AGENCY: ENVIRONMENTAL PROTECTION AGENCY (EPA)

TITLE: Tribal Training Support for the Community and Tribal Air Quality

Programs

ACTION: Request for Applications (RFA)

RFA NUMBER: EPA-OAR-OAQPS-19-06

CATALOG OF FEDERAL DOMESTIC ASSISTANCE (CFDA) NO: 66.037

IMPORTANT DATES

August 5, 2019 RFA OPENS

September 20, 2019 RFA CLOSES – APPLICATIONS DUE

November 20, 2019 ANTICIPATED NOTIFICATION OF SELECTION

January 20, 2020 ANTICIPATED AWARD

The closing date and time for receipt of applications is **September 20, 2019, at 11:59 p.m. Eastern Time (ET)** in order to be considered for funding. Application packages must be submitted electronically to the EPA through Grants.gov (http://www.grants.gov) no later than **September 20, 2019, at 11:59 p.m.** ET in order to be considered for funding.

SUMMARY: This notice announces the availability of funds and solicits applications from eligible entities to provide tribal training and technical support to tribal governments seeking to investigate, develop and establish air quality management programs for lands under their jurisdiction.

NOTE: If you intend to name a contractor (including an individual consultant) or a subrecipient as a project partner or otherwise in your application, EPA recommends that you carefully review, and comply with, the directions contained in the "Contracts and Subawards" clause that can be accessed under the Section IV.E. clause for "Additional Provisions for Applicants Incorporated into the Solicitation."

FUNDING/AWARDS: The total estimated funding for this competitive opportunity is approximately \$300,000 over 3 years. EPA anticipates awarding one cooperative agreement from this announcement, subject to availability of funds, the quality of applications received and other applicable considerations. The cooperative agreement will be funded incrementally over a period of 3 years. EPA estimates the first year of funding will be approximately \$100,000. Additional funds may be added in each subsequent year of the agreement, subject to satisfactory performance and the availability of funds.

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I. FUNDING OPPORTUNITY DESCRIPTION

A. Background

EPA's Office of Air Quality Planning and Standards' (OAQPS) Community and Tribal Programs Group (CTPG) within the Office of Air and Radiation (OAR), provides leadership and technical assistance to federally-recognized tribes and the EPA regional offices on tribal air quality issues. Additionally, CTPG provides cross-office coordination on tribal issues and consults with tribes to help protect the sovereignty and cultural resources in Indian country. The CTPG is soliciting applications from eligible entities to increase tribal capacity through training and technical support.

Currently, there are 573 federally-recognized tribes nationwide (http://www.bia.gov/WhoWeAre/BIA/OIS/TribalGovernmentServices/TribalDirectory/index.htm). Many of these tribes receive funding support from EPA to investigate their air quality and make informed decisions about how to best restore, protect, and preserve air resources for lands within their jurisdiction. While several tribal governments have completed air quality assessments and determined no further needs, many more do require support to conduct air quality related activities. The purpose of this project is to provide continuous air quality training and technical support to tribal partner governments and supplement other ongoing activities on a short-term basis.

B. Scope of Work

EPA is requesting applications from eligible entities to provide training and technical support to tribes and the tribal community. The training and technical support should be designed to develop and/or enhance the capacity of tribes to successfully implement efficient and effective air quality management programs.

Target Audience

The target audiences will primarily be tribal air program representatives, as well as other tribal professionals involved in air quality abatement, such as public health professionals and community members (and/or environmental justice community members) affected by air quality issues.

Air Quality Programs

Applicants are encouraged to include the following air quality programs in their training curriculum and technical support: ambient air modeling and monitoring; air toxics; emissions inventory development; regulation development; wood stove change-outs; and program development including permitting, and state implementation plan (SIP) process. The curriculum for community members will provide for capacity building on air quality issues and the Clean Air Act (CAA) with the goal of supporting effective public participation.

Training Methods

The training should incorporate team-based interactive classroom exercises, presentations by experienced tribal and non-tribal air quality professionals, in-the-field hands-on exercises, classroom discussion and participation, and question and answer discussions. Training should be structured to maximize the use of tribal instructors' available time and promote interaction and networking, in addition to the basic learning experience, in a manner specifically for and culturally sensitive to the needs of tribes. Even though EPA staff can assist the grantee, the grantee must be able to deliver training without input from the EPA.

Training Objectives

Applicants should address each of the following training objectives in their narrative proposals:

- <u>Permit Training</u>: Support tribes in development of permits and permit programs and to review state permits.
- <u>State Implementation Plan (SIP) Training</u>: Support tribes to participate in the SIP development process.
- <u>Technical Training</u>: Support tribes in development of emissions inventories, and implementation of ambient air quality modeling and monitoring.
- <u>National Meetings</u>: Recognizing the importance of communications and networking, the recipient should organize and promote one or more annual national meetings for tribes to meet and discuss current and future air quality issues. Issues should be based on the recipient's expertise, tribal feedback, and current national program initiatives. Attendance from all parts of Indian country is preferred and support from EPA and national tribal organizations is essential. Financial support, although limited, should be available to tribes unable to fund travel.
- <u>Community Training</u>: Provide training for community individuals (and/or environmental justice communities) as appropriate.
- <u>Wood Stove Change-Out</u>: Provide training to tribal environmental professionals to become experts in installation and maintenance of wood stoves.

Applications submitted for consideration should:

- 1) describe how national meetings will be developed in a manner that encourages interest and attendance among tribal air programs in coordination with public and private tribal air program interests;
- 2) discuss how funding support would be structured for tribes unable to fund travel and how training locations would be determined; and
- 3) discuss how training topics are current and of interest to the broadest audience.

<u>NOTE</u>: The preceding list is not all-inclusive and similar projects may be negotiated to support the stated mission and objectives as part of the overall tribal air program.

C. EPA Strategic Plan Linkage, Anticipated Outputs/Outcomes and Performance Measures

Pursuant to Section 6a of EPA Order 5700.7, "Environmental Results under EPA Assistance Agreements," EPA must link proposed assistance agreements with the Agency's Strategic Plan.

EPA also requires that grant applicants and recipients adequately describe environmental outputs and outcomes to be achieved under assistance agreements (see EPA Order 5700.7, Environmental Results under Assistance Agreements, www.epa.gov/sites/production/files/2015-03/documents/epa_order_5700_7a1.pdf).

