

Gulf of Mexico Historically Underserved Farmer to Farmer Grants Program Q&A

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NOTE TO APPLICANTS: We are able to respond to questions from individual applicants regarding threshold eligibility criteria, administrative issues related to the submission of the application, and requests for clarification about the announcement. We are unable to respond to questions requesting input on a project idea, format of an application, nor other project specific questions that may compromise the competitive process.

In addition, if you have not successfully been awarded an EPA grant previously, you may want to review the recorded webinar and/or presentation found here: <https://www.epa.gov/grants/epa-grants-award-process-webinars>

[New Questions](#)

Questions will be added here on a weekly basis as they are received. They will be organized by the date they were added (with newest questions first).

Added 1/7/22 (asked during webinar held 1/6/22; to view the webinar please follow this [link](#))
Please note that some of the answers given during the webinar have been further refined below.

Q: Can one eligible entity apply for more than one regional award? Related - if they apply for multiple regional awards and show the capacity to manage multiple awards, can they be awarded more than one regional awards?

A: Yes, an entity can apply for more than one regional award. However, the entity must submit an application for **each** region as the review teams will be different for each region. If an organization scores the highest based on the merit review in more than one region, that organization will receive an award in each region in which it is evaluated as the top applicant.

Q: If EPA determines that an entity can apply for more than one regional award, can you also provide details on how we should delineate that in the budget narrative and other parts of the response? For

example, should we aggregate all the data or submit several cost scenarios, depending on the number of awards (e.g., if just one region vs. multiple)?

A: There should be a different application for each regional application. They should not be aggregated into one application.

Q: Is it allowable for a project to award subawards directly to minority farmers?

A: The subawardees must be determined through a competitive process. Eligible applicants for the subawardees are the same eligible entities for the EPA award – as listed in Section III.A of the RFA. The only example of where individual farmers could be provided an award directly is if their farm meets one of the eligible entities listed (ie. A nonprofit). A subawardee, however, could provide resources to a farmer via a cost share application process or participant support costs or something similar.

Q: Based on the RFA, for-profit entities cannot be applicants nor a competitive subaward entity. Can an individual farmer be a subaward entity? If so, can the farmer use the funds to purchase technology and training from a for-profit entity that would allow the him/her to make significant impacts in the EPA's goals as outlined in the RFA (i.e. reducing contamination of water)?

A: The subawardees must be determined through a competitive process. Eligible applicants for the subawardees are the same eligible entities for the EPA award – as listed in Section III.A of the RFA. The only example of where individual farmers could be provided an award directly is if their farm meets one of the eligible entities listed (ie. A nonprofit). A subawardee, however, could provide resources to a farmer via a cost share application process or participant support costs or something similar. Subawardees may contract with for-profit entities and purchase technologies as long as it complies with the language in the competitive funding opportunity and award.

Q: Can an individual grower be a subaward recipient. Technically he is an individual or a sole proprietor. Or would we have to work with a non-profit, co-op or possibly irrigation district?

A: The subawardees must be determined through a competitive process. Eligible applicants for the subawardees are the same eligible entities for the EPA award – as listed in Section III.A of the RFA. The only example of where individual farmers could be provided an award directly is if their farm meets one of the eligible entities listed (ie. A nonprofit). A subawardee, however, could provide resources to a farmer via a cost share application process or participant support costs or something similar. Most likely your subawardees will be one of the organizations you identified in your question.

Q: Must subawards only provide assistance to underserved farmers/communities or can the work potentially be a upstream benefit to a underserved Farmer/community?

A: The subawards should be for eligible entities to directly collaborate with underserved farmers - which can be defined utilizing either the USDA definition or the executive order definition.

Q: Since specific subawards will not be identified before the proposal is submitted, can the quantitative environmental results evolve as the subawards are granted and implemented?

A: Yes, we expect the results to evolve as the subawards are granted.

Q: Can acceptable quantitative environmental results include percent improvements per area of land

A: Please see the environmental results section - I.C - of the RFA as some results are required. Percent improvements per area of land could be one of the quantitative environmental results identified as long as the required environmental results are also included.

Q: Are there any EPA GMD environmental targets that should be considered and/or used to set proposal specific results?

A: Please see the environmental results section - I.C - of the RFA as some results are required..

