

# Frequently Asked Questions and Answers: FY24 Reducing Embodied Greenhouse Gas Emissions for Construction Materials and Products Grant Program (AKA EPD Assistance Grants)

The Notice of Funding Opportunity (NOFO) for this competition details the application requirements and formally requests applications. This document addresses frequently asked questions to help potential applicants apply for this grant funding. Topics posed relate to the pre- and post-application phase. Periodic updates to this document will be made during the application submission period. Please refer to the NOFO for full details.

Note that there may be limited updates to the frequently asked questions in the final 30 days of the application period.

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## **General Program Questions**

### **Application Assistance Resources**

#### **Where can applicants go for help in applying for EPA grants in general?**

- Prior to applying for an EPA grant, applicants must have an active account on the Sam.gov.
- For more information on how to apply for EPA grants please see EPA's [How to Apply for Grants](#).
- EPA also recommends applicants refer to information on Grants.gov including the following:
  - [Support page](#)
  - [Self-Service Knowledge Base page](#)
  - [Introduction to Grants.gov Video Series](#)

#### **I have never submitted a federal grant application before. Are there resources that I can refer to?**

- Yes. Please see the information on the following site, EPA's Grant Recipient Training Opportunities page contains information for prospective grant applicants and grant recipients: <https://www.epa.gov/grants/recipient-training-opportunities>. These pages provide useful information on how to develop a budget, understanding the grant process from application to closeout, understanding the different uses of subawards and contracts in a grant, and more.

### **Application Logistics**

#### **Whom can I contact with technical questions that are not addressed in a current solicitation notice or in the FAQs?**

- Please email [Embodiedcarbon@epa.gov](mailto:Embodiedcarbon@epa.gov).

#### **When is the deadline for submitting applications?**

- The deadline for submitting applications is **January 16, 2024** at 11:59 PM (Eastern Time) through Grants.gov.

#### **When does EPA plan to start making awards?**

- EPA anticipates beginning to make selections in the Spring of 2024 and awards in Summer 2024.

#### **Will there be additional competitions for funding under IRA 60112 for Reducing Embodied Greenhouse Gas Emissions for Construction Materials and Products?**

- EPA does anticipate additional competitions but has not established any future competitions.
- The Inflation Reduction Act requires EPA to obligate all IRA Section 60112 funds by September 30, 2031.

#### **What is the difference between a grant and a cooperative agreement? How should I note my preference in my application?**

- The determination of whether a grant or cooperative agreement will be awarded will be made by EPA. If an applicant would like to designate a preference for a grant or cooperative agreement, they may do so by indicating that preference in the project narrative of their application.
- Grants: Awards of financial assistance issued by the federal government to eligible recipients based on approved workplans. EPA will not be substantially involved in the performance of

grants but will monitor and perform oversight of grant work to ensure federal funds are being used as intended and expended in a timely and efficient manner.

- Cooperative Agreements: Cooperative agreements involve substantial involvement between the EPA and the selected applicant in performance of supported work. EPA will negotiate precise terms and conditions relating to substantial involvement as part of the award process.

**Reducing Embodied Greenhouse Gas Emissions for Construction Materials and Products is focused on construction materials manufacturers' development of disclosure documents called Environmental Product Declarations (EPDs) to reliably report emissions and gain access to growing markets for low embodied carbon materials. Are there any similar federal programs that support low embodied carbon construction materials and products?**

- Yes. Please see the [Tools & Resources](#) of this website.

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## **Application and Threshold Eligibility**

### **Eligible Applicants**

#### **Who is eligible for an award under this competition?**

According to Section III.A. of the Notice of Funding Opportunity, entities eligible to apply for this funding opportunity include businesses that manufacture, remanufacture, and refurbish construction materials and products, and States, Indian Tribes, and nonprofit organizations that will support such businesses.

