

**U.S. Small Business Administration  
Office of International Trade**

**STATE TRADE EXPANSION PROGRAM (STEP)**

**Notice of Funding Opportunity No.  
SB-OITST-24-001**

The purpose of this Notice of Funding Opportunity is to invite proposals for funding from eligible state entities interested in and capable of providing assistance and guidance to eligible small business concerns (ESBCs) to increase the number of such firms that export and the dollar value of small business exports.

**Opening Date: April 22, 2024  
Closing Date: June 6, 2024**

Proposals responding to this Notice of Funding Opportunity must be posted to [www.Grants.gov](https://www.Grants.gov) by **11:59 p.m. Eastern Standard Time, June 6, 2024**. No other method of submission will be permitted. Proposals submitted after the stipulated deadline will be rejected without being evaluated.

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1.0. **Notice of Funding Opportunity Information**

1.1. Program Overview

1.1.1.	Federal Agency Name	U.S. Small Business Administration (SBA)
1.1.2.	Notice of Funding Opportunity Title	State Trade Expansion Program (STEP)
1.1.3.	Announcement Type	Initial
1.1.4.	Notice of Funding Opportunity Number:	Notice of Funding Opportunity Announcement No. SB-OITST-24-001
1.1.5.	CFDA Number	59.061
1.1.6.	Closing Date for Submissions:	June 6, 2024, 11:59 PM Eastern Daylight Savings Time
1.1.7.	Authority:	15 U.S.C. § 649(l)
1.1.8.	Duration of Authority:	Permanent
1.1.9.	Funding Instrument:	Grant
1.1.10.	Funding:	Funding is for 24 months (eight quarters).
1.1.11.	Award Amount/Funding Range:	<p>The amount of STEP funding in FY 2024 is \$20 million (based on availability of funds). Applicants can apply for awards ranging from \$100,000.00 (minimum) to \$900,000.00 (maximum).</p> <p>Per the statutory authority above, the 10 States with the highest number of small business exporters shall receive no more than 40% of the total Federal fiscal year appropriation. Based upon the latest data available from the U.S. Department of Commerce, for purposes of this Notice of Funding Opportunity, these states are California, Florida, Georgia, Illinois, Michigan, New Jersey, New York, Ohio, Pennsylvania, and Texas.</p>
1.1.12.	Project Duration:	Awards will be made for 24 months.
1.1.13.	Project Starting Date:	September 30, 2024
1.1.14.	Proposal Evaluation:	An initial screening for eligibility (in accordance with Section 3.1) will be conducted by the program office. Proposals will be reviewed for sufficiency and quality as detailed in Sections 4 and 5. SBA may ask Applicant for clarification of technical proposal and cost aspects of proposals.

1.1.15. Agency Programmatic Point of Contact:

Shadetra Robinson, Director, State Trade Expansion Program, U.S. Small Business Administration, Office of International Trade

Applicants may submit questions to the STEP email address ([STEP@SBA.gov](mailto:STEP@SBA.gov)) during the open period (April 22, 2024, through May 3, 2024). SBA will post answers to the questions on [www.sba.gov/STEP](http://www.sba.gov/STEP) by about May 17, 2024. No additional questions will be accepted after May 3, 2024.

1.2 *Introduction*

The Trade Facilitation and Trade Enforcement Act of 2015 (HR 644), signed into law on February 24, 2016, made the State Trade Expansion Program a permanent provision of the Small Business Act to make grants to States, and the equivalent thereof, to carry out projects that support developing exports by eligible small business concerns (ESBCs) (as defined in Section 8.1.5). The objective of STEP is to increase (1) the number of U.S. small businesses that export, (2) the dollar value of exports, and (3) the number of U.S. small businesses exploring significant new trade opportunities (as defined in 8.1.15).

1.3 *Background*

Since its inception in 1953, SBA has served to aid, counsel, assist, and protect the interests of small businesses. SBA offers a wealth of financial support, resources, and services to small businesses through an array of loan, contract, and grant opportunities. The Agency also plays a critical role in business counseling and training to small businesses and nascent entrepreneurs. The primary purpose is to promote growth, expansion, innovation, increased productivity, and management improvement.

The mission of SBA's Office of International Trade (OIT), which bears responsibility for administering STEP, is to build the capacity of current and future small business exporters to compete in the global marketplace through capital, counseling, and the advancement of commercial interests at home and abroad.

1.4 *Purpose and Allowable Statutory Activities*

The underlying premise of STEP is to supplement non-federal entities' (as defined in Section 3.1) funds for export activities, not to substitute federal funds to cover costs that applicants would normally or otherwise cover. Per 2 C.F.R. Section 200.408, non-federal entities' proposed use of federal funds for STEP will be limited to the below statutory uses of funds that directly benefit ESBCs to become an exporter, increase their export sales, and/or increase new export opportunities.

**Allowable Statutory Activities Guidance**

1. **Participation in foreign trade missions.** For the purposes of STEP, a foreign trade mission is defined as travel to a foreign country by ESBCs that will enable them to explore or expand international business opportunities.
2. **A foreign market sales trip.** For the purpose of STEP, a foreign market sales trip is defined as travel to a foreign market by ESBCs that will enable them to explore or expand their international business opportunities.
3. **Participate in reverse trade missions/shows.** Reverse trade missions are defined as bringing foreign buyers to the United States to meet with potential suppliers of U.S. manufactured goods and services. Proposals for this activity are limited to costs borne directly by ESBCs to participate in a reverse trade mission and paid for by a STEP grantee which directly benefit ESBCs (e.g., meeting space, audio/visual support). Payment of any costs associated with travel (transportation,

lodging, etc.) of foreign buyers is not allowed.

4. **Participate in commerce subscription services.** Grant recipients may elect to utilize the services available from the U.S. Commercial Service, to assist with choosing the best market for their products or services; evaluating prospective foreign business partners; increasing market potential; and gold key matchmaking services.
5. **Website and product translation, SEO, Localization.** The translation of websites into foreign languages, localization for foreign markets, and search engine optimization for ESBCs.
6. **International marketing media design.** STEP defines marketing media as the ability to promote ESBCs' products or services to strengthen their export sales potential, using any of the following: brochures; social media platforms; websites; billboards; newspapers; posters; branding and advertising.
7. **Participation in trade show exhibition.** A trade show is defined by STEP as an exhibition for ESBCs to showcase and demonstrate their products and services. This includes foreign trade shows appropriate for ESBC export development, and domestic trade shows, according to the domestic trade show policy.
8. **Participation in export training workshops.** Training workshops and education courses that are offered to recipients of STEP funds must have a direct benefit to, and assist, ESBCs with gaining credible knowledge of export policies, regulations, and/or best practices.
9. **Any other initiative determined appropriate by the Associate Administrator.**

**STEP Priorities:** To ensure the full utilization of all STEP funds, it is strongly recommended that every non-federal entity request a federal award amount that can be managed and realistically expended within a 24-month period of performance. A non-federal entity's technical proposal and budget should be clearly focused and targeted based on the top priority exporting needs of small businesses in the non-federal entity's state that addresses the key performance measures outlined below.

**Key Performance Measures:**

1. Reach 100% utilization of the award.
2. Increase the number of ESBCs in the state that export.
3. Increase the value of exports by ESBCs in the state.
4. Increase the number of ESBCs exploring significant new trade opportunities.
5. Increase the number of ESBCs in Small Business Communities (as defined in Section 8.1.16) that export.

**Direct Support to Eligible Small Business Concerns:**

Federal funds must directly support development of New-to-Export ESBCs (NTE) (as defined in Section 8.1.11) and Market Expansion ESBCs (ME) (as defined in Section 8.1.10). Accordingly, applicants must reflect in their technical proposal and budget narrative the use of at least 85% of their proposed federal award for the purpose of providing direct benefit to ESBCs, drawn from the above list of eight allowable statutory activities. An application with less than 85% will be considered “not responsive” to the Notice of Funding Opportunity requirements and will not be evaluated. Proposed costs that directly benefit ESBCs are composed of:

- i. Costs directly borne by an ESBC to participate in an approved export activity as part of a trade expansion program;
- ii. Approved travel by state STEP personnel listed on the A-10 form and with the funding designated on the SF 424A to develop the pipeline of ESBCs and to assist ESBCs on trade missions and shows; and,
- iii. Approved contract services that directly support ESBCs (e.g., interpreters that are engaged in meetings between ESBCs and foreign buyers, companies engaged in ESBC website development, and providers of export training).

Applicants may propose efforts that comprise financial assistance awards (e.g., vouchers, stipends) for reimbursements to STEP clients (as defined in Section 8.1.17) for participation in approved export activities.

1.5 *Collaboration and Leveraging of Resources*

The SBA’s District Offices, SBA’s Export Finance Managers (EFMs), and SBA’s resource partners such as SBDCs, SCORE, WBCs, Veterans Business Outreach Centers (VBOCs), Small Business Investment Companies (SBICs), Certified Development Companies (CDCs), and SBA lenders are all helpful resources. SBA is particularly interested in demonstrated collaboration with Federal agencies (such as the U.S. Commercial Service) and other federal, state, local, and tribal government export development programs and activities provided by institutions of higher education (e.g., colleges and universities), trade and vocational schools, and private organizations such as chambers of commerce and trade and industry groups and associations.

1.6 *Changes or Cancellation*

SBA reserves the right to amend or cancel this announcement, in whole or in part, at the Agency’s discretion.

2.0 **Award Information**

2.1 *Estimated Funding*

SBA will award \$20 million in FY2024 (based on availability of funds).

