



# State and Tribal Indoor Radon Grant (SIRG) Program Handbook

August 2024

## Table of Contents

Introduction .....	1
Section 1: Overview .....	1
Statutory Authority:.....	2
Authorization:.....	2
Applicant Eligibility:.....	2
Funding Allocation:.....	3
Section 2: Grant Regulatory Framework.....	3
Federal Grant Regulations:.....	3
EPA Grant Regulations: .....	4
EPA Grant Policies and Guidance:.....	4
Terms and Conditions: .....	5
EPA Environmental Results Order:.....	5
Section 3: General Application Information .....	5
Pre-Application Assistance: .....	5
Application Process and Resources:.....	6
Application Deadlines: .....	6
Types of Awards: .....	6
Financial Management System:.....	7
Merit and Risk Review:.....	7
Application Evaluation Criteria:.....	7
Awarding Process:.....	7
Current Terms and Conditions: .....	8
Section 4: Key Programmatic Application and Funding Criteria.....	8
Work Plans and Key Programmatic Criteria: .....	8
Priority Program Areas:.....	8
Risk-Based Targeting: .....	10
Section 5: Statutory Requirements .....	10
Cost Share Requirements for Stand-Alone Grants: .....	10
Applicant-Funded Activities: .....	11
Third-Party In-Kind Contributions:.....	12
Program Income: .....	12
Cost Share Requirements for Performance Partnership Grants:.....	12
Statutory Ceilings: .....	13
Subaward Recipients: .....	14

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

Section 6: Allowable Costs, Required Activities, and Eligible Activities.....	15
General Requirements: .....	15
Activities Required by Statute:.....	15
Requesting Information: .....	15
Public Listing Requirement:.....	16
Performance Partnership Grant–Specific Conditions:.....	17
Eligible Activities:.....	17
(1) Radon Measurement Data:.....	18
(2) Public Information and Educational Materials: .....	20
(3) Radon Control Programs: .....	21
(4) Purchase of Radon Measurement Equipment or Devices:.....	21
(5) Analytical Equipment: .....	22
(6) Training: .....	23
(7) Program Overhead and Administration: .....	23
(8) Data Storage and Management System: .....	24
(9) Mitigation Demonstrations: .....	24
(10) Public Information and Technical Assistance:.....	25
Section 7: Post-Award Requirements.....	26
Requesting Changes to a Grant Agreement:.....	26
Reporting Requirements: .....	26
Recommended Format: .....	26
Content: .....	27
Reporting Frequency: .....	27
Subaward Performance Reporting (If Applicable):.....	27
Post-Award Reporting and Grant Close Out: .....	27
Grant Monitoring and Program Performance Evaluations: .....	28
Grant Monitoring:.....	28
Joint Evaluation Process:.....	29
Satisfactory Implementation:.....	29
Audits: .....	30
Closing Statement.....	30
Appendix A: Glossary and Terms .....	32
Appendix B: How to Register to Apply for Grants .....	37
Step 1. Register Your Organization in SAM.gov .....	37
Step 2. Create a User Account and Applicant Profile in Grants.gov.....	38
Step 3. Create Individual Grants.gov Accounts for Organization Members .....	39

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

Step 4. Learn How to Use Workspace in Grants.gov .....	39
Application Process: .....	39
Technical Issues with Submission: .....	40
Application Materials: .....	41
Appendix C: Budget Details .....	42
Appendix D: Further Information Regarding Contracts, Subawards, and Participant Support Costs .....	45
Background: .....	45
Contracts: .....	45
Subawards: .....	45
Participant Support Costs: .....	46
Resources: .....	47

## Introduction

For more than 30 years, the U.S. Environmental Protection Agency (EPA) has supported state and Tribal efforts to reduce radon-related lung cancer through the State and Tribal Indoor Radon Grant (SIRG) Program. Despite notable progress, radon continues to be a serious public health concern. Radon remains the second leading cause of lung cancer in the United States. State and Tribal radon programs have helped lead public outreach on radon and reduce exposure in communities across the United States.

Since the last publication of SIRG Guidance (in 2005), many aspects of the EPA's Radon and SIRG Programs have changed. For example, several current voluntary consensus standards of practice have replaced older EPA guidance. In addition, a growing number of states have established oversight programs for radon service providers, and the EPA's role to oversee national measurement and mitigation proficiency oversight has evolved. Furthermore, the EPA and eight other federal agencies united to launch and implement the [Federal Radon Action Plan](#) (or FRAP), a 2010–2015 project designed to extend the reach, scope, and impact of federal action on radon. Since 2015, the EPA has joined forces with key players across the government, industry, and [nonprofit](#) sectors to support and implement the [National Radon Action Plan](#) (NRAP). These organizations are now working to implement strategies under the current version of the NRAP. The network of stakeholders has grown over the years, and together these stakeholders have collaborated on local- and national-scale initiatives to reduce the public health risk from radon. In many cases, these new partnerships have helped support and expand the reach of long-standing state and Tribal radon programs.

In response to new grant regulations and requirements, as well as new radon testing and mitigation standards, the EPA is updating this primary SIRG guidance document. This guidance document provides updated legal, policy, and programmatic changes that apply to the SIRG Program and also provides new clarity, consistency, and organization to the guidance.

The primary changes to this document clarify how grant funds are used and what activities can be implemented with these funds. Several sections address a renewed emphasis on program priorities, new initiatives, and documentation of results. This updated document includes some entirely new elements, some modified sections, and some sections that remain consistent with previous guidance.

This guidance document is intended to help grantees plan and implement a state or Tribal radon program using federal SIRG funding. It also emphasizes the EPA's continued focus on and investment in this important public health issue and accompanying state and Tribal grant programs.

*Note: The first use of relevant terms in this document are linked to the corresponding entry in the glossary found in Appendix A; simply click on the link to view the definition. To return from the appendix, use Alt+Left Arrow (hold down the Alt key while pressing the Left Arrow key).*

## Section 1: Overview

The EPA's radon grants assist state and Tribal recipients in their efforts to raise radon awareness, promote adoption of radon-resistant building techniques, and encourage radon testing and mitigation, when necessary.

This program guidance document outlines the EPA's SIRG authorities, relevant regulations, eligibility requirements, [terms and conditions](#), the award process, eligible activities, reporting systems, and other

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

important criteria and guidance. This version supersedes previous guidance and is effective once finalized, but it is not retroactive.

This document serves as a reference for states and Tribes as they implement radon programs to address their specific needs. Although comprehensive radon programs that address many of the priority program areas have proven highly effective in achieving risk reduction, recipients may choose to concentrate their resources and efforts in specific areas.

Throughout the document, the terms “[applicant](#),” “[recipient](#),” and “[grantee](#)” should be considered inclusive of [states](#), [federally recognized Tribes](#), and territories eligible for SIRG funding.

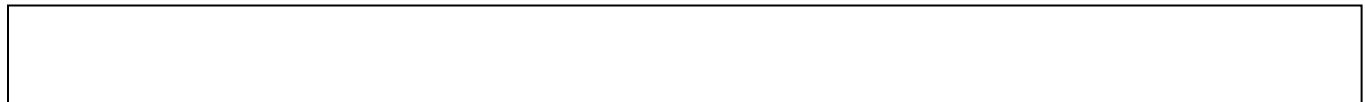
### ***Statutory Authority:***

In October 1988, in response to growing national concern over the threat of radon gas and its progeny, Congress enacted the Indoor Radon Abatement Act (IRAA) as an amendment to Title III of the Toxic Substances Control Act (TSCA). The statute contains provisions aimed at reducing radon health risks. TSCA § 306(a) authorizes the EPA Administrator to award grants for “the development and implementation of programs for the assessment and mitigation of radon.”

### ***Authorization:***

TSCA § 306(j) authorized an appropriation for grant assistance of up to “\$10 million for each of the fiscal years 1989, 1990, and 1991.” Since then, SIRG funding has been authorized and funded via appropriation acts.

TSCA specifies several **authorization restrictions**: SIRG funding for any one grantee may not exceed 10 percent of the total annual appropriation for the SIRG Program (TSCA § 306(j)(3)). In addition, funds appropriated to the EPA that are not obligated to grantees in a given federal fiscal year shall remain available for awarding in the following federal fiscal year (TSCA § 306(j)(4)). However, funds awarded to grantees, but not yet obligated by the end of the [budget period](#), are subject to review by the EPA program offices (40 CFR §§ 35.117–35.118). (Additional details are provided in Section 5.)



### ***Applicant Eligibility:***

Since the initial authorization of the SIRG Program, the EPA has expanded applicant eligibility beyond states (including the District of Columbia, commonwealths, territories, and possessions) to also include federally recognized Tribal governments. In 2001, the EPA issued revised regulations addressing eligibility of State and Local Assistance Grants, adding Tribal nations and Tribal consortia as eligible applicants for the SIRG Program (40 CFR §§ 35.700–35.708). For additional details about the EPA’s determination, see 66 FR 3782.<sup>1</sup>

---

<sup>1</sup> “While Congress did not expressly provide a role for Tribes in either TSCA or PPA, both statutes were clearly intended to have comprehensive, nationwide coverage—including the provisions regarding financial assistance for these programs. The EPA does not believe that Congress intended the Agency to provide grants exclusively to States and thereby leave Tribal lands without the benefit of grant assistance for these programs, since the problems and goals they address—toxic substances, radon abatement and pollution prevention—are relevant throughout the nation in both State and Tribal areas. Therefore, the EPA has determined that it is appropriate to provide grants to Tribes for Radon Abatement programs under section 306 of TSCA, Toxics Substances Compliance Monitoring programs under section 28 of TSCA, and Pollution Prevention Grant programs under section 6605 of PPA” (66 FR 3782).

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

Most long-standing radon programs are administered by a state agency or department of health and/or environment. New SIRG applicants must obtain a letter from the state governor designating them as the lead state agency/department and affirming that they have the legal and administrative authority to enter into a grant agreement with the EPA. Tribes and Tribal consortia do not have to submit such a letter but must meet the eligibility requirements defined in 40 CFR § 35.703.

Once a letter is on file with the appropriate EPA regional office, it does not have to be resubmitted annually. (Many long-standing grantees have already completed this process and have a letter on file with an EPA regional office.) However, if a change in the state's program results in its moving to another agency or department, a new governor's designation must be obtained and submitted to the EPA regional office before the new state agency can submit a grant application or receive funding.

A limited number of grantees have transitioned radon programs from a state agency to an eligible institution of higher education. In advance of this type of transition, grantees must notify the appropriate EPA regional office and obtain a new governor's designation identifying the institution of higher education as the new grant recipient. Please consult your EPA regional office if your state is considering this type of transition or a change in program administration. Grantees should alert the EPA regional office well in advance of such changes to ensure that the entity being considered meets the eligibility requirements for receiving and administering federal grant funding.