1. Linkage to EPA Strategic Plan: The activities to be funded under this announcement support EPA's FY 2018-22 Strategic Plan. Awards made under this announcement will support Goal 1, "Core Mission: Deliver real results to provide Americans with clean air, land, and water, and ensure chemical safety," Objective 1.1, "Improve Air Quality." Under this objective, EPA will "Work with states and tribes to accurately measure air quality and ensure that more Americans are living and working in areas that meet high air quality standards." Applicants must explain in their application how their project will further this objective.

Specifically, the proposed activities will support EPA's efforts to encourage and facilitate involvement of tribal partner governments in implementing ambient air quality programs under the CAA in Indian country, through the provision of training and technical support.

Please read EPA's FY 2018-2022 Strategic Plan (<u>www.epa.gov/planandbudget/strategicplan</u>) for more information.

EPA also requires that grant applicants adequately describe environmental outputs and outcomes to be achieved under assistance agreements (see EPA Order 5700.7A1, Environmental Results under Assistance Agreements, www.epa.gov/sites/production/files/2015-03/documents/epa_order_5700_7a1.pdf). Applicants must include specific statements describing the environmental results of the proposed project in terms of well-defined outputs and, to the maximum extent practicable, well-defined outcomes that will demonstrate how the project will contribute to the priorities described above.

2. Outputs: The term "output" means an environmental activity, effort and/or associated work product related to an environmental goal and objective that will be produced or provided over a period of time or by a specified date. Outputs may be quantitative or qualitative, but must be measurable during an assistance agreement funding period.

Expected outputs from the projects to be funded under this announcement include, but are not limited to:

- Number of tribal environmental professionals trained;
- Number of tribal environmental professionals trained in installation and maintenance of wood stoves;
- Developing tools that facilitate projects or provide access to information; and
- Developing, coordinating and providing support for meetings, trainings and capacity building workshops (e.g., providing logistical support, identifying tribal instructors and participants, etc.).

Project outputs should aim to increase the awareness, capacity and action of tribal governments seeking to investigate, develop and establish air quality management programs. Additional outputs may be manifested through an increase in tribal activities carrying out air quality assessments in Indian country and implementing air quality programs to address identified air quality concerns.

Progress reports and a final report will also be required outputs, as specified in Section VI.C. "Reporting Requirement" of this RFA.

3. Outcomes: The term "outcome" means the result, effect or consequence that will occur from carrying out an environmental program or activity that is related to an environmental or programmatic goal or objective. Outcomes may be qualitative and environmental, behavioral, health-related or programmatic in nature, but must also be quantitative. They may not necessarily be achievable within an assistance agreement funding period.

Expected outcomes from the projects to be funded under this announcement include, but are not limited to:

- Increased awareness of the Clean Air Act and programs available in support of pollution prevention;
- Improved capacity among tribal organizations seeking to investigate, develop and establish programs that assess air quality;
- Improve the ability of tribes, tribal professionals and tribal communities in addressing air quality concerns in Indian country through tribal trainings and/or technical support;
- Improved characterizations of outdoor air and/or indoor air quality by tribes; and
- Improve tribal communities' knowledge of air quality regulatory and permit processes.

Applicants should indicate how they will measure the degree of awareness, capacity and action achieved through their efforts.

- 4. Performance Measures. The applicant should also develop performance measures they expect to achieve through the proposed activities and describe them in their application. These performance measures will help gather insights and will be the mechanism to track progress concerning successful processes and output and outcome strategies and will provide the basis for developing lessons to inform future recipients. It is expected that the description of performance measures will directly relate to the project outcomes and outputs. The following are questions to consider when developing output and outcome measures of quantitative and qualitative results:
 - What are the measurable short term and longer term results the project will achieve?
 - How does the plan measure progress in achieving the expected results (including outputs and outcomes) and how will the approach use resources effectively and efficiently?

D. Statutory Authority

The statutory authority for this action is the Clean Air Act 103(b)(3), which authorizes the award of grants to conduct, and promote the coordination and acceleration of, research, investigations, experiments, demonstrations, surveys, and studies related to the causes, effects, (including health and welfare effects), extent, prevention, and control of air pollution. Tribal governments have both CAA authority over lands within their jurisdiction and discretion to address air pollution under the CAA. Training and supporting their involvement are directly related to the CAA authority described above.

Demonstrations must involve new or experimental technologies, methods, or approaches, where the results of the project will be disseminated so that others can benefit from the knowledge gained in the demonstration project. A project that is accomplished through the performance of routine, traditional, or established practices, or a project that is simply intended to carry out a task rather than transfer information or advance the state of knowledge, however worthwhile the project might be, is not considered a demonstration project. Implementation activities are <u>not</u> eligible for funding under this announcement.

II. AWARD INFORMATION

A. What is the amount of funding available?

The total estimated funding expected to be available for award under this competitive opportunity is approximately \$300,000, over 3 years. EPA estimates the first year of funding will be approximately \$100,000. Additional funds may be added in each subsequent year of the agreement, subject to satisfactory performance and the availability of funds.

B. Partial Funding

In appropriate circumstances, EPA reserves the right to partially fund applications by funding discrete portions 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 was evaluated and selected for award; thereby, maintaining the integrity of the competition and selection process.

C. How many agreements will EPA award in this competition?

EPA anticipates awarding one cooperative agreement under this announcement subject to the availability of funds, quality of applications received and other applicable considerations.

EPA reserves the right to make additional awards under this announcement, consistent with Agency policy and other applicable considerations, if additional funding becomes available after the original selections. Any additional selections for awards will be made no later than 6 months from the date of the original selections.

In addition, EPA reserves the right to reject all applications and make no awards under this announcement or to make fewer awards than anticipated.

D. What is the project period for awards resulting from this solicitation?

The estimated project period for awards resulting from this solicitation is expected to begin in January 2020, with an estimated completion date of January 2023.

E. Funding Type

The funding for selected projects will be in the form of a cooperative agreement.

Cooperative agreements provide for substantial involvement between the EPA Project Officer and the selected applicants in the performance of the work supported. Although EPA will negotiate precise terms and conditions relating to substantial involvement as part of the award process, the anticipated substantial federal involvement for these projects may include:

- close monitoring of the successful applicant's performance to verify the results proposed by the applicant;
- collaboration during performance of the scope of work;
- in accordance with 2 CFR 200.317 and 2 CFR 200.318, review of proposed procurement;
- approving qualifications of key personnel (EPA will not select employees or contractors employed by the award recipient); and
- review and comment on reports prepared under the cooperative agreement (the final decision on the content of reports rests with the recipient).