The award amounts that can be proposed under this Announcement is a minimum of \$100,000.00 and a maximum of \$900,000.00.

2.2 *Expected Number of Awards*

SBA anticipates making about 56 awards, subject to receiving a passing evaluation score under Section 5.2, available funding for proposed activities, and requested amounts. If the total awards requested by the number of passing applicants is greater than the appropriated funding levels, an applicant may be asked to amend their request to account for the oversubscription of available funds.

2.3 *Period of Performance/ Budget Periods*

An award under this announcement will be made for a two-year period of performance (eight quarters).

2.4 *Funding Information*

In accordance with 2 C.F.R. Section 200.408, allowability of costs is restricted to the statutory export activities, specified in Section 1.4 above.

2 CFR § 200.458 Pre-award costs defines pre-award cost as follows: Pre-award costs are those incurred prior to the effective date of the federal award or subaward directly pursuant to the negotiation and in anticipation of the federal award where such costs are necessary for efficient and timely performance of the scope of work. Such costs are allowable only to the extent that they would have been allowable if incurred after the date of the federal award and only with the written approval of the federal awarding agency. If charged to the award, these costs must be charged to the initial budget period of the award, unless otherwise specified by the federal awarding agency or pass-through entity.

Funds provided under STEP must be used solely for the purposes stipulated in this announcement and the Notice of Award for this performance period and may not be commingled with any other monies or transfer of funds from one award to another. All costs proposed in an Applicant's budget must meet the tests of allowability, allocability, and reasonableness set forth in the applicable Office of Management and Budget (OMB).

2.5 *Funding Instrument*

The funding instrument used will be a Grant.

2.6 *Matching Requirement*

- i. The federal share of project cost for States that have high export volumes will be 65% and the State matching funds required will be 35% of the sum of the Federal award. High export volume was determined based upon U.S. Census Bureau export data by state. This means that for every \$1 of Federal funds proposed, STEP non-federal entities must provide \$0.53846 in match. For purposes of this Notice of Funding Opportunity, the high export volume States are California, Texas, and Louisiana.
- ii. The federal share of project cost for states that **do not** have high export volume will be 75% and state matching funds required will be 25% of the sum of the federal award and recipient match amount. This means that for every \$1 of federal funds proposed, STEP non-federal entities must provide \$0.333333 in match.
- iii. SBA will waive up to \$200,000 of the matching funds required for an insular area non-federal entity that is an agency or instrumentality of an area's government pursuant to 48 U.S.C. § 1469a, which includes American Samoa, Guam, the U.S. Virgin Islands, and the Commonwealth of Northern Mariana Islands. **If the insular area non-federal entity is not an agency or instrumentality of the area's government, the full matching funds requirement applies.**
- iv. Matching funds must be comprised of not less than 50% cash and not more than 50% of indirect and in-kind contributions. Matching funds may not be derived from any federal program. **Non-federal entity personnel salary and fringe proposed as match will be counted as cash.**
- v. **Non-federal entities may not use program income for the purpose of meeting their match.**



2.7 *Program Income (reference 13 CFR 143.25, 2 CFR 200.80, 2 CFR 200.307)*

Program income is gross income from fees, or any other monies collected by a STEP non-federal entity or a partner entity from a STEP ESBC. For STEP, program income must be:

- i. Included in the applicant-proposed and SBA-approved budget.
- ii. Accounted for separately from other federal and non-federal monies.
- iii. Added to the approved STEP federal award amount.
- iv. Used to directly benefit STEP ESBCs for activities approved by the assigned SBA STEP Program Manager and must be expended before the grant closes.

Fees paid by a STEP ESBC directly to a recognized provider of export services are not considered program income. The provider can be an independent entity (e.g., U.S. Department of Commerce, trade show organizer, export trainer). The entity can be under contract to a STEP non-federal entity to provide export-related services.

Program income may **not** be used for the purpose of meeting match requirement and may **not** be used to support salaries of STEP personnel.

When an applicant intends to serve solely as a fiscal agent and simply receive monies from ESBCs and then provide 100% of the collected costs to third parties for services for those ESBCs, rather than using the monies to recoup costs the applicant has already paid, this approach can be requested, approved, and not considered program income.

3.0 **Eligibility Information**

3.1 *Eligible Non-Federal Entity (Eligible Applicant)*

The Trade Facilitation and Trade Enforcement Act of 2015 provides that STEP grants may be awarded only to “states,” meaning any of the United States, the District of Columbia, the Commonwealth of Puerto Rico, the U.S. Virgin Islands, Guam, the Commonwealth of Northern Mariana Islands, and American Samoa. Therefore, only non-federal entities that meet this definition are eligible to apply for and administer an award under this Notice of Funding Opportunity.

For purposes of this Notice of Funding Opportunity, the term “eligible non-federal entity” means a state agency or other entity that, prior to the date of application for this announcement, has been officially designated by the state governor, or equivalent thereof (e.g., mayor of the District of Columbia), as the sole applicant and lead entity for conducting the State’s trade and export activities.

- i. The organizational structure of the state’s designated international trade arm must show an official agency relationship with state government, and the state must provide financial backing in meeting the required match amount and show support for program activities.
- ii. Only those proposals accompanied by the written designation of the state governor, or his/her designee, may apply for funding consideration.
- iii. Should the governor, or equivalent thereof, assign to a designee the signatory responsibility for the designation letter, the designation letter must include an acknowledgement that the governor, or his/her equivalent, has authorized the designee to sign the letter on his/her behalf.
- iv. For insular areas, the equivalent of a state governor is the appropriate signatory.

### 3.2 *Ineligible Non-Federal Entity*

The following organizations will automatically be considered ineligible, and their applications will be rejected without being evaluated:

- i. Any organization that has not been officially **designated by a state governor** as the sole applicant and lead entity for conducting the State's trade and export activities (See Section 3.1 *Eligible non-federal entity*, above.);
- ii. Any organization that owes an outstanding and unresolved financial obligation to the federal government;
- iii. Any organization that is currently suspended, debarred or otherwise prohibited from receiving awards of contracts, grants, or cooperative agreements from the federal government;
- iv. Any organization with an outstanding and unresolved material deficiency reported under the requirements of the Single Audit Act or OMB Circular A-133 Single Audit within the past three years;
- v. Any organization that has had a STEP grant or cooperative agreement involuntarily terminated or non-renewed by SBA for cause within the past year;
- vi. Any organization that has filed for bankruptcy within the past five years;
- vii. Any organization that proposes to serve as a pass-through and permits another organization to manage the day-to-day operations of the project;
- viii. Any organization that was convicted or had an officer or agent acting on its behalf convicted, of a felony criminal violation under any federal law within the past two years.

## 4.0 **Application and Submission Information**

### 4.1 *General*

- i. A state may submit only one proposal in response to this Notice of Funding Opportunity.
- ii. Any additional applications from a state will automatically be rejected without being evaluated. (Only the latest application successfully submitted by an eligible non-federal entity to [www.Grants.gov](http://www.Grants.gov) (will be screened for potential evaluation for an award.)
- iii. Non-federal entities must **round all monetary values to the nearest whole dollar** in all budgetary and financial application document submissions.

### 4.2 *Application Instructions*

All applications successfully submitted to SBA via [www.Grants.gov](http://www.Grants.gov) will undergo a screening process, consisting of a review for applicant eligibility and application completeness. **Applications will be rejected without further evaluation if they are submitted by ineligible entities, or they are non-responsive to the requirements of this Notice of Funding Opportunity.**

For applicant convenience, a technical proposal template and list of application elements are provided to ensure the application package follows the order listed in the Notice of Funding Opportunity.

The following documents are completed as part of the electronic application form on [www.Grants.gov](http://www.Grants.gov):

- 1) SF-424, Application Federal Assistance,-
- 2) SF-424A, Budget Information,-

All documents must be submitted as separate attachments. Documents cannot be bundled together.

**Instructions for file naming conventions:** Please include the following attachments separately using the exact name and standard order outlined below. The application elements as described below should be named with the attachment number [#], applicant's state abbreviation (do not spell out state name), and name of document (identified in the left-hand side of chart below). Do not add the word "attachment" in the file name.

**For example:** [1] [State abbreviation] Cover Letter. Applications must upload the following elements as attachments in [www.Grants.gov](http://www.Grants.gov):

### **REQUIRED APPLICATION ELEMENTS**

The following Financial Assistance General Certifications and Representations are located within the System for Award Management ([SAM.gov](http://SAM.gov)) and do not need to be submitted with this application:

Lobbying Disclosure Act of 1995, 2 U.S.C. 1601 et seq.  
Financial Management Certification – 2 CFR 200.302 & 2 CFR 200.303  
Debarment and Suspension – 2 CFR Part 180  
Drug-Free Workplace – 41 U.S.C. 8103  
Tax Compliance – Section 543 of PL 112-55  
Conflict of Interest – 2 CFR 200.112

#### **Cover Letter (Maximum 1 page) - See Application Instructions Appendix**

##### **[1] [State abbreviation] Cover Letter - *(Signed) PDF format***

The first element of the application must be a cover letter containing a summary of each non-Federal entity's key proposed export activities, which will be sent to Congress and appear on the SBA's STEP webpage. Submit the cover letter electronically in pdf format. The cover letter is not counted in the 10-page requirement and must be one page and include the following information:

- i. Non-federal entity's name and address (which must match the governor's letter of designation); -
- ii. Non-federal entity's website address; -
- iii. Non-federal entity's STEP webpage, if one already exists; -
- iv. Name, telephone number, fax number, and email address of the non-federal entity's designated point of contact (the Authorized Organizational Representative);
- v. Dollar amount of federal assistance being requested; -
- vi. A one paragraph summary (110-125 words) of the proposed export activities supporting the proposed milestone goals. Use the following language to start this requirement:

"The (fill in state name) will use STEP award funds to support export development for eligible small business concerns to include (insert the proposed export activities)."