### ***Funding Allocation:***

The EPA's Office of Air and Radiation allocates SIRG funding to the 10 EPA regional offices. Allocations are based on radon risk potential, population data, smoking rates, and other applicable factors. For more information about the SIRG regional allocation in recent years, please see the [SIRG Regional Allocation table](#). The EPA regional offices determine the amount of funding each individual recipient will receive. Funding for grant recipients may depend in part on the EPA regional office's evaluation of performance in previous grant years, the degree of grantee success in achieving priority area goals, and the reporting of measurable results. For more information on how your region allocates funding, please contact your EPA regional [Project Officer](#) or [Radon Program Coordinator](#).

## **Section 2: Grant Regulatory Framework**

Interested and eligible applicants should review federal and Agency grant regulations, along with TSCA § 306, and this guidance document. The EPA strongly encourages current and potential grant recipients to regularly review the [EPA Grants](#) webpage, which includes the latest guidance and policy documents, several grant training modules, and information related to frequently asked questions.

Federal and EPA-specific grant regulations apply to the SIRG Program. In addition, the SIRG Program is subject to statutory requirements outlined in TSCA/IRAA. Compliance is the responsibility of the grantee, and applicants/recipients should read and become familiar with the following regulations and guidance. If needed, the Agency will provide interpretation and compliance assistance.

### ***Federal Grant Regulations:***

*2 CFR Part 200—Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*

In 2014, the EPA adopted the Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards to Non-Federal Entities (subparts A–F of 2 CFR Part 200). These regulations serve as a governmentwide framework for grants

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

management and provide a set of requirements for federal grant awards while reducing administrative burden on recipients and preventing waste, fraud, and abuse. Each agency was required to adopt the regulations at 2 CFR Part 200 in addition to developing agency-specific regulations. For more information about the EPA's adoption and implementing regulations, see 2 CFR Part 1500. The regulations at 2 CFR Parts 200 and 1500 are often referred to together as the Uniform Grants Guidance (UGG).<sup>2</sup> The UGG provides information about grant requirements, such as standards for financial and program management and identifying allowable [costs](#).

### ***EPA Grant Regulations:***

The EPA characterizes SIRG awards as Environmental Program Grants (40 CFR Part 35). These grants are continuing [environmental programs](#) awarded primarily to states and Tribes and available under specific statutes or combined into [Performance Partnership Grants](#) (PPGs). Regulations generally applicable to radon grants or [assistance agreements](#) include, but are not limited to, the following:

- 40 CFR—Chapter 1—Subchapter A: The General EPA Regulations applicable to grants or assistance agreements include, but are not limited to, the following:
  - Part 3—Cross-Media Electronic Reporting
  - Part 4—Uniform Relocation Assistance and Real Property Acquisition for Federal and Federally Assisted Programs
  - Part 7—Nondiscrimination in Programs or Activities Receiving Federal Assistance from the Environmental Protection Agency
- 40 CFR—Chapter 1—Subchapter B: Grants and Other Federal Assistance
  - Part 33—Participation by Disadvantaged Business Enterprises in United States Environmental Protection Agency Programs
  - Part 34—New Restrictions on Lobbying
  - Part 35—State and Local Assistance
    - Subpart A contains general requirements applicable to Environmental Program Grants for states and territories.
      - ◆ The regulations at 40 CFR §§ 35.100–35.118 apply to all state and territory Environmental Program Grants.
      - ◆ The SIRG-specific grant regulations for states and territories are located at 40 CFR §§ 35.290–35.298.
    - Subpart B contains requirements applicable to the Environmental Program Grants for Tribes.
      - ◆ The regulations at 40 CFR §§ 35.500–35.518 apply to all Tribal Environmental Program Grants.
      - ◆ The SIRG-specific grant regulations for Tribes are located at 40 CFR §§ 35.700–35.708.

### ***EPA Grant Policies and Guidance:***

In addition to the grant regulations listed above, crosscutting public policy requirements also apply to federal grants. The Agency also has developed numerous policies and guidance to ensure effective

---

<sup>2</sup> The UGG supersedes requirements that were previously specified in OMB Circulars A-21, A-87, A-102, A-110, A-122, and A-133, as well as 40 CFR 30 and 40 CFR 31.



## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

grants management. To assist the public in understanding these policies, the EPA developed a searchable and regularly updated database, available on the [EPA Grants Policy Resources](#) webpage.

### *Terms and Conditions:*

All grant agreements contain terms and conditions that constitute legally binding agreements between the EPA and the recipient. The EPA routinely updates and provides a list of [grant terms and conditions](#) applicable to Agency awards. The regional Project Officer will ensure that all applicable terms and conditions are included in award agreements. In general, *administrative* terms and conditions focus on broadly applicable grant requirements and grants management activities (e.g., award process, payments, administrative reports, [close out](#) actions). *Programmatic* terms and conditions outline specific requirements for SIRG grantees (e.g., radon provider listing requirements) or further clarify administrative requirements in the context of the program (e.g., specifying reporting timelines and preferred methods).

### *EPA Environmental Results Order:*

[EPA Order 5700.7A1](#) is the EPA's policy for addressing environmental results under Agency assistance agreements. The EPA program offices must ensure that grant and/or assistance agreement [work plans](#) contain well-defined [outputs](#) and, to the maximum extent practicable, well-defined [outcomes](#) designed to achieve environmental results and public health protection. Agency grants and [cooperative agreements](#) further the EPA's strategic goals by ensuring that work plans focus beyond merely short-term results to encourage substantive environmental outputs and outcomes. For state and Tribal grants, this requirement can be satisfied by ensuring compliance with 40 CFR § 35.107 (state work plans) and 40 CFR § 35.507 (Tribal work plans).

## **Section 3: General Application Information**

This section provides an overview of the grants process and requirements. The application process begins with pre-application assistance. Before submitting a draft application, interested applicants should consult with the appropriate EPA regional Project Officer to ensure compliance with EPA policies and regulations, statutory requirements, and SIRG Program priorities. After negotiating and developing a work plan and budget with the regional Project Officer, applicants will apply through [Grants.gov](#). The regional Project Officer will review the package for compliance with program and administrative requirements.

### ***Pre-Application Assistance:***

The EPA Radon Program generally issues SIRG funding guidance on an annual basis to identify, clarify, or reinforce program priorities. Before developing or submitting a draft application, applicants should consult with the appropriate regional Project Officer, review the most recent guidance, and identify any upcoming application deadlines. Applicants and the regional Project Officer should discuss potential work plan components and availability of funding. Following review of the draft application, the regional Project Officer will advise the applicant to prepare and submit a final application.

Each [regional grants office](#) is available to provide pre-application assistance. The office will conduct a separate review of the application to ensure that it meets all statutory requirements and applicable EPA grant regulations. This review focuses on ensuring that all required paperwork is signed and included in the application package.

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

### **Application Process and Resources:**

Please review these resources for additional application information:

- [Grant Opportunity Search](#) (Note: Search under “Funding Opportunity Number” and input EPA-CEP-01 or EPA-CEP-02. Select CFDA 66.032 to preview the SIRG application.)
- Recipient Training Opportunities.
- [Introduction to Regulations, Policies and Guidance for EPA Grants](#)
- Grants.gov Resources:
  - [Grants Learning Center](#)
  - [Applicant Resources](#)
  - [Workspace Overview](#)
- Appendix B: Includes additional information and more detailed application instructions.
- Appendix C: Includes a link to Budget Training and more detailed budget instructions.
- Appendix D: Provides further information regarding contracts, subawards, and participant Support Costs.

Regional Project Officers can assist with questions about application submissions, including required forms and necessary materials.

### **Application Deadlines:**

Applicants seeking funding should work with their regional offices, which will notify current and potential grantees of any application deadlines.<sup>3</sup> Applicants may also find additional information about deadlines using the grant opportunity search function previously highlighted. Please note that awards for environmental program grants generally must be issued by September 30 of any given year.

### **Types of Awards:**

A grant agreement is an instrument of financial assistance between a federal awarding agency and a [nonfederal entity](#). The EPA uses several types of grant agreements, described below.

**Stand-Alone State and Tribal Indoor Radon Grants (SIRG)** will be issued as either grant agreements or cooperative agreements. In a *grant agreement*, the Agency is not substantially involved in carrying out project activities. Conversely, in a *cooperative agreement*, substantial programmatic involvement is expected between the EPA and the recipient during the performance of project activities. In this case, substantial involvement refers to close collaboration with the recipient in determining the scope of work and describing the EPA’s anticipated involvement.

**Performance Partnership Grants (PPGs)** were designed to enable states and Tribes to combine funds from more than one environmental program grant into a single grant with a single budget. Recipients do not need to account for PPG funds based on the funds’ original environmental program source; they only need to account for total grant expenditures. Although individual program requirements still apply, grantees have the flexibility to direct resources where they are needed most to address their priorities.

---

<sup>3</sup> Tribal grants may have more flexibility depending on the authority the grant is awarded under (e.g., project grants awarded under TSCA § 10 may not need to follow a fiscal or calendar year budget/project period).

***Financial Management System:***

EPA grant applicants must meet the basic requirements for financial management systems (2 CFR § 200.302) and internal controls (2 CFR § 200.303) to receive federal funding. Grant recipients must have administrative and financial management systems in place that provide internal controls and help the organization prepare required reports based on the terms and conditions of their award. The systems must be capable of tracking grant funds to adequately establish that the funds have been used according to federal statutes and regulations and the terms and conditions of the award.

***Merit and Risk Review:***

EPA regional Project Officers are required to complete merit reviews for all SIRG cooperative agreements and grant applications. The EPA developed the merit review process as an objective approach to evaluating award applications in accordance with written standards. Applications for a new discretionary noncompetitive assistance agreement, and supplemental funding amendments, awarded by the EPA's Office of Air and Radiation are subject to a merit review (2 CFR § 200.205).

***Application Evaluation Criteria:***

The EPA regional Project Officer and [Grants Specialist](#) review the grant application for completeness and correctness. Applications must include all required information and signatures, a detailed work plan explaining planned activities, and a specific budget breakdown for major activities. The regional Project Officer and Grants Specialist will also review applications to ensure that costs included in the application are allowable costs and to determine whether the recipient lists any pre-award costs, which require prior approval from the EPA. The regional Project Officer and the applicant will negotiate any outstanding work plan or budget questions. Once [negotiations](#) are completed, the regional Project Officer will send a funding recommendation to the EPA Approval Official. Once the funding recommendation is approved, it moves to the EPA regional grants office for final review and awarding.

*Note: TSCA § 306(i)(1) specifies that no grant may be made in any fiscal year to an applicant that in the preceding fiscal year received a SIRG grant unless the EPA determines that such grantee satisfactorily implemented the activities funded by the grant in the preceding fiscal year. Regional Project Officers often conduct this review in conjunction with SIRG application reviews.*

***Awarding Process:***

The Regional Administrator, or designee, will review a complete application and either approve, conditionally approve, or disapprove it within 60 days of receipt (40 CFR § 35.110). This period may be extended by mutual agreement between the EPA and the applicant. The Regional Administrator will award funds for approved or conditionally approved applications when funding is available. After approving an application, to determine the amount of funds to be awarded to states (40 CFR § 35.112) and Tribes (40 CFR § 35.512), the EPA will consider such factors as the applicant's allotment, the extent to which the proposed work plan is consistent with the EPA guidance and mutually agreed-on priorities, the anticipated cost of the work plan, and the level of radon health risk. The award document and any grant or program conditions will then be prepared and issued. The official notification of an award will be made by the EPA regional grants office. 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. The award notice, signed by an 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 the 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.