III. ELIGIBILITY INFORMATION

A. Eligible Entities

In accordance with CFDA 66.037, applications will be accepted from states, local governments, territories, Indian tribes, and possessions of the U.S., including the federally recognized Indian tribal government, District of Columbia, international organizations, public and private universities and colleges, hospitals, laboratories, and other public or private non-profit institutions.

Non-profit organization, as defined by 2 CFR 200.70, means any corporation, trust, association, cooperative or other organization 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 its net proceeds to maintain, improve and/or expand its operations. Note that 2 CFR Part 200 specifically excludes the following types of organizations from the definition of "non-profit organization" because they are separately defined in the regulation: (i) institutions of higher education; and (ii) state, local and federally-recognized Indian tribal governments. While not considered to be a "non-profit organization(s)" as defined by 2 CFR 200.270, Institutions of Higher Education are, nevertheless, eligible to submit applications under this RFA. Hospitals operated by state, tribal, or local governments or that meet the definition of nonprofit at 2 CFR 200.70 are also eligible to apply. For-profit colleges, universities, trade schools, and hospitals are

ineligible.

For-profit organizations are <u>not</u> an eligible entity for this funding opportunity. Additionally, non-profit organizations described in Section 501(c)(4) of the Internal Revenue Code that engage in lobbying activities as defined in Section 3 of the Lobbying Disclosure Act of 1995 <u>are not eligible to apply</u>.

B. Cost Sharing or Matching

No matching funds are required under this competition. Cost sharing/matching is not required as a condition of eligibility under this competition.

C. Threshold Eligibility Criteria

These are requirements that if not met by the time of application submission will result in elimination of the application from consideration for funding. Only applications from eligible applicants (see Section III.A of this RFA) that meet all of these threshold eligibility criteria will be evaluated against the ranking criteria in Section V of this RFA. If necessary, EPA may contact applicants to clarify threshold eligibility questions prior to making an eligibility determination. Applicants deemed ineligible for funding consideration as a result of the threshold eligibility review will be notified within 15 calendar days of the ineligibility determination.

1. Application Content and Submission

- a. Applications must substantially comply with the application submission instructions and application content requirements set forth in Section IV and Appendix A of this RFA or else they will be rejected.
- b. Where a page limit is expressed in Section IV and Appendix A of this RFA with respect to the Project Narrative, pages in excess of the page limitation will not be reviewed.
- c. Applications must be submitted through Grants.gov as stated in Section IV of this announcement (except in the limited circumstances where another mode of submission is specifically allowed for as explained in Section IV) on or before the application submission deadline published in Section IV of this announcement. Applicants are responsible for following the submission instructions in Section IV of this announcement to ensure that their application is timely and properly submitted.

Applications submitted after the submission deadline will be considered late and deemed ineligible without further consideration unless the applicant can clearly demonstrate that it was late due to EPA mishandling or because of technical problems associated with <u>Grants.gov</u> or relevant <u>SAM.gov</u> system issues. An applicant's failure to timely submit their application through <u>Grants.gov</u> because they did not timely or properly register in <u>SAM.gov</u> or <u>Grants.gov</u> will not be considered an acceptable reason to consider a late submission.

2. Applications must further EPA's current priorities for improving air quality, which focus on improving air quality to ensure more Americans are living and working in areas that meet high air quality standards. (See Section I.C.)

3. Ineligible activities: If an application is submitted that includes any ineligible tasks or activities, that portion of the application will be ineligible for funding and may, depending on the extent to which it affects the application, render the entire application ineligible for funding.

IV. APPLICATION AND SUBMISSION INFORMATION

A. Requirement to Submit Through Grants.gov and Limited Exception Procedures

Applicants, except as noted below, must apply electronically through <u>Grants.gov</u> under this funding opportunity based on the Grants.gov instructions in this announcement and Appendix A. If an applicant does not have the technical capability to apply electronically through Grants.gov because of limited or no internet access which prevents them from being able to upload the required application materials to Grants.gov, the applicant must contact <u>OMS-ARM-OGDWaivers@epa.gov</u> or the address listed below in writing (e.g., by hard copy, email) *at least 15 calendar days prior to the submission deadline under this announcement* to request approval to submit their application materials through an alternate method.

Mailing Address:

OGD Waivers c/o Jessica Durand USEPA Headquarters William Jefferson Clinton Building 1200 Pennsylvania Ave., N. W. Mail Code: 3903R Washington, DC 20460

Courier Address:

OGD Waivers c/o Jessica Durand Ronald Reagan Building 1300 Pennsylvania Ave., N.W. Rm # 51278 Washington, DC 20004

In the request, the applicant must include the following information:

- Funding Opportunity Number (FON)
- Organization Name and Unique Entity Identifier (e.g., DUNS)
- Organization's Contact Information (email address and phone number)
- Explanation of how they lack the technical capability to apply electronically through Grants.gov because of 1) limited internet access or 2) no internet access which prevents them from being able to upload the required application materials through Grants.gov.

EPA will only consider alternate submission exception requests based on the two reasons stated above and will timely respond to the request – all other requests will be denied. If an alternate

submission method is approved, the applicant will receive documentation of this approval and further instructions on how to apply under this announcement. Applicants will be required to submit the documentation of approval with any initial application submitted under the alternative method. In addition, any submittal through an alternative method must comply with all applicable requirements and deadlines in the announcement including the submission deadline and requirements regarding application content and page limits (although the documentation of approval of an alternate submission method will not count against any page limits).

If an exception is granted, it is valid for submissions to EPA for the remainder of the entire calendar year in which the exception was approved and can be used to justify alternative submission methods for application submissions made through December 31 of the calendar year in which the exception was approved (e.g., if the exception was approved on March 1, 2019, it is valid for any competitive or non-competitive application submission to EPA through December 31, 2019). Applicants need only request an exception once in a calendar year and all exceptions will expire on December 31 of that calendar year. Applicants must request a new exception from required electronic submission through grants.gov for submissions for any succeeding calendar year. For example, if there is a competitive opportunity issued on December 1, 2018, with a submission deadline of January 15, 2019, the applicant would need a new exception to submit through alternative methods beginning January 1, 2019.