#### **Technical Proposal *template* (Maximum 10 pages) - See Application Instructions Appendix**

##### **[2] [State abbreviation] Technical Proposal-*Word format***

To expedite the proposal review process, applicants must submit their technical proposal using the template provided in the application instructions appendix. The proposal elements must be in the same order as the evaluation criteria in Section 5.2 of the Notice of Funding Opportunity. The proposal may not exceed 10 pages (excluding title page and cover page) and must be double-spaced on 8 ½ x 11- inch paper. Times New Roman in 12-point font is required. Only the first 10 pages will be reviewed and evaluated. An applicant will not be notified and consulted if additional pages are eliminated and not reviewed.

Non-federal entities do NOT need to address every allowable statutory export activity (identified in Section 1.4). Non-federal entities are strongly encouraged to prepare focused proposals including performance measures and supporting activities that can realistically be achieved within the performance period.

- i. **Introduction:** Start the technical proposal with an ‘**Introduction**’ section on page one (not on the title page) that summarizes in no more than one (1) paragraph, your organization’s requested federal and non-federal award amount, targeted number of eligible small business concerns, brief description of proposed statutory activities that will be achieved with STEP funds in each of the two years of performance, the total expected export sales, and anticipated return on investment that is realistic and achievable.
- ii. **Exporting Experience:** In an estimated (1) page, this section must describe the organizational capability to achieve success in the past and/or present to increase the number of small business exporters, export sales, and significant new trade opportunities.
- iii. **Project Design:** In an estimated 1-7 pages, labeled with the main heading ‘**Project Design**’, this section should demonstrate how credible and impactful the non-federal entity’s organization can leverage partnerships to produce new small business exporters, increase ESBCs’ export sales, and expand significant new export opportunities; as well as promote export services to a broad range of small business communities. This section must address all components as described in Section 5.2:
  - a. Performance measures & outcomes. -
  - b. Direct benefit to ESBCs.-
  - c. Direct benefit to Small Business Communities.
  - d. Collaboration-
- iv. **Financial Assistance Plan** - In an estimated 1 page, labeled with the main heading ‘**Financial Assistance Plan**’, this section must outline the five elements (detailed in Section 5.2) for ESBCs seeking assistance with award funds.
- v. **Data Collection & Measurement of Outcomes** - In an estimated 1 page, labeled with the main heading ‘**Data Collection and Measurement of Outcomes**’, this section must address the required data collection elements identified in Section 5.2.7 (and listed in technical proposal template); and the applicant’s ability to quantitatively measure progress towards achieving proposed outcomes. STEP’s proven results are measured by an increase in the number of firms, an increase in the value of ‘actual’ export sales, and an increase in significant new export trade opportunities. *Refer to the Technical Proposal template for more details.* Applicants are encouraged to discuss the benefit that can be realized to your state’s economy as a result of jobs created and/or jobs retained stemming from ESBCs participation in export activity. Non-federal entities shall include a question on the STEP application that is completed by the clients to capture the data including number of jobs created and jobs retained.

**Proposed Plan: Performance Measures & Outcomes - See Application Instructions Appendix**

**[3] [State abbreviation] Proposed Plan - *Excel format***

Non-federal entities will be responsible for preparing a **Proposed Plan** including, **performance measures and outcomes** in an excel spreadsheet (‘Instructions’ on how to complete the proposed plan can be found in the application instructions as an Appendix.) based on the milestone goals submitted in the technical proposal. The Proposed Plan serves as the data blueprint to measure the extent to which the STEP grant recipient

achieves program activities and the results (outcomes) of those measures. If awarded a grant, the grant recipient will be assigned a STEP Program Manager who is responsible for reviewing and approving your plan. Grant recipients will be required to report performance measures achieved, activities completed, and measurable results on a quarterly basis for the full two-year award period. SBA will collect, analyze, and utilize this data to evaluate the program's overall success. Client data will be confidential and used by SBA only if permission is given by a representative of the ESBC.

### **BUDGET INFORMATION**

*Each applicant must provide budget information according to the specific instructions for each item. **Submit budget information documents separately, in the following order, with the file name labeled as follows:***

#### **Standard Form (SF) 424 V4, Application for Federal Assistance**

##### **[4] [State abbreviation] SF 424 *Online and Pdf format* SF 424**

Application for Federal Assistance. This standardized form requires basic information about your organization. The STEP Project Director must be listed in block 8f on the SF 424, not a grant writer or any other contact person, since this is where SBA obtains the contact information to generate the Notice of Award (NOA) for acceptance of the grant. Pertinent information regarding this announcement and all programmatic matters will also need to be provided to the STEP Project Director listed in block 8f.

#### **SF-424A, Budget Information (Non-Construction Programs)**

##### **[5] [State abbreviation] SF 424A - *Online and Pdf format***

This form requires an estimate of the Applicant's total cost of executing STEP activities described in the technical proposal.

- i. Do not include more funds in the match section than is required.
- ii. Include only applicant staff travel in the "Travel" cost category and ESBC travel in the "Other" cost category.
- iii. For Section A, fill in columns (a) with 'STEP', (b) with 59.061, and appropriate total amounts in (e), (f), and (g).
- iv. For Section B, label column (1) 'federal', label column (2) with exact 'non-federal' (cash) match, label column (3) with any 'non-federal' (in-kind) contribution (from applicant or a third party). The 'total' federal and non-federal amount is in column (5) and across line K.
- v. For Section C, (non-federal resources): Only complete columns 8(a) Grant Program with 'STEP', column (b) applicant (combined cash/in-kind, if applicable), and column (e) Totals
- vi. Prepare SF424A, Section D to match approved plan expenditures for the first four quarters. In other words, the 'forecasted cash needs' for year ONE, federal amount (line 13) and non-federal amount (line 14) must match the activity expenditure amounts on your proposed plan by quarter. Line 15, the total amount of expenditures you proposed in your federal and non-federal budget and approved plan for all activities must be the same for the first four quarters; Do not merely divide the total amount by four (quarters). They should match the technical proposal and proposed plan exactly for proposed activities and requested amounts.
- vii. Prepare SF424A, Section E, to match approved plan expenditures for the second four quarters. In other words, the "forecasted cash needs" for the SECOND year of award. Federal amount (line 16) and non-federal amount (line 17) must match the activity expenditure amounts on your proposed plan by quarter. Line 19, the total amount of expenditures you proposed in your federal budget and non-federal budget and proposed plan for all activities must be the same for the second four quarters. Do not merely divide the total amount by four quarters. They should match the technical proposal and proposed plan exactly for proposed activities and requested amounts.

**Attachments A-10 through A-12 (Budget Detail Worksheets)**

**[6] [State abbreviation] A10 - A12- Pdf format**

- i. A STEP Project Director must devote 50% of their time each quarter throughout the duration of the grant cycle, to the STEP project. The Director may not divide their time across all STEP years to meet the minimum 50% requirement.
- ii. On the A-10, identify all personnel who will be funded by federal and non-federal amounts or who will support the STEP project without project funding (follow the sample shown on the A-9 'Supplementary Instructions' for personnel calculations. Do not include the A-9 instruction page in the application package).
- iii. All subtotals and totals on the A-10 through A-12 must match all dollar amounts reflected on the SF-424A.
- iv. Non-federal entities may substitute their own forms or spreadsheets in place of the A-10 through A-12, provided these alternate forms include all the same cost elements and columns in the same order as the A-10 through A-12.
- v. The STEP Director (PI/PD) and/ or Authorized Representative (AOR) should be identified beside their name when listed on the A-10. Ensure all current contact information is listed by that person who will represent that role.

**Budget Narrative**

**[7] [State abbreviation] Budget Narrative - Pdf format**

- i. Provide a detailed explanation of the components of each budget cost category listed on the SF-424A; Section B.
- ii. Explain how each cost component directly benefits ESBCs.
- iii. Indicate which cost category (item and dollar amount) comprises the proposed non-activity related federal expense that was entered in the yellow highlighted section at the bottom row (P 21) in the proposed plan.

**Match Certification - See Application Instructions Appendix**

**[8] [State abbreviation] Match Certification - Pdf format - See Application Instructions Appendix**

Provide a match certification letter that reflects the Applicant's match components composed of the following elements:

- a. Match dollar amount.
- b. Type of match (cash, indirect expense, or in-kind).
- c. Description.

A sample match certification letter is included in the application instructions package as an appendix.

Include as attachments any commitment letter(s) from sources which the applicant intends to obtain in-kind matching funds.

**Match Commitment letter(s)**

**[9] [State abbreviation] Commitment Letter - Pdf format**

**Commitment letter(s)** from sources which the non-federal entity intends to obtain in-kind matching funds (*if applicable*).

**CERTIFICATION FORMS AND ASSURANCES**

Submit certification and assurances forms separately in the following order, with the file name labeled as follows (Note: Where applicable, if the applicant has submitted these certifications and assurances via [www.SAM.gov](http://www.SAM.gov) over the past 12 months, the applicant can rely on those forms instead of submitting new versions. Applicable forms are marked below.):

### **Cost Policy Statement**

#### **[10] [State abbreviation] Cost Policy Statement - *(Signed) Pdf format***

The Cost Policy Statement must describe the non-federal entity's general accounting policies and a description of their cost allocation methodology (how each type of proposed cost is allocated: direct, indirect, or match).