***Current Terms and Conditions:***

The EPA Office of Grants and Debarment updates the [EPA General Terms and Conditions](#) and National Administrative and Programmatic Terms and Conditions every fiscal year. (Please refer to Section 2 for more information on terms and conditions.)

**Section 4: Key Programmatic Application and Funding Criteria**

This section outlines the importance of work plans and describes programmatic funding criteria. It also discusses high-priority activities for the SIRG Program for work plans and grant activities.

***Work Plans and Key Programmatic Criteria:***

The EPA requires work plans that specify the outputs and outcomes that will be achieved as part of a proposed project and how they will be measured. SIRG work plans should be viewed as strategic planning tools that identify program goals and objectives, expected outcomes and results, resource needs, and implementation target dates.

As outlined in TSCA § 306, SIRG applications should include each of the following:

1. A description of the seriousness and extent of radon exposure in the area in which the grant activities will be performed.
2. Identification of the lead state or Tribal agency, or other nonfederal entity, with primary responsibility for the radon program and a description of the lead agency's role and responsibilities and those of any other agencies or municipal, district, or areawide organizations involved in the radon program.
3. A work plan describing the activities and programs related to radon to be funded.
4. A budget specifying the federal and applicant share of the funding for each work plan element.

*Note: First-time applicants should consider long-range planning when developing their work plans to demonstrate a long-term, strategic approach to risk reduction. Work plans are the basis for managing and evaluating performance under the grant agreement.*

***Priority Program Areas:***

Among other factors, the EPA will base its review of SIRG applications on whether they reflect program priorities, identify appropriate risk reduction targets, and outline a responsible use of resources. An applicant's proposed projects, work plan, and projected results should align with the Agency's radon program goals and priorities. Beginning in 2016, Congress outlined recommendations and key areas of emphasis for the EPA's SIRG Program that are reflected in the current program priorities.

The EPA has identified several priority areas for SIRG recipients based on a combination of statutorily outlined activities, congressional recommendations, activities demonstrated to achieve risk reduction, and strategies for targeted program outreach. With respect to addressing priority program areas, the EPA will consider activities outlined in a grantee's current work plan, as well as the capabilities and capacity of each grantee.

The risk of exposure to radon is well-established and documented in the scientific literature, and numerous training and educational materials exist to raise awareness about the health risks. Therefore, the EPA encourages grantees, specifically long-standing programs, to use funds in ways that expand the

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

role of their radon programs beyond providing educational resources and awareness to implementing program activities aimed at quality data collection, code adoption, and other high-impact risk reduction activities.

The EPA will continue to focus the SIRG Program on areas of emphasis and activities, including, but not limited to—

- Adopting, or seeking to adopt, radon building codes for all homes and buildings.
- Increasing disclosure, testing, and mitigation in conjunction with residential real estate transactions.
- Providing training and technical support on voluntary consensus standards (VCS) for radon testing and mitigation, identifying and spreading best practices for building radon-resistant homes, and adopting radon-resistant practices in building codes.
- Identifying innovative ways to obtain mitigation assistance for low-income residences.
- Expanding coverage and seeking opportunities to assist underserved communities.
- Developing or implementing processes to ensure appropriate credentialing (certification, licensure) of radon testing and mitigation service providers (e.g., developing a state-run credentialing program, ensuring enforcement of state credentialing requirements, maintaining accurate lists of credentialed service providers, offering training opportunities for credentialed providers).
- Informing local school systems about radon exposure risk in schools and providing technical assistance as needed on school testing and mitigation plans.
- Collecting available radon measurement data to develop locality-specific classifications of radon risks and to support the Centers for Disease Control and Prevention (CDC) National Environmental Public Health Tracking Network (Tracking Network) radon data repository.
- Promoting radon awareness through the medical community, cancer control plans, childcare providers, and real estate transactions (e.g., homebuyers, homeowners, renters).

This is not intended to be an exhaustive list, and the EPA may establish additional criteria to promote the goals of the SIRG Program (TSCA § 306(i)). (Please refer to Section 6 for a more detailed discussion of eligible activities.)

*Note: As specified in TSCA § 306(d), the Agency shall give preference to states and Tribes that have made reasonable efforts to ensure adoption of model new construction standards. At the time Congress passed IRAA, it directed the EPA to “develop model construction standards and techniques for controlling radon levels.” In the early years of the EPA’s Radon Program, the Agency primarily developed its own radon standards for use across the country. Most of the EPA standards have been archived and remain available as reference documents. However, since the late 1990s, federal legislation and Executive Orders have directed agencies to participate in private, consensus-based processes to develop standards. For more than a decade, the EPA has engaged with industry, states, and other stakeholders in the development of current radon standards of practice and international building codes. Through recent guidance, the EPA clarified its expectations for SIRG recipients to reference the most current VCS when implementing their radon programs.<sup>4</sup> The purpose of the guidance is to recommend that states and other recipients of SIRG funding reference VCS supported by the EPA when implementing their*

---

<sup>4</sup> “Guidance on the Use of Voluntary Consensus Standards for SIRG Recipients.” For the most current version, visit the EPA’s [SIRG Program and Resources](#) webpage.

*radon programs. Citing or incorporating current radon VCS in state/Tribal legislation, building codes, outreach, and other program elements is a best practice for SIRG recipients. This program element remains a priority for the EPA because of the large potential for comprehensive radon risk reduction.*

### **Risk-Based Targeting:**

Although the EPA supports risk-based targeting to achieve maximum radon risk reduction, there is no known safe level of exposure to radon, and SIRG-funded risk reduction efforts should seek to broadly address radon in all communities across the country.

One approach to risk-based program design involves identifying geographic areas that have the potential for elevated radon levels. In the early years of the EPA Radon Program, the Agency developed the national EPA Map of Radon Zones based on indoor radon measurement data, geology, aerial radioactivity, soil parameters, and foundation types. Many SIRG recipients have established state or Tribal programs to track and analyze local radon testing data, allowing them to further understand the radon potential across their state and/or Tribal lands.

In addition, the CDC Tracking Network added radon testing data to its comprehensive database. The Tracking Network connects people with vital information on a variety of health and environmental topics, including radon. Some state radon programs, already collecting radon testing and mitigation data, have advanced the CDC's efforts by providing testing results. The CDC continues to work with partners to add data from additional states and laboratories to develop a real-time map of radon testing results. SIRG recipients are encouraged to participate in data sharing to bolster the CDC's national and publicly available radon datasets to the fullest extent possible.

Another approach to risk-based program design focuses on delivering public health benefits to underserved communities. Some communities have less access to radon resources, and low-income families may lack the necessary financial resources to test for and mitigate elevated radon levels. In some cases, these obstacles prevent state and Tribal radon programs from achieving risk reduction for all communities. A national study identified lower levels of radon awareness, testing, and mitigation in low-income communities.<sup>5</sup> The EPA encourages program administrators at all levels (i.e., state, Tribal, territorial, and local) to look for innovative ways to communicate radon health risk information, build partnerships, design programs that encourage residents to take necessary preventative measures, and ensure that public health protections are accessible in underserved communities.

## **Section 5: Statutory Requirements**

This section outlines the statutory requirements and limitations applicable to SIRG awards. The EPA specifically addresses SIRG award match requirements, restrictions on use of [program income](#), and specific restrictions and ceilings on certain allowable activities.

### **Cost Share Requirements for Stand-Alone Grants:**

Some of the EPA's programs require grant applicants to provide a [cost share](#), also known as [matching funds](#). A cost share is a nonfederal contribution to a grant project, generally specified as a percentage that the recipient (or third party) is required to contribute.

---

<sup>5</sup> U.S. Department of Housing and Urban Development (HUD). *American Housing Survey, 2015* (unpublished analysis). Washington, DC: HUD Office of Lead Hazard Control and Healthy Homes and Office of Policy Development and Research.



## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

For stand-alone state and Tribal grants, TSCA § 306(f) established a progressive match: 25 percent in the first year, 40 percent in the second year, and 50 percent in the third and subsequent years of participation. However, in the fiscal year 2006 appropriation, Congress permanently reduced the recipient match requirement from a maximum of 50 percent to a maximum of 40 percent for participants with two or more years in the program.<sup>6</sup> (*Note: Federal funds may not be used to satisfy the match requirement.*)

For the SIRG Program, cost share is specified as a percentage of the **total cost of the project**. Applicants should show how they will meet the cost share requirement for the total cost of the project. However, this does not need to be demonstrated on an activity-by-activity basis. All dollars spent under the grant agreement (including those dollars an applicant expends to meet its match) must comply with regulations and requirements.

### Example: Cost Share Calculation

**Cost Share Based on Federal Funds and Required Percentage of Total Project Cost**

Suppose a grant has \$120,000 in federal funding available and the applicant is required to contribute 25 percent of the total project cost. The total project cost and cost share can be calculated using the following formula:

**Total Project Cost = Federal Funding / (1 – Cost Match Requirement)**

Total Project Cost = \$120,000 / (1 – 0.25)

Total Project Cost = \$120,000 / (0.75)

Total Project Cost = \$160,000

Therefore, the minimum cost share is \$40,000, or \$160,000-\$120,000

\$120,000  
Federal Funds

+

\$40,000  
Cost Share

=

\$160,000  
Total Project Cost

Source: [EPA Grants Management Training for Applicants and Recipients, Module 3](#)

The matching requirement may be satisfied by any combination of the following (2 CFR §§ 200.306–200.307):

1. Applicant-funded activities or [in-kind contributions](#).
2. Third party-funded activities or in-kind contributions.
3. Program income (if specified in the grant agreement).

#### *Applicant-Funded Activities:*

Examples of applicant-funded activities allowable as matching funds include personnel salary and fringe benefits, [indirect costs](#) (at an approved rate), expenses related to operating a hotline or source of public information (website, email, etc.), contractual costs, [subgrants](#), purchases of supplies, program income, and certain contributed in-kind activities.

---

<sup>6</sup> “Beginning in fiscal year 2006 and thereafter, and notwithstanding section 306 of the Toxic Substances Control Act, the Federal share of the cost of radon program activities implemented with Federal assistance under section 306 shall not exceed 60 percent in the third and subsequent grant years.” [Public Law 109–54](#), August 2, 2005.

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

### *Third-Party In-Kind Contributions:*

[Third-party in-kind contributions](#) are defined as “the value of non-cash contributions (i.e., [property](#) or services) that (a) benefit a federally assisted project or program; and (b) are contributed by nonfederal third parties, without charge, to a nonfederal entity under a federal award” (2 CFR § 200.1).