Q: Who pays for monitoring/evaluation? The cooperative agreement holder or subawardee?

A: It depends on how the cooperative agreement holder decides to run his/her subaward program.

Q: For the "past performance" criteria, does the 1/2 point allocation mean if an applicant has never been awarded a grant from EPA specifically?

A: It does not have to be EPA specifically. Per the language in the RFA "Submit a list of federally or non-federally funded assistance agreements (assistance agreements include federal grants and cooperative agreements but not Federal contracts) that your organization performed within the last three years (no more than 3 agreements, and preferably EPA agreements)."

Q: In the case of resubmissions, do we need to include responses to previous comments on the original proposal? If so, in which part of the proposal should we include our responses to previous comments?

A: We do not have resubmissions as part of our application and evaluation process. An applicant selected for award may need to provide additional information or updates to their workplan but only after they are selected for award.

Q: Does an applicant need to be based in the geographic area where the cooperative agreement is/is preference given to eligible entities that are based in the 4 regions?

A: The applicant does not need to be based in the geographic area and no preference is given to eligible entities that are based in those areas.

Q: How does the EPA anticipate applicants collaborating across regions?

A: As identified in Section I.B of the RFA, awardees must attend a virtual meeting (3 – 6 months post award) to collaborate with the other recipients on development of items required by this grant, including approaches for tracking subawardee outcomes and outputs and reporting of environmental results, with the ultimate goal to improve consistency and efficiency in development of these items. This meeting will be facilitated by EPA. During this meeting, discussion will take place on the value and frequency of additional meetings/collaboration.

Q: The RFA states that projects should avoid duplication with related projects by ensuring redundant subawards are not being issued by related federal (e.g. Department of Agriculture's Conservation and Innovation Grant (CIG) program) or non-federal partners (e.g. EPA Gulf of Mexico Farmer to Farmer awardees. Does this restrict grantees from issuing subawards to a third party that includes both EPA funds and funding from another source (for example a non-federal donor)?

A: Funds can be provided to organizations that are already receiving federal funding as long as it is not for duplicate work. A statement may be requested to assure it is not duplicate work. If the funds from

EPA are being leveraged with a non-federal donor there should just be delineation on what portion is funded by EPA and what portion of the subaward is being funded by the non-federal donor for tracking and reporting purposes.

Q: If we are submitting a proposal similar to one submitted for the last RFA, but not selected for funding, should we include text explaining how we have addressed the comments made by reviewers in the new proposal?

A: This RFA is different from the previous Farmer to Farmer RFA so while it is great that comments from previous reviewers have been addressed, it does not need to be included. Please ensure you are addressing the scope and evaluation criteria of the current RFA.

Q: In the RFA, the cooperative agreement structure note that EPA may "provide access for the recipient to EPA scientific expertise, sampling protocols, publicly available data, and other forms of technical assistance, should the request be made by the recipient and the EPA has available personnel." Should these requests be made in the proposal or can they be made throughout the project? What expectations should grantees have for technical assistance from EPA, including how it might be available to subawardees?

A: The technical assistance is typically determined during development of the workplan and throughout the project. Assistance by EPA is limited by personnel availability so while EPA will make every effort to provide technical assistance when feasible to the awardee it is less likely there will be personnel available to assist subawardees. If your project cannot be completed without EPA technical assistance this should be included as a request as a part of your application.

Added 1/3/2022

Q. Can competitive subaward programs consider the economic and social impacts alongside the environmental impacts of proposed work? If so, how should those be weighted in the evaluation criteria?

A. The competitive subaward evaluation criteria will be determined by the organization which receives the EPA award and may include economic and social impacts along with environmental impacts, but must ensure environmental impacts as identified in the outcomes section of I.C.2 are met. As this is a cooperative agreement, the EPA project officer may be involved in the project in the ways identified in section II.C.

Q. Individuals that could assist with the initial setup of the program to ensure the project is reaching underserved farmers are sometimes affiliated with (e.g., as employees, board members) the groups who would want to apply for the subawards. Please confirm that the EPA would find that a recusal process for stepping out of assessing applications with conflicts of interest is an acceptable way to include these individuals on an advisory group?

