



Missouri Department of
Economic Development

NTIA BROADBAND INFRASTRUCTURE PROGRAM GUIDELINES

APPLICATION PERIOD: June 28 – July 26, 2021

The National Telecommunications and Information Administration of the U.S. Department of Commerce (NTIA) issued a Notice of Funding Opportunity (NOFO) to describe the requirements under which it will award grants for the Broadband Infrastructure Program, authorized by the Consolidated Appropriations Act, 2021, Division N, Title IX, Section 905, Public Law 116-260, 134 Stat. 1182 (Dec. 27, 2020) (Act). The NTIA Broadband Infrastructure Program provides new federal funding to make grants on a competitive basis for the deployment of broadband infrastructure. NTIA will make up to \$288,000,000 available for federal assistance under the Broadband Infrastructure Program. The Act authorizes grants to "covered partnerships" for "covered broadband projects", defined as "competitively and technologically neutral projects for the deployment of fixed broadband service that provides qualifying broadband service in an eligible service area."

This document provides guidance to fixed broadband service providers interested in being in a "covered partnership" in Missouri's application to the NTIA for grant funds under the Broadband Infrastructure Program. For additional information, downloads, and application submission information please visit DED's Broadband Infrastructure Program grant website: <https://ded.mo.gov/content/ntia-broadband-infrastructure-program>

The Department of Economic Development (DED) will serve as lead applicant for the State of Missouri in a grant application to NTIA. DED will submit a single application that can include multiple covered partnerships and broadband projects. NTIA has issued guidance suggesting it expects to make awards in the \$5 million to \$30 million range. DED intends to submit an application near this range and intends to include multiple project areas from multiple broadband providers within its application. DED's authority to obligate and issue grant funds will be subject to appropriation limits approved by Missouri's General Assembly.

Fixed broadband providers may submit multiple projects for DED's evaluation, but no provider is permitted to submit more than \$10,000,000 in total across its project applications. More information on DED's evaluation and scoring approach can be found in these guidelines.

The Process and Timeline

DED PROCESS AND DEADLINES:

Covered partnership applications to DED are due no later than noon central time on Monday, July 26, 2021 so that DED has adequate time to prepare its application to NTIA.

Formatting of submissions. Please note NTIA's application format requirements in the NOFO regarding documents submitted with your covered partnership application that might be incorporated into the State's application (NOFO p. 17-18).

Confidential and proprietary information. Applications submitted in response to the NOFO may be subject to requests for release under the Freedom of Information Act (FOIA), as amended (5 U.S.C. 552). Per the NOFO, NTIA will protect confidential and proprietary information from public disclosure to the extent authorized by applicable law, including FOIA, the Trade Secrets Act, as amended (18 U.S.C. 1905), and the Economic Espionage Act of 1996 (18 U.S.C. 1831 et seq.).

The NOFO states:

In the event that an application contains information or data that the applicant deems to be confidential commercial information that is exempt from disclosure under FOIA, that information should be identified, bracketed, and marked as Privileged, Confidential, Commercial or Financial Information. Based on these markings, the confidentiality of the contents of those pages will be protected to the extent permitted by law.

Accordingly, covered partnership applicants should follow this marking guidance in their covered partnership application to DED.

DED Evaluation of Applications.

DED will evaluate covered partnership applications using evaluation criteria that mostly mirrors the NTIA's, as set forth in the NOFO. For DED's Review, DED will prioritize projects receiving 70 points or above for inclusion in DED's covered partnership application to NTIA. Qualification for inclusion will be contingent upon additional due diligence of the provider of fixed broadband. Receiving 70 points in DED's scoring will be equivalent to a rating of "satisfactory", on average, across evaluation categories. For detailed scoring criteria, please review the "Missouri Covered Partnership Application Scoring" section.

NTIA PROCESS AND DEADLINES:

DED must submit its grant application to NTIA on or before **August 17, 2021**. Fixed broadband providers that will be included in the State's application to NTIA are expected to cooperate with DED in putting together the State's application in a timely manner.

NTIA expects to complete its review, selection of successful applicants, and award processing by **November 15, 2021**. NTIA will evaluate and prioritize applications for funding through a multi-stage process as set forth in the NOFO.

NTIA expects the earliest start date for awards to be **November 29, 2021**.

Covered partnerships must expend the grant funds not later than one year after receiving the funds. The NTIA will only consider an extension if the covered partnership certifies that: (1) it has a plan for the use of the grant funds, (2) the construction project is underway, or (3) extenuating circumstances require an extension of time to allow the project to be completed. (NOFO p. 6). The NOFO allows the request for extension to be submitted with the State's Grant Application, and DED will submit an extension request with its application.