Consistent with Assistance Listing No. 66.721 and EPA's Policy for Competition of Assistance Agreements (EPA Order 5700.5A1), competition under this solicitation is available to the following:

- Businesses (for profit or nonprofit) that manufacture, remanufacture, or refurbish construction materials and products.
- States, including the District of Columbia, the Commonwealth of Puerto Rico, U.S. Virgin Islands, Guam, American Samoa, the Commonwealth of the Northern Mariana Islands, and any agency or instrumentality thereof (including port authorities) exclusive of local governments.
- Indian tribes are defined as any Indian tribe, band, nation, or other organized group or community, including any Alaska Native Village or regional or Village Corporation as defined in or established pursuant to the Alaska Native Claims Settlement Act (43 U.S.C. Chapter 33), which is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians (25 U.S.C. 450b(e)). See annually published Bureau of Indian Affairs list of Indian Entities Recognized and Eligible to Receive Services." Note that Alaskan Native Corporations are Indian tribes for the purposes of 2 CFR 200.1.
- Nonprofits, consistent with the definition of Nonprofit organization at 2 CFR § 200.1, mean any corporation, trust, association, cooperative, or other organization that is operated mainly for scientific, educational, service, charitable, or similar purpose in the public interest and is not organized primarily for profit; and uses net proceeds to maintain, improve, or expand the operation of the organization. The term includes tax-exempt nonprofit neighborhood and labor organizations. Note that 2 CFR 200.1 specifically excludes Institutions of Higher Education from the definition of non-profit organization because they are separately defined in the regulation.

While not considered to be a non-profit organization(s) as defined by 2 CFR 200.1, public or nonprofit Institutions of Higher Education are, nevertheless, eligible to submit applications under this NOFO. Private universities who can demonstrate that they qualify as nonprofits based on the nature of how they are incorporated under state law or through their federal tax-exempt status are eligible.

**Who is ineligible to apply under this competition?**

- According to Section III.A. of the Notice of Funding Opportunity, ineligible applicants include entities who are not incorporated in the United States, for profit firms who do not manufacture construction materials and products (e.g., consulting firms and individual consultants, management firms, architectural and engineering firms, information technology vendors, proprietary colleges, universities and trade schools), and Local governments as defined in 2 CFR § 200.1.

**Are individual companies eligible to apply?**

- Yes. Individual companies that meet the eligibility requirements in Section III.A. of the NOFO can apply.

**If an entity is waiting for a 501(c)3 approval, will the entity qualify as a nonprofit with provisional approvals from IRS?**

- An entity may still qualify as a nonprofit organization without 501(c)(3) approval because 501(c)(3) status is not required for an entity to meet the definition of “nonprofit organization” in 2 CFR § 200.1.
- 2 CFR § 200.1 states that a nonprofit organization “means any corporation, trust, association, cooperative, or other organization, not including Institutes of Higher Education, that: (1) is operated primarily for scientific, educational, service, charitable, or similar purposes in the public interest; (2) is not organized primarily for profit; and (3) uses net proceeds to maintain, improve, or expand the operations of the organization.

**Are agencies and instrumentalities of a unit of government eligible to apply?**

- Yes, an entity recognized by an eligible unit of government (i.e., a state, territory, or tribal government,) as an agency or instrumentality is eligible to apply as the unit of government. Please refer to Eligibility Criteria Section III.A. of the NOFO.

**Do applicants need to be U.S. owned/operated?**

- Yes. See Section I.C. Scope of Work and Eligible Projects and Section III.A. Eligible Applicants of the NOFO.

**Could a foreign-owned for-profit company that would otherwise be ineligible for a grant award establish a US-based non-profit for purposes of eligibility?**

- Yes. However, the non-profit would be prohibited from using the grant award for projects taking place outside of the U.S. Funds under this program can only be used to support U.S.-based facilities, manufacturers, EPD verifiers, Program Operators, or Community Assessment Bodies. See Section I.C. Scope of Work and Eligible Projects.