Examples of third-party in-kind contributions include a company donating radon detectors or materials; a nongovernmental employee who provides time to help staff a booth during an exhibition; a company providing free advertising, such as billboards, radio, or TV; time and salary contributed by nongovernmental employees for an allowable activity; or contributions of a [local government](#) or university to the state or Tribe as “pass-through” funds. States and Tribes considering in-kind match contributions must document and obtain approval from their state’s financial officer (if applicable) and/or the EPA regional office.

### *Program Income:*

Program income might accrue from different sources, such as charging fees for training, selling test kits, and/or charging registration fees for a conference. In some states, program income might be generated from license, registration, or certification fees; inspection programs; or other user fees.<sup>7</sup> Many approaches for developing program income may require state legislative authority.

Program income is deducted from total allowable costs unless otherwise specified in the grant agreement. An applicant can request that the EPA consider the use of program income for cost share or in addition to grant funds through a grant application or amendment.<sup>8</sup> The EPA regional office may permit grantees to use program income to meet matching fund requirements or to increase the award amount by funding additional eligible activities if such arrangements are specified within the terms of the grant agreement. However, for the recipient to use program income in addition to their SIRG award, the recipient must have access to these funds and must expend the generated income on allowable radon program activities. If program income is returned to the state’s general treasury account, then the EPA must deduct the [federal share](#) of the program income from the federal funding of the grant award.

### ***Cost Share Requirements for Performance Partnership Grants:***

It is important to note that cost share requirements under a stand-alone grant and a PPG vary for states and Tribes. Please review the requirements carefully.

**States** (40 CFR § 35.136): The applicant must provide a match that is “not less than the sum of the minimum nonfederal cost share required under each of the environmental programs that are combined in the PPG.”

---

<sup>7</sup> Taxes, special assessments, levies, fines, and other such revenues raised by a nonfederal entity are not program income unless the revenues are specifically identified in the federal award or federal awarding agency regulations as program income (2 CFR § 200.307(c)). Permit fees are governmental revenue and not program income (2 CFR § 1500.8).

<sup>8</sup> Program income generated by a grant-supported activity must be specified in the grant award, according to one of the following three options: (1) The income may be deducted from total allowable costs to determine net allowable costs. This reduces proportionate shares of the EPA’s and the grantee’s contributions to the program. (2) Program income may be added to the funds committed to the grant agreement by the EPA and the grantee and then used for the purposes and under the terms of the grant agreement. This means that the funds must go back into the program and be used only for additional allowable radon activities. (3) When authorized, program income may be used as part of the grantee’s cost share, and the amount of federal funds committed to the project remains the same (2 CFR § 200.307(e)(3)).



## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

**Tribes** (40 CFR § 35.536): See note below until the EPA can revise the PPG regulations.

*Note: The EPA's Office of Grants and Debarment approved a class exception that waives cost share requirements for Tribal and inter-Tribal consortia PPGs with the following conditions:*

- *The class exception took effect on October 1, 2021, and applies only to new Tribal or inter-Tribal consortia PPGs and new funding awarded via supplemental amendments to Tribal or inter-Tribal consortia PPGs awarded on or after October 1, 2021.*
- *The class exception is in place until the EPA can revise or remove cost share requirements from 40 CFR § 35.536.<sup>9</sup>*

### **Statutory Ceilings:**

Under the SIRG Program, certain allowable activities have specific restrictions and funding ceilings. Grantees must be able to track expenditures to determine compliance with the statutory budget limitations for radon measurement devices and demonstration projects, as well as for program administration, as described below.

#### *(1) 50 Percent Ceiling on Measurement Equipment/Mitigation Demonstrations*

TSCA § 306(i)(2) states that “the costs of implementing paragraphs (4) and (9) of subsection (c) shall not in the aggregate exceed 50 percent of the amount of any grant awarded under this section to a [recipient] in a fiscal year. In implementing such paragraphs, a [recipient] should make every effort, consistent with the goals and successful operation of [a state or Tribal] radon program, to give a preference to low-income persons.”

Under TSCA § 306(i)(2) and 40 CFR §§ 35.298(c) and 35.708(d), the costs of radon measurement [equipment](#) or devices and demonstrations shall not exceed 50 percent of the entire award (including cost share) provided to a state or Tribe in a fiscal year. Recipients should track expenditures to ensure that they do not exceed the threshold on these two eligible activities combined. Grantees are encouraged to consider methods of providing access to low-income and underserved communities when using SIRG funds for either of these eligible activities. (Please refer to Section 6 for additional information about programmatic considerations related to measurement equipment and mitigation demonstrations.)

In addition, capital expenditures for special purpose equipment are allowable as direct costs, provided that items with a unit cost of \$5,000 or more have the prior written approval of the federal awarding agency or pass-through entity (2 CFR § 200.439(b)(2)).

2 CFR § 200.1 defines:

- *Capital Expenditures:* Expenditures to acquire capital assets or expenditures to make additions, improvements, modifications, replacements, rearrangements, reinstallations, renovations, or alterations to capital assets that materially increase their value or useful life.
- *Special Purpose Equipment:* Equipment that is used only for research, medical, scientific, or other technical activities. Examples of special purpose equipment include microscopes, X-ray machines, surgical instruments, and spectrometers.

---

<sup>9</sup> [Class Exception to the Cost Share Requirements for Tribal and Intertribal Consortia Performance Partnership Grants \(PPGs\) at 40 CFR § 35.536.](#)

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

- *Note: Additional requirements should be identified for Special Purpose Equipment in the notice of funding opportunities and in programmatic terms and conditions to be consistent with the regulation at 2 CFR § 200.211(d).*

*PPG-Specific Conditions:* It is important to note that award limitations under a PPG award can vary. As specified by 40 CFR § 35.134(c) and 40 CFR § 35.532(b), the 50 percent limitation on equipment and devices for state and Tribal indoor radon grants does not apply when SIRG funding is included as part of a PPG.

### *(2) 25 Percent Ceiling on Program Administration and Overhead*

TSCA § 306(i)(3) states that “the costs of general overhead and program administration under subsection (c)(7) shall not exceed 25 percent of the amount of any grant awarded under this section to a [recipient] in a fiscal year.”

Under TSCA § 306(i)(3) and 40 CFR §§ 35.298(d) and 35.708(d), the costs of general overhead and program administration shall not exceed 25 percent of the entire award (including cost share) of any grant awarded to a state or Tribe in a fiscal year. This limitation applies to both federal funding and the recipient’s cost share. Recipients should track expenditures to ensure that no more than 25 percent of their entire award is spent on these two eligible activities combined.

The Agency recognizes that the development and maintenance of a state or Tribal radon program will require a variety of administrative functions. Under 2 CFR § 200.1, 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 objectives or projects as a direct cost. In most states, administrative costs are included in the indirect cost category; therefore, indirect costs are generally used as a base for this administrative ceiling. Allowable administrative costs include, but are not limited to, providing information to decision-makers, acquiring and allocating key resources, designating staff responsibilities, providing management oversight and direction, monitoring program progress, or other costs that are not directly attributable to a specific project or program element. Visit [Indirect Cost Guidance for Recipients of EPA Assistance Agreements](#) for additional information.

*PPG-Specific Conditions:* It is important to note that award limitations under a PPG award can vary. As specified by 40 CFR § 35.134(c) and 40 § CFR 35.532(b), the 25 percent limitation on general overhead and program administration for state and Tribal indoor radon grants does not apply when SIRG funding is included as part of a PPG.

### ***Subaward Recipients:***

As defined by statute, SIRG is a grant program intended to assist states and Tribes “in the development and implementation of programs for the assessment and mitigation of radon.” SIRG recipients may elect to award funding to subrecipients, which is defined generally as a nonfederal entity that receives a [subaward](#) from a pass-through entity to carry out a part of a federal award, but it “does not include an individual that is a beneficiary of such award” (2 CFR § 200.1). Importantly, by law, SIRG funds are not available to individuals or homeowners.

By statute, a state or Tribe may use SIRG funds “for financial assistance to persons only to the extent such assistance is related to demonstration projects or the purchase and analysis of radon measurement devices” (TSCA § 306(i)(4)). SIRG grants may be used to fund demonstration projects on homes, schools, or other buildings for the purpose of gathering information and furthering knowledge about radon mitigation. Activities may include diagnostic testing, mitigation design, implementation,

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

and follow-up testing. Approval to use funds to demonstrate an innovative mitigation technique will require close coordination and negotiation with a regional EPA project officer. The costs of demonstration of radon mitigation shall not in the aggregate exceed 50 percent of the amount of any grant awarded under this section in a fiscal year. In implementing such mitigation demonstrations, recipients should make every effort, consistent with the goals and successful operation of a radon program, to give preference to low-income individuals.

States and Tribes may use SIRG funds to develop a limited program for radon financial assistance. Any SIRG funds used to provide financial assistance to individuals should include considerations listed at TSCA § 306(i)(2) and must be limited to activities directly related to demonstration projects or to the purchase and analysis of radon measurement devices for low-income individuals or communities. Examples of projects eligible for funding under this section include assistance to—

- Individuals or community interest groups in high-risk areas to provide radon test kits to homeowners.
- Mitigation contractors to demonstrate mitigation techniques.
- School districts to undertake comprehensive testing or perform school mitigation demonstrations.

*Note: The EPA recognizes that the statutory limitations on SIRG funding, in particular that grant funds generally cannot be used for direct mitigation of homes, may present challenges for some grantees. As one approach to addressing the need for mitigation funding, some states have leveraged alternative sources of funding and developed low-income mitigation assistance programs. In addition, the EPA encourages states and Tribes to develop partnerships with healthy housing and home repair programs and consider leveraging funding and financing resources from other federal agencies, such as the U.S. Department of Housing and Urban Development (e.g., HOME Investment Partnerships Program, Community Development Block Grant Program), U.S. Department of Agriculture, and others to complement existing radon programs.*

### **Section 6: Allowable Costs, Required Activities, and Eligible Activities**

#### ***General Requirements:***

This section outlines the major eligible activities specified by statute. Recipients should ensure that grant costs are allowable, eligible, reasonable, necessary, and incurred during the specified budget period (2 CFR §§ 200.402–200.405).

#### ***Activities Required by Statute:***

##### *Requesting Information:*

The EPA may request “information, data, and reports developed by the [recipient] [...] to make the determination of continuing eligibility” (TSCA § 306(h)(1)). In addition, any recipient receiving SIRG funding shall provide to the EPA “all radon-related information generated in its activities, including the results of radon surveys, mitigation demonstration projects, and risk communication studies” (TSCA §306(h)(2)).

