

FAQs – The Environmental Justice Collaborative Problem-Solving (EJCPS) Cooperative Agreement Program

FAQ SECTIONS

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Eligibility

- 1) **Who is eligible to apply?** Eligible entities for this opportunity include a community-based nonprofit organization, or a partnership of community-based nonprofit organizations documented with a signed Letter of Commitment.
- 2) **Are community-based nonprofit organizations who have received past EPA grants and/or currently have ongoing EPA grants eligible to apply for this opportunity?** Yes. There is no restriction on the EJCPS opportunity preventing current EPA grantees from receiving an EJCPS award, even if they have current EPA grants.
- 3) **Are national nonprofits headquartered in a different state, but with regional offices or projects in a different region eligible to apply as a lead CBO for a project led by one of the field offices?** Yes. National nonprofits are eligible to apply for projects in different regions. If satellite offices do direct work in target communities, then that should be explained in the workplan. NOTE – All applicants will be evaluated on the strength of their connection to the target community. Keep that in mind if the target community is in a different region or area of the country.
4. **Is a community-based nonprofit organization able to apply if it is run by an all-volunteer staff?** Yes, if the organization is an incorporated nonprofit organization, the organization would be eligible. An all-volunteer staff means that the organization could apply for the small nonprofit set aside for \$150,000 projects or for the larger funding track for \$500,000 projects.
5. **Is a community-based nonprofit organization eligible to apply if it is under a fiscal sponsorship?** EPA does not recognize the fiscal sponsor role. EPA recognizes “prime” applicants and partners. If a fiscal sponsor applies on behalf of a community group, then the fiscal sponsor will be looked at as the “prime” applicant and the community group will be looked at as a “partner”. The fiscal sponsor will be evaluated on the strength of their connection to the target community, as well as on its ability to carry out the project directly.
6. **Are organizations in the U.S. territories eligible to apply to this opportunity?** Yes. Community-based nonprofit organizations are eligible to apply to this opportunity. Governments in U.S. territories should look to apply to the Environmental Justice Government-to-Government (EJG2G) Program.

Community-Based Nonprofit Organization qualifications

- 1) **What is the definition of a community-based nonprofit organization (CBO)?** For this opportunity, CBOs are defined as public or private nonprofit organizations that support and/or represent a community and/or certain populations within a community through engagement, education, and other related services provided to individual community residents and community stakeholders. A “community” can be characterized by a particular geographic area and/or by the relationships among members with similar interests and can be characterized as part of a broader national or regional community where organizations can be focused on the needs of urban, rural, and/or tribal areas, farmworkers, displaced workers, children with high levels of lead, people with asthma, subsistence fishers, and other similar groups.
- 2) **Does a community-based non-profit organization (CBO) have to be 501(c)(3) registered for this opportunity?** No. For this opportunity, applicants claiming non-profit status must include documentation that shows the organization is either a 501(c)(3) non-profit as designated by the Internal Revenue Service OR documentation that shows that the non-profit organization is recognized by the state, territory, commonwealth, or tribe in which is located.
- 3) **Are tribal groups that are not federally recognized, and do not “own” land, but have a common goal of providing for their indigenous members that are informally acknowledged by a state considered CBOs?** State recognized tribes are not eligible to apply to the EJ Collaborative Problem-Solving opportunity unless the state recognized tribe is an incorporated nonprofit organization and provides proof of their nonprofit status. However, state recognized tribes are eligible to apply to the EJ Government-to-Government opportunity.
- 4) **What defines 5 or fewer full-time employees as it relates to qualifying as a small CBO?** For this announcement, a full-time employee is defined as an employee who works 40 or more hours per week for the applying organization. CBOs may have more part time employees or volunteers but may still qualify as small CBOs if they have at most 5 full time employees. NOTE - Applicants who meet the standard set forth above for inclusion under the set-aside at the time of submission of their application, but who during this competition subsequently grow larger than 5 full-time employees, must immediately notify EPA of their change in size.
- 5) **If a small organization (fewer than 5 full-time employees) is partnering with other organizations, can they apply for the high grant award (\$500K).** Yes. A small organization may elect to apply for the high grant award.