Please note that the process described in this section is only for requesting alternate submission methods. All other inquiries about this announcement must be directed to the Agency Contact listed in Section VII of the announcement. Queries or requests submitted to the email address identified above for any reason other than to request an alternate submission method will not be acknowledged or answered.

B. Grants.gov Application Submission Instructions (see Appendix A)

Your organization's authorized official representative (AOR) must submit your complete application electronically to EPA through <u>Grants.gov</u> no later than **September 20, 2019, 11:59 PM Eastern Time**.

C. Content of Application Submission

The application package *must* include all of the following materials:

1. Grant Application Forms. Please complete the forms as appropriate.

- a. Standard Form 424, *Application for Federal Assistance*. Please note that the organizational Dun and Bradstreet (D&B) Data Universal Number System (DUNS) number must be included on the SF-424. Organizations may obtain a DUNS number at no cost by calling the toll-free DUNS number request line at 1-866-705-5711.
- b. Standard Form 424A, Budget Information Non-Construction Programs
- c. Standard Form 424B, Non-Construction Programs
- d. EPA Form 4700-4, Pre-Award Compliance Review Report for All Applicants

- Requesting Federal Financial Assistance
- e. Key Contacts Form
- f. Project Narrative Attachment Form (See Section IV.C.2. below for additional information)
- g. Other Attachment Form, if applicable (See Section IV.C.3. below for additional information)
- 2. Project Narrative. The project narrative must explicitly describe how the proposed project meets the guidelines established in Sections I-III of this announcement (including the threshold eligibility criteria in Section III.C.) and must address each of the evaluation criteria set forth in Section V. The Project Narrative (a through f below) cannot exceed a maximum of 15 single-spaced typewritten pages, including the Summary Page excess pages will not be reviewed. Supporting materials, such as resumes and letters of support, can be submitted as attachments and are not included in the 15-page limit.

a. Summary Information Page (recommended not to exceed one page)

- i. Project Title
- ii. Applicant Information. Include applicant (organization) name, address, contact person, phone number, fax and e-mail address.
- iii. Funding Requested. Specify the amount you are requesting from EPA.
- iv. Total Project Cost. Specify total cost of the project. Identify funding from other sources, including cost share or in-kind resources.
- v. Project period. Provide beginning and ending dates. (Projects are anticipated to begin date and end no later than date.)
- vi. DUNS number
- b. **Project Summary/Approach.** The summary shall contain the following components:
 - i. Detailed project summary, description of specific actions and methods to be undertaken and the responsible institutions, including estimated time line for each task.
 - ii. Description of the associated work products to be developed.
 - iii. Explanation of project benefits to the public, and specifically the potential audience(s) served.
 - iv. Explanation of tribal training and technical support addressed in the project narrative.
 - v. Description of the roles of the applicant and partners, if any.
 - vi. Description of the applicant's organization and experience related to the proposed project.
 - vii. Description of staff expertise/qualifications, staff knowledge, and resources or the ability to obtain them, to successfully achieve the goals of the proposed project.

- viii. Discussion of how the project promotes Environmental Justice concerns (see Section I) and an understanding of EPA's Policy on Environmental Justice for Working with Federally Recognized Tribes and Indigenous Peoples.
- c. Environmental Results—Outcomes, Outputs and Performance Measures. Identify the expected quantitative and qualitative outcomes and outputs of the project (See Section I), including what performance measurements, timeline of milestones, or other means will be used to track and measure your progress towards achieving the expected outcomes and outputs and how the results of the project will be evaluated.
- d. **Programmatic Capability and Past Performance.** Submit a list of federally funded assistance agreements (assistance agreements include Federal grants and cooperative agreements but not Federal contracts) similar in size, scope and relevance to the proposed project that your organization performed within the last 3 years (no more than 5 agreements, and preferably EPA agreements) and describe (i) whether, and how, you were able to successfully complete and manage those agreements; and (ii) your history of meeting the reporting requirements under those agreements including whether you adequately and timely reported on your progress towards achieving the expected outputs and outcomes of those agreements (and if not, explain why not) and whether you submitted acceptable final technical reports under the agreements.

In evaluating applicants under these factors in Section V, EPA will consider the information provided by the applicant and may also consider relevant information from other sources, including information from EPA files and from current/prior grantors (e.g., to verify and/or supplement the information provided by the applicant). If you do not have any relevant or available past performance or reporting information, please indicate this in the application and you will receive a neutral score for these factors (a neutral score is half of the total points available in a subset of possible points). If you do not provide any response for these items, you may receive a score of 0 for these factors.

- e. **Detailed Budget Narrative** (See Appendix B, Budget Sample). This section provides an opportunity for a narrative description of the budget found in the SF-424A. Clearly explain how EPA funds will be used. Selected applicant(s) will need to submit a copy of their current indirect cost rate that has been negotiated with a federal cognizant agency prior to award
 - i. Description of the budget and estimated funding amounts for each work component/task.
 - ii. Description of the applicant's approach, procedures, and controls for ensuring that awarded grant funds will be expended in a timely and efficient manner.
 - iii. Applicants must itemize costs related to personnel, fringe benefits, contractual costs, travel, equipment, supplies, other direct costs, indirect

- costs, and total costs. *Selected applicant(s) will need to submit a copy of their current indirect cost rate that has been negotiated with a federal cognizant agency prior to award.
- iv. For applicants that provide a voluntary cost share/match, the budget narrative must clearly specify the amount of federal funding and the cost share amount for each category of total project costs for each category.

 Include an explanation of how the voluntary match will be met. All matching funds are subject to the regulations governing matching fund requirements at 2 CFR Part 200.
- **3. Attachments**. These are optional and are <u>not included</u> in the 15-page limit.
 - a. Negotiated Indirect Cost Rate Agreement.
 - b. Biographical Sketch. Provide resumes or curriculum vitae for all Principal Investigators and any other key personnel.
 - c. Quality Assurance Narrative Statement.
 - d. Support Letters. These should indicate how the supporting organization will assist in the project.
 - e. Approval Letter. If applicable, approval letter to use alternate means to submit initial application.

D. Submission Date and Times

The closing date and time for submission of applications is **September 20, 2019, 11:59 p.m., Eastern Time**. Applications submitted after the closing date and time will not be considered for funding.