A. Yes, a documented recusal process is an acceptable way to include these individuals. In addition, the EPA awardee must ensure those individuals are not involved with the development of the competitive subaward funding opportunity.

Q. Can competitive grant programs focus on a specific set of targeted practices (e.g., agriculture) or should they allow for a very broad range of practices (e.g., agriculture and forestry and natural lands, etc.)?

A. The competitive grant program can focus on either agriculture only or include a broader range of practices. This would be determined by the awardee and what makes sense for the areas in which they work.

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Overview

Q. How much funding is available for this RFA?

A. The total estimated funding expected to be available is approximately \$12 million unless additional funding becomes available.

Q. Will there be more funding available in the future?

A. Funding for the Gulf of Mexico Program is dependent each year on allocations in the federal budget approved by Congress and the program priorities during that time.

Q. Is this funding opportunity available each year? Will it be available next fiscal year?

A. Funding for the EPA Gulf of Mexico Program is dependent each year on allocations in the federal budget approved by Congress and the program priorities during that time.

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Submitting an Application

Q. Where do I start?

A. You should start by closely reading the funding announcement and determining whether your organization has the expertise and experience to manage a large grant program. If your organization does possess this experience, you should determine whether your organization is eligible by reviewing Section III, Eligibility Information. Carefully consider the Scope of Work and the Environmental Results (Sections I.B-I.C). Read Content of Application (Section IV.D) and Evaluation Criteria (Section V.A) to ensure your application includes all required information.

Q. What kind of materials do I need to submit for the application?

A. To be considered for a GMD Grant, EPA requires that each submission contain a set of common elements that are described in Section IV.D (Content of Application Submission.) Section IV.D goes into detail about every item that must be included in the application package.

Q. What is the application submission deadline?

A. 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.A) on or before the application submission deadline.

Q. How will EPA review applications?

A. Please see Section V of the RFA.

Q. Are applicants required to follow the format detailed in section IV.D. of the RFA under Application Submission Content?

A. It is highly recommended that you explain each aspect of your application clearly and address each topic by following the format provided in IV.D., include the headings as given, and do not reorder the paragraphs, or you risk the possibility of information being left out by you as the applicant, or overlooked or not fully comprehended by the reviewers when the project is scored.

Q. Can someone be PI on one application and co-PI on another? Are multiple submissions from one organization generally encouraged or discouraged?

A. There is no limit to the number of applications an individual can be involved in nor the number of applications an organization can submit. We do, however, receive a high volume of applications and are only able to fund a small percentage.

Q. May a logic model be used to summarize some of the application components?

A. A logic model can be used to address some of the project components.

Q. Is the budget narrative included within the 12-page narrative?

A. Yes, the budget narrative should be included within the 12-page limit of the application narrative. The budget table does not count towards that 12 page limit.

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Eligibility/Project Eligibility

Q. How can I tell if I am eligible to apply for a grant?

A. Please refer to Section III.A. of the RFA.

Q. What is ineligible for funding?

A. Section III in the RFA identifies eligible and ineligible entities and activities. EPA also conducts a threshold eligibility review of all applications (Section III.D). 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.

Q. A funding idea was submitted and GMP was asked for input and/or requested a phone call to discuss project. The following response was provided to all potential applicants who requested input on their specific project idea or design.

A. In order to ensure a fair competitive process, the EPA's Gulf of Mexico Program does not provide specific input on project ideas to applicants.

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Environmental Outputs and Outcomes

Q. What are "Outputs and Outcomes"?

A. Outputs and outcomes are explained in Section I.C. of the RFA. The terms outputs and outcomes are derived from the EPA's focus on environmental results (EPA Policy Order 5700.7 Environmental Results). Therefore, EPA's priority is to support projects that are likely to achieve **quantifiable** outputs and outcomes. Applicants must include specific statements describing the environmental results of the proposed project in terms of well-defined "outputs" and "outcomes".

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Project Monitoring

Q: Will a QAPP need to be developed and approved by EPA for each project funded by the awardees?

A. After the awards are made, A QMP or QAPP will need to be developed by the awardee for EPA approval. The QMP or QAPP will outline the awardees process for quality assurance of the projects they will fund through the RFA. This should include a QAPP for the projects when appropriate, but the QAPP will need to be approved by the awardee and not the EPA.