Application Preparation

- 1) **What kind of letters are required from project partners?** Partnerships must be documented with a signed Letter of Commitment from the community-based nonprofit organization detailing the parameters of the partnership, as well as the role and responsibilities of the community-based nonprofit organization. This opportunity defines a “partnership” as a formal financial relationship between two or more community based nonprofit organizations (CBO) that is memorialized in writing and is legally binding under applicable law. The Letters of Commitment from the partnering CBO must then include a subaward agreement planned to establish the partnership.

- 2) **Do you need a Letter of Commitment from Non-Financial relationships with CBOs and non-CBOs for the application?** Yes. If a non-financial relationship exists between two CBOs, a letter of commitment should be submitted explaining the non-financial relationship.
- 3) **Can an organization indicate a preference for the \$150K or \$500K track?** Yes. If an organization has 5 or fewer full-time employees on staff, then they may submit project proposals for the \$150,000 track, or the \$500,000 track.
- 4) **Can universities co-lead the proposal so the university can help the community partners to submit the paperwork?** Universities can be a partner on the grant. However, the CBO must be the one to submit the application through Grants.gov via the CBO's UEI number and Grants.gov profile. Partners can be as involved in the workplan development process as the entities feel necessary.
- 5) **Has the EJ Screen Data been updated since the last Environmental Justice Opportunity?** Yes. Please log in to the redesigned EJSCREEN tool. There are new data and capabilities.
- 6) **Is there a limit on the number of attachments for this application?** No. However, we ask that you keep the volume of attachments to a reasonable number.

Partnerships

- 1) **How much of a subaward is required to establish a partnership?** The amount of each subaward to partnering organizations is up to the applying organization. There is no set value.
- 2) **Can for-profit entities qualify as partners?** For-profit entities can qualify as partners but are ineligible to receive subawards. For profit entities can receive contracts. If a contract will be offered to a for-profit entity, the applicant must comply with the competitive procurement requirements as outlined in the [Contracts and Subawards solicitation clause](#).
- 3) **Is there list of qualifying partnerships under this program?** Yes. A list of qualifying partnerships can be found on pages 5-6 of the RFA. These include:
 - Other local community-based non-profit organizations;
 - Local, regional, and national environmental non-profit organizations;
 - State, local, and tribal governments;
 - Federal government agencies;
 - Health care providers;
 - Faith-based organizations and local houses of worship;
 - Philanthropic organizations;
 - Civic organizations;
 - Local economic and/or community development corporations/organizations;
 - State, local and tribal government agencies;
 - AND Contracts with for profit businesses and industry

- 4) **Are all sub awardees required to have a Unique Entity ID (UEI) on Sam.gov?** Prior to making subawards, subrecipients must have a UEI. However, subrecipients are not required to complete the full SAM registration to obtain this. Information regarding obtaining a UEI is available at the SAM Internet site: <https://www.sam.gov/SAM/> and in the General Condition of the pass-through entity's agreement with EPA entitled "System for Award Management and Universal Identifier Requirements" T&C of the pass-through entity's agreement with the EPA.
- 5) **Can the minimum of three partners be a mix of financial and non-financial partners, or must they all be financial partners?** The three partners can be a mix of financial and non-financial partners. The letters of commitment should demonstrate the resources that the partner is bringing to the effort, and their interest in the project and community.

Project

- 1) **Can the project be shorter than the 3-year period outlined in the RFA?** Yes. All projects must end within three years. Projects within this time frame (i.e., one year) are permissible.
- 2) **Since the funding comes from the Inflation Reduction Act (IRA) to what extent must the EJ burden on a community be air or climate related?** Per EPA's Office of General Counsel (OGC), eligible activities through IRA can address environmental issues beyond air or climate. See Section I of The RFA contains a (non-exhaustive) list of eligible activities and project examples.
- 3) **Can this grant be used as part of a larger project or does it have to be self-contained within the \$500K.** Yes. EJCPS funding can be included as a part of a larger community project or initiative.
- 4) **Are special considerations given greater weight than those that do not address special considerations?** No. Special considerations are not given a greater weight than those that do not address them. They are only considered as an "other factor" AFTER the scoring and ranking process is complete. These will only be considered when making final selection decisions from among the high-ranking applications.
- 5) **What are examples of Health Impact Assessments?** Community-based nonprofit organizations are encouraged to partner with health agencies and institutions to help with the management of HIAs. Examples of Health Impact Assessments include the Gerena School Renovation Project, and Kingsbury Bay-Grassy Point Habitat Restoration Project listed on page 11 of the RFA.
- 6) **Is the project limited to one region or can it extend to different cities, counties, and even regions?** The project is not limited to one region. It can extend to different cities, counties, regions, and even nationwide as long as the project builds upon existing community understanding to establish and maintain partnerships capable of producing meaningful environmental and/or public health results across the regions.