E. Additional Provisions for Applicants Incorporated into the Solicitation

Additional provisions that apply to this solicitation and/or awards made under this solicitation, including but not limited to those related to confidential business information, contracts and subawards under grants, and application assistance and communications, can be found at www.epa.gov/grants/epa-solicitation-clauses. These, and the other provisions that can be found at the website link, are important, and applicants must review them when preparing applications for this solicitation. If you are unable to access these provisions electronically at the website above, please communicate with the EPA contact listed in this solicitation to obtain the provisions.

V. APPLICATION REVIEW INFORMATION

Only eligible entities whose applications meet the threshold criteria in Section III of this RFA will be evaluated according to the criteria set forth below. **Applicants should explicitly address these criteria as part of their application package submittal in the project narrative, following the content requirements set forth in Appendix B.** Each application will be rated using a point system. Applications will be evaluated based on a total of 100 points possible.

A. Evaluation Criteria

Criteria	Points
Total Possible Points	100
 1. Project Summary and Approach: Under this criterion, EPA will evaluate applications based on the extent and quality of the applicant's project summary and overall approach. Specifically, EPA will evaluate the extent and quality to which the project narrative: A. (15 points) Includes a well-conceived strategy for addressing the requirements in Section I, Parts B (Scope of Work) and C (EPA Strategic Plan Linkage and Anticipated Outcomes/Outputs); and B. (15 points) Sets forth a reasonable time schedule for the execution of the tasks associated with the project and for achieving the project goals and objectives by project end. 	30
 2. Environmental Results – Outputs, Outcomes and Performance Measures: Under this criterion, EPA will evaluate: A. (7 points) The effectiveness of the applicant's plan for tracking and measuring its progress toward achieving the expected project outputs and outcomes, including those identified in Section I of this announcement. B. (8 points) The performance measures proposed by the applicant and how they will be used to help track and measure the Applicants progress towards achieving the expected outputs and outcomes. 	15
 3. Programmatic Capability and Past Performance: Under this criterion, EPA will evaluate applicants based on their ability to successfully complete and manage the proposed project taking into account their: A. (5 points) Past performance in successfully completing and managing the assistance agreements identified in the Project Narrative as described in Section IV.C of the announcement, B. (8 points) History of meeting the reporting requirements under the assistance agreements identified in the Project Narrative as described in Section IV.C of the announcement, including whether the applicant submitted acceptable final technical reports under those agreements and the extent to which the applicant adequately and timely reported on their progress towards achieving the expected outputs and outcomes under those agreements and if such progress was not being made whether the applicant adequately reported why not; C. (8 points) Organizational experience and plan for timely and successfully achieving the objectives of the proposed project; and D. (9 points) Staff expertise and qualifications, staff knowledge, and resources or the ability to obtain them, to successfully achieve the goals of the proposed project. 	30

Note: In evaluating applicants under items A and B of this criterion, the Agency will consider the information provided by the applicant and may also consider relevant information from other sources including agency files and prior/current grantors (e.g., to verify and/or supplement the information supplied by the applicant). If you do not have any relevant or available past performance or reporting information, please indicate this in the application and you will receive a neutral score for these sub-factors (items A and B above-a neutral score is half of the total points available in a subset of possible points). If you do not provide any response for these items, you may receive a score of 0 for these sub-factors. 4. Budget: Under this criterion, EPA will evaluate applicants based on: A. (5 points) Whether costs are reasonable to accomplish the proposed goals, objectives, and measurable environmental outcomes; and B. (5 points) Whether the proposed budget provides a detailed breakout of	10
the approximate funding used for each major activity.	
5. Expenditure of Awarded Grant Funds: Under this criterion, EPA will evaluate applicants based on their approach, procedures, and controls for ensuring that awarded grant funds will be expended in a timely and efficient manner.	5
6. Environmental Justice Impacts: Under this criterion, EPA will evaluate the extent to which the proposed project helps to promote addressing environmental justice issues and concerns (See Section I) including how it will help to minimize and/or reduce exposures and negative impacts of environmental risks to communities, including but not limited to minority, low-income, and tribal communities, that the applicant can demonstrate have been or are more likely to be adversely affected (e.g., higher rates of medical problems due to environmental factors) by such risks than other communities.	10

B. Review and Selection Process

Applications will first be evaluated against the threshold factors listed in Section III.C. of this RFA. Only those applications which meet all of the threshold factors will be evaluated using the evaluation criteria listed above by an EPA evaluation team. Each application will be given a numerical score and will be rank-ordered by the review panel. Preliminary funding recommendations will be provided to the EPA Approving or Selection Official based on these reviews and rankings.

C. Other Factors

Final funding decisions will be made by the Approving or Selection Official based on the rankings and preliminary recommendations of the EPA evaluation team. In making the final funding decisions, the Approving or Selection Official may also consider programmatic priorities

and geographic diversity of funds. Once final decisions have been made, a funding recommendation will be developed and forwarded to the EPA Award Official.

D. Additional Provisions for Applicants Incorporated into the Solicitation

Additional provisions that apply to this solicitation and/or awards made under this solicitation including the clause on Reporting and Use of Information Concerning Recipient Integrity and Performance can be found at EPA Solicitation Clauses. These, and the other provisions that can be found at the website link, are important, and applicants must review them when preparing applications for this solicitation. If you are unable to access these provisions electronically at the website above, please communicate with the EPA contact listed in this solicitation to obtain the provisions.

VI. AWARD ADMINISTRATION INFORMATION

A. Award Notices

Following evaluation of applications, all applicants will be notified regarding their status.

1. Successful Applicants: EPA anticipates notification to successful applicants will be made via electronic or postal mail within 45 days of the closing date of this RFA. The notification will be sent to the original signer of the application or the project contact listed in the application. This notification, which informs the applicant that its application has been selected and is being recommended for award is not an authorization to begin work. The official notification of an award will be made by EPA's Grants and Interagency Agreements Management Division.

Applicants are cautioned that only a grants officer is authorized to bind the Government to the expenditure of funds; selection does not guarantee an award will be made. For example, statutory authorization, funding or other issues discovered during the award process may affect the ability of EPA to make an award to the applicant. The award notice, signed by the EPA grants officer, is the authorizing document and will be provided through electronic or postal mail. The successful applicant may need to prepare and submit additional documents and forms (e.g. work plan), which must be approved by EPA, before the grant can officially be awarded. The time between notification of selection and award of a grant can take up to 90 days or longer.

2. Unsuccessful Applicants: EPA anticipates notification to unsuccessful applicant(s) will be made via electronic or postal mail within 45 days of the closing date of this RFA. The notification will be sent to the original signer of the Standard Form 424, Application for Federal Assistance.