COVERED PARTNERSHIP GRANT AGREEMENT WITH DED:

IF NTIA awards a grant for a project, DED will enter into a grant agreement with NTIA, and DED will enter into a covered partnership grant agreement with the fixed broadband provider member of the covered partnership for the project. Note that due to this grant being a federal grant, various federal laws and regulations will apply as outlined in the NOFO, including those set forth in the [Department of Commerce Financial Assistance Standard Terms and Conditions](#).

Essential Reference Documents

- DED encourages prospective applicants to refer to the [NTIA NOFO & FAQ's](#) for more detailed information in deciding whether to submit a Covered Partnership Application.
- Fixed broadband providers that apply are expected to have read and understand the full details of the [NOFO](#). DED has endeavored to include the key parts of the Act and NOFO in these Guidelines, but the NOFO controls the award of grants by NTIA.
- [Department of Commerce Financial Assistance Standard Terms and Conditions](#), which include numerous federal requirements that will apply to these grants and will be included in DED's covered partnership grant agreement for projects approved by NTIA.
- (If the hyperlinks do not work, the NOFO and FAQs are available on the NTIA BroadbandUSA website at: <https://broadbandusa.ntia.doc.gov/broadband-infrastructure-program>

Applicants eligible for a Covered Partnership with the State

Providers of fixed broadband service, including the following types of organizations, may be in a covered partnership with the State:

- Corporations, partnerships or limited liability companies registered in this state;
- Nonprofit organizations registered in this state that own and/or operate broadband networks;
- Political subdivisions of this state that own and/or operate broadband networks; and
- Rural electric cooperatives organized under chapter 394 of the Revised Statutes of Missouri and their broadband affiliates.

A provider of broadband service that is part of a covered partnership is not required to be designated as an eligible telecommunications carrier pursuant to section 214(e) of the Communications Act of 1934 (47 U.S.C. 214(e)) to be eligible to receive a grant under the NOFO or as a condition of receiving a grant under the NOFO.

Covered Broadband Projects

A covered broadband project means a competitively and technologically neutral project for the deployment of fixed broadband service that ***provides qualifying broadband service in an eligible service area***. NTIA has indicated that non-contiguous broadband projects are eligible for evaluation. DED requires each non-contiguous covered broadband project to be located within a maximum of four contiguous counties.

“Qualifying broadband service” means broadband service with: (i) a download speed of not less than 25 megabits per second; (ii) an upload speed of not less than 3 megabits per second; and (iii) a latency sufficient to support real-time, interactive applications. For purposes of this program, NTIA will interpret the 25/3 standard to mean the ability to provide 25 Mbps downstream and 3 Mbps upstream simultaneously to every household in the eligible service area. NTIA will interpret latency to mean 95 percent or more of all peak period measurements of network round trip latency [*i.e.*, the total round-trip latency between the customer premises and the closest designated Internet core peering interconnection point] are at or below 100 milliseconds.

“Eligible service area” means a census block in which broadband service is not available at one or more households or businesses in the census block, as determined by the U.S. Assistant Secretary of

Commerce for Communications and Information on the basis of: (i) the maps created under section 802(c)(1) of the Communications Act of 1934 (47 U.S.C. 642(c)(1)); or (ii) if the maps described in subparagraph (i) are not available, the most recent information available to the Assistant Secretary, including information provided by the Commission.

Per the NOFO, NTIA will rely on the its National Broadband Availability Map (NBAM), which includes the FCC Form 477 data, to validate applicants' proposed service areas as meeting the Act's definition of eligible service area. Per the Second Set of FAQs, NTIA will also use any applicant provided data to assess eligibility, stating it will consider the applicant's submission of data and information used to substantiate the position that not all locations in the census block are served by qualifying broadband service (25/3 with low latency). NTIA will only fund the portions of that census block that are currently unserved.

DED will use the NBAM as well, including FCC Form 477 data from June 2020, to determine eligible service areas. If the NBAM shows that the census block has fixed broadband service, covered partnership applications must include data and information showing that a census block nevertheless qualifies as an eligible service area.

In the event new data from the FCC is made available prior to DED finalizing its federal application, applicants will be provided an opportunity to address any coverage changes due to the updated information.