This policy must be signed by the **Authorized Representative (AOR)** (or equivalent thereof, holding analogous responsibilities, and having analogous expertise).

### **Designation Letter**

#### **[11] [State abbreviation] Governor Designation Letter - *(Signed) Pdf format***

Governor's letter, or equivalent thereof (e.g., mayor of the District of Columbia), designating the applicant as the State's sole applicant and lead entity for conducting the State's trade and export activities.

- Address the letter to:  
Ms. Shadetra Robinson, STEP Director  
Office of International Trade  
409 3<sup>rd</sup> Street, S.W.  
Washington, D.C. 20416

For insular areas, the governor, or equivalent must state that the applicant is an agency or instrumentality of the area to receive the waiver of matching funds. See Section 3.1.

## **ORGANIZATIONAL MANAGEMENT**

*Each Applicant must provide budget information according to the specific instructions for each item. **Submit organizational management documents separately in the following order, with the file name labeled as follows:***

### **Key Personnel Résumés and Position Descriptions**

#### **[12] [State abbreviation] Key Personnel Resumes and Position Descriptions - *Pdf format***

**Résumés and position descriptions** for ALL key personnel (including vacant positions) supporting the STEP project.

- i. Résumé of STEP Project Director should reflect knowledge and experience with both administering a federal award and executing the proposed export activities;-
- ii. Other résumés must reflect experience and education relevant to the proposed STEP project.

Résumés may not be more than one page in length. Only the first page of each resume will be reviewed and evaluated. An applicant will not be notified and consulted if additional pages are eliminated and not reviewed.

### **Lists of Contractual and Consulting Agreements**

#### **[13] [State abbreviation] List of Contractual and Consulting- *Pdf format***

**Provides two separate lists of contracts and agreements as follows:**

1. **List of Contractual and Consulting Agreements** - List of all current or anticipated contractual and consulting agreements that ***directly support*** the applicant's proposed export activities which must include:
  - i. Contract provider name or TBD if contractor is anticipated.
  - ii. Manner in which the provider was or will be selected (i.e., competitively or sole source).
  - iii. Summary of support provided.



- iv. Actual or estimated contract cost to support the proposed STEP activities.
- v. Identity of the employee or official of the applicant's organization who will be responsible for overseeing the agreements, and,
- vi. Description of the oversight process.

The non-federal entity shall follow their own procurement policies and procedures when contracting with project funds but must comply with the requirements of 2 C.F.R. §§ 200.317-200.326. Additionally, when using project funds to procure supplies and/or equipment, you are encouraged to purchase American-manufactured goods to the maximum extent practicable. American-manufactured goods are those products for which the cost of their component parts that were mined, produced, or manufactured in the United States exceeds 50% of the total cost of all their components. For further guidance regarding what constitutes an American-manufactured good (also known as a domestic end product), see 48 C.F.R. Part 25.

The following additional rules apply to contracts involving \$10,000 or less:

- a. Non-federal entity does not need to submit copies of the proposed contracts to the GOTR for approval before executing them.
- b. The contracts are not required to be awarded via competition if the organization considers their prices to be reasonable.

The following additional rules apply to contracts involving between \$10,001 and \$250,000 in project funds:

- a. Non-federal entity does not need to submit copies of the proposed contracts to the GOTR for approval before executing them.
- b. Non-federal entity must obtain price quotes (either orally or in writing) from at least three qualified sources and inform SBA of these quotes in the corresponding payment requests/financial reports.
- c. If the non-federal entity does not choose to go with the lowest price quote, an explanation must be provided.

The following additional rules apply to contracts involving more than \$250,000 in project funds:

- a. Non-federal entity must submit copies of the proposed contracts to the GOTR for approval before executing the contract.
- b. The contracts must be awarded via competition. Non-competitive contracting at this level is only allowed if you can demonstrate to SBA's satisfaction either: (i) there is only one possible source for a particular good or service or (ii) there is an emergency involving the risk of imminent damage to property or injury to people.

**List of contracts** that the non-federal entity proposes to charge against the project as a direct cost or to meet matching funds requirement that will be outside the indirect cost rate agreement (e.g., a facility's lease).

- vii. Contract provider/lessor name.
- viii. Summary of support provided.
- ix. Actual or estimated contract cost.

If non-federal entity does not propose any contract support for this award, include this attachment marked "N/A."



## FINANCIAL MANAGEMENT

*Each Applicant must provide financial management information according to the specific instructions for each item. **Submit financial management documents separately in the following order, with the file name labeled as follows:***

### **A-133 Audit Report**

#### **[14] [State abbreviation] Audit Report - Pdf format**

Attach the most recent A-133 Single Audit report that should not be longer than a **year** old from this fiscal year of 2024 application. The FY2023 report should be submitted but if that year's report is not finished, please indicate when the report will be published. If the non-federal entity is not subject to the requirements of the Single Audit Act, the non-federal entity must instead submit a copy of its most recently audited financial statement and the CPA opinion of this audit (e.g., unqualified, qualified, adverse, etc.).

Note: if the non-federal entity's A-133 Single Audit or most recent financial statement audit is large, provide a blank page with website link and instructions on where to locate the audit.

### **Indirect Cost Rate Agreement (ICRA) or Extension Letter (if applicable)**

#### **[15] [State abbreviation] ICRA - Pdf format**

For non-federal entities that include indirect costs, provide a current, executed Indirect Cost Rate Agreement from the cognizant federal agency or a letter from the non-federal entity's cognizant federal agency approving an extension of a previous indirect cost rate for a period of time that covers the period of performance for this award. If the non-federal entity does not propose such charges for this award, include this attachment marked "N/A."

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## **4.3 Submission Instructions**

This section provides the application submission and receipt instructions for applications submitted for this Announcement. Please read the following instructions carefully and completely.

### **1. Electronic Delivery**

SBA is using [www.Grants.gov](http://www.Grants.gov) to provide the grant community with a single site to find and apply for grant funding opportunities. Applicants must submit their applications online through [www.Grants.gov](http://www.Grants.gov)

### **2. How to Register with Grants.gov**

SBA requires the use of the [www.Grants.gov](http://www.Grants.gov) website for submission of all directed announcement grant application packages. If your organization hasn't already done so, it must register with [www.Grants.gov](http://www.Grants.gov) before it can apply for this funding opportunity. Registration creates a profile of basic information about your organization including the staff members who are authorized to submit applications on its behalf. These steps take several days, so please don't wait until the last minute if you have a deadline approaching. If you have problems registering with [www.Grants.gov](http://www.Grants.gov), call the support desk at 1-800-518-4726. Complete instructions for registering with [www.Grants.gov](http://www.Grants.gov) are located at [www.Grants.gov](http://www.Grants.gov).

Organizations must have a Unique Entity Identifier (UEI) number, active System for Award Management (SAM) registration, and [www.Grants.gov](http://www.Grants.gov) account to apply for grants. If individual applicants are eligible to apply for this funding opportunity, then you may begin with step 3, Create this identifier at [www.Grants.gov](http://www.Grants.gov) account, listed below.

As of February 2, 2019, under the provisions of the Paperwork Reduction Act of 1995, the Regulatory Secretariat Division of the Office of Management and Budget (OMB) implemented a new process in the System for Award Management (SAM), to the currently approved information collection requirement regarding the pre-award registration requirements for federal Prime Grant recipients. These revisions will enable non-federal entities to submit common federal government-wide certifications and representations for federal financial assistance at the time of registration in SAM. You must have an up-to-date SAM profile before your grant application can be reviewed for possible award.

Creating a [www.Grants.gov](http://www.Grants.gov) account can be completed online in minutes, but UEI and SAM registrations may take several weeks. Therefore, an organization's registration should be done in sufficient time to ensure it does not impact the entity's ability to meet required application submission deadlines.

Complete organization instructions can be found on [www.Grants.gov](http://www.Grants.gov):

- i. *Obtain a UEI:* All entities applying for funding, including renewal funding, must have a UEI. Applicants must enter the UEI in the data entry field labeled "Organizational UEI" on the SF-424 form. For more detailed instructions for obtaining a UEI, refer to: [Home | GRANTS.GOV](#)
- ii. *Register with SAM:* All organizations applying online through [www.Grants.gov](http://www.Grants.gov) must register and maintain registration with the System for Award Management (SAM). Failure to register with SAM will prevent your organization from applying through [www.Grants.gov](http://www.Grants.gov). SAM registration must be renewed annually. For more detailed instructions for registering with SAM, refer to:
- iii. *Create at [www.Grants.gov](http://www.Grants.gov)* The next step is to register an account with [www.Grants.gov](http://www.Grants.gov). Follow the on-screen instructions or refer to the detailed instructions at [Home | GRANTS.GOV](#)
- iv. *Add a Profile to [www.Grants.gov](http://www.Grants.gov) Account:* A profile in [www.Grants.gov](http://www.Grants.gov) corresponds to a single applicant organization the user represents (i.e., an applicant) or an individual applicant. If you work for or consult with multiple organizations and have a profile for each, you may log in to one [www.Grants.gov](http://www.Grants.gov) account to access all of your grant applications. To add an organizational profile to your [www.Grants.gov](http://www.Grants.gov) account, enter the UEI for the organization in the UEI field while adding a profile. For more detailed instructions about creating a profile on [www.Grants.gov](http://www.Grants.gov), refer to: [Home | GRANTS.GOV](#)
- v. *EBiz POC Authorized Profile Roles:* After you register with [www.Grants.gov](http://www.Grants.gov) and create an Organization Applicant Profile, the organization applicant's request for [www.Grants.gov](http://www.Grants.gov) roles and access is sent to the EBiz POC. The EBiz POC will then log in to [www.Grants.gov](http://www.Grants.gov) and authorize the appropriate roles, which may include the Authorized Organization Representative (AOR) role, thereby giving you permission to complete and submit applications on behalf of the organization. You will be able to submit your application online any time after you have been assigned the AOR role.
- vi. *Track Role Status:* To track your role request, refer to: [Home | GRANTS.GOV](#)
- vii. *Electronic Signature:* When applications are submitted through [www.Grants.gov](http://www.Grants.gov), the name of the organization applicant with the AOR role that submitted the application is inserted into the signature line of the application, serving as the electronic signature. The EBiz POC **must** authorize people who are able to make legally binding commitments on behalf of the organization as a user with the AOR role; this step is often missed, and it is crucial for valid and timely submissions.