Q. What is the definition of Environmental Data?

A. EPA's Environmental Data Definition: Environmental information or data is defined as any measurements or information that describe environmental processes, location, or conditions; ecological or health effects and consequences; or the performance of environmental technology.

Q. We are currently working on our application for the RFA, and have run into a question about the Environmental Data Statement. Based on the information provided in the RFA and links, we have drafted the following statement:

"We acknowledge that if funded for this project, we will be required and are prepared to demonstrate competency to assess the quality of work to meet project requirements, and acknowledge that a Quality Management Plan (QMP) and/or Quality Assurance Project Plan (QAPP) may be required."

Is this what this section is requiring, or do we need to provide further demonstration of competency (ex. provide current accreditation or certification certificate with scope of accreditation and accrediting body plus contact information) attached to the application?

A. A statement, such as what is written, is all that is needed. It is a step designed to ensure that the applicant is fully aware that if data collection is planned and the award is over \$200k, that a QAPP will be required. In addition, please schedule time for QAPP development and approval. *If the organization does not have an EPA approved Quality Management Plan, please note that this may also need to be developed and approved by EPA.*

Q. In the Questions and Answers for this application, there is a statement on page 4: If the organization does not have an EPA approved Quality Management Plan, please note that this must also be developed and approved by EPA. Inquiry through pre-awards and grant management for our organization has not turned up such a plan. Our assumption is that this is a document not specifically related to the current grant application, but an institutional-type document. Would you please provide more information on this requirement, including directions for preparing such a plan?

A: Thank you for your question about the development of the QMP. As you identified, the QMP is meant to be an institutional level document and not a project specific document. Recipients may be required to submit both a QMP and a QAPP. Instructions for development of both documents can be found at this [link](#). There is no expectation for either document to be developed prior to notification of funding.

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Match Requirement

Q. Is there a match requirement?

A. Neither matching nor cost share funds are required under this competition. Cost sharing will not be evaluated as a part of this competition.

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Contracts and Subawards

Q. Can grant funding be used by the applicant to make subawards, acquire contract services, or fund partnerships?

A. Yes, funds can be used for contracts and subawards in accordance with the additional provisions instructions which can be found on [the EPA Solicitation Clauses](#) page. EPA awards funds to one eligible applicant as the "recipient" even if other eligible applicants are named as "partners" or "co-applicants" or members of a "coalition" or "consortium." The recipient is accountable to EPA for the proper expenditure of funds and reporting requirements.

Q. May EPA grant recipients enter into agreements with federal agencies to carry out tasks/activities under the grant work plan?

A. Reimbursable Agreement- Grant recipients may enter into reimbursable agreements with federal agencies as long as those federal agencies are authorized under applicable federal laws to enter into such agreements with federal grant recipients. This is the mechanism by which a grant recipient can

work with a federal agency as a partner. Reimbursable agreements do not have to be competed, but grant recipients must provide a brief explanation as to why they are selecting a federal agency to carry out the work.

Q. If awarded a grant, can a grantee sole source a subcontract to a for profit entity?

A. A for profit can be selected as a sole source subcontractor, but the burden of proof is on the applicant or recipient to demonstrate why this is the only entity able to complete the task.

Q. We would like to have a placeholder of \$XXX for a contractor to provide _____ for our project. We plan to go through a competitive process to hire a contractor, but it will not be able accomplished prior to the application deadline. Is it okay to include a placeholder amount and wait to ensure the project is funded prior to beginning the competitive process?

A. Yes.

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Standard Form (SF) 424 and SF 424 A

Q. How do we answer question 19 in the SF 424?

A. Mark A and submit your application to your intergovernmental review state point of contact if **BOTH** of the following are true of your project:

1. Project involves land use planning or construction associated with demonstration projects.
2. Please follow this link: <https://www.whitehouse.gov/wp-content/uploads/2020/04/SPOC-4-13-20.pdf>. If your state is listed on this link, your project will need to be submitted to your state for review and select a or b as applicable.

Otherwise, select C.

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Budget

Q. Are preaward costs eligible?

A. In certain circumstances, costs incurred within 90 days prior to the grant award may be eligible for reimbursement. However, this does not include any costs associated with responding to this solicitation or in finalizing the application package. If costs are incurred before the award, they are incurred at the applicant's own risk.