Non-federal share/match for Missouri Covered Partnership

NTIA is not requiring applicants to provide a cost match. Still, providers applying to DED can receive points for including a non-federal cost match of 10% or more in their application. Please see scoring section for details. The state of Missouri will **not** be providing matching funds. Applicants must provide documentation of capacity to provide the matching funds. Documentation of capacity will include the non-federal cost share outlined within the NTIA Letter of Commitment and company financial statements.

All fund sources, including in-kind contributions, will need to be identified on the project budget. Please note 2 CFR § 200.306 for restrictions on in-kind contributions and the valuation principles that must be used.

Funding Prioritization

DED will accept applications for any proposed covered broadband project, but applicants should note that section 905(d)(4) of the Act states that the NTIA shall give priority to applications for covered broadband projects, in decreasing order of priority:

1. Covered broadband projects designed to provide broadband service to the greatest number of households in an eligible service area.
2. Covered broadband projects designed to provide broadband service in an eligible service area that is wholly within any area other than—
 - a. A county, city, or town that has a population of more than 50,000 inhabitants; and
 - b. The urbanized area contiguous and adjacent to a city or town described in clause (a).
3. Covered broadband projects that are the most cost-effective, prioritizing such projects in areas that are the most rural.
4. Covered broadband projects designed to provide broadband service with a download speed of

not less than 100 megabits per second and an upload speed of not less than 20 megabits per second.

5. Any other covered broadband project that meets the requirements of this subsection.

Additional criteria in NTIA's awarding funds to covered broadband projects that qualify for funding are on pages 34-35 of the NOFO (V-C, Selection Factors and Selection Process).

Announcement of Proposed Service Areas (i.e., Challenge Process)

NTIA will have a challenge process for proposed project areas, described in the NOFO as the 'Announcement of Proposed Services Areas.' DED will not have a challenge process. See Section VII.B of the NOFO (pages 42-43) for a full description of the announced proposed area process.

Eligible uses of grant funds and matching funds

Below are non-exclusive examples of how a covered partnership may generally use grant funds and matching funds:

- costs of construction, improvement, and/or acquisition of facilities and telecommunications equipment required to provide qualifying broadband service, including infrastructure for backhaul, middle and last mile networks;
- cost of long-term leases (for terms greater than one year) of facilities required to provide qualifying broadband service, including infeasible right-of-use (IRU) agreements;
- costs of engineering design, permitting and work related to environmental, historical and cultural reviews;
- reasonable pre-application expenses in an amount not to exceed \$50,000. Pre-application expenses, which include expenses related to preparing an application, may be reimbursed if they are incurred after the publication date of this NOFO and prior to the date of issuance of the grant award from NTIA, except that lobbying costs and contingency fees are not reimbursable from grant funds. Pre-application costs should be clearly identified in the proposed project budget. Additionally, pre-application costs are incurred at the sole risk of the applicant and will not be reimbursed by NTIA if the proposed project does not receive an award pursuant to this program; and
- other allowable costs necessary to carrying out programmatic activities of an award, not to include ineligible costs described below.

Allowable costs are determined in accordance with the cost principles applicable to the entity incurring the costs, as set forth in 2 CFR part 200.

Ineligible uses of grant funds and matching funds

A provider of broadband services cannot use grant funds or matching funds:

- To repay, or make any other payment relating to, a loan made by any public or private lender;
- As collateral for a loan made by any public or private lender;

- to pay for the preparation of the grant in an amount more than \$50,000;
- To pay for previously incurred administrative costs or previously purchased equipment or construction activities undertaken prior to the award (grant funds may not be applied to retroactive costs aside from the grant preparation costs up to \$50,000); and
- To pay for costs of providing broadband service to any locations that are used to meet an FCC Universal Service Fund (USF) deployment obligation.

Any party in a covered partnership cannot use grant funds or matching funds:

- to purchase or support any covered communications equipment or service (as defined in section 9 of the Secure and Trusted Communications Networks Act of 2019 (47 U.S.C. 1608));
- as a profit, fee, or other incremental charge above actual cost; and
- directly or indirectly as an offset for other funds, to support or oppose collective bargaining.

Accountability

- If debt financing will be obtained, submit letter(s) of commitment to demonstrate the willingness of the financial institution to provide the specified amount to construct the project.
- If the project is funded by NTIA, the fixed broadband provider for the project must submit a preliminary engineering report for the project area within 60 days following the execution of the grant agreement with DED.
- Grant closeout will conform to the requirements of applicable federal law, NTIA's grant agreement with DED, and DED's subrecipient agreement with the fixed broadband provider.
- If project costs exceed the budget included with the application, grantees will still be required to finish the proposed project without an increase in the grant award.
- Funded projects of the covered partnership will be required to comply with reporting requirements outlined in Section VI.E of the NOFO (Reporting, p. 39), and the corresponding outreach by DED to meet these requirements.
- Funded projects will also be required to comply with the requirements set forth in Section VI.H of the NOFO (Federal Funding Accountability and Transparency Act of 2006, p. 40), and corresponding outreach by DED to meet these requirements.