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

### *Public Listing Requirement:*

As specified in TSCA § 306(h)(3)<sup>10</sup>, all SIRG grant recipients shall “...maintain, and make available to the public, a list of firms and individuals within the State that have received a passing rating under the Environmental Protection Agency proficiency rating program.” Under TSCA § 305(a)(2), the EPA has authority to operate a voluntary proficiency program for rating the effectiveness of radon service providers. The EPA has developed and maintained a provider credentialing program (the “Environmental Protection Agency proficiency rating program”) and completed a one-time evaluation of two certification bodies in 2001: the National Radon Proficiency Program (NRPP)<sup>11</sup> and National Radon Safety Board (NRSB). Since then, the EPA has maintained oversight of these radon credentialing programs, provided an associated national radon reference, and supported development of and access to standards of practice for radon measurement and mitigation. Taken together, these activities align with the EPA’s authority to operate a proficiency program designed to identify quality radon measurement and mitigation service providers and radon measurement devices. Service providers, either firms or individuals, who are certified by either of these two certification bodies are considered to have “received a passing rating under the Environmental Protection Agency proficiency rating program.” The EPA is currently developing voluntary criteria for radon credentialing organizations (EPA, Notice of Proposed Radon Credentialing Criteria, 88 Fed. Reg. 17215 (March 22, 2023)). Once these criteria are finalized, new and existing organizations will have the ability to demonstrate that they meet the Radon Credentialing Criteria specifications. When an organization demonstrates that they meet the Radon Credentialing Criteria specifications and is recognized by EPA, service providers who are credentialed by that organization will also be considered to have “received a passing rating under the Environmental Protection Agency proficiency rating program.”

**Table 1: Organizations Recognized by EPA for Credentialing Radon Service Providers**

Before the criteria are finalized	<ul style="list-style-type: none"> <li>• NRPP</li> <li>• NRSB</li> </ul>
During the phase-in period after the criteria are finalized	<ul style="list-style-type: none"> <li>• NRPP</li> <li>• NRSB</li> <li>• Credentialing organizations (certification body or state) determined to meet the Radon Credentialing Criteria specifications</li> </ul>
After the phase-in period	<ul style="list-style-type: none"> <li>• Only credentialing organizations determined to meet the Radon Credentialing Criteria specifications.</li> <li>• Note: The terms and conditions and accompanying guidance will be revised as necessary to clarify requirements for all grantees when maintaining a public list.</li> </ul>

<sup>10</sup> This reference is used interchangeably with the reference to IRAA Section 306(h)(3) in the current Term and Condition.

<sup>11</sup> NRPP, formerly affiliated with the National Environmental Health Association.

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

The terms and conditions specify which entities must, at a minimum, be included in public lists maintained by grantees without an existing state-run process established under a state’s regulatory requirements for credentialing of radon service providers (e.g., state license). Grantees who choose to list other entities on their public lists must distinguish between entities who do and do not meet the requirements outlined in the terms and conditions. This may be accomplished in several ways including but not limited to:

- Including a statement identifying organizations that have been recognized by the EPA for credentialing radon service providers and links to the credentialing organization’s service provider directories.
- Maintaining lists of service providers with information on:
  - Credentials and/or credentialing organization(s), identifying those organizations that have been recognized by the EPA.
  - Service providers’ contact information only, noting via a footnote those service providers who have been credentialed by organizations recognized by the EPA.

Grantees may also consider including a disclaimer specifying functions that are not maintained or overseen by the grantee (e.g., The state of [INSERT] does not accredit, certify, license, endorse, or recommend any company or individual.).

### *Performance Partnership Grant–Specific Conditions:*

The EPA’s Office of Grants and Debarment approved a class exception to include the SIRG public list requirements at 40 CFR § 35.298(g) for states and 40 CFR § 35.708(g) for Tribes in all PPGs with SIRG funding with the following conditions:

- The requirement at 40 CFR § 35.298(g) and 40 CFR § 35.708(g) for SIRG recipients to “maintain and make available to the public, a list of firms and individuals in the State that have received a passing rating under the EPA proficiency rating program” will be applied consistently for all state and Tribal radon grants, including PPGs.
- This class exception applies to all new and existing PPGs that include SIRG Program grants and will be in place until such time that the EPA can revise the PPG award limitations referenced in 40 CFR § 35.134(c) and 40 CFR § 35.532(b)(1).<sup>12</sup>

*Note: Access to qualified radon service providers is an important responsibility of states and Tribes. Although currently no Tribes independently credential radon service providers, this requirement still applies to both states and Tribes. Tribes receiving radon funding may refer customers to a nearby state list of credentialed providers or develop their own credentialing programs and maintain a list of radon service providers.*

### **Eligible Activities:**

In addition to the previously outlined Priority Program Areas, TSCA § 306(c) outlines a list of activities that are eligible for funding.<sup>13</sup> This section covers each activity and addresses limitations and

---

<sup>12</sup> [Best Practices Guide for Performance Partnership Grants with Tribes and Intertribal Consortia](#).

<sup>13</sup> Areas no longer applicable: Multimedia mitigation—the implementation of a multimedia mitigation (or MMM) program under the Safe Drinking Water Act (or SDWA) no longer applies to the SIRG Program.

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

restrictions, where applicable. Applicants may request funding for tasks or items not listed here. An EPA Grants Specialist will make eligibility determinations for such requests on a case-by-case basis.

### (1) Radon Measurement Data:

Statutory Provision:

TSCA § 306(c)(1): “Survey of radon levels, including special surveys of geographic areas or classes of buildings (such as, among others, public buildings, school buildings, high-risk residential construction types).”

The following list includes items or tasks that the EPA believes are within the definition of this activity and thus are eligible for funding:

- Development of strategies (which can include information surveys and data collection) to target high-risk communities or areas.
- Development of data collection methods and procedures training on methods of data collection
- Training on quality assurance.
- Analysis of radon detectors (e.g., radon test kit programs).
- Personnel and travel to place and retrieve detectors.
- Analysis of data.
- Preparation of summary statistics.
- Training of state staff for required expertise in geology, radon, statistics, etc.
- Development of required quality assurance documentation.
- Survey of public awareness of radon risks.

If recipients choose to conduct surveys, the data collection tool should be statistically valid and allow recipients to effectively identify trends and/or evaluate results from the study. Recipients are also encouraged to develop the targeted outreach needed to fill data gaps related to assisting underserved communities or to evaluate specific exposure level scenarios (e.g., suspected radon “hot spots,” schools, public buildings, mitigated homes, homes built with radon-resistant construction techniques).

Discussion:

In general, the EPA believes that risk reduction activities are more valuable in the long-term than assessment activities. However, recipients may consider data collection and mapping to provide additional context or information for implementing risk reduction activities. Examples could include surveying county or local jurisdictions about adoption of radon-resistant building codes and participating in the CDC’s Radon Workgroup focused on developing a national standardized radon testing and mitigation database for the Tracking Network.

The Paperwork Reduction Act of 1980 (PRA) is a law that imposes specific requirements on federal agencies to avoid unnecessary, duplicative, or burdensome requests for information by the agencies and to improve the quality and practical utility of information collections. PRA generally applies to information collected via identical questions from 10 or more members of the public during a 12-month period (44 U.S.C. 3507; 5 CFR § 1320.3). It applies to mandatory or voluntary information collections. OMB approval is required before an agency can collect information subject to PRA.

PRA applies when the EPA directly conducts a collection of information or sponsors the collection of information by a third party. Thus, an information collection conducted *by* a financial assistance recipient may be subject to PRA. Grants and cooperative agreements are treated differently under PRA,

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

which generally *will apply* when the EPA funds or is substantially involved in the design and administration of the collection of information under a cooperative agreement. PRA generally *will not apply* to an information collection funded by the EPA under a grant, unless the EPA specifically requests the information collection or the terms and conditions of the grant require EPA approval of the information collection (5 CFR § 1320.3(d)). Given this, the below guidance will generally apply only to cooperative agreement recipients using EPA funding for the design and administration of information collections.<sup>14</sup>

Past SIRG recipients have raised questions about whether pre- and/or post-conference evaluations may trigger the PRA. Discussions and conversations at public meetings are exempt from PRA clearance, and many online or interactive communications fall under this exemption, including public conference calls, webinars, discussion boards and forums, and chat sessions (5 CFR § 1320.3(h)(8)). However, OMB guidance has clarified that surveys distributed at a public meeting, which would include pre- or post-conference evaluations, would most likely be an information collection subject to PRA.<sup>15</sup> SIRG recipients wishing to use EPA funding to design or administer these surveys should check with their regional Project Officer or Radon Program Coordinator about the possibility of getting fast-track OMB approval for certain customer satisfaction surveys.

### Data Quality Considerations:

Overall data collection activities should serve to advance radon risk potential where a data gap exists. SIRG recipients that offer free or discounted test kits to residents, track and analyze local radon testing data, and/or develop more current radon potential maps must develop and submit to the EPA a Quality Assurance Project Plan (QAPP) to address the statistical or analytical quality of their surveys.

The QAPP should be prepared in accordance with the [EPA Quality Assurance Project Plan Standard](#). For quality assurance requirements specific to radon measurement, recipients should follow and/or reference the most current VCS supported by the EPA, to the fullest extent possible. (Please refer to Section 4 for additional information about VCS.) General types of radon measurement quality assurance procedures include the use of calibration checks, spikes, background, blanks, duplicates, and routine instrument performance checks. Visit [State and Tribal Indoor Radon Grants Program and Resources](#) to download SIRG QAPP checklists and draft templates.

QAPPs are required for all work performed by or on behalf of the EPA involving the collection, production, evaluation, or use of environmental information and the design, construction, operation, or application of environmental technology.

Environmental information includes data and information that describe environmental processes or conditions. Examples include, but are not limited to—

- Direct measurements of environmental parameters or processes.
- Analytical testing results of environmental conditions (e.g., geophysical or hydrological conditions).
- Information on physical parameters or processes collected using environmental technologies.
- Calculations or analyses of environmental information.
- Information provided by models.

---

<sup>14</sup> Agency funding can be used to analyze the results of information collections without triggering the PRA.

<sup>15</sup> [A Guide to the Paperwork Reduction Act: Do I Need Clearance?](#)



## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

- Information compiled or obtained from databases, software applications, decision-support tools, websites, existing literature, and other sources.
- Development of environmental software, tools, models, methods, or applications.
- Design, construction, and operation or application of environmental technology.

A QAPP must be on file with the EPA or submitted to the EPA regional office within the date range specified in the terms and conditions of the award prior to initiating data collection or data compilation. Once the primary plan is approved, new QAPPs may be required prior to beginning any “new” environmental measurements funded through SIRG. QAPPs must be updated every five years. For more specific information, check the grant award documents or contact the appropriate regional Project Officer.

### *(2) Public Information and Educational Materials:*

#### Statutory Provisions:

TSCA § 306(c)(2): “Development of public information and educational materials concerning radon assessment, mitigation, and control programs.”

TSCA § 306(g): “[Recipients] may...use funds from grants under this section to assist local governments in implementation of activities eligible for assistance under paragraphs (2), (3), and (6) of subsection (c).”

#### Discussion:

One common component of any state or Tribal radon program is public information and outreach. SIRG funds may be used to design and implement radon outreach and education activities. States and Tribes receiving SIRG funding may conduct public awareness campaigns throughout the year and in connection with National Radon Action Month (NRAM) aimed at increasing public awareness about cancer risks associated with radon exposure and the need for increased testing and mitigation. Public information campaigns should aim to educate consumers about the importance of testing their homes for radon, to mitigate if necessary, or to take preventive steps in new construction.

