

Training and Technical Assistance for Rural, Small, and Tribal Municipalities and Wastewater Treatment Systems for Clean Water Act Prevention, Reduction, and Elimination of Pollution Frequently Asked Questions (FAQs)

Funding Opportunity Number (FON): EPA-OW-OWM-22-02

In accordance with EPA's Assistance Agreement Competition Policy (EPA Order 5700.5A1), EPA will respond to questions from individual applicants regarding threshold eligibility criteria, administrative issues related to the submission of the proposal, and requests for clarification about the announcement. However, consistent with the provisions in the announcement, EPA staff cannot meet with individual applicants to discuss draft proposals, provide informal comments on draft proposals, or provide advice to applicants on how to respond to ranking criteria. Applicants are responsible for the contents of their proposals.

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A. Applicant Eligibility:

A1: Am I eligible to apply for the Request for Applications (RFA)?

Section III.A., Eligible Applicants, states “Eligible applicants under this competition are public and private nonprofit organizations, subject to CWA 104(w), that are qualified and experienced in providing on-site training and technical assistance to rural, small, and tribal municipalities and/or small publicly owned treatment works and/or decentralized wastewater treatment systems. Consistent with the definition of Nonprofit organization at 2 CFR § 200.1, the term nonprofit organization means any corporation, trust, association, cooperative, or other organization that is operated mainly for scientific, educational, service, charitable, or similar purpose in the public interest and is not organized primarily for profit; and uses net proceeds to maintain, improve, or expand the operation of the organization. The term includes tax-exempt nonprofit neighborhood and labor organizations. Note that 2 CFR 200.1 specifically excludes Institutions of Higher Education from the definition of non-profit organization because they are separately defined in the regulation. While not considered to be a nonprofit organization(s) as defined by 2 CFR 200.1, public or nonprofit Institutions of Higher Education are, nevertheless, eligible to submit applications under this RFA. Nonprofit organizations that are not exempt from taxation under section 501 of the Internal Revenue Code must submit other forms of documentation of nonprofit status; such as certificates of incorporation as nonprofit under state or tribal law. Nonprofit organizations exempt from taxation under section 501(c)(4) of the Internal Revenue Code that lobby are not eligible for EPA funding as provided in the Lobbying Disclosure Act, 2 U.S.C.

1611. EPA may ask applicants to demonstrate that they are eligible for funding under this announcement.”

A2: How is a nonprofit organization defined in this RFA?

See Question A.1.

A3: Will EPA respond to questions regarding this announcement?

Section VII, Agency Contact, states “In accordance with EPA’s Assistance Agreement Competition Policy (EPA Order 5700.5A1), EPA staff will not meet with individual applicants to discuss draft applications, provide informal comments on draft applications, or provide advice to applicants on how to respond to ranking criteria. Applicants are responsible for the contents of their applications. However, consistent with the provisions in the announcement, EPA will respond to questions from individual applicants regarding threshold eligibility criteria, administrative issues related to the submission of the application, and requests for clarification about any of the language or provisions in the announcement.” Section VII also states “Questions about this RFA must be submitted in writing via e-mail and must be received by the Agency Contact identified below by **August 1, 2022**, and written responses and answers to FAQs will be posted on EPA’s website at <https://www.epa.gov/small-and-rural-wastewater-systems/technical-assistance-treatment-works#newrequest>.” The email address for submitting questions by the deadline is: treatmentworksRFA@epa.gov.

A4: Can funding be used to update wastewater system planning documents for small wastewater systems and/or disadvantaged communities?

In Section I.D., Priority Area 2, Protect Water Quality and Compliance Assistance the RFA states “Examples of eligible training and technical assistance activities for rural, small, and tribal publicly owned treatment works and decentralized wastewater treatment systems to support compliance and protect water quality may include, but are not limited to, the following:”

- Perform on-site training or technical assistance to improve specific performance at local facilities, for example, assessment of the system’s overall strengths and areas for improvement, asset management, energy management, climate change risk assessment and risk mitigation, rate design, improved communications with local officials, effective utility management, or other topics that help facilities maintain long-term managerial, financial, and technical operational success.
- Provide operator training and technical assistance on CWA compliance.
- Assist with workforce development and training for operator certification and continuing education units (CEUs). Applicants should describe how they will obtain state approval for CEU credits for their training courses.