Required supplemental information for Application

Please see the grant application form for a full list of materials to be submitted.

MISSOURI COVERED PARTNERSHIP APPLICATION SCORING

PLEASE NOTE:

Fixed broadband providers may submit multiple projects for DED’s evaluation, but no provider is permitted to submit more than \$10,000,000 in total across its project applications.

DED will evaluate covered partnership applications using evaluation criteria that mostly mirrors the NTIA’s, as set forth in the NOFO. For DED’s Review, DED will prioritize projects receiving 70 points or above for inclusion in DED’s covered partnership application. Qualification for inclusion will be contingent upon additional due diligence of the provider of fixed broadband. Receiving 70 points in DED’s scoring will be equivalent to a rating of “satisfactory”, on average, across evaluation categories.

Evaluation and Scoring Process for Inclusion in Missouri’s Covered Partnership 100 points possible

1. Project Purpose and Benefits: 30 points possible

Level of Impact in the Proposed Service Area (20 points):

Anticipated Broadband Improvements Scoring Table

Table 1: Level of Impact				
# of Connections	Speed Now*:	≤25/3	≤25/3	≤25/3
	Speed After Build*:	<100/20	100/20	1Gbps/30 Mbps
1-50	Points Awarded:	6	12	16
51-499		8	15	18
500+		10	18	20**

***Speeds are shown as download/upload times and reflect megabits per second (Mbps) except those marked with “Gbps,” which reflect gigabits per second.**

**** The project must connect 100 percent of total unserved households to receive the full 20 points in this category.**

Reviewers will consider the extent to which the provider(s) of broadband service comprising the covered partnership has received support from other federal or state sources to deploy broadband service in the proposed service area. Reviewers will also consider whether there are service providers already present in all or part of the area, as well as the pricing, coverage, and available capacity of those providers. Reviewers will consider what proportion of the end users projected to be served are located in unserved areas. NTIA at a later date may take into account any comments submitted by existing broadband service providers in response to the announcement described in Section VIII.B of the NOFO.

Applications that propose a Last Mile project must connect 100 percent of total unserved households, as defined in Section I.B.(k) of the NOFO, in the proposed service area to receive the full 20 points in this category. Projects to deploy middle mile or backhaul networks must prioritize connecting with last mile networks serving unserved households and substantiate the incremental value to the last mile connection to the middle mile network, including, increased network capacity for last mile circuits, increased network performance, and lower costs that are passed onto end users, as well as identify

potential or partnered last mile networks that could or would leverage the middle mile network, in the proposed service area to receive points in this category.

Affordability of Services Offered (10 points): Applications will be evaluated on the pricing of the broadband services offered compared to existing broadband services in the proposed service area or based on nationwide averages. Applicants should demonstrate that pricing is competitive and affordable to their target markets.

Table 2: Affordability		
Rating	Points	Definition
Distinctive	10	Applicant proposes significantly discounted rates for low income households and shows evidence based on their market averages as well as their current and/or expected rates. Applicant already offers a robust adoption outreach plan to market the new service and also provides additional programming to assist households.
Superior	9	Applicant proposes moderately discounted rates for low income households and shows evidence based on their market averages as well as their current and/or expected rates. Applicant demonstrates an adoption program already exists and will be utilized to market to households in the project area.
Satisfactory	7 - 8	Applicant proposes at least somewhat discounted rates for low income households and shows evidence based on their market averages as well as their current and/or expected rates. Applicant demonstrates an adoption program will be developed and utilized.
Marginal	5 - 6	Applicant demonstrates little evidence that rates will be at or below averages within the market. Applicant may struggle to demonstrate an adoption program will be developed and utilized.
Unsatisfactory	0 - 4	Applicant demonstrates no evidence of rates will be at or below averages within the market. No adoption program exists currently or is planned.