Q. What are indirect or overhead costs?

A. Indirect costs represent the expenses of doing business that are not readily identified with a particular grant, contract, project function or activity, but are necessary for the general operation of the organization and the conduct of activities it performs (source: Indirect Cost Overview, Dept. of Education). In order to charge indirect costs to the grant, the applicant must have an up-to-date approved indirect cost rate agreement with its cognizant agency (the federal agency the applicant receives the most funding from). EPA does recognize indirect cost agreements negotiated with other federal agencies.

Q. What if we don't have an indirect cost rate agreement?

A. Any non-Federal entity that has never received a negotiated indirect cost rate may elect to charge a de minimis rate of 10% of modified total direct costs (MTDC) which may be used indefinitely.

Q. We want to apply for the 10% de minimis indirect cost rate. Where do we send out application to use the 10% de minimis?

A. You do not need to apply to use the 10% Federal de Minimis. Any non-Federal entity that has never received a negotiated indirect cost rate may elect to charge a de minimis rate of 10% of modified total direct costs (MTDC) which may be used indefinitely. For more information, please see: 2 CFR 200.414 (f) https://www.ecfr.gov/cgi-bin/text-idx?node=se2.1.200_1414&rgn=div8.

Q. How do I ensure I'm putting the costs in the correct budget categories?

A. There are several guidelines used for federal budgets. The recorded webinar and presentation found here <https://www.epa.gov/grants/epa-grants-award-process-webinars> provides an overview of the grant application process, including what should be included in the budget categories and the cost principles EPA utilizes. In addition, Appendix A of the RFA provides a link to EPA's Interim Budget Guidance as well as helpful hints and sample language. If you have a question about a particular item, please feel free to email the question to gmp-rfp@epa.gov.

Q. Can these projects fund international travel?

A. It depends on the relevance of the travel to the project. In any case where international travel is requested, however, the award will need to go through an additional layer of review and approval.

Q. We plan to use EPA's suggested budget template to complete our budget. Should we put both subawardees and subcontractors in the "Contractual" section?

A. Subcontractors should be in the Contractual category, but subawardees should be listed in the "other" budget category.

Q. Please advise if the suggested Budget Table template should also be used by lower tier subawardees, then rolled up into our Budget Table template?

A. We recommend our budget table template for the applicant, but any subawardee information can be presented in the way that makes the most sense for your application.

Q. Does this opportunity allow funding to be used for staff position? Is there a cap on the personnel costs? I can't seem to find details of what costs (and how much) are eligible under this funding opportunity.

A. In Appendix A of the RFA, there is a link to [EPA budget development guidance](#). It does not discuss a cap on personnel costs, because there isn't one that is directed, but all costs should be reasonable based on the activities that will take place during the project period and should only cover the identified project period.

Q: I am using the suggested budget template and need to add another line for Contractual services (beyond the ones in the Additional Lines C-H) but it will not allow me to.

A: Contact mills.calista@epa.gov for questions regarding the budget template.

Q: The excel spreadsheet for the budget table template requires a password.

A: The template is secured to ensure formulas are not modified. Instructions for using the template are located in Tab 1 Budget Guidelines. Tab 2 is an example of the required line-item budget. To create your own line-item budget, please edit Tab 4 to reflect all planned expenditures. Enter project specific information in the yellow cells and the spreadsheet will auto calculate. Additional lines are available in tabs 5 and 6 if needed.

Q: Can the budget template be edited to add match/cost share?

A: As stated in Section III.C. on page 12 of the RFA: "There is no cost-sharing or matching requirement as a condition of eligibility under this RFA." Because matching/cost share funds are not required, it will not be part of the evaluation process and it is not necessary to include in the application. A budget template that includes match was not released with this RFA.

Q. What are the key pieces of information necessary (questions to answer) to justify the selection of a sole-sources contract?