A5: Further clarification about the definition of an applicant is requested; for example, can a university submit more than one application if different Principal Investigators want to submit their own individual applications from the same university?

Each applicant must be an eligible entity, and per the RFA, Section III.C Individuals are not eligible to apply. The RFA Section III.A, states “Eligible applicants under this competition are public and private nonprofit organizations, subject to CWA 104(w), that are qualified and experienced in providing on-site training and technical assistance to small publicly owned treatment works and decentralized wastewater treatment systems...[and]... institutions of higher education who otherwise qualify as nonprofit organizations are eligible to apply...” Meanwhile

Section III.C. 2. “Applications must address one, and only one, of the five Priority Areas listed in Section I.D, although eligible organizations may submit more than one application under this competition as long as each one is separately submitted and addresses only one Priority Area. Applications that address more than one Priority Area in a single application will not be reviewed.” Section III.C. 3. states “Under this competition, only one application may be submitted for each Priority Area per applicant. Applicants may submit only one application per Priority Area. If an applicant submits more than one application for a single Priority Area, EPA will contact them before the review process begins to determine which application(s) will be withdrawn. If the applicant is not able to communicate a decision within two business days of being contacted by EPA, EPA will accept the application received by Grants.gov first. Additional information regarding the one application per applicant requirement may be found in the FAQ document available at www.epa.gov/small-and-rural-wastewatersystems/technical-assistance-treatment-works.”

A6: Our organization is planning to apply for this grant, and we are a branch, within a division, of a state Health and Human Services Department. We are planning to partner with local health departments and universities to provide trainings and educate homeowners with septic (decentralized) systems in the rural, small economically distressed communities in our state. Is our branch eligible to apply for this grant?

See question A.1. in the FAQ for information about eligible applicants. States are not eligible to apply.

A7: Could you please provide a summary of the eligible project costs for the grant solicitation? Specifically, if a non-profit is the lead, however, contracts with a consulting firm to bring in the technical expertise for training/education, etc. would the consultant be an eligible cost and the proposed implementation structure (Non-profit with specialty consultants) for support be eligible?

Section I.D, Description of Five Priority Areas, includes examples of eligible project activities. Page 1 of the RFA states: “...If you name subawardee/subgrantees and/or contractor(s) including individual consultants in your application as partners to assist you with the proposed project, pay careful attention to the information in the CONTRACTS AND SUBAWARDS provision found at [EPA’s Solicitation Clauses](#).” From the EPA Solicitation Clauses, “Applicants must compete contracts for services and products, including consultant contracts, and conduct cost and price analyses, to the extent required by the procurement provisions of the regulations at 2 CFR Part 200. Applicants are not required to identify subrecipients and/or contractors (including consultants) in their application. However, if they do, the fact that an applicant selected for award has named a specific subrecipient, contractor, or consultant in the application EPA selects for funding does not relieve the applicant of its obligations to comply with subaward and/or competitive procurement requirements as appropriate. Please note that applicants may not award sole source contracts to consulting, engineering or other firms assisting applicants with the application solely based on the firm's role in preparing the application. For additional guidance applicants should review EPA’s Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements.” From Section IV.D.2.C.4, Partnerships, “For-profit organizations are not eligible for subawards under this grant program but may receive procurement contracts. Any contracts for services or products funded with EPA financial assistance must be awarded under the competitive procurement procedures of 2 CFR Part 200

and/or 2 CFR Part 1500, as applicable. The regulations at 2 CFR 1500.10 contain limitations on the extent to which EPA funds may be used to compensate individual consultants. Refer to the Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements for guidance on competitive procurement requirements and consultant compensation. Do not name a procurement contractor (including a consultant) as a “partner” or otherwise in your application unless the contractor has been selected in compliance with competitive procurement requirements.”

