EPA REGION 1 RLF WORKSHOP
APRIL 6-7, 2017

RLF 101
General Terms & Conditions
What You Don't Know Will Hurt You

Read the Terms and Conditions

- Brownfield RLF Terms & Conditions (T&C) are extensive and complicated. They are also critically important.

- The T&Cs structure the "deal" EPA makes with RLF Recipients.

- If something goes wrong, one of the first places EPA will look will be the T&Cs.

- The T&Cs implement statutory, regulatory and program policy requirements.

- There are two categories of T&Cs - "General" T&Cs and "RLF" T&Cs.

General T&Cs

- EPA's General T&Cs apply to all assistance agreements.
- These T&Cs typically implement Government-wide requirements.
- The General T&Cs are on the EPA website.
- The General T&Cs are incorporated by reference into the Brownfields RLF Cooperative Agreement.
- These T&Cs "flow down" to subrecipients but not to borrowers except when specified in the Programmatic T&Cs.

Topics Covered by General T&Cs

- Financial Information
- Payment Method
- Supplemented by RLF T&C
- Selected Items of Cost
- Consultant Fee Cap
- Subaward Management
- Management Fees
- Reporting and Additional Post-Award Requirements
- Central Contractor Registration/System for Award Management and Universal Identifier Requirements

Topics Covered by General T&Cs

- Reporting Subawards and Executive Compensation
- Recipient Integrity and Performance Matters - Reporting of Matters Related to Recipient Integrity and Performance ($10 M in Fed Funds)
- Audit Requirements ($750 K in Fed Funds)
- Closeout Requirements (Supplemented by RLF T&C)
- Suspension and Debarment
- Conflicts of Interest

Topics Covered by General T&Cs

- Programmatic General T&Cs (Selected)
- Sufficient Progress
- EPA Acknowledgement Requirements
- Electronic and Information Technology Accessibility
- Light Refreshments and/or Meals
- Tangible Personal Property
- Public Policy Requirements
- Civil Rights Obligations
- Drug-Free Workplace

Topics Covered by General T&Cs

- Hotel-Motel Fire Safety
- Lobbying and Litigation
- Recycled Paper
- Resource Conservation and Recovery Act (Recycled Material Purchase Requirements)
- Trafficking in Persons

Questions?