A. Please see the following screen shot, but basically, If you decide on a sole source contract you need to identify what activities the contractor will be responsible for and why they are the only contractor capable of providing this work (that would be the justification for a sole source contractor). For a contract that you bid out, you just need to say a contractor will be competitively selected and which activities the contractor will be responsible for. If you are bidding it out, you should not do so until you are selected for award and the award is final.

a. The applicant should list the proposed contract activities along with a brief description of the scope of work or services to be provided, proposed duration, and proposed procurement method (competitive or non-competitive) in its budget narrative.

b. EPA does not require applicants to identify contractors (including consultants) in the work plan, and the terms of EPA's competitive announcements warn applicants not to do so unless they have already complied with the 2 CFR Part 200 Procurement Standards. Refer to the Sole Source Guidance in Subsection C. 3. Of the

[Interim General Budget Development Guidance for Applicants and Recipients of EPA Financial Assistance](#)

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Other Questions

Q. The application has this statement about 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 a application, it will do so in a manner that does not prejudice any applicant or affect the basis upon which the application was evaluated and selected for award and therefore maintains the integrity of the competition and selection process.”

Does this mean that a grant application can be submitted for a project if it is for the engineering and studies needed to design a project (what we refer to as Phases 1 and 2) which has the ultimate goal of meeting one of the priorities stated in the project after construction (Phase 3)? Or is this grant only for projects which can go straight into construction?

A. The partial funding clause (referred to above) enables EPA to fund a portion of an application, but is not intended to enable a phased funding approach for a project. A "construction" project in the traditional term of building construction cannot be funded with this RFA. In addition, in order for an application to meet the threshold criteria for evaluation it must result in meeting the outputs identified in I.B.2. of the RFA).

Q. Are letters of support encouraged or required?

A. Letters of support are not required and are not included in the page limit. They will not be used for evaluation purposes, but can be included to provide documentation of support for the project.

Q. Can references cited be added as supporting material or must literature cited fit into the page limit?

A. A references cited page may be added as supporting material and would not be included in the page limit.

Q. Is it a disadvantage for the lead organization to be one that has a current GMP award?

A. It is neither an advantage or disadvantage. All applications will be evaluated based on the criteria identified in the RFP.

Q. Where should the Indirect Cost Rate Agreement be uploaded into the Grants.gov package?

A. The Indirect Cost Rate Agreement can go in the “Optional Attachments Form” section.

Q. How do I submit an additional question that has not been addressed in this document?

A. We are able to respond to questions from individual applicants regarding threshold eligibility criteria, administrative issues related to the submission of the application and requests for clarification about the announcement. You may submit your questions via email to gmp-rfp@epa.gov.

Q. For the resumes, is there a required format or a page limit?

A. There is neither a required format nor a page limit.

Q. With regards to Applicant Capability and Past Performance, will the experience of the applicant and co-applicant be evaluated together or separately?

A. The applicant is considered the manager of the grant and as such is the organization that is evaluated under applicant capability.

Q. We have a question concerning submission of forms. Are all forms required by applicant and co-applicant separately or can a single package be submitted by applicant only?

A. Based on your question, I believe you are forming a coalition with another organization. This is welcome, but one entity must be the responsible entity for the grant. That entity would be the one completing the application package and all required forms. The other organization would be a subawardee. For more information about coalitions, please see the following:

"Coalitions: Groups of two or more eligible applicants may choose to form a coalition and submit a single application under this RFA; however, one entity must be responsible for the grant. Coalitions must identify which eligible organization will be the recipient of the grant and which eligible organization(s) will be subawardees of the recipient. Subawards and subgrants must be consistent with the definitions of those terms in 2 C.F.R. § 200.92. The recipient must administer the grant, will be accountable to EPA for proper expenditure of the funds and reporting, and will be the point of contact for the coalition. As provided in 2 C.F.R. § 200.331(d), subrecipients or subgrantees are accountable to the recipient or grantee for proper use of EPA funding. Coalitions may not include for-profit organizations that will provide services or products to the successful applicant. For-profit organizations are not eligible for subawards. For-profit organizations are eligible to receive contracts. Any contracts for services or products funded with EPA financial assistance must be awarded under the competitive procurement procedures of 2 C.F.R. § 200.319, as applicable. The regulations also contain limitations on consultant compensation. (Please see 2 C.F.R. § 1500.9, formerly at 40 C.F.R. § 30.27(b) or 31.36(j), as applicable.) For additional information, please review the following Federal Register: <http://edocket.access.gpo.gov/2004/pdf/04-7867.pdf>."

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