2. Project Viability: 40 points possible

Technical Approach and Related Network Capacity and Performance (20 points): Applications will be scored on the comprehensiveness and appropriateness of the technical solution for the community need and related benefits (capacity and performance). Applications will be evaluated on the proposed technological solution and the ability of the proposed network to provide sufficient capacity, as well as scalability, to meet the needs of the households, businesses, and community anchor institutions in the

proposed service area. Networks with higher end-user speeds and the potential for incremental future capacity/bandwidth increases to offer higher broadband speeds in the future will receive greater consideration. Proposed networks provide broadband service with 95 percent or more of all peak period measurements of network round-trip latency at or below 80 milliseconds. Reviewers will give additional consideration for construction projects that are “shovel ready” and capable of completion within a one-year award period.

Table 3: Technical Approach		
<u>Rating</u>	<u>Points</u>	<u>Definition</u>
Distinctive	20	Applicant demonstrates the project is shovel ready; articulates a very strong case where the proposed technology will perform well above minimum expectations outlined in the NOFO, including the latency stipulation. Applicant provides strong evidence to validate their technology deployment.
Superior	18 - 19	Applicant demonstrates the project is shovel-ready; articulates a strong case demonstrating the proposed technology will perform above minimum expectations outlined in the NOFO, including the latency stipulation. Applicant provides sufficient evidence to validate their technology deployment.
Satisfactory	14 - 17	Applicant demonstrates the project could be shovel-ready; articulates in at least a simplistic form that the proposed technology will perform at minimum expectations outlined in the NOFO, including the latency stipulation. Applicant provides at least some evidence to validate their technology deployment.
Marginal	10 - 13	Applicant struggles to demonstrate the project is shovel-ready; presents a weak case for the proposed technology and its likelihood to perform at the minimum expectations outlined in the NOFO; latency may be below expectations from the application. Applicant may not have provided evidence to validate their technology deployment.
Unsatisfactory	0 - 9	Applicant proposes a project that is not shovel ready and the evidence supplied was either insufficient or non-existent in the application; reviewer cannot make a determination of the capability of the technology. Latency may be below or well below the expectations or omitted from the application.

Applicant’s Organizational Capability (20 points): Reviewers will assess whether the applicant has the organizational capability necessary to undertake and complete the project. Reviewers will consider the experience and expertise of the project management team and the past track record of the organization with projects of a similar size and scope, as well as the organization’s capacity and readiness. Reviewers will review financial statements when rating financial wherewithal. Reviewers will also assess the applicant's partnership strategy, including how it complements the applicant's organizational capacity, as well as the project approach, feasibility, and timely completion of proposed project. Special note: NTIA will only fund proposals where it determines that the applicant has the organizational capability necessary to carry out the project to completion.

Table 4: Applicant’s Organizational Capability		
Rating	Points	Definition
Distinctive	20	Applicant demonstrates a very strong proposal with compelling and clearly articulated technical expertise to construct the project, the organizational capability to provide on-going support, and the financial wherewithal and viability to take on the project. Applicant has partnership commitments from multiple entities. Applicant provides evidence of a very strong track record in deploying high-speed internet.
Superior	18 - 19	Applicant presents a strong proposal with clearly articulated technical expertise to construct the project, the organizational capability to provide on-going support, and the financial wherewithal and viability to take on the project. Applicant has a partnership commitment from at least one entity. Applicant provides evidence of a strong track record in deploying high speed internet. Applicant may have omitted or did not fully describe an item or two, preventing it from being rated as distinctive in this category.
Satisfactory	14 - 17	Applicant presents a proposal that articulates or implies limited but probably sufficient technical expertise, organizational capability, and financial wherewithal and viability to take on the project. Applicant, ideally, has a partnership commitment from at least one entity. Applicant may have limited experience to fully assess their track record. Several items may not have been fully addressed or are absent from the proposal, preventing it from receiving a higher score.
Marginal	10 - 13	Applicant presents a proposal with insufficient or questionable technical expertise, organizational capabilities, or financial wherewithal. Applicant may not have a partner identified. Applicant may have little to no known experience to fully assess their track record. Many items may not have been fully addressed or are absent from the proposal.
Unsatisfactory	0 - 9	

		Applicant presents a proposal with very limited or no information to assess technical expertise, organizational capacity, or financial wherewithal. Applicant may be deficient or has omitted information in many of the proposal's sub-categories. Reviewer may be unable to fully assess the proposal.
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3. Project Budget & Sustainability: 30 points possible

Reasonableness of the Budget (10 points): Reviewers will evaluate the reasonableness of the budget based on its clarity, level of detail, comprehensiveness, appropriateness to the proposed technical and programmatic solutions, the reasonableness of its costs, and whether the allocation of funds is sufficient to complete the tasks outlined in the project plan. Project budget needs to reflect relevant cost categories (.e.g., administrative and legal expenses; land; structures; rights-of-way; appraisals; construction; etc.). The project budget is required to have itemized calculations for each cost placed under the categories listed above.