### 3. How to Submit an Application to SBA via [www.Grants.gov](http://www.Grants.gov)

[www.Grants.gov](http://www.Grants.gov) applicants must apply online using Workspace. Workspace is a shared, online environment where members of a grant team may simultaneously access and edit different web forms within an application. For each Notice of Funding Opportunity (NOFO), you can create individual instances of a workspace.

Below is an overview of applying on [www.Grants.gov](http://www.Grants.gov). For access to complete instructions on how to apply for opportunities, refer to: [Home | GRANTS.GOV](#)

- i. *Create a Workspace*: Creating a workspace allows you to complete it online and route it through your organization for review before submitting.
- ii. *Complete a Workspace*: Add participants to the workspace to work on the application together, complete all the required forms online or by downloading PDF versions, and check for errors before submission. The Workspace progress bar will display the state of your application process as you apply. As you apply using Workspace, you may click the blue question mark icon near the upper-right corner of each page to access context-sensitive support.
  - a. *Adobe Reader*: If you decide not to apply by filling out web forms you can download individual PDF forms in Workspace. The individual PDF forms can be downloaded and saved to your local device storage, network drive(s), or external drives, then accessed through Adobe Reader. NOTE: Visit the Adobe Software Compatibility page on [www.Grants.gov](http://www.Grants.gov) to download the appropriate version of the software.
  - b. *Mandatory Fields in Forms*: In the forms, you will note fields marked with an asterisk and a different background color. These fields are mandatory fields that must be completed to successfully submit your application.
  - c. *Complete SF-424 Fields First*: The forms are designed to fill in common required fields across other forms, such as the applicant name, address, and UEI. Once it is completed, the information will transfer to the other forms.
- iii. *Submit a Workspace*: An application may be submitted through workspace by clicking the Sign and Submit button on the Manage Workspace page, under the Forms tab. [www.Grants.gov](http://www.Grants.gov) recommends submitting your application package at least 24-48 hours prior to the close date to provide you with time to correct any potential technical issues that may disrupt the application submission.
- iv. *Track a Workspace Submission*: After successfully submitting a workspace application, a [www.Grants.gov](http://www.Grants.gov) Tracking Number is automatically assigned to the application. The number will be listed on the confirmation page that is generated after submission. Using the tracking number, access the Track My Application page under the Applicants tab or the Details tab in the submitted workspace.

For additional training resources, including video tutorials, refer to: [Home | GRANTS.GOV](#)

*Applicant Support*: [Home | GRANTS.GOV](#) provides applicants 24/7 support. For questions related to the specific grant opportunity, contact the number listed in the application package of the grant you are applying for.

If you are experiencing difficulties with your submission, it is best to call the [www.Grants.gov](http://www.Grants.gov) Support Center and get a ticket number. The Support Center ticket number will assist the SBA with tracking your issue and understanding background information on the issue.

#### 4. Timely Receipt Requirements and Proof of Timely Submission

a. *Online Submission.* All applications must be received by [11:59 p.m.] Eastern Day light Savings Time on May 17, 2024. Proof of timely submission is automatically recorded by [www.Grants.gov](http://www.Grants.gov). An electronic date/time stamp is generated within the system when the application is successfully received by [www.Grants.gov](http://www.Grants.gov). The applicant with the AOR role who submitted the application will receive an acknowledgement of receipt and a tracking number (GRANTXXXXXXXX) from [www.Grants.gov](http://www.Grants.gov) with the successful transmission of their application. This applicant with the AOR role will also receive the official date/time stamp from [www.Grants.gov](http://www.Grants.gov) tracking number in an email serving as proof of their timely submission.

When SBA successfully retrieves the application from [www.Grants.gov](http://www.Grants.gov), and acknowledges the download of submissions, [www.Grants.gov](http://www.Grants.gov) will provide an electronic acknowledgment of receipt of the application to the email address of the applicant with the AOR role who submitted the application. Again, proof of timely submission shall be the official date and time that [www.Grants.gov](http://www.Grants.gov) receives your application. Applications received by [www.Grants.gov](http://www.Grants.gov) after the established due date for the program will be considered late and will not be considered for funding by SBA.

Applicants using slow internet, such as dial-up connections, should be aware that transmission can take some time before [www.Grants.gov](http://www.Grants.gov) receives your application. Again, [www.Grants.gov](http://www.Grants.gov) will provide either an error or a successfully received transmission in the form of an email sent to the applicant with the AOR role attempting to submit the application. The [www.Grants.gov](http://www.Grants.gov) Support Center reports that some applicants end the transmission because they think that nothing is occurring during the transmission process. Please be patient and give the system time to process the application.

##### 4.4 *Required Proposal Submission Date*

**Each non-federal entity is required to submit its proposal electronically via no later than 11:59 p.m. Eastern Standard Time on June 6, 2024.** Because of the pre-conditions for submitting applications via [www.Grants.gov](http://www.Grants.gov) and the potential for encountering technical difficulties in using that site, non-federal entities are strongly encouraged to log on to [www.Grants.gov](http://www.Grants.gov) and review the submission instructions early. **DO NOT WAIT UNTIL THE CLOSING DATE TO BEGIN THE SUBMISSION PROCESS.** Non-Federal entities bear sole responsibility for ensuring their proposals are submitted and received before the closing date.

SBA will consider the date and time stamp on the validation generated by [www.Grants.gov](http://www.Grants.gov) as the official submission time. A proposal that is not received by [www.Grants.gov](http://www.Grants.gov) before the closing date of this Notice of Funding Opportunity will be rejected without being evaluated, unless the non-Federal entity can clearly demonstrate through documentation obtained from [www.Grants.gov](http://www.Grants.gov) that it attempted to submit its proposal in a timely manner but was unable to do so solely because of [www.Grants.gov](http://www.Grants.gov) system issues. Additionally, SBA will not accept any changes, additions, revisions, or deletions to applications made after the application closing date, unless requested by the SBA.

Non-Federal entities should save and print written proof of an electronic submission made at [www.Grants.gov](http://www.Grants.gov). If problems occur while using [www.Grants.gov](http://www.Grants.gov), the applicant is advised to (i) print any error message received; and (ii) contact [www.Grants.gov](http://www.Grants.gov) for immediate assistance.

Applicants may obtain advice and assistance with the [www.Grants.gov](https://www.Grants.gov) process by visiting [Home | GRANTS.GOV](#) or by calling 1-800-518-4726

## 5.0 Application Review Information

### 5.1 General

The entire application package, comprised of the technical proposal (using required template format), and all additional attachments, will be evaluated on its comprehensiveness, completeness, and overall quality.

All applications successfully submitted to SBA via [www.Grants.gov](https://www.Grants.gov) will undergo a screening process, consisting of a review for eligibility and application completeness. Applications will be rejected without further evaluation if they are submitted by ineligible entities or they are non-responsive to the requirements of this Notice of Funding Opportunity.

In addition, an applicant must disclose in its application if it currently holds any other financial assistance awards from SBA or has any other applications for SBA financial assistance awards still pending. If it does, the applicant must identify how it will avoid duplication of efforts, commingling of funds, and overlapping or double claiming of costs among those projects. Applicants must treat each SBA project as separate and discrete with individual outcomes and deliverables and provide each application and award with its own reporting, accounting, and audit trails. Failure to sufficiently distinguish between multiple applications from the same organization, or between an application and one or more current SBA awards, may result in rejection of an application on the grounds that it is duplicative of proposed or existing efforts.

### 5.2 Evaluation Criteria

All timely and materially complete applications received from eligible non-federal entities will be evaluated in accordance with the criteria listed below. Evaluation of applications will result in the possibility of a grant in accordance with a merit-based review process.

This will be achieved using a Tier I and Tier II process. Applications must receive a minimum score of 70 total points (combining Tier I and Tier II score) to receive a grant. If an applicant receives a passing score, the amount of the applicant's grant award will be determined based on the availability of funds. The past performance will be based on FY2022 STEP 10 award. If an applicant did not have a STEP 10 award the applicant will automatically be awarded 55 points in Tier II.

OIT reserves the right to award automatic 55 points in Tier II to an applicant that had a STEP 10 grant award if it was unable to fully expend federal funds and/or carry out STEP activities due to circumstances that uniquely affected the applicant beyond the control of the grantee. An example of the failure or inability to execute STEP grant is a given applicant having been uniquely subjected to severe weather (i.e., hurricanes, tornados, tsunami) that caused damage to property, prolonged disruption to the small businesses in that community, or closure of lead agency's office. OIT also reserves the right to adjust awards based on financial management and internal controls established by the grantee or based on other factors that may have negatively impacted prior year performance but have since been resolved (i.e., change in management within a non-federal entity's STEP office).