**Notice of Intent to Apply (NOTE: The date has been extended to November 15, 2023.)**

**Do applicants need to provide a Notice of Intent (NOI) for their application?**

- No. It is optional but encouraged to send a NOI to [embodiedcarbon@epa.gov](mailto:embodiedcarbon@epa.gov). Please include your approximate funding request amount and one to two sentences about the scope of your project. The submission of a Notice of Intent to Apply is optional, confidential, and not binding (applicants may choose to take a different approach/scope in the final proposal). The NOI is a process management tool that will allow EPA to better anticipate the total staff time required for efficient review, evaluation, and selection of submitted applications.

**Is EPA reviewing NOIs to confirm applicant eligibility?**

- EPA will not be reviewing or making determinations about an applicant's eligibility based solely on the information provided in the Notice of Intent; EPA will determine an applicant's eligibility based on the information provided in the full application. To understand if you are an eligible applicant, please refer to Section III.A. of the NOFO.

**Will the number of NOIs received by EPA be shared publicly?**

- As noted on the summary page of the Notice of Funding Opportunity, submissions of NOI will be kept confidential.

**Can an entity withdraw a Notice of Intent?**

- Yes, applicants may withdraw a Notice of Intent by emailing [embodiedcarbon@epa.gov](mailto:embodiedcarbon@epa.gov).

**Will EPA "approve" NOIs? Should applicants wait to hear from EPA before drafting their application?**

- No, EPA is not approving NOIs. Applicants should not wait to hear from EPA before drafting their full application.

**Number and Amount of Awards**

**How many grants will be awarded?**

- EPA anticipates making up to 40 awards under this announcement in FY24.

**Will EPA award partial awards?**

- Yes, EPA may partially fund applications. See Section II.B. of the NOFO:
- Partial Funding - In appropriate circumstances, EPA reserves the right to partially fund applications by funding discrete portions or phases of proposed projects. If EPA decides to partially fund an application, it will do so in a manner that does not prejudice any applicants or affect the basis upon which the application, or portion thereof, was evaluated and selected for award, and therefore maintains the integrity of the competition and selection process.

**How much funding is available?**

- Funding award amounts in FY 24 are expected to be \$250,000 to \$10 million for up to \$100 million total. EPA anticipates making awards in these funding subranges: \$250,000 to \$750,000; \$750,000 to \$5,000,000; and \$5 to \$10 million with periods of performance of up to five years.

**If the selected applications exceed the total funds available, is it more likely EPA will partially fund applications or award fewer awards?**

- EPA reserves the right to modify this award allocation based on the quality of applications that are received and other program considerations. EPA aims to maximize national geographic coverage of the program across all the awards.
- As described in Section II.B. of the NOFO, in appropriate circumstances, EPA reserves the right to partially fund applications by funding discrete portions or phases of proposed projects.

**Scope of Work**

The goal of the EPD Assistance Program, as outlined in Inflation Reduction Act Section 60112(a), is “to support the development, enhanced standardization and transparency, and reporting criteria for Environmental Product Declarations that include measurements of the embodied greenhouse gas emissions of the material or product associated with all relevant stages of production, use, and disposal, and conform with international standards, for construction materials and products by providing technical assistance to businesses that manufacture construction materials and products in developing and verifying Environmental Product Declarations, and to States, Indian Tribes, and nonprofit organizations that will support such businesses.