SIRG recipients have helped lead and advance public outreach on radon in collaboration with a variety of partners, including state cancer coalitions, universities, hospitals, state and local news media outlets, and many other stakeholders to drive homeowners, businesses, and schools to test and mitigate. The EPA recognizes the importance of targeted outreach efforts and encourages grantees to perform outreach to a variety of key stakeholders and consumers via multiple outreach activities, including, but not limited to, engaging on social media, sponsoring poster competitions, promoting local radon-related stories, building a radon coalition in the community, recognizing radon champions, and asking local chapters of health and environmental organizations to promote radon awareness. (Additional examples of potential activities can be found on the [Radon Leaders NRAM](#) webpage.)

SIRG recipients are encouraged to leverage the existing [EPA Radon Media Resources for Partners and Stakeholders](#) and share targeted outreach materials with other programs within their region and across the country, as well as leverage the experience of other radon programs in designing successful outreach efforts. When planning for and developing public information or outreach efforts, recipients should utilize multiple communication tools and platforms, in multiple languages as appropriate, to maximize the reach of the campaign. Allowable costs may include, but are not limited to, developing educational materials, infographics, case studies, social media campaigns, videos, advertising and other



## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

public service announcements, publications to support radon information campaigns, and reproduction costs.

*Note: Any advertising and/or public service announcements must be specifically approved in the grant agreement, as specified by 2 CFR § 200.421. Applicants must identify and include such costs in their proposed budgets.*

### (3) Radon Control Programs:

#### Statutory Provisions:

TSCA § 306(c)(3): “Implementation of programs to control radon in existing and new structures.”

TSCA § 306(g) “[Recipients] may...use funds from grants under this section to assist local governments in implementation of activities eligible for assistance under paragraphs (2), (3), and (6) of subsection (c).”

#### Discussion:

Designing and implementing programs that seek to incorporate radon testing, mitigation, and radon-resistant new construction into state and Tribal requirements for constructing homes, schools, and other buildings is considered a high-impact risk reduction strategy and has the potential to advance national policy and systems-level initiatives. Policies, programs, and initiatives aimed at building radon risk reduction into existing state and Tribal systems through increased testing and mitigation have the largest potential for bottom-line risk reduction.

Advancing work in this area aligns with the goals and priorities many radon stakeholders have committed to working toward under the previous and current versions of the NRAP. As previously mentioned, the EPA encourages states and Tribes to develop partnerships with healthy housing and home repair programs and consider leveraging funding and other financing resources to complement existing radon programs. SIRG recipients are encouraged to review the list of SIRG Program priorities discussed in Section 4 for specific activities related to radon control programs.

*Note: TSCA § 306(g) provides that states and Tribes may pass SIRG funds through (e.g., as subgrants) to local governments to implement such programs.*

### (4) Purchase of Radon Measurement Equipment or Devices:

#### Statutory Provisions:

TSCA § 306(c)(4): “Purchase...of radon measurement equipment or devices.”

TSCA § 306(i)(2): “The costs of implementing paragraphs (4) and (9) of subsection (c) shall not in the aggregate exceed 50 percent of the amount of any grant awarded under this section to a [recipient] in a fiscal year. In implementing such paragraphs, a [recipient] should make every effort, consistent with the goals and successful operation of [the] radon program, to give a preference to low-income persons.”

#### Discussion:

Recipients may use SIRG funding to purchase radon measurement equipment or devices to advance the reach of risk reduction activities. The EPA defines equipment or devices as instruments used to—

1. Test for radon gas or radon decay products in outdoor air, soil, water, or other media, in areas including residential, school, or commercial structures.

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

2. Perform diagnostic tests related to mitigation design approach.
3. Evaluate the effectiveness of mitigation techniques or systems.
4. Monitor exposure levels.

Recipients that plan to use SIRG funds to purchase testing equipment must ensure grant-related equipment costs comply with requirements outlined in TSCA § 306(i)(2). Several types of radon measurement devices are available and commonly used across the country. The EPA recognizes the benefit of certain radon measurement devices for specific scenarios and recommends that SIRG recipients purchase the measurement equipment or devices that most appropriately address their program's needs. Furthermore, the EPA encourages recipients to identify and purchase radon measurement equipment or devices that meet the requirements outlined in the most applicable and current VCS supported by the EPA for radon devices.

*Note: SIRG recipients are prohibited from spending more than 50 percent of their grant award in a given fiscal year on the purchase of measurement equipment or devices and mitigation demonstration projects (TSCA § 306(i)(2)). (Please refer to Section 5 for additional information about grant award limitations.)*

### *(5) Analytical Equipment:*

#### Statutory Provision:

TSCA § 306 (c)(5): "Purchase and maintenance of analytical equipment connected to radon measurement and analysis, including costs of calibration of such equipment."

#### Discussion:

Due to the radioactive and unstable nature of radon, device calibration must be performed on a consistent basis to ensure that the equipment is functioning correctly. SIRG recipients who purchase certain radon measurement equipment and devices will need to acquire calibration services to ensure the accuracy of the devices. In general, costs associated with obtaining such services are allowable, but grantees should seek laboratory services that have well-demonstrated validity and methods.

There are annual requirements for secondary radon chambers to be certified to perform radon measurements and calibration services for the radon industry. The first step in these certifications is to participate in the EPA's Radon Reference and Intercomparison Program (ERRIP), managed and operated by the EPA Office of Radiation and Indoor Air's National Analytical Radiation Environmental Laboratory (NAREL) located in Montgomery, Alabama. NAREL works with these secondary radon chambers by providing the only U.S. radon reference that is National Institute of Standards and Technology–traceable. There are currently three industry certified secondary radon chambers available for use by the U.S. radon community: Bowser-Morner Inc., Dayton, Ohio; KSU Radon Chamber, Manhattan, Kansas; and Spruce Environmental Technologies, Ward Hill, Massachusetts. NAREL provides direct analytical support and technical assistance to stakeholders on environmental laboratory radiological measurements.

For the most current information on certified secondary reference laboratories, please refer to these organizations' websites directly. The certification programs may be able to provide additional services and/or direct SIRG recipients to reliable sources of information on calibration and intercomparisons if needed.

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

### *(6) Training:*

#### Statutory Provisions:

TSCA § 306(c)(6): “Payment of costs of Environmental Protection Agency–approved training programs related to radon for permanent State or local employees.”

TSCA § 306(g): “[Recipients may] use funds from grants under this section to assist local governments in implementation of activities eligible for assistance under paragraphs (2), (3), and (6) of subsection (c).”

TSCA § 308(a) provided the EPA authority to establish Regional Radon Training Centers designed to provide training, technical assistance, and develop educational materials for government officials, industry, and the public.

#### Discussion:

Generally, the EPA approves the use of SIRG funds to support participation by permanent state, Tribal, or local radon employees in the following types of training activities:

1. Training courses or workshops on radon supported by EPA cooperative agreements or state government radon programs.
2. In-person or online training offered by the regional radon training centers.
3. Radon-related courses at accredited colleges and universities or other private sector institutions.
4. National, regional, and local radon conferences and symposia.

The EPA defines a permanent radon employee as one who is officially classified as permanent by a state, Tribal, or local government. Eligible costs associated with training activities include travel expenses to attend courses, workshops, and seminars, as well as any fees that may be incurred. In general, states are encouraged to fully use the existing mechanisms described above for training state and local employees. Additionally, TSCA § 306(g) indicates that states may pass SIRG funds through to local governments to use for training activities.

TSCA § 308(a) provides the EPA the authority to establish regional radon training centers designed to provide training and technical assistance and develop educational materials for government officials, industry, and the public. Although the location and functionality of the regional radon training centers has changed since the inception of the EPA’s Radon Program, two training centers currently remain:

- [Eastern Regional Radon Training Center at Rutgers \(or EERTC\)](#)
- [Midwest Universities Radon Consortium \(MURC-KSU\)](#)

Both regional radon training centers provide valuable information to the public and stakeholders at the federal, state, and local levels about how to test homes for elevated radon levels; how to fix homes, schools, and other buildings; and how to reduce risk from radon. More information about current [regional radon training centers](#) can be found on the [EPA Radon Hotline and Information Resources](#) webpage.

### *(7) Program Overhead and Administration:*

#### Statutory Provisions:

TSCA § 306(c)(7): “Payment of general overhead and program administration costs.”

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

TSCA § 306(i)(3): “The costs of general overhead and program administration under subsection (c)(7) shall not exceed 25 percent of the federal amount of any grant awarded under this section to a state in a fiscal year.”

### Discussion:

The EPA recognizes that state and Tribal radon programs will require a variety of administrative functions. For most grantees, administrative costs are included in the indirect cost category. Therefore, indirect costs are generally used as the base for a grants administrative ceiling. SIRG funds used for general overhead and program administration costs must comply with requirements outlined in TSCA § 306(i)(3), which prohibits expending more than 25 percent of the amount of the grant award on general overhead and program administration in any one fiscal year. (Please refer to Section 5 for more information about grant award limitations.)

### *(8) Data Storage and Management System:*

#### Statutory Provision:

TSCA § 306(c)(8): “Development of a data storage and management system for information concerning radon occurrence, levels, and programs.”

#### Discussion:

Developing a radon data management system may entail developing web-based platforms, purchasing new software, leveraging the time of a software engineer or database expert, and other expenses related to managing, maintaining, and tracking relevant information. SIRG funds may be used to cover software expenses and, to a limited extent, purchasing personal computers and other technology. If additional funding is needed outside of SIRG, grantees are encouraged to leverage IT expertise from other parts of their organization or through the CDC’s Tracking Network Radon Workgroup and/or explore opportunities for additional funding through the EPA’s [Exchange Network Grant Program](#). These grants are designed to support better environmental decisions and programs by promoting the use of more timely, consistent, and shareable data. Recipients may consider blending funding from SIRG and the Exchange Network to support their program needs.

During the last decade, the EPA has collaborated with the CDC to bolster and facilitate the use of the Tracking Network, a web-based platform to allow states to display radon testing data at the state and county levels. The EPA strongly encourages SIRG recipients to participate in data sharing with the CDC Tracking Network program. The CDC Tracking Network works with participating partners to collect radon test and mitigation data in hopes of scaling up to a national-level database. Grantees and other radon stakeholders should work collaboratively and develop the capability to provide consistent national data measures. Radon-related information for which storage and management capabilities are needed may include measurement locations, type and location of measurement devices, screening results, follow-up results, house characteristics, and mitigation characteristics. Please refer to the CDC’s data dictionary for more details or information.

### *(9) Mitigation Demonstrations:*

#### Statutory Provision:

TSCA § 306(c)(9): “Payment of costs of demonstration of radon mitigation methods and technologies as approved by the” agency.