Tier I will consist of an evaluation of project design totaling 20 points.

Tier II will consist of an evaluation of five criteria as outlined below, totaling 80 points:

- i. Utilization Rate (20 *points*)
- ii. Return on Investment (15 *points*)
- iii. Number of activities provided to all ESBCs (15 *points*)
- iv. Number of activities provided solely to NTE ESBCs (15 *points*) and,
- v. Percentage of eligible small business concerns in Small Business Communities (15 *points*) (as defined in Section 8.1.16) that export.

### **Tier I Evaluation**

**Technical Proposal (20 Points)** - The non-federal entities will be evaluated based on their technical proposal, budget narrative, and accompanying proposed plan (excel spreadsheet). The project design should be very clear, concise and focused (based on a careful assessment of top priorities, key export industries and markets) on the non-federal entity's state or territory. It must address credible and impactful outcomes pertaining to the program's objectives which are: to increase the number of ESBC exporters, value of exports, and significant new trade opportunities through collaborative efforts. To receive the full 20 points, all the following components must be included in the technical proposal.

- i. **Exporting Experience 5**– Non-federal entities will be evaluated according to their organizational capability to achieve success in increasing the number of small business exporters, export sales, and significant new trade opportunities.
- ii. **Performance Measures & Outcomes 5 (Milestone Goals)** –Non-federal entities will be evaluated on their capability and experience with developing credible and impactful performance measures and outcomes that are commensurate with statutory requirements.
- iii. **Directly Benefit ESBCs – 85% of the proposed federal award is the minimum percentage required to directly benefit ESBC export activities.** The proposal and budget narrative must demonstrate the non-federal entity's capacity to recruit, prepare and assist new small business exporters, specifically:
  - a. Building a pipeline and developing small businesses into new exporters (e.g., recruiting, preparing, and assisting NTEs participation in export activities); and
  - b. Building a pipeline of existing small business exporters and expanding their markets (e.g., recruiting, preparing, and assisting MEs participation in export activities).
  - c. Directly Benefit ESBCs from Small Business Communities – The proposal must include a plan to increase the number of ESBCs from Small Business Communities (e.g., recruiting, preparing, and assisting ESBCs from Small Business Communities to participate in export activities).
- iv. **Collaboration 5** - Non-Federal entities are expected to establish and leverage collaborative partnerships with relevant organizations to accomplish the proposed performance measures and supporting export activities. Based on information contained in the Technical Proposal, non-Federal entities will be evaluated on how well they will collaborate on proposed export activities with each of their identified partners, drawn from the following entities:



- a. SBA's District Offices, SBA's Office of International Trade EFM's and SBA's resource partners such as Small Business Development Centers (SBDC), SCORE, Women's Business Centers, Veterans Business Outreach Centers, Small Business Investment Companies, Certified Development Companies, SBA lenders, and other SBA award recipients;
  - b. Other Federal, State, local and tribal government agencies. SBA is particularly interested in demonstrated collaboration with the U.S. Commercial Service;
  - c. Institutions of higher education (colleges & universities), trade and vocational schools; and
  - d. Private organizations, such as Chambers of Commerce, trade and industry groups, and associations.
- v. **Financial Assistance Plan 5**-Non-Federal entities Financial Assistance Plan should address criteria and policies for the following elements. This Plan must conform to the STEP parameters as described below. Non-federal entities may not build in discretion to use STEP funds for other purposes not approved by SBA.
- a. **Application Process:** Non-federal entities application process for eligible small business concerns seeking STEP assistance including the following:
    - Criteria and selection process to become a STEP client;-
    - Organization and title of the selection panel or committee members (SBA employees cannot be members).
  - b. **Internal Controls:** The non-federal entities financial management structure and systems – a clearly defined and documented internal control process that will ensure compliance related to the *timely* and *reasonable* expenditure of Federal funds.
    - A specific response time (such as, 30-45 days) for issuing financial assistance awards to STEP clients, processing payments, and submitting reimbursement request in order to expend and report STEP funds in a timely manner must be outlined.
    - The non-federal entities' process for ensuring that STEP funding is distributed to allow a diversity of ESBC participation and encouraging support to new STEP clients.

Non-federal entities are strongly encouraged to develop requirements for 'building the pipeline' so that companies can 'graduate' from the program after a reasonable duration and amount of funding. STEP clients should not become dependent on receiving Federal STEP funds.
  - c. **Threshold Amounts:** Non-federal entity's ability to develop reasonable thresholds for ESBC reimbursement and participation in STEP activities. This includes thresholds to define the total amount of federal funding assistance the STEP client may apply for and the total number of export activities they are eligible to participate in during the two-year period of performance.
    - Maximum dollar amount of financial assistance available to a STEP client.
    - Total number of activities that a STEP client can participate in during the STEP award performance period.

***Participation Threshold Table (OPTIONAL)***

	Total amount of Federal funding assistance to STEP clients	Total number of export activities STEP clients are eligible to participate in
Participation Period		

Note: The thresholds for participating ESBCs in non-federal entities proposals will be reviewed for *reasonableness* to ensure the program meets the objective of the Trade Facilitation and Trade Enforcement Act of 2015. The Participation Threshold Table is OPTIONAL as long as the requested information in the table is included in the non-federal entity's proposal.

- vi. **Data Collection and Measurement of Outcomes** - Based on information contained in the technical proposal and their client Data Collection Instrument (DCI), the non-federal entities will be evaluated on whether their Data Collection Methodology is credible and includes the following critical elements necessary to obtain the sufficient export sales data from ESBCs. DCI elements:
- STEP Client's level of export experience ("market expansion" or "new-to-export" as defined in 8.1.10 and 8.1.11 respectively) on the DCI and on the STEP client application;
  - Actual export sales amount resulting from a completed activity;
  - A statement on the DCI by the client that conveys their certification of the reported data. For example, "I hereby certify that all information provided in this document, as well as any accompanying documents, are true and complete;"
  - Number of times results data will be collected during the award year on the DCI and in the technical proposal.
  - Number of jobs created plus jobs retained stemming from ESBCs participation in export activity to specific countries and industries to the extent it is possible to collect; and,
  - Non-Federal entities instrument used to collect and record data (e.g., web-based, paper form, email, phone call) on the DCI and in the technical proposal. *Electronic signatures may be obtained from STEP clients.*

Additionally, the STEP client application must include opt-in language, as described below.

- STEP Client Application. Opt-in Language. The opt-in referral is an important part of SBA's export strategy. If an ESBC is receiving STEP funds, we want our SBA's EFMs to contact the ESBC to discuss finance options. Each STEP client application must include the following language.
  - "The US Small Business Administration (SBA) would like to give eligible small business concerns the opportunity to expand your knowledge and resources of other export programs that are offered by the agency and other federal agencies. Please check the appropriate box if you would like your company's name and contact information to be shared with other relevant agencies to learn more about federal export programs. Your choice to participate or not will not change the status of your participation with STEP. SBA's aim is strictly to share information about other opportunities with you." This will be followed by "Yes" and "No."



- If the STEP client selects “Yes”, the client’s company name, contact person, email or website must be included on the client report.

## **Tier II Evaluation**

### **Past Performance (80 Points)**

Tier II will consist of the SBA Office of International Trade’s evaluation of accumulated past performance data of non-federal entities with STEP 10 awards. If a non-federal entity did not have a STEP 10 award, SBA will award 55 points to the applicant as to not disadvantage States with no applicable prior performance data.

Non-Federal entities will be evaluated in Tier II on the following elements:

- Utilization Rate (20 points):** Evaluation of the use of funds.
- Return on Investment (15 points):** Evaluation of the actual sales reported compared to the award amount.
- Number of activities provided to all ESBCs (15 points):** Evaluation of the number of activities provides to ESBCs that received STEP assistance compared to the award amount.
- Number of activities provided solely to NTE ESBCs (15 Points):** Evaluation of the number of activities provided to New to Export ESBCs that received STEP assistance compared to the award amount.
- Percentage of eligible small business concerns in Small Business Communities (15 Points)** (as defined in Section 8.1.16) that export.

### 5.3 *Merit-based Review and Selection Process*

Non-federal entities that are not rejected by [www.Grants.gov](http://www.Grants.gov) or SBA’s initial screening process will be scored on the basis of how well they meet the evaluation criteria outlined above. The maximum score any application can receive is 100 points (up to 20 possible points in Tier I and up to 80 possible points in Tier II). The threshold score is 70 points. Any application that receives a score below the threshold score will not be funded once applications have been received and evaluated.

## 6.0. **Award Administration Information**

### 6.1. *Award Notification*

All non-federal entities selected for an award and non-federal entities not selected for an award will receive written notification. **There will be a debriefing process for unsuccessful non-federal entities only.**

### 6.2 *Administrative and National Policy Requirements*

All successful non-federal entities will be required to comply with the requirements set forth in 2 C.F.R. Part 200 and OMB Circular A-133 Single Audit (as applicable); and the terms and conditions set forth in their Notices of Award.

The non-federal entity must permit personnel from SBA’s Office of Inspector General (OIG), other SBA personnel involved in the examination and oversight of STEP recipients, and/or their designated agents, unrestricted access to review and make copies of all products, materials, and data, including those prepared or stored electronically.

In addition, SBA may from time to time advise non-federal entities of awards made under this announcement of new legal requirements and/or policy initiatives with which they must agree to comply.