**What kinds of projects will be considered for funding under this NOFO?**

- Per Section I.C. of the Notice of Funding Opportunity, EPA envisions selected projects to fall under five broad categories:
  1. **Robust Data for EPDs:** Projects that contribute new and/or improve critical data, analysis, or feedback for producing robust EPDs.
  2. **Robust Product Category Rule (PCR) Standard Development, PCRs, and Associated Conformity Assessment Systems:** Projects that encourage the development of robust, standardized PCRs, including identifying what data needs to be collected for EPDs, how that data should be collected, how it should be reported in EPDs, and what transparency and verification needs to be in place to ensure credible EPDs.
  3. **Robust Tools & Resources to Support & Incentivize Development and Verification of EPDs:** Projects that contribute to the development of tools and resources to make it easier, faster, and more cost effective to produce and disclose robust EPDs.
  4. **EPD Development and Verification:** Projects that offer construction material and product manufacturers assistance in producing robust EPDs, or in which a construction material or product manufacturer is producing robust EPDs.
  5. **Robust EPD Data Platforms and Integration:** Projects that support EPD reporting, availability, and verification; support the standardization of disparate EPD systems; and support future EPD integration into construction design and procurement systems.
- Please see Appendix B for an expanded list of example eligible projects in these categories. Projects described in Appendix B are intended to provide examples of the range of the types of projects and activities that may be eligible for funding under this funding opportunity. Please see Section I.D. for the definition of “robust,” as used in this section and throughout the document.

**Can a jurisdictional entity propose a program that serves a geography larger than the entity's geographic boundaries?**

- Yes, a jurisdictional entity may propose a program that serves a geography larger than the entity's geographic boundaries.
- For a jurisdictional entity, carrying out activities in another jurisdiction may pose more challenges, such as having to seek approval from the other jurisdiction for projects. This varies by state and local law. It is the responsibility of the recipient to address these challenges in carrying out the award. An applicant should therefore be mindful of any jurisdictional issues in developing a program strategy.

**Period of Performance**

**Should applicants plan to fully spend financial assistance dollars by the end of the 5-year period of performance, or is it sufficient to plan to commit these dollars to projects by the end of the five-year period?**

- The recipient must liquidate any financial obligation (i.e., commitment) that the recipient incurred under the award within 120 days following the end of the five-year period of performance, per 2 CFR § 200.344(b).

**Cost Sharing or Matching**

**Are there any match or cost-sharing requirements? Do applicants need to secure other sources of funding to apply?**

- No, there are no match nor cost-sharing requirements for this grant competition.
- Applicants do not need to secure other funding sources to apply to this grant competition.

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**Grant Competition**

**How will applications be selected? What are the threshold criteria and how are they used?**

- All applications will be reviewed against the threshold eligibility criteria noted in Section III.C & III.D. of the NOFO. The threshold eligibility criteria are used to screen which applications are eligible to merit further review. Applications that meet all threshold eligibility criteria will be evaluated against the evaluation criteria noted in Section V of the NOFO.

**Can EPA perform a cursory review of my application and tell me if my project is a good fit for this grant competition?**

- No.
- In accordance with [EPA's Assistance Agreement Competition Policy – EPA Order 5700.5A1](#), EPA may not meet with individual applicants to discuss draft proposals/applications, provide informal comments on draft proposals/applications, or provide advice to applicants on how to respond to ranking criteria.
- Applicants are responsible for the contents of their applications. However, consistent with the provisions in the announcement, EPA will respond to questions from applicants regarding threshold eligibility criteria, administrative issues related to the submission of the application,

and requests for clarification about the announcement.

**How long does the application review process take and when will I be notified of EPA’s decision?**

- Applications that do not pass the threshold eligibility review (based upon the criteria noted in Section III.D of the grant announcements will be deemed ineligible. Applicants that fall into this category will receive a letter of ineligibility within 15 calendar days upon EPA making their decision. The letter of ineligibility will explain the reason for the disqualification from competition.
- EPA anticipates it will notify prospective grantees of anticipated funding recommendations between 60 – 90 days from the date of application submissions. Applications that met threshold criteria but did not merit funding consideration will receive an email notification.
- Official grant award notices will be issued by EPA’s Grants and Interagency Agreement Management Division (GIAMD) of the Office of Grants and Debarment (OGD).

