, equipment, supplies, contractual, minor construction, other and indirect charges) must align with the project as described.

  - All items in the budget narrative are detailed and reflected in the budget.

- Complete appropriate SF-424 forms.

- **Note:** The project budget should reflect the full funding request with that amount allocated across the project period.

Application Completeness (up to 2 points)

Applications will be awarded up 2 points for completeness. Applications missing pieces of required documentation will not receive the maximum points possible.