From Section IV.D.2.C.7 Detailed Budget Narrative, “Provide a detailed budget and estimated funding amounts for each project component/task. This section provides an opportunity for a narrative description of the budget or aspects of the budget found in the SF-424A such as “other” and “contractual.” Applicants must itemize costs related to personnel, fringe benefits, contractual costs, travel, equipment, supplies, other direct costs, indirect costs, and total costs. All subawardees funding should be located in the “other” cost category. Describe itemized costs in enough detail for EPA to determine the allowability of costs for each project component/task, as well as the cost-effectiveness and reasonableness of all costs. Please see EPA’s [Budget Development Guidance](#) and [Indirect Cost Guidance](#) for additional information on preparing budget narratives.”

The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, which include guidance on allowable costs, can be found at 2 C.F.R. Part 200 et. seq.

A.8: How do you obtain a SAM ID?

Section IV.B.1.,SAM.gov (System for Award Management), Registration Instructions states, “Organizations applying to this funding opportunity must have an active SAM.gov registration. If you have never done business with the Federal Government, you will need to register your organization in SAM.gov. If you do not have a SAM.gov account, then you will create an account using [login.gov](#)1 to complete your SAM.gov registration. SAM.gov registration is FREE. The process for entity registrations includes obtaining a Unique Entity ID (UEI), a 12-character alphanumeric ID assigned an entity by SAM.gov, and requires assertions, representations and certifications, and other information about your organization.” Section IV.B.2., Grants.gov Registration Instructions, states, “Please note that this process can take a month or more for new registrants. 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 application submission deadline.”

B. Project Objectives:

B1: Does a decentralized wastewater treatment system include an individual home sewage system?

Appendix Definition, states “Decentralized systems” are defined as: septic or onsite or clustered systems used to collect, treat, and disperse or reclaim wastewater from a small community, tribe, or service area that are publicly or privately-owned and/or serve tribal communities (with the exception of systems that are owned by U.S. federal entities). For further details regarding decentralized systems refer to the EPA “Overview of Clean Water State Revolving Fund Eligibilities” decentralized chapter at: <https://www.epa.gov/cwsrf/overview-clean-water-state-revolving-fund-eligibilities>.

B2: How are “small publicly-owned treatment works” defined in the RFA?

Appendix Definition, states “[S]mall publicly owned treatment works” are defined as wastewater systems or treatment facilities that are owned by a public entity (such as a municipality) or not-for-profit entity (such as regional sewer districts), and/or serve tribal communities (with the exception of systems that are owned by U.S. federal entities).”

The RFA also defines “small publicly-owned treatment works” as systems that treat up to 1 million gallons per day (MGD) of wastewater or serve a population of less than 10,000 persons and may also serve operations such as, but not limited to hospitals, schools, and restaurants. Most wastewater systems in the nation serve populations less than 10,000.

C. Threshold Eligibility:

C1: If charts and exhibits are included in the application Project Narrative can they be in a smaller font than the 12-point font that is required for the body of the proposal?

The RFA does not establish a required minimum 12-point font for the Project Narrative or any charts and/or exhibits; however, the RFA does indicate that readability is of paramount importance. EPA recommends that all text in the Project Narrative, including any charts and/or exhibits, is in a 12-point font. Note that Section III.C, Threshold Eligibility Criteria, establishes a page limitation for the Project Narrative: “Where a page limit is expressed in Section IV.D.2 with respect to the Project Narrative, pages in excess of the page limitation 6 will not be reviewed. Section IV.D.2 establishes a 20-page, single-spaced Project Narrative page limit.”

C2: Is there a minimum or maximum amount of federal funding that can be requested in the application?