**Will EPA hold debriefings for applicants?**

- Applicants found to be ineligible are advised to request a debriefing within 15 calendar days of receiving the ineligibility letter from EPA.

**Are grant awards issued under this program eligible for inclusion in PPGs?**

- No. Grant awards issued under this program are ineligible for inclusion in Performance Partnership Grants (PPGs).

**Will there be a set aside for Tribal projects?**

- No. The grant programs will not include a funding set aside for Tribal projects.

**Will applications be reviewed by EPA staff, outside experts/advisors, or combination?**

- The application review teams may include a combination of EPA staff and qualified external reviewers.

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## **Partnerships, Subawards, and Contracts**

**Do all members of a partnership have to be eligible applicants?**

- Yes. See the section IV.E.5. of the NOFO.

**Can an entity be in a partnership on multiple applications?**

- Yes, an entity may be a partner with more than one lead applicant, so long as each application is for a different type of work (e.g., serving a different geography or sector, and/or different scope of work).

**Is there a maximum or minimum amount of grant funds that a pass-through entity applicant may subaward?**

- There is no maximum or minimum amount of grant funds that a pass-through applicant can subgrant. Entities exploring subawards with a pass-through applicant should discuss the amount of grant funds they need to perform their respective scope of work. However, the pass-through

proposal for subaward management must describe how they will manage the subaward process. See Section IV.E.4.

**Is there a requirement on how much funding must be distributed through pass-through entities versus how much can be used by the primary awardee?**

- No, while there is no set amount a pass-through must distribute, the purpose of a pass-through is to ‘pass-through’ the grant funds to subrecipients. The pass-through should retain an amount of funding sufficient to oversee its subawards and contractors.

**Can a pass-through entity allocate some funds for the purpose of engaging a consultant as a contractor (versus as a subawardee)?**

- Yes the pass-through entity can enter into contracts with consultants or engineers subject to the competitive procurement requirements of 2 CFR 200, Subpart D, and 2 CFR 1500. See [EPA’s Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#) for further information.

**Can an eligible applicant apply with the intent of contracting with another entity to administer the program?**

- Yes. Applicants do not need (and are not encouraged to) to identify contractors at the time of application but need to follow procurement policy guidelines as outlined in the following link: [EPA’s Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#).

**Could an eligible entity receive both a direct grant and a subaward or a contract via another entity’s direct grant? What if that entity were to receive greater than \$10 million total?**

- There is no legal prohibition on an entity receiving both a direct grant and a subaward in the same grant program, regardless of the total amount awarded to the entity. The applications will be evaluated and scored based on the criteria identified in the NOFO, and final awards will be distributed accordingly.

**Could pass-through funds be allocated to a U.S. entity that distributes (rather than manufactures) a construction material, or would support be limited to technical assistance provided by the primary awardee?**

- No, subrecipients must be eligible entities under the NOFO, which are businesses that manufacture, remanufacture, or refurbish construction materials and products.

**How should applicants indicate that they intend to apply as a pass-through entity?**

- Information on pass-through entity applications is included in Section I.C, I.D, and IV.E.4 of the Notice of Funding Opportunity.
- Applicants should specify in the Budget Narrative and the Budget Table the intent to act as a pass-through entity and issue subawards and/or enter into a procurement contract. Applicants should also explain in the Program Narrative their vision, plan, and strategy for the program and the role of the program administrator in implementation.

**Do contractors and/or subrecipients receiving financial assistance from grantees need a SAM.gov registration and/or a Unique Entity Identifier (UEI)?**

- Contractors do not need to have either a SAM.gov registration or a UEI.
- Subrecipients who receive subawards from a pass-through entity will need a UEI, although they will not need a SAM.gov registration.

**Can EPA share the partner connection list with organizations that did not complete the [partner connection forms](#)?**

- No, EPA cannot share the partner connection list with organizations that did not complete the partner connection forms.