Table 5: Reasonableness of Budget		
Rating	Points	Definition
Distinctive	10	Applicant provides a comprehensive budget utilizing DED's budget template. Budget provides clarity and detail with complete itemization of costs. Budget narrative provides strong support for reasonableness of the costs and the allocation of funds is sufficient to complete the project. Applicant includes project's cost per passing.
Superior	9	Applicant provides a comprehensive budget utilizing DED's budget template. Budget provides clarity and detail with sufficient itemization of costs. Budget narrative provides adequate support for the reasonableness of the costs and the allocation of funds is sufficient to complete the project. Only one or two items may not be addressed or omitted limiting the applicant from receiving a distinctive rating. Applicant includes project's cost per passing.
Satisfactory	7 - 8	Applicant provides a budget utilizing DED's budget template. Budget provides clarity and detail with at least partial itemization of costs. Budget narrative provides mostly adequate support for the costs and allocation of funds. At least some items may not be addressed, limiting the applicant from receiving a higher score. Applicant includes project's cost per passing.
Marginal	5 - 6	Applicant provides limited budget detail. Applicant may attempt to utilize the DED provided budget template but budget may lack clarity and may omit several categories. Costs described may be out of expected ranges. Reviewers are able to review some of the project, but may not be able to complete review in its entirety due to several deficiencies.

Unsatisfactory	0 - 4	Applicant provides an extremely limited or unclear budget. Costs may not be reasonable, may not address a number of budget categories, or may omit many items from the budget, preventing reviewers from fully reviewing the proposal.

Sustainability of the Project (15 points): Applicants must convincingly demonstrate the ability of the project to be sustained beyond the award period. Reviewers will consider project pro forma financial information. Reviewers will also consider business plans, market projections, third-party funding commitments, and other data as may be appropriate to the nature of the applicant and the proposed project. Reviewers will consider demonstrations of community commitments or anchor tenant commitments that would help promote sustainability. Project plans will also need to describe the ability to scale the project by integrating advanced services over time (such as interoperable interfaces for fifth generation fixed wireless capability or by deploying fiber).

Table 6: Project Sustainability		
<u>Rating</u>	<u>Points</u>	<u>Definition</u>
Distinctive	15	Applicant articulates a robust sustainability effort to ensure the project succeeds and can serve as a catalyst for future expansions within the surrounding area. Applicant submits all of the suggested items for review including a business plan, market projections, third-party funding commitments, and other data points to enhance the proposal. Applicant demonstrates community commitment or anchor tenants. Applicant submits strong evidence of scalability to integrate advanced services over time.
Superior	14	Applicant articulates a strong sustainability effort to ensure the project succeeds and can serve as a catalyst for future expansions within the surrounding area. Applicant submits most of the suggested items for review such as a business plan, market projections, third-party funding commitments, or other data points to enhance the proposal. Applicant demonstrates at least one community commitment or anchor tenants. Applicant submits evidence of scalability to integrate advanced services over time.
Satisfactory	11 - 13	Applicant articulates a sustainability effort to ensure the project succeeds and may serve as a catalyst for future expansions within the surrounding area. Applicant submits some of the suggested items for review such as a business plan, market projections, third-party funding commitments, or

		other data points to enhance the proposal. Applicant may demonstrate little to no community commitment or anchor tenants. Applicant submits some evidence of scalability to integrate advanced services over time.
Marginal	8 - 10	Applicant articulates a very limited sustainability effort to ensure the project succeeds and struggles to articulate how the project will serve as a catalyst for future expansions within the surrounding area. Applicant may not include most or all of suggested items for review. Applicant may demonstrate little to no community commitment or anchor tenants. Applicant may have submitted limited evidence of scalability and fails to persuasively describe how the project will integrate advanced services over time.
Unsatisfactory	0 - 7	Applicant articulates no sustainability effort to ensure the project succeeds and does not articulate how the project will serve as a catalyst for future expansions. Applicant may not demonstrate community commitment or anchor tenants. Applicant may have submitted no evidence of scalability and doesn't describe how the project will integrate advanced services over time

Leverage of Non-Federal Resources (5 points): Projects that have at least a 10% non-federal cost share outlined in the letter of commitment to NTIA will receive 5 points in this category. Providers with less than 10% cost-share will receive 0 points in this category.