6.3 *STEP Financial Requirements*

Non-federal entity proposals are not permitted to include costs associated with any of the following items or activities:

- i. Transactions with suspended or debarred entities, as discussed in Part III(B)(2) below.
- ii. Construction or renovation of facilities or acquisition of real estate.
- iii. Litigation, whether civil, criminal, or administrative.
- iv. Providing matching contributions to any other federal awards.
- v. Meals, lodging, per diem, or other subsistence expenses associated with local travel (however, Project Funds may be used to pay transportation expenses for local travel). Local travel is any travel conducted entirely within a 50-mile radius of your organization's address of record.
- vi. Travel by elected officials.
- vii. Costs associated with printing materials, and
- viii. National and regional association dues, travel to association events.

The underlying premise of the STEP is to supplement the non-federal entity with funds for export activities, not to substitute federal funds for costs non-federal entities would normally or otherwise cover. Per 2 C.F.R. Section 200.408, use of federal funds for the STEP is limited to the STEP statutory uses of funds. Proposed use of federal funds not directly supporting development of new exporters and increasing export sales will not be approved (e.g., national/regional association dues, travel to association events).

Regarding foreign travel and other costs incurred by STEP ESBCs, the following costs are allowable:

- i. Airfare (consistent with Fly America Act guidelines)
- ii. Ground transportation fees
- iii. Parking
- iv. Baggage fees
- v. Meals and lodging (based on GSA/Department of State per diem rates)
- vi. Registration fees and booth space for trade shows
- vii. Trade mission fees
- viii. Training programs
- ix. Currency exchange fees
- x. Meeting space audio/visual for reverse trade missions
- xi. EXIM and private credit insurance fees
- xii. Other associated and allowable travel expenses including visas and travel insurance
- xiii. Fees for shipping sample products to trade shows and/or trade missions only
- xiv. Cost of compliance testing an existing product for entry into an export market
- xv. Trade data subscription for states to assist STEP clients with market research (services must be used within the performance period September 30, 2024 – September 29, 2026), Note: Reimbursement will only be granted while the grant is enforced. Should the grant be terminated, the funding must be returned to SBA (e.g., inter-contract)
- xvi. Translation into foreign language, search engine optimization, localization services, e-Commerce fees
- xvii. Design of marketing media commensurate with STEP's statutory objectives deemed appropriate (including digital marketing activities)
- xviii. Attorney fees for review of international distributor agreements

**Staff Foreign/Domestic Travel** - STEP supported travel costs incurred by non-federal entities are limited to non-federal entity staff that directly support the proposed STEP project who are listed on the A-10 form.

**Guidance on Manufacturing of Goods and Services** - ESBCs engaged in STEP export activities must be an export-ready U.S. company seeking to export goods or services of U.S. origin or have at least 51% U.S. content. To clarify, the ESBC must be an export-ready U.S. company seeking to export goods and services that are EITHER:

1. Of U.S. origin; OR
2. Have at least 51 % U.S. content.

OIT follows the U.S. Commercial Service definition of U.S. content, as defined below.

**U.S. content or manufactured goods** = (ex-factory price of a good) minus (aggregate value contributed by non-U.S. or foreign sources (e.g., costs or payments to foreign suppliers/providers/employees not resident in the United States)).

Example:

Ex-factory price of good		\$100
- aggregate value contributed by non-U.S. or foreign sources	Manufacturing costs (payment to foreign contract manufacturer)	-\$25
	Value of all foreign-supplied parts/inputs/materials	-\$20
	Foreign administrative costs	-\$2
	Foreign transportation and logistics costs (up to factory door)	-\$2
	Licenses, royalties, and fees paid for foreign intellectual property	-\$0
= U.S. content		\$51

**U.S. content for services** = (contract value of the service, whether delivered in the U.S. or overseas) minus (aggregate value contributed by non-U.S. or foreign sources (e.g., costs or payments to foreign suppliers/providers/employees not resident in the United States)).

Example:

Contract value of the service		\$100
- aggregate value contributed by non-U.S. or foreign sources	Staffing costs of foreign subcontractor	-\$25
	Value of foreign inputs/materials used to execute contract	-\$15
	Foreign based legal and administrative costs	-\$9
= U.S. content		\$51

The following costs of STEP ESBC and applicants are NOT allowable:

- i. Passport
- ii. Immunizations
- iii. Expenses related to entertaining current or prospective clients or government officials
- iv. New product development or alteration of existing products
- v. Cell phone and cell phone chargers

- vi. Television and radio procedures
- vii. Efforts to create or augment marketing and advertising campaigns to draw international visitors to a state
- viii. COVID testing (STEP will not pay for required quarantines when entering a country).
- ix. Rewards points (e.g., airlines)
- x. Printing materials (pg.28 section 6.3)

#### 6.4 *Reporting Requirements*

All non-federal entities are required to submit the reports identified below. SBA may withhold payment if reports are not received or are deemed inadequate. Failure to report in a timely manner will also be weighed against future applications for award funding from the same organization. The reports, or portions thereof, provided by the non-federal entity may be made public. Additionally, SBA reserves the right to require non-federal entities to post these reports on their web sites.

##### *Financial Reports*

Non-federal entities will be required to submit quarterly financial reports to SBA using the form SF-425, federal Financial Report (FFR) within 30 days of the completion of the first seven quarters and within 120 days of the completion of the eighth and final quarter of the period of performance. Non-federal entities are encouraged to submit final quarter reports prior to the end of the allowed 120 days.

##### *Progress Reports*

Non-federal entities will be required to submit quarterly progress reports to SBA using the Grant Progress Report within 30 days of the completion of each of the first seven quarters and within 120 days of the completion of the eighth quarter of the performance period. Non-federal entities are encouraged to submit final quarter reports prior to the end of the allowed 120 days.

##### *Report Submission*

Reports must be submitted electronically via A-STEP to the assigned GOTR.

#### 7.0. **Agency Contacts**

##### 7.1 *State Trade Expansion Program Point of Contact*

Questions concerning general information contained in this Notice of Funding Opportunity should be directed to [STEP@sba.gov](mailto:STEP@sba.gov). Non-federal entities may submit questions to the STEP email address from April 22, 2024, through May 3, 2024. SBA will post answers to the questions on [SBA.gov](https://www.sba.gov) by about May 17, 2024. No additional questions will be accepted after May 3, 2024.

##### 7.2 *Financial/ Awards Management Point of Contact*

Questions regarding programmatic and budgetary matters related to this Notice of Funding Opportunity should be directed to the STEP email address ([STEP@SBA.gov](mailto:STEP@SBA.gov)) during the open period (April 22, 2024, through May 3, 2024). SBA will post answers to the questions on [www.sba.gov/STEP](https://www.sba.gov/STEP) by May 17, 2024, at 11:59 p.m.

##### 7.3 *[www.Grants.gov](https://www.Grants.gov) Technical Support*

For technical support with filing an electronic application in response to this Notice of Funding Opportunity, contact the [www.Grants.gov](https://www.Grants.gov) support desk at 1-800-518-4726 or [Home | GRANTS.GOV](https://www.Grants.gov)

8.0. **Other Information**

8.1. *Definitions*

The following definitions apply to awards made under this Notice of Funding Opportunity:

- 8.1.1 *Budget Period* – A 24-month period during which expenditure obligations will be incurred by the non-federal entity of an award under this Notice of Funding Opportunity. Thus, for the purposes of this Notice of Funding Opportunity, the budget period will be from September 30, 2024, to September 29, 2026, for the Notice of Award.
- 8.1.2 *Cost Policy Statement* – A document describing non-federal entities' general accounting policies and a description of their cost allocation methodology (how each type of proposed cost is allocated: direct, indirect, or match). This policy must be signed by an authorized official and for the purposes of this Announcement, it is included in the AOR's Certification Letter.
- 8.1.3 *Counseling* – Services provided one-on-one to an individual and/or business that are delivered in person (face-to-face), on the telephone, or electronically and which are:
- i. Substantive in nature and concern the formation, management, financing, and/or operation of a small business enterprise; and
  - ii. Specific to the needs of the business or individual.
- 8.1.4 *Eligible Applicant* – A state agency that has been officially designated by a state governor (or equivalent) as the sole applicant and lead entity for conducting the State's trade and export activities, and that such designation occurred prior to the date of application submission for an award under the State Trade Expansion Program.
- 8.1.5 *Eligible Small Business Concern* - A company/firm that meets and adheres to the following criteria:
- i. Is organized or incorporated in the United States;-
  - ii. Is operating in the United States;-
  - iii. Size standard requirements:
    - a. The applicable industry-based small business size standard established under section 3 of the Small Business Act; or
    - b. The alternate size standard applicable to the program under section 7(a) of the Small Business Act and the loan programs under Title V of the Small Business Investment Act of 1958 (15 U.S.C. 695 et seq.);
    - c. The U.S. Small Business Administration (SBA) size standards are found at 13 C.F.R. Part 121. Use the following sba.gov link for information on size standards for your business ([www.sba.gov/category/navigation-structure/contracting/contracting-officials//small-business-size-standards](https://www.sba.gov/category/navigation-structure/contracting/contracting-officials//small-business-size-standards));-
  - iv. Has been in business for not less than 1 year, as of the date on which assistance using a grant under this subsection commences; and,
  - v. Has access to sufficient resources to bear the costs associated with trade, including the costs of packing, shipping, freight forwarding, and customs brokers.
- 8.1.6 *Export Sales* – For the purposes of STEP, there are two types of sales that non-federal entities will report data as defined below:
- i. *Actual* export sales – payment received, signed contract, signed purchase order in hand from a foreign buyer for a product or service provided by a STEP client.