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

### Discussion:

Considering the broad knowledge base regarding effective radon mitigation techniques, the use of SIRG to fund demonstration projects on homes, schools, or other buildings is expected to be limited. Although SIRG recipients may request funds under this section for the purpose of gathering information and/or to demonstrate a new and innovative mitigation technique, effective approaches to mitigation are well-known. Numerous testing and mitigation standards have been developed during the last few decades, including specific protocols to address radon in a variety of building types. Approval to use funds to demonstrate an innovative mitigation technique will require close coordination and negotiation with an EPA regional Project Officer and a significant level of scientific rigor.

If approved, recipients should make every effort to design demonstration projects that would assist high-risk, low-income, and/or underserved communities. Mitigation demonstration projects should clearly outline the criteria for low-income and/or underserved individuals or communities. Recipients should use only certified, experienced instructors or contractors for demonstration projects. (Please see Section 5 for more information about grant award limitations.)

*Note: The EPA's Home Evaluation Program referenced in TSCA §§ 305(a)(5) and 306(c)(9) is no longer operational.*

### *(10) Public Information and Technical Assistance:*

#### Statutory Provision:

TSCA § 306(c)(10): "A toll-free radon hotline to provide information and technical assistance."

#### Discussion:

Although the statutory language narrowly focuses on a toll-free hotline, the EPA has adopted a broader interpretation of this activity given that the current methods of providing public information and technical assistance have evolved significantly. SIRG recipients may use their funds to establish and operate a source of public information and technical assistance (e.g., website, email, toll-free hotline) to provide basic radon-related information to the public. Allowable costs may include initial set-up costs, maintenance, necessary staff, and any other direct cost of the source of public information and technical assistance.

Some long-standing state and Tribal radon programs established toll-free hotlines decades ago and continue to maintain that service because it is well-supported and utilized by the individuals and communities they serve. However, given the numerous web-based methods many individuals and communities currently use for public information, the EPA does not necessarily recommend that SIRG recipients establish a *new* toll-free hotline for SIRG recipients. Grantees should consider and develop methods of providing public information and technical assistance that most appropriately address their program's needs. The EPA strongly encourages recipients to leverage existing resources and direct public questions to well-established and nationally funded radon hotlines, such as the Kansas State University hotline. Under a cooperative agreement with the EPA, Kansas State University provides national radon program services, including selling radon test kits and answering technical assistance questions for the public. The radon hotline assists consumers across the country with radon-related questions and concerns. More information is available on the [EPA Radon Hotline and Information Resources](#) webpage.

## **Section 7: Post-Award Requirements**

As noted earlier, recipients should regularly review the grant terms and conditions throughout the project to ensure compliance with all requirements. The grant agreement specifies terms and conditions that cover important topics, including filing financial reports, submitting progress reports, documenting environmental results, and requesting changes to the award agreement or other written approvals. Grantees need prior approval from the EPA to make certain significant post-award changes to work plan commitments or budgets (2 CFR § 200.308). Recipients are required to report major changes to the budget or project scope and request prior approval from the EPA for budget and program plan revisions, as outlined in this section of the guidance.

The EPA also encourages grantees to review [EPA Grants Management Training for Applicants and Recipients Module 5](#), which provides guidelines and information about managing an EPA grant in accordance with the EPA's grant regulations and the terms and conditions of the award.

### ***Requesting Changes to a Grant Agreement:***

If changes to the grant agreement are necessary, contact the EPA regional Project Officer as soon as possible to discuss the changes. All requested changes must be within the scope of the grant agreement, and most changes must be approved by the EPA.

Depending on the complexity of changes to a grant agreement, different steps may be required for the grant to comply with federal and EPA regulations. To request a change, submit a written request to the regional Project Officer and Grants Specialist, including a justification for the proposed changes. Some types of changes require prior approval before they can be implemented, whereas other changes can be implemented without the EPA's approval but still require grantees to notify the Agency. If changes to an award agreement are significant, a formal amendment may be necessary. A formal grant amendment is required for certain types of changes (e.g., increase of funds, modified budget/project period start and end dates). Other types of changes, such as a re-budgeting request, require a written request to the EPA Project Officer and Grants Specialist.

### ***Reporting Requirements:***

Grant recipients are required to submit progress reports to their EPA regional Project Officer. SIRG programmatic reporting requirements are outlined in the award terms and conditions. Some terms and conditions are required by regulation or policy and apply to all EPA grant awards, whereas others apply to a specific program or EPA regional office. The purpose of progress reports is for recipients to summarize technical progress and activities completed under the grant, identify activities planned for the upcoming reporting period, and document expenditures. Compliance with these conditions will be considered as part of the program evaluation process. Grantees also may use progress reports to identify any potential problems or delays that may interfere with achieving the goals of the project as outlined in the work plan.

### ***Recommended Format:***

SIRG recipients may complete annual reporting and submit grant results using the recommended SIRG reporting template. Although recipients can provide the information using another format, the optional template can assist SIRG recipients when reporting on current and planned work within the areas of emphasis and activities outlined. The EPA regions may require quarterly, biannual, or annual reporting. Regional Project Officers will share the applicable SIRG reporting template with recipients.

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

### *Content:*

Recipients should consult the terms and conditions of the grant agreement for specific information on reporting frequency and what to include in the progress reports. A final progress report also will be required at the completion of the grant. In general, by the time a recipient spends about half of the total budget amount, they should be about halfway through the planned grant project activities.

In accordance with 2 CFR § 200.329, recipients agree to submit performance reports that include brief information on each of the following areas: (1) a comparison of actual accomplishments to the outputs/outcomes established in the assistance agreement work plan for the period; (2) the reasons established outputs/outcomes were not met, if appropriate; and (3) additional pertinent information, including, when appropriate, analysis and explanation of cost overruns or high-unit costs.

For Environmental Program Grants (e.g., SIRG), interim performance and final performance reports must include three essential elements: (1) strategic plan goal, (2) strategic plan objective, and (3) work plan commitments plus time frame. (See [Grants Policy Issuance 11–03: State Grant Work plans and Progress Reports](#) for more information.)

### *Reporting Frequency:*

Grantees must submit performance reports at the interval specified in the award terms and conditions but not less than annually nor more frequent than quarterly reporting. Annual reports are due 90 calendar days after the reporting period; quarterly or semiannual reports are due 30 calendar days after the reporting period.

The EPA requires all grantees to submit timely and comprehensive reports addressing the activities outlined in their approved work plans and in the terms and conditions of their award. These reports provide the Agency with the information that it needs to ensure that each grantee is meeting the commitments contained in the award. More importantly, reports provide a mechanism for evaluating the environmental progress brought about by the SIRG Program.

### *Subaward Performance Reporting (If Applicable):*

Under some grant projects, the primary grant recipient (referred to as the pass-through entity), will issue subawards to other organizations for certain activities. A subaward is when a secondary organization receives an award of financial assistance from a pass-through entity to carry out a project or activity that is part of the grant recipient's award agreement. If a recipient has specified subawards in their approved work plan and award agreement, the subrecipients are subject to the same Agency requirements as the pass-through entity. SIRG recipients acting as a pass-through must monitor the activities of subaward recipients to ensure that subawards are used for authorized purposes in compliance with federal statutes, regulations, and terms and conditions and that subaward [performance goals](#) are achieved as required by 2 CFR § 200.332. (Please refer to the [Subaward Policy for EPA Assistance Agreement Recipients](#) for more information.)

### *Post-Award Reporting and Grant Close Out:*

The EPA requires some additional forms as part of the post-award reporting process, which should be specified in the grant award terms and conditions. All forms are available on the [EPA Grantee Forms](#) webpage.

***Grant Monitoring and Program Performance Evaluations:***

An EPA Project Officer will be assigned to monitor the progress and performance of each grantee. The Project Officer is the recipient's primary point of contact with the EPA. In some of the EPA regional offices, separate individuals are assigned to process award documents, oversee the administrative aspects of the award (including processing of applications), and oversee the technical and program aspects of the grant. Grantees should be aware of who at the EPA is responsible for which aspects of their grant.

***Grant Monitoring:***

The EPA conducts various types of monitoring activities to identify potential problems with grants as soon as possible, as well as situations in which technical assistance from the EPA might be necessary. These types of monitoring activities include reviewing progress reports and financial reports, conducting baseline and advanced monitoring activities, and conducting audits. However, recipients are ultimately responsible for managing the day-to-day operations of their grant, including the activities of subaward recipients.

The EPA requires recipients to periodically complete and submit Federal Financial Reports and progress reports. Agency Project Officers and Grants Specialists review these reports to confirm that funds expended align with activities completed under the grant, determine whether grant outputs and outcomes specified in the work plan are being achieved, and identify any potential problems that could affect planned project goals.

The EPA conducts several types of comprehensive monitoring of grants:

- Programmatic Baseline Monitoring—Involves the periodic review of a recipient's progress on, and compliance with, the scope of work, terms and conditions, and regulatory requirements of a specific award. The EPA Project Officers conduct programmatic baseline monitoring at least annually for all active grants.
- Programmatic Advanced Monitoring—Provides an in-depth assessment of a grant's programmatic and technical progress and management and how well the project is meeting expectations. During programmatic advanced monitoring reviews, the EPA Project Officers compare the recipient's work plan with actual progress made under the award, examine finances to ensure that funds are available to complete the project, and ensure that all programmatic statutory and regulatory requirements are being met.
- Administrative Baseline Monitoring—Involves the review of a recipient's compliance with the financial and administrative requirements and terms and conditions of a grant. The EPA Grants Specialists conduct administrative baseline monitoring at least annually for all active grants.
- Administrative Advanced Monitoring (AAM)—Provides an in-depth assessment of a recipient's written policies and procedures and includes transaction testing of a sample of drawdowns to ensure the recipient has the proper administrative and financial management systems in place to administer federal funds. AAM reviews involve comparing the recipient's drawdowns with back-up documentation to confirm that funds were spent on allowable costs and that they were properly allocated to the grant, as well as ensuring compliance with regulations and terms and conditions.
- Merit and Risk Review—Regional Project Officers are required to complete merit reviews for all SIRG cooperative agreements and grant awards. Applications for a new discretionary



## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

noncompetitive assistance agreement and supplemental funding amendments are subject to a merit review.

### *Joint Evaluation Process:*

The applicant and regional office will develop a process for jointly evaluating and reporting progress and accomplishments under the work plan (40 CFR § 35.115). A description of the evaluation process and a reporting schedule must be included in the grantee's work plan.

The evaluation process should provide the following details (as described in 40 CFR § 35.115 and 40 CFR § 35.515):

1. A discussion of accomplishments as measured against work plan commitments.
2. A discussion of the cumulative effectiveness of the work performed under all work plan components.
3. A discussion of existing and potential problem areas.
4. Suggestions for improvement, including, where feasible, schedules for making improvements.