B. Administrative and National Policy Requirements

A listing and description of general EPA Regulations applicable to the award of assistance agreements may be viewed at: www.epa.gov/grants/policy-regulations-and-guidance-epa-grants.

C. Reporting Requirement

Quarterly progress reports and a detailed final report will be required. Quarterly reports summarizing technical progress, planned activities for the next quarter and a summary of expenditures are required. The final report shall be submitted to EPA within 90 calendar days of the completion of the period of performance. The final report must include: summary of the project or activity, advances achieved and costs of the project or activity. In addition, the final report shall discuss the problems, successes, and lessons learned from the project or activity that could help overcome structural, organizational or technical obstacles to implementing a similar project elsewhere. The schedule for submission of quarterly reports will be established by EPA, after the grants are awarded. Award recipients may be provided with additional information and guidance on reporting performance measures and project progress after award.

D. Disputes

Assistance agreement competition-related disputes will be resolved in accordance with the dispute resolution procedures published in 70 FR (Federal Register) 3629, 3630 (January 26, 2005) which can be found at <u>Grant Competition Dispute Resolution Procedures</u>. Copies of these procedures may also be requested by contacting the person listed in Section VII of the announcement. Note, the FR notice references regulations at 40 CFR Parts 30 and 31 that have been superseded by regulations in 2 CFR parts 200 and 1500. Notwithstanding the regulatory changes, the procedures for competition-related disputes remains unchanged from the procedures described at 70 FR 3629, 3630, as indicated in 2 CFR Part 1500, Subpart E.

E. Additional Provisions for Applicants Incorporated into the Solicitation

Additional provisions that apply to this solicitation and/or awards made under this solicitation, including but not limited to those related to DUNS, SAM, copyrights, disputes, and administrative capability, subrecipients and contractors (including individual consultants) can be found at: www.epa.gov/grants/epa-solicitation-clauses. These, and the other provisions that can be found at the website link, are important, and applicants must review them when preparing applications for this solicitation. If you are unable to access these provisions electronically at the website above, please communicate with the EPA contact listed in this solicitation to obtain the provisions.

VII. AGENCY CONTACTS

For further information, contact:

U.S. Environmental Protection Agency ATTN: Regina Chappell OAR/OAQPS/OID/CTPG 4930 Page Road, C304-3 Research Triangle Park, NC 27709

Email: chappell.regina@epa.gov

All questions or comments must be communicated in writing via postal mail or email to the contact person listed above. Questions and answers will be posted until the closing date of this announcement at the OAR Grants/Funding webpage: http://www.epa.gov/grants/air-grants-and-funding.

APPENDIX A - Grants.gov Application Submission Instructions

The electronic submission of your application must be made by an official representative of your institution who is registered with Grants.gov and is authorized to sign applications for Federal assistance. For more information on the registration requirements that must be completed in order to submit an application through grants.gov, go to Grants.gov and click on "Applicants" on the top of the page and then go to the "Get Registered" link on the page. If your organization is not currently registered with Grants.gov, please encourage your office to designate an Authorized Organization Representative (AOR) and ask that individual to begin the registration process as soon as possible. Please note that the registration process also requires that your organization have a Unique Entity Identifier (e.g. DUNS number) and a current registration with the System for Award Management (SAM) and the process of obtaining both could take a month or more. Applicants must ensure that all registration requirements are met in order to apply for this opportunity through grants.gov and should ensure that all such requirements have been met well in advance of the submission deadline. Registration on grants.gov, SAM.gov, and DUNS number assignment is FREE.

Applicants need to ensure that the AOR who submits the application through Grants.gov and whose Unique Entity Identifier (e.g., DUNS number) is listed on the application is an AOR for the applicant listed on the application. Additionally, the DUNS number listed on the application must be registered to the applicant organization's SAM account. If not, the application may be deemed ineligible.

To begin the application process under this grant announcement, go to <u>Grants.gov</u> and click on "Applicants" on the top of the page and then "Apply for Grants" from the dropdown menu and then follow the instructions accordingly. Please note: To apply through Grants.gov, you must use Adobe Reader software and download the compatible Adobe Reader version. For more information about Adobe Reader, to verify compatibility, or to download the free software, please visit Adobe Reader Compatibility Information on Grants.gov

You may also be able to access the application package for this announcement by searching for the opportunity on Grants.gov. Go to <u>Grants.gov</u> and then click on "Search Grants" at the top of the page and enter the Funding Opportunity Number, EPA-OAR-OAQPS-19-06, or the CFDA number, CFDA 66.037, in the appropriate field and click the Search button.

Please Note: All applications must now be submitted through Grants.gov using the "Workspace" feature. Information on the Workspace feature can be found at the <u>Grants.gov Workspace</u> <u>Overview Page</u>.

Application Submission Deadline: Your organization's AOR must submit your complete application package electronically to EPA through <u>Grants.gov</u> no later than **September 20**, **2019**, **by 11:59 p.m. ET**. Please allow for enough time to successfully submit your application process and allow for unexpected errors that may require you to resubmit.

Please submit *all* of the application materials described below using the Grants.gov application package accessed using the instructions above.

Application Materials

The following forms and documents are required under this announcement, as described in Section IV.C and Appendix B of the RFA:

Mandatory Documents:

- Application for Federal Assistance (SF-424)
- Budget Information for Non-Construction Programs (SF-424A)
- Standard Form 424B, Non-Construction Programs
- EPA Key Contacts Form
- EPA Form 4700-4 Pre-award Compliance Review Report
- Project Narrative Attachment Form (See Section IV.C.2. for additional information)

Optional Documents:

- Other Attachment Form, attach the following if appropriate:
 - Negotiated Indirect Cost Rate Agreement (Other Attachment Form)
 - Biographical Sketch. Provide resumes or curriculum vitae for all Principal Investigators and any other key personnel (Other Attachment Form)
 - Quality Assurance Narrative Statement (Other Attachment Form)
 - Support Letters. These should indicate how the supporting organization will assist in the project (Other Attachment Form)

Applications submitted through Grants.gov will be time and date stamped electronically.

If you have not received a confirmation of receipt from EPA (not from Grants.gov) within 30 days of the application deadline, please contact Regina Chappell at (919) 541-3650. Failure to do so may result in your application not being reviewed.