Section III.C.6. “Applications under this RFA may not exceed the maximum amount in the funding range specified under each Priority Area in Section 1.D in federal funds; applications exceeding the specified maximum amount in the funding range in the Priority Area will be rejected.”

C3: Can an eligible applicant submit more than one application?

From Section III.C.2. “Applications must address one, and only one, of the five Priority Areas listed in Section I.D, although eligible organizations may submit more than one application under this competition as long as each one is separately submitted and addresses only one

Priority Area. Applications that address more than one Priority Area in a single application will not be reviewed.” Section III.C.3 states “Under this competition, only one application may be submitted for each Priority Area per applicant. Applicants may submit only one application per Priority Area. If an applicant submits more than one application for a single Priority Area, EPA will contact them before the review process begins to determine which application(s) will be withdrawn. If the applicant is not able to communicate a decision within two business days of being contacted by EPA, EPA will accept the application received by Grants.gov first. Additional information regarding the one application per applicant requirement may be found in the FAQ document available at www.epa.gov/small-and-rural-wastewatersystems/technical-assistance-treatment-works.”

C4: Can an application address only one component identified in Section I.C, Project Components?

Section III.C.5 states “Applications must address all five project components listed in Section I.C.” Section I . C, Project Components states “Each application, regardless of the Priority Area being addressed, must address the five project components outlined in this section. Additional information, requirements, and example of technical assistance and training activities are provided in Section I.D. Description of Five Priority Areas.”

Applicants must address the following five components:

1. Priority Areas
2. Technical Assistance and Training Experience and Approach
3. Geographic Area and Targeted Municipalities and Systems
4. Consultation and Coordination with State, Territorial and/or Tribal Governments
5. Partnerships

D. Application Evaluation:

D1: How will the application be evaluated?

All eligible applications, based on Section III.C., Threshold Eligibility Criteria, will be evaluated based on the evaluation criteria provided in Section V.A., Selection Criteria.

E. Budget:

E1: Is there a match requirement for these funds?

No. A non-federal cost-share or match is not required.

E2: If the applicant develops a curriculum for training, can that curriculum be used for systems not targeted by the grant? For example: municipalities larger than the target group.

Yes. In accordance with 2 CFR 200.315, The Non-Federal entity may copyright any work that is subject to copyright and was developed, or for which ownership was acquired, under a Federal award. The Federal awarding agency reserves a royalty-free, nonexclusive, and irrevocable right to reproduce, publish, or otherwise use the work for Federal purposes, and to authorize others to do so.

E3: Does EPA have a limit on indirect costs that can be charged?

Indirect cost rates must be negotiated with the cognizant federal funding agency in accordance with the procedures in 2 CFR 200 Subpart E “Cost Principles”. As specified in the RFA, Section IV.D.1.g: “You must submit a copy of your organization’s Indirect Cost Rate Agreement as part of the application package if your proposed project budget includes indirect costs.”

For more information, please read the EPA’s Indirect Cost Guidance for Recipients of EPA Assistance Agreements at <https://www.epa.gov/grants/rain-2018-g02>.

E4: Will there be another round of funding for this grant program?

Through EPA's Fiscal Year 2022 Appropriations Act Congress allocated \$20 million for this grant program, and EPA anticipates there will be an RFA issued.

F. Miscellaneous:

F1: Will EPA seek external reviewers for the Training and Technical Assistance for Rural, Small, and Tribal Municipalities and Wastewater Treatment Systems for Clean Water Act Prevention, Reduction, and Elimination of Pollution RFA?

No. Section V.B of the RFA states “A panel comprised of EPA staff will review the eligible applications based on the evaluation criteria listed in Section V.

F2: Where can applicants access the webinar recording and slide deck?

Applicants can access the webinar recording and slide deck at <https://www.epa.gov/small-and-rural-wastewater-systems/technical-assistance-treatment-works>

F.3: At what point will technical assistance be available to communities?

Technical assistance will be available to communities once the grants are awarded.

F.4: Does a community have to be selected before applying?

See Question A.1.