**What is the difference between a subrecipient and a contractor?**

- A subrecipient is an entity that receives a subaward from the recipient (referred to as the “pass-through entity”) to carry out part of the federal award. Subrecipients only receive reimbursement for their actual direct or approved indirect costs such that they do not “profit” from the transaction.
- A partner in a partnership agreement is considered a subrecipient.
- A contractor is an entity that receives a contract from the recipient to carry out the federal award. Contractors (including individual consultants) typically provide goods and services on commercial terms, operate in a competitive environment and a reasonable profit is allowable. A contractor does not need to be an eligible recipient but grant recipient must follow procurement guidelines.
- For additional information on determining whether a transaction qualifies as a subaward or a procurement contract, please refer to Section II.C. Award Types of the NOFO, [EPA’s Subaward Policy](#), and [EPA’s Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#).

**What is a partnership?**

- A “partnership” is a formal relationship between two or more eligible grant or cooperative agreement recipients that is memorialized in writing and is legally binding under applicable law. The partnership agreement must specify which member of the partnership will enter into the assistance agreement with EPA for the purposes of accountability for the proper expenditure of Federal funds, performance of the assistance agreement, liability for claims for recovery of unallowable costs incurred under the agreement and must specify roles in performing the proposed scope of work for the assistance agreement. One eligible recipient in the partnership must receive EPA funding as the direct recipient of the grant or cooperative agreement and the other partner(s) receiving funding as a subrecipient(s).

**If a grantee has underperforming subrecipients, can the grantee withdraw and redeploy the capital to other subrecipients?**

- Yes. As provided in 2 CFR § 200.332(d), the pass-through grantee has authority to monitor subrecipient performance to verify that the subrecipient achieves performance goals. The pass-through grantee has discretion to take any of the remedial actions described at 2 CFR § 200.339 if the subrecipient is unable or unwilling to take corrective actions, including termination of the subgrant.

**Do applicants need to identify all subrecipients and/or contractors before submitting their applications?**

- EPA does not require nor encourage applicants to name contractors.

**May contractors, subrecipients, and other award partners change over the program period?**

- It depends. Any changes must be consistent with the applicable regulations and terms and conditions of the grant. Some changes may require modifications or amendments to the grant and approval by the Grant Management Office (GMO).

**Can grantees purchase goods and services from foreign-owned companies?**

- Recipients may purchase goods and services from foreign-owned companies using the applicable procurement standards in 2 CFR 200, with the exception of the prohibition in 2 CFR 200.216 on the procurement of certain telecommunications and video surveillance services and equipment, and the requirement that all travel services must be on available U.S. air carriers certified under 49 U.S.C. Section 40118.

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## **Award Administration**

### **National Policy Requirements**

**Does Build America, Buy America apply to this grant program?**

- No. It does not apply to this grant program. Since no iron, steel, manufactured products, or other construction materials can be purchased with this grant program, Build America, Buy America does not apply.

**Does Davis-Bacon and Related Acts apply to this grant program?**

- No.

**Do Title IX Requirements apply to this grant program?**

- Yes. If the recipient is an education program or activity (e.g., school, college or university) or if the recipient is conducting an education program or activity under the assistance agreement, the recipient must comply with Title IX of the Education Amendments of 1972. Title IX prohibits discrimination on the basis of sex in education programs and activities operated by entities receiving Federal financial assistance. For further information about compliance obligations regarding Title IX, see 40 CFR Part 5 and the [Department of Justice](#).

**Is this grant program a covered program under Justice40?**

- No.

### **Fund Draw Down Mechanisms**

**Will grant funds be disbursed to grantees once awards are made?**

- No, EPA will not disburse grant funds at the time of award. Once EPA awards the grant or cooperative agreement, the recipient will only have access to funding (“draw down”) to the extent authorized in 2 CFR 200.305(a) for states and 2 CFR 200.305(b) for non-state recipients.
- States draw down funds based on the standards specified in their Cash Management

Improvement Act agreements with the U.S. Treasury or the Treasury regulations at 31 CFR part 205 and Treasury Financial Manual (TFM) 4A-2000, "Overall Disbursing Rules for All Federal Agencies" as provided in 2 CFR 200.305(a).