Technical Issues with Submission

- 1. Once the application package has been completed, the "Submit" button should be enabled. If the "Submit" button is not active, please call <u>Grants.gov</u> for assistance at 1-800-518-4726. Applicants who are outside the U.S. at the time of submittal and are not able to access the toll-free number may reach a Grants.gov representative by calling 606-545-5035. Applicants should save the completed application package with two different file names before providing it to the AOR to avoid having to re-create the package should submission problems be experienced, or a revised application needs to be submitted.
- 2. Submitting the application. The application package must be transferred to <u>Grants.gov</u> by an AOR. The AOR should close all other software before attempting to submit the application package. Click the "submit" button of the application package. Your Internet browser will launch, and a sign-in page will appear. **Note: Minor problems are not uncommon with transfers to Grants.gov. It is essential to allow sufficient time to ensure that your application is submitted to Grants.gov BEFORE the due date identified in Section IV of the solicitation.** The support desk operates 24 hours a day, 7 days a week, except Federal Holidays.

A successful transfer will end with an on-screen acknowledgement. For documentation purposes, print or screen capture this acknowledgement. If a submission problem occurs, reboot the computer – turning the power off may be necessary – and re-attempt the submission.

Note: Grants.gov issues a "case number" upon a request for assistance.

- 3. Transmission Difficulties. If transmission difficulties that result in a late transmission, no transmission, or rejection of the transmitted application are experienced, and following the above instructions do not resolve the problem so that the application is submitted to Grants.gov by the deadline date and time, follow the guidance below. The Agency will make a decision concerning acceptance of each late submission on a case-by-case basis. All emails, as described below, are to be sent to Regina Chappell with the FON in the subject line. If you are unable to email, contact Regina at (919) 541-3650. Be aware that EPA will only consider accepting applications that were unable to transmit due to Grants.gov or relevant www.SAM.gov system issues or for unforeseen exigent circumstances, such as extreme weather interfering with internet access. Failure of an applicant to submit timely because they did not properly or timely register in SAM.gov or Grants.gov is not an acceptable reason to justify acceptance of a late submittal.
- a. If you are experiencing problems resulting in an inability to upload the application to <u>Grants.gov</u>, it is essential to call Grants.gov for assistance at 1-800-518-4726 before the application deadline. Applicants who are outside the U.S. at the time of submittal and are not able to access the toll-free number may reach a Grants.gov representative by calling 606-545-5035. **Be** *sure* **to obtain a case number from Grants.gov**. If the problems stem from unforeseen exigent circumstances unrelated to Grants.gov, such as extreme weather interfering with internet access, contact Regina Chappell at (919) 541-3650.
- b. Unsuccessful transfer of the application package: If a successful transfer of the application cannot be accomplished even with assistance from Grants.gov due to electronic submission system issues or unforeseen exigent circumstances, and you have already attempted to resolve the issue by contacting Grants.gov, send an email message to Regina Chappell prior to the application deadline. The email message must document the problem and include the Grants.gov case number as well as the entire application package in PDF format as an attachment.
- c. Grants.gov rejection of the application package: If a notification is received from Grants.gov stating that the application has been rejected for reasons other than late submittal promptly send an email to Regina Chappell with the FON in the subject line within one business day of the closing date of this solicitation. The email should include any materials provided by Grants.gov and attach the entire application in PDF format.

Please note that successful submission through Grants.gov or via email does not necessarily mean your application is eligible for award.

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APPENDIX B – Budget Detail Sample

This section of the Project Narrative is a detailed description of the budget found in the SF-424A and must include a detailed discussion of how EPA funds will be used. Applicants must <u>itemize</u> costs related to personnel, fringe benefits, travel, equipment, supplies, contractual costs, other direct costs, indirect costs, and total costs. Additional guidance for developing the applicant's budget is available in <u>RAIN-2019-G02</u>, "Interim General Budget Development Guidance for Applicants and Recipients of EPA Financial Assistance."

If the project budget includes any voluntary cost share, the Budget Detail portion of the project narrative must include a detailed description of how the applicant will obtain the cost share and how the cost share funding will be used. If EPA accepts an offer for a voluntary cost share, applicants must meet their sharing commitment as a legal condition of receiving EPA funding. If the proposed cost share is to be provided by a third-party, a letter of commitment is required. Any form of cost share included in the Budget Detail must also be include on the SF-424 and SF-424A. Please see Section III.B if this RFA for more detailed information on cost share.

Applicants should use the following instructions, budget object class descriptions, and example table to complete the Budget Detail section of the work plan.

- Personnel List all staff positions by title. Give annual salary, percentage of time assigned to the project, and total cost for the budget period. This category includes only direct costs for the salaries of those individuals who will perform work directly for the project (paid employees of the applicant organization as reflected in payroll tax records). If the applicant organization is including staff time (in-kind services) as cost share, this should be included as Personnel costs. Personnel costs do not include: (1) costs for services of contractors (including individual consultants), which are included in the "Contractual" category; (2) costs for employees of subrecipients under subawards, or non-employee program participants (e.g. interns or volunteers) which are included in the "Other" category; or (3) effort that is not directly in support of the proposed project, which may be covered by the organization's negotiated indirect cost rate. The budget detail must identify the personnel category type by Full Time Equivalent (FTE), including percentage of FTE for part-time employees, number of personnel proposed for each category, and the estimated funding amounts.
- Fringe Benefits Identify the percentage used, the basis for its computation, and the types of benefits included. Fringe benefits are allowances and services provided by employers to their employees as compensation in addition to regular salaries and wages. Fringe benefits may include, but are not limited to the cost of leave, employee insurance, pensions and unemployment benefit plans. If the applicant's fringe rate does not include the cost of leave, and the applicant intends to charge leave to the agreement, it must provide supplemental information describing its proposed method(s) for determining and equitably distributing these costs.
- Travel Specify the mileage, per diem, estimated number of trips in-State and out-of-State, number of travelers, and other costs for each type of travel. Travel may be integral

to the purpose of the proposed project (e.g. inspections) or related to proposed project activities (e.g. attendance at meetings). Only include travel costs for employees in the travel category. Travel costs do not include: (1) costs for travel of contractors (including individual consultants), which are included in the "Contractual" category; (2) travel costs for employees of subrecipients under subawards, and non-employee program participants (e.g. trainees) which are included in the "Other" category. Further, travel does not include bus rentals for group trips, which would be covered under the contractual category. Finally, if the applicant intends to use any funds for travel outside the United States, it must be specifically identified. All proposed foreign travel must be approved by EPA's Office of International and Tribal Affairs prior to being taken.