If the joint evaluation reveals that the recipient has not made sufficient progress under the work plan, the regional office and recipient will negotiate a resolution that addresses the issues. If the issues cannot be resolved through negotiation, the EPA has written procedures for handling disagreements that may occur between EPA staff and an organization during execution of a grant project. It is the EPA's goal to resolve disputes at the lowest level possible. However, if a recipient is unable to reach an informal resolution with EPA staff, the recipient can request a written final decision from an EPA Disputes Decision Official, who is an individual designated by regulation to resolve disputes concerning grants. (Additional information about the EPA's dispute procedures can be found in 2 CFR 1500, Subpart E—Disputes.)

### ***Satisfactory Implementation:***

IRAA § 306 (i)(1) specifies that grant recipients may not receive grant money in the following federal fiscal year unless they have [...] "satisfactorily implemented the activities funded by the grant in [the] preceding fiscal year." States and Tribes will be expected to provide, on request, evidence or information verifying that their programs are on schedule and that planned milestones have been achieved. Information obtained through the joint evaluation review process, progress reports, and results of advanced monitoring efforts will be used to make this determination each year. The following criteria will be used:

- Completion of Major Milestones—The EPA will evaluate the degree to which each grantee completed milestones, achieved objectives, and met schedules. Actual versus planned performance and results will be evaluated, as will the quality of the program. This will be accomplished by reviewing grantee reports and other data provided, as well as various means of communication throughout the year.
- Emphasis of Priority Areas—The EPA's priority activities/projects and policy priorities for the SIRG Program are identified in this guidance and will likely be discussed in annual guidance to states and Tribes. The EPA will also consider the degree of success achieved in the various priority areas. This will also be accomplished by the review of grantee reports and other data provided, as well as various means of communication throughout the year.
- Indicators of Program Success and Effectiveness—The EPA will consider any available measures of a SIRG grantee's program effectiveness, preferably an increase in the level of testing and

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

needed mitigation, the use of radon-resistant building techniques or their adoption into code, and the inclusion of radon testing during real estate transactions. The EPA is aware that some program successes are difficult to obtain in states that have not acquired regulatory authority; therefore, the EPA regional radon program staff will work with grantees to determine appropriate indicators of program success and effectiveness.

Throughout the award project period, Project Officers may recommend changes or may require corrective actions to resolve problems or issues of contention.

### **Audits:**

Audits are in-depth examinations of a grantee's financial records, management systems, and work progress. The EPA's Office of Inspector General periodically examines EPA grants to ensure that grant funds are being used efficiently and effectively. Audits may involve assessing the allowability of grant costs and compliance with grant requirements and terms and conditions. 2 CFR § 200 Subpart F sets forth standards for audits of grant recipients. More specifically, it sets forth standards for obtaining consistency and uniformity among federal agencies for such audits and provides policies and procedures for federal awarding agencies and pass-through entities when using the results of these audits.

The UGG requires any nonfederal entity that expends \$750,000 or more in federal awards during a fiscal year to undergo a single audit of its financial statements and federally funded programs. Of note, many SIRG recipients do not expend more than \$750,000 during the recipient's fiscal year and meet the exemption criteria outlined in 2 CFR § 200.501(d).<sup>16</sup>

An EPA Project Officer or Grants Specialist may also initiate an audit based on concerns about a recipient's performance or financial management.

### **Closing Statement**

This guidance document replaces any previous revisions and serves to guide grantees in planning for and implementing a state or Tribal radon program. However, the guidance is subject to change at any time. For any questions about interpreting this document or other questions about a SIRG award agreement, please contact your EPA regional Project Officer or regional Radon Program Coordinator.

This updated guidance document clarifies requirements for existing and potential new grantees and increases awareness of this funding opportunity. Updating the primary guidance document for the SIRG Program after having implemented this program for several decades also provides the Agency an opportunity to take stock of how SIRG recipients have moved along the spectrum of engagement on this important public health issue. The EPA encourages SIRG recipients to move beyond design and implementation of activities and into a phase of sustained measurable success and progress toward long-term solutions to prevent avoidable radon-induced lung cancer. The EPA also continues to look for opportunities to assist underserved communities through state and Tribal radon grants.

---

<sup>16</sup> There is an exemption when federal awards expended are less than \$750,000. A nonfederal entity that expends less than \$750,000 during the nonfederal entity's fiscal year in federal awards is exempt from federal audit requirements for that year, except as noted in 2 CFR § 200.503, but records must be available for review or audit by appropriate officials of the federal agency, pass-through entity, and U.S. Government Accountability Office (2 CFR § 200.501(d)).

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

State and Tribal radon programs are essential components of the national effort to reduce radon risk. Overseeing and administering the SIRG Program is one of the most important ways that the EPA supports states and Tribes in addressing radon as a public health concern.

## Appendix A: Glossary and Terms

**applicant:** For this document, the terms “applicant,” “recipient,” and “grantee” should be considered inclusive of states, [as defined below](#), and federally recognized Tribes.

**assistance agreement:** A grant or a legal instrument of financial assistance between a federal awarding agency or pass-through entity and a nonfederal entity that, consistent with 31 U.S.C. §§ 6302, 6304—

- Is used to enter into a relationship, the principal purpose of which is to transfer anything of value from the federal awarding agency or pass-through entity to the nonfederal entity to carry out a public purpose authorized by a law of the United States (see 31 U.S.C. § 6101(3)) and not to acquire property or services for the federal awarding agency or pass-through entity’s direct benefit or use.
- Is distinguished from a cooperative agreement in that it does not provide for substantial involvement between the federal awarding agency or pass-through entity and the nonfederal entity in carrying out the activity contemplated by the federal award.
- Does not include an agreement that provides only (1) direct U.S. government cash assistance to an individual, (2) a subsidy, (3) a loan, (4) a loan guarantee, or (5) insurance.

**budget period:** The time interval from the start date of a funded portion of an award to the end date of that funded portion during which recipients are authorized to expend the funds awarded, including any funds carried forward or other revisions pursuant to 2 CFR § 200.308.

**close out:** The process by which the federal awarding agency or pass-through entity determines that all applicable administrative actions and all required work of the federal award have been completed and takes actions as described in 2 CFR § 200.344.

**commitment:** The administrative reservation of funds in anticipation of creating an obligation reflected in a Commitment Notice.

**contract under an assistance agreement/grant:** A legal instrument by which a recipient or subrecipient purchases property or services needed to carry out the project or program under a federal award. For additional information on subrecipient and contractor determinations, see 2 CFR § 200.331.

**cooperative agreement:** A legal instrument of financial assistance between a federal awarding agency or pass-through entity and a nonfederal entity that, consistent with 31 U.S.C. §§ 6302–6305—

- Is used to enter into a relationship, the principal purpose of which is to transfer anything of value from the federal awarding agency or pass-through entity to the nonfederal entity to carry out a public purpose authorized by a law of the United States (see 31 U.S.C. § 6101(3)) and not to acquire property or services for the federal government or pass-through entity’s direct benefit or use.
- Is distinguished from a grant in that it provides for substantial involvement between the federal awarding agency or pass-through entity and the nonfederal entity in carrying out the activity contemplated by the federal award.
- Does not include: (1) a cooperative research and development agreement as defined in 15 U.S.C. § 3710a or (2) an agreement that provides only (i) direct U.S. government cash assistance to an individual, (ii) a subsidy, (iii) a loan, (iv) a loan guarantee, or (v) insurance.

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

**cost:** An amount incurred by a recipient for goods or services or to provide support under a subaward determined on a cash, accrual, or other basis acceptable to the federal awarding or cognizant agency. It does not include transfers to a general or similar fund.

**cost sharing or matching funds:** The portion of project costs not paid by federal funds or contributions (unless otherwise authorized by federal statute).

**environmental programs:** Activities involving the environment, including direct measurements or data generation, environmental modeling, compilation of data from literature or electronic media, and data supporting the design, construction, and operation of environmental technology.

**equipment:** Tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost that equals or exceeds the lesser of the capitalization level established by the nonfederal entity for financial statement purposes or \$5,000.

**federal share:** The portion of the federal award costs that are paid using federal funds.

**federally recognized Tribe:** Any Indian Tribe, band, nation, or other organized group or community, including any Alaska Native village or regional or village corporation as defined in or established pursuant to the Alaska Native Claims Settlement Act (43 U.S.C. Chapter 33), which is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians (25 U.S.C. § 450b(e)). See annually published “Indian Entities Recognized by and Eligible To Receive Services From the United States Bureau of Indian Affairs.”

**grant:** A legal instrument of financial assistance between a federal awarding agency or pass-through entity and a nonfederal entity that, consistent with 31 U.S.C. §§ 6302, 6304:

- Is used to enter into a relationship the principal purpose of which is to transfer anything of value to carry out a public purpose authorized by a law of the United States (see 31 U.S.C. § 6101(3)) and not to acquire property or services for the federal awarding agency or pass-through entity’s direct benefit or use.
- Is distinguished from a cooperative agreement in that it does not provide for substantial involvement of the federal awarding agency in carrying out the activity contemplated by the Federal award.
- Does not include an agreement that provides only (i) direct U.S. government cash assistance to an individual, (ii) a subsidy, (iii) a loan, (vi) a loan guarantee, or (v) insurance.

**Grants Specialist:** The EPA official designated in the assistance agreement/grant as the EPA’s administrative contact with the recipient. The Grants Specialist provides administrative guidance to recipients and Project Officers, reviews and approves the administrative portion of the application, prepares the assistance agreement/grant, evaluates effectiveness/compliance with administrative conditions, and closes out assistance agreement/grants.

**grantee:** The eligible recipient of a grant who is accountable for the use of grant funds. Grantees may be nonfederal governmental units or nongovernmental organizations. The grantee is the entire legal entity even if only a particular component (e.g., the environmental department of a state government) of the entity is designated in the grant award document. (See also “[recipient](#).”)

**indirect (facilities and administrative [F&A]) costs:** Those costs incurred for a common or joint purpose benefitting more than one cost objective and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. To facilitate equitable distribution

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

of indirect expenses to the cost objectives served, it may be necessary to establish a number of pools of indirect (F&A) costs. Indirect (F&A) cost pools must be distributed to benefitted cost objectives on bases that will produce an equitable result in consideration of relative benefits derived.

**indirect cost rate agreement:** An agreement between the recipient and the cognizant federal agency that identifies the basis for the indirect cost rate(s) and the period covered and provides other information necessary for the proper application of the rate(s).

**in-kind contribution:** The value of a non-cash contribution a recipient or a third party makes to meet a recipient's cost-sharing or matching requirement. An in-kind contribution may consist of using [real property](#), equipment, or the value of goods purchased or services rendered that directly benefit the EPA-funded project.

**local government:** Any unit of government within a state, including a: (1) county; (2) borough; (3) municipality; (4) city; (5) town; (6) township; (7) parish; (8) local public authority, including any public housing agency under the United States Housing Act of 1937; (9) special district; (10) school district; (11) intrastate district; (12) council of governments, whether or not incorporated as a nonprofit corporation under state law; and (13) any other agency or instrumentality of a multistate, regional, intrastate, or local government.

**matching funds or cost sharing:** The portion of project costs not paid by federal funds or contributions (unless otherwise