- Non-state recipients are subject to the "Proper Payment Draw Down" General Term and Conditions in [EPA's General Terms and Conditions](#) for Assistance Agreements which interpret 2 CFR 200.305(b). Essentially, non-state recipients may only draw down funds to meet their immediate cash needs and must disburse substantially all of the drawn down funds within five business days to pay employees, contractors, subrecipients or other allowable costs.

### **Use of Funds**

#### **If EPA funds are used to help develop a toolkit or other resource for an industry sector or manufacturers, who owns the toolkit or other resource once it is complete?**

- The recipient will own the toolkit.
- However, as discussed in 2 CFR 200.315, EPA reserves a right to use the toolkit for Federal purposes.
- By accepting the grant funds subject to the regulation, the grant recipient has agreed to EPA having a license to use the product and data generated with grant funds and allowing others to access and use the material for Federal purposes as discussed in the regulation.
- At the time of the grant closeout, an agreement can be made between EPA and the recipient on future uses and accessibility.

#### **Can we purchase equipment using grant funding? What happens to the equipment after the grant is over?**

- Equipment may be purchased with grant funding as noted in 2 CFR 200.313, provided the equipment is integral to the grant activity and as such will provide technical assistance, training or tools to businesses.
- Grant recipients may use such equipment for which it was acquired as long as needed, regardless of whether the project or program continues to receive federal funding.
- The recipient may also use the equipment in other activities currently or previously supported by a federal agency.
- When the recipient no longer needs the equipment for the original project or program, or for other activities currently or previously supported by a federal agency, and the fair market value is less than \$5,000, the equipment may be kept, sold, or disposed of by the applicant with no further obligation by EPA.
- If the fair market value of the equipment is \$5,000 or more, the recipient may keep or sell the equipment at which point EPA would have the right to proceeds from the sale.
- The amount of compensation will be computed by calculating the percentage of federal participation in the cost of the project – this will be assessed on the current fair market value of the equipment. If the recipient has no need for the equipment, the recipient will need to submit a formal request to EPA to state that there will not be a need for keeping the equipment.
- Refer to 2 CFR 200.313. In cases where a recipient fails to take appropriate disposition actions, EPA may direct the recipient to take such actions.

## **Reporting Requirements**

### **Will EPA consider extending the semi-annual update performance reporting requirement from 30 days after the end of each reporting period to 45 days?**

- No; 2 CFR § 200.329(c)(1) states that such performance reports “submitted quarterly or semiannually must be due no later than 30 calendar days after the reporting period.”
- However, the regulation does provide that if “a justified request is submitted by a non-Federal entity, the Federal agency may extend the due date for any performance report.” If unanticipated circumstances prevent a recipient from submitting a particular performance report in a timely manner, EPA’s Project Officer may extend the due date for that specific report.

### **Do applicants need to submit a reporting plan for their proposed project? What are the reporting expectations for grantees?**

- According to Section VI of the Notice of Funding Opportunity, applicants must provide an estimate of expected outputs and outcomes, as well as a plan for reporting outputs and outcomes during the grant period.
- Once grants are awarded, grantees will be required to submit:
  1. Midyear updates at the 6-month and 18-month mark should be emailed to the grantees’ Project Officer providing an update on the number of businesses provided technical assistance. This is a brief email update.
  2. Annual reports detailing the outputs and outcomes described in Section VI, should be submitted annually.
  3. In addition to the annual reports, a final report should be submitted at the conclusion of the grant period detailing outputs and outcomes as described in Section VI.

### **When will EPA provide further guidance on reporting requirements?**

- EPA will include reporting requirements within the terms and conditions of each grant agreement.