• Equipment - Identify each item to be purchased which has an estimated acquisition cost of \$5,000 or more per unit and a useful life of more than one year. Equipment also includes accessories necessary to make the equipment operational. Equipment does not include: (1) equipment planned to be leased/rented, including lease/purchase agreement; or (2) equipment service or maintenance contracts that are not included in the purchase price for the equipment. These types of proposed costs should be included in the "Other" category. Items with a unit cost of less than \$5,000 should be categorized as supplies, pursuant to 2 CFR 200.94. The budget detail must include an itemized listing of all equipment proposed under the project.

Note: If your organization has written procurement procedures that define a threshold for equipment costs that is lower than \$5,000 then that threshold takes precedence.

- Supplies "Supplies" means all tangible personal property other than "equipment." The budget detail should identify categories of supplies to be procured (e.g., laboratory supplies or office supplies). Non-tangible goods and services associated with supplies, such as printing service, photocopy services, and rental costs should be included in the "Other" category.
- Contractual Identify each type of proposed contract and specify its purpose and estimated cost. Contractual services (including consulting services) are those services to be carried out by an individual or organization, other than the applicant, in the form of a procurement relationship. EPA's <u>Subaward Policy and Supplemental Frequent Questions</u> has detailed guidance available for differentiating between contractors and subrecipients. Leased or rented goods (equipment or supplies) should be included in the "Other" category.

EPA does not require applicants to identify specific contractors. The applicant should list the proposed contract activities along with a brief description of the anticipated scope of work or services to be provided, proposed duration, and proposed procurement method (competitive or non-competitive), if known. Any proposed non-competed/sole-source contracts in excess of \$3,500 must include a justification. Note that it is unlikely that EPA will accept proposed sole source contracts for goods and services (e.g. consulting) that are widely available in the commercial market. Refer to EPA's Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements for EPA's policies on competitive procurements and encouraging the use of small and disadvantaged business enterprises.

• Other - List each item in sufficient detail for EPA to determine the reasonableness and allowability of its cost. This category should include only those types of direct costs that do not fit in any of the other budget categories. Examples of costs that may be in this category are: insurance; rental/lease of equipment or supplies; equipment service or maintenance contracts; printing or photocopying; participant support costs such as non-employee training stipends and travel, subsidies or rebates for purchases of pollution control equipment; and subaward costs. Applicants should describe the items included in the "Other" category and include the estimated amount of participant support costs in a separate line item. Additional information about participant support costs is contained in RAIN-2018-G05, "Interim EPA Guidance on Participant Support Costs."

Subawards (e.g., subgrants) are a distinct type of cost under this category. The term "subaward" means an award of financial assistance (money or property) by any legal agreement made by the recipient to an eligible subrecipient event if the agreement is referred to as a contract. This term does not include procurement purchases, technical assistance in the form of services instead of money, or other assistance in the form of revenue sharing, loans, loan guarantees, interest subsidies, insurance, or direct appropriations. Subcontracts are not subawards and belong in the contractual category. Applicants must provide the aggregate amount they propose to issue as subaward work as a separate line item in the "Other" category and a description of the types of activities to be supported. Refer to EPA's Subaward Policy and supplemental Frequent Questions for additional guidance.

- Indirect Charges If indirect charges are budgeted, indicate the approved rate and base. Indirect costs are those incurred by the grantee for a common or joint purpose that benefit more than one cost objective or project and are not readily assignable to specific cost objectives or projects as a direct cost. In order for indirect costs to be allowable, the applicant must have a federal or state negotiated indirect cost rate (e.g., fixed, predetermined, final or provisional), or must have submitted an application to the cognizant Federal or State agency. Examples of Indirect Cost Rate calculations are shown below:
 - Personnel (Indirect Rate x Personnel = Indirect Costs)
 - o Personnel and Fringe (Indirect Rate x Personnel & Fringe = Indirect Costs)
 - Modified Total Direct Costs (Indirect Rate x Modified Total direct costs = Indirect Costs)
 - Direct Costs minus distorting or other factors such as contracts and equipment
 (Indirect Rate x (total direct cost distorting factors) = Indirect Costs)
 Additional indirect cost guidance is available in RAIN-2018-G02, "Indirect Cost Guidance for Recipients of EPA Assistance Agreements."

Example Budget Table

	EPA Funding
Personnel	
(1) Project Manager @ \$40/hr x 10 hrs/week x 52 wks	\$20,800
(3) Project Staff @ \$25/hr x 40 hrs/week x 40 wks	\$120,000
TOTAL PERSONNEL	\$140,800

Fringe Benefits	
20% of Salary and Wages	20% (140,800)
Retirement, Health Benefits, FICA, SUI	\$28,160
TOTAL FRINGE BENEFITS	\$28,160
Travel	
Travel for Project Manager and staff: 500 mi/mo @ \$0.55/mi x 12 mos	\$3,300
TOTAL TRAVEL	\$3,300
Equipment	
TOTAL EQUIPMENT	0
Supplies	
Office and related supplies to support training	\$3,000
TOTAL SUPPLIES	\$3,000
Contractual	
Support Services Contract	\$50,000
TOTAL CONTRACTUAL	\$50,000
Other	
Subawards Costs	\$0
Participant Support Costs	\$60,000
Additional Other Costs	\$0
TOTAL OTHER	\$60,000
Indirect Charges	
Federal Negotiated Indirect Cost Rate = 10% with personnel costs as base (Indirect Rate x Personnel = Indirect Costs)	\$14,080
TOTAL INDIRECT	\$14,080
TOTAL FUNDING	\$299,340
TOTAL PROJECT COST	\$299,340

Note on Management Fees: When formulating budgets for applications, applicants must not include management fees or similar charges in excess of the direct costs and indirect costs at the rate approved by the applicant's cognizant Federal audit agency, or at the rate provided for by the terms of the agreement negotiated with EPA. The term "management fees or similar charges" refers to expenses added to the direct costs in order to accumulate and reserve funds for ongoing business expenses, unforeseen liabilities, or for other similar costs that are not allowable under EPA assistance agreements. Management fees or similar charges cannot be used to improve or expand the project funded under this agreement, except to the extent authorized as a direct cost of carrying out the work plan.