Fiscal/ Grant Expenditures

- 1) **Is funding for the drawdowns available upfront, or can the grant funds only be drawn down on a reimbursement basis?** Grantees can draw down funds to cover their immediate cash needs for project expenses throughout the project period. Drawn down funds must be expended to cover associated project costs within five business days to comply with the “immediate cash needs” standard. Grantees are not required to “finance” the full grant amount upfront. However, grantees are not permitted to drawdown a lump sum amount and “bank” the grant funds until they are needed later in the project period. Questionable draw down activity will be scrutinized.
- 2) **Can a single project receive money from two different EPA project opportunities (i.e., EJCS and EJ2G)?** Complementary projects are allowed, but duplicative projects (i.e., the same exact project proposal) will not be funded under two separate EPA opportunities. Coalitions of partners interested in addressing environmental issues impacting their communities through both the EJCS and EJ2G opportunities should coordinate the submittal of both applications to ensure that proposed activities complement each other. Duplicative activities will not be funded.
- 3) **Is the small award of \$150K for the duration of the project, or \$150K per year?** The small award is the award for the duration of the project.
- 4) **Can you clarify fiscal sponsorship? It sounds like a group’s fiscal sponsor could make the proposal score lower or become ineligible if the fiscal sponsor does not qualify as a CBO?** Only CBOs are eligible for this opportunity. First and foremost, it’s important that a fiscal sponsor qualifies as a CBO. Please see the definition of community-based nonprofit organization (CBO) in Section I of the RFA. After confirmation that a fiscal sponsor qualifies as a CBO, then the fiscal sponsor can apply for the EJCS opportunity. However, the fiscal sponsor will be considered the “prime” applicant, they will be evaluated on their connection with the underserved community and their ability to carry out the project. CBOs represented by the sponsor will be considered project partners. One of the goals of EJCS is to build organization capacity to manage federal grants directly.
- 5) **Will a breakdown of allowable/unallowable expenditures for the funds be provided?** Allowable project activities and project examples are provided in Section I of the RFA. Additional guidance on EPA allowable expenditures for participant support cost can be found on the EPA [Guidance on Participant Support Costs](#) webpage.
- 6) **If an all-volunteer organization partners with a municipality, will the municipality be able to do the financial aspects of the grants?** No. Partners can help manage implementation of grant activities on the ground, but for this opportunity, only the lead applying CBO will have direct access to the grant funding.
- 7) **Do organizations have to go through competitive procurement process for CBO partners? Or is that just for services provided by the for-profit companies?** The competitive procurement process is only required for services valued at greater than \$10,000 provided by for-profit companies.
- 8) **Can this opportunity be used as a match for another federal funding opportunity? Does this opportunity require a match?** No. This opportunity cannot be used to match other federal funding opportunities. EJCS does not require a match.

Administrative

- 1) **Can this grant complement other funding streams?** Yes. This grant can complement other funding streams.
- 2) **What is expected in terms of reporting for this opportunity?** Selected grantees are required to submit progress reports every 6 months. The progress reports will provide an updated logic model, new partnerships developed, any delays or issues that have come up within the reporting period, etc.
- 3) **How does this grant differ from EJG2G? Is it eligible projects or allocation of funds?** The difference between these opportunities is who can apply directly. For EJCPs, CBOs apply directly. For EJG2G, units of government apply directly.
- 4) **Does completing the registration process for this program, apply to other EPA programs?** Creating a UEI during the registration for this program can be used for other programs. The UEI active registration status must be renewed on a yearly basis.
- 5) **Are requirements for the [Pre-Award Compliance for Non-Profit Organizations](#) applicable to grants under \$200,000?** No. Pre-award compliance requirements are not applicable to grants under \$200,000.