- 8.1.7 *Financial Assistance Plan* – A non-federal entity’s proposed plan of providing financial assistance awards to cover costs that eligible small business concerns would otherwise pay from their own funds.
- 8.1.8 *Grant* - A federal grant is an award of financial assistance from a federal agency to a non-federal entity to carry out a public purpose of support or stimulation authorized by a law of the United States.
- 8.1.9 *Job Creation* – Job creation is the sum of all employment gains from expanding establishments from year to year including establishment startups. Note: the contribution of firm births can be measured by using the job creation from establishments with firm age equal to zero.
- 8.1.10 *Market Expansion (ME)* are ESBCs who currently export to one or more markets and are seeking to:
- Expand into new country market(s); or
  - Expand into a new region or new segment or new product line within an existing market.
- 8.1.11 *New to Export (NTE)* are ESBCs with:
- No export experience at all;
  - Only “accidental” or “novice” exporting experience; or
  - No export experience within 24 months.
- 8.1.12 *Non-Federal Entity* – See Section 3.1.
- 8.1.13 *Notice of Award* – The legal document, signed by both SBA and the non-federal entity, that memorializes the award of funding under a Notice of Funding Opportunity and contains the specific terms and conditions that apply to the award.
- 8.1.14 *Project Period* – The period of performance for an award made under this Notice of Funding Opportunity, includes 24 months of a performance budget period.
- 8.1.15 *Significant New Trade Opportunities* – The total number of ESBCs that receive STEP services. This is the total number of New to Export ESBCs PLUS the total number of Market Expansion ESBCs.
- 8.1.16 *Small Business Communities* (for the purposes of the STEP program) are defined as:
- socially and economically disadvantaged individuals (set forth in 13 C.F.R 124.103 and 104) who have been subjected to racial or ethnic prejudice or cultural bias within American society because of their identities as members of groups and without regard to their individual qualities; whose ability to compete in the free enterprise system has been impaired due to diminished capital and credit opportunities as compared to others in the same or similar line of business who are not socially disadvantaged. The socially and economically disadvantaged individual must own not less than 51% of the firm. These include:
    - Black Americans;
    - Hispanic Americans;
    - Native Americans (Alaska Natives, Native Hawaiians, or enrolled members of a federally or state recognized Indian Tribe);
    - Asian Pacific Americans (the complete list is available at 13 C.F.R 103); and
    - Subcontinent Asian Americans (persons with origins from India, Pakistan, Bangladesh, Sri Lanka, Bhutan, the Maldives Islands or Nepal).
  - Small business concerns owned or controlled by women that are:
    - Not less than 51% unconditionally and directly owned and controlled by one or more women who are United States citizens; and
    - A small business as defined in 13 C.F.R. part 121.

iii) Rural small business concerns - an eligible small business concern located in a rural area, as defined at 26 USC 1393(2), *Rural area*. This includes any area that is outside of a metropolitan statistical area (MSA). MSAs have at least one urbanized area of 50,000 or more population, plus adjacent territory that has a high degree of social and economic integration as measured by commuting ties. See OMB Bulletin No. 15-01 for a complete list of MSAs.

iv) Veterans and/or service-connected disabled veterans – as defined at 38 CFR 3.1(d) and 13 CFR 125.8(g), *SBC owned and controlled by service-disabled veterans*, is a person who served in the active military, naval, or air service and who was discharged or released under conditions other than dishonorable, which is demonstrated on the DD Form 214 and who is:

- Not less than 51% unconditionally and directly owned and controlled by one or more veterans who are United States citizens; and
- A small business as defined in 13 C.F.R. part 121.

8.1.17 *State(s)* - Any of the United States, the District of Columbia, the Commonwealth of Puerto Rico, the U.S. Virgin Islands, Guam, the Commonwealth of Northern Mariana Islands, and American Samoa.

8.1.18 *STEP Client* – An ‘eligible small business concern’ to which a non-federal entity provides financial assistance awards and/or services consistent with the non-federal entity’s award under this Announcement.

8.1.19 *STEP non-federal entity* – A non-federal entity (as defined in Section 3.1) to which an award is made under this Announcement.

8.1.20 *Training* – a workshop, seminar or similar activity or event that: delivers a structured program of knowledge, information, or experience on a business-related subject. The training must last for a minimum of one hour and include two or more individuals and/or businesses in attendance.

## **9.0 *Key Policies Applicable to this Announcement***

9.1 *Buy American and Hire American* – All STEP grant recipients and clients are subject to Executive Order 13788 of April 18, 2017 to monitor, enforce, and comply with Buy American Laws to the extent they apply to ensure the maximum utilization of goods, products, and materials produced in the United States, to promote economic growth, create good jobs at decent wages, strengthen our middle class, and support the American manufacturing and defense industrial bases; and Hire American requirements in order to create higher wages and employment rates for workers in the United States, and to protect their economic interests. Note: This is an abbreviation of law. Read the full details that can be found in the federal Register, Vol. 82, No. 76, dated April 21, 2017.

9.2 *Debarment* – SBA will not award STEP grants to suspended or debarred parties unless SBA grants an exception. 2 C.F.R. § 180.400(a), as adopted by 2 C.F.R. § 2700.10. Before signing a Notice of Award for the STEP award, the potential non-federal entity and its principals must disclose whether they are:

- i. Presently excluded or disqualified;
- ii. Convicted within the preceding three years of any of the offenses listed in 2 C.F.R. § 180(a)(essentially crimes and civil actions indicating a lack of present responsibility such as fraud, embezzlement, false claims, tax evasion and obstruction of justice);
- iii. Presently indicted for, or otherwise criminally or civilly charged with the commission of any offense listed in 2 C.F.R. § 180(a); or,
- iv. Have had one or more public transactions (federal, state or local) terminated within the preceding 3 years for cause or default.

Please note that SBA defines ‘principal’ at 2 C.F.R. §§ 180.995 and 2700.995. A principal is essentially an individual in a position to influence the grantee’s performance of the STEP Award. STEP non-federal entities must review the definition of principal in order to ensure compliance with this requirement.

STEP non-federal entities must include a term or condition in contracts and other arrangements used to support performance of the STEP Award, which requires signatories to those arrangements to comply with Subpart C of 2 C.F.R., Part 180.

- 9.3 *Domestic Policy* - A strong emphasis of the Small Business Administration’s State Trade Expansion Program is assisting STEP clients, to travel to new foreign markets to develop key contacts, establish distribution channels, and negotiate export sales in the market. However, ESBCs that are new to exporting could discover their first international trade partners and make export sales at domestic trade shows that attract a strong international buyer attendance. In addition, experienced ESBCs seeking to expand their export markets and sales could make significant progress at a domestic trade show that serves as the premier international exhibition for their industry.

The current STEP authorizing statute allows use of STEP funding to support STEP clients who can effectively increase export sales by exhibiting at domestic trade shows. We must balance the risks of using federal export development funds solely for domestic business development with the rewards of allowing STEP clients to exhibit at domestic trade shows which are appropriate for developing the export component of their businesses. Future domestic trade shows are eligible for STEP grantees to provide financial assistance to both new-to-export and market-expansion STEP clients when the following requirements are met:

1. Grantees will provide the annual schedule of IBP and IBP Select trade shows to all STEP clients who are considering or applying for domestic trade show assistance from STEP.
2. For each STEP client accepted for STEP financial assistance to exhibit at a domestic trade show, the Grantee will:
  - a. Obtain from the STEP client its international strategy for exhibiting at a specific domestic trade show;
3. Complete a justification statement that reflects the grantee’s reasonable judgment that a domestic trade show is appropriate for the STEP client’s export development. Reasonable judgment may be based upon one or more factors, to include: a significant foreign buyer presence based upon prior years’ attendance data published by the trade show organizer, a known foreign buyer delegation attending a domestic trade show which is specifically relevant to a STEP client’s export development, a domestic trade show which serves as the premier international exhibition for a STEP client’s industry, et al. After the event, grantee will obtain from STEP client a list of matchmaking activities completed, if any, and the international leads (such as brokers, distributors, and buyers) contacted during the domestic trade show (the reasonable, necessary, allowable, and allocable costs of matchmaking services are eligible for STEP funding).
4. The grantee will place the required documentation outlined in steps 2 through 3 in the STEP client’s field and will maintain this documentation for three years after submission of the close out documentation for that award period of performance. This documentation will be subject to review by SBA or its agents at any time.

- 9.4 *Fly America Act* - Codified at 14 C.F.R. Part 301-10.131-143, the Act requires that, generally, individuals whose travel is paid for with federal award funds fly on U.S. Flag Air Carriers. Therefore, it is applicable to travel by both STEP award recipients and STEP clients. However, there are several exceptions that enable travel on non-U.S. Flag Air Carriers.



- i. If travel of a STEP non-federal entity or STEP client is not paid for with federal award funds, the Act is not applicable. That is, if the travel is paid out of State matching funds, by the STEP client, or by a non-federal third party, the act does not apply.
- ii. If travel is to a destination for which an Open Skies Agreement has been negotiated, the Fly America Act is not applicable. Currently, Open Skies Agreements have been negotiated with the European Union, Austria, Switzerland, and Japan.
- iii. There are a number of other narrower, more trip-specific exceptions that can be found in the regulation and require waiver approval by SBA as part of the travel request process.

9.5 *Self-Representation as an eligible small business concern* – The Trade Facilitation and Trade Enforcement Act of 2015 (HR 644) limits provision of services to ‘eligible small business concerns.’ (See definition at 8.1.5.) To ensure compliance with this requirement, firms receiving assistance under the STEP must self-represent themselves as such. This self-representation must be made by firms prior to provision of service by STEP non-federal entities, and copies of such self-representations must become part of the non-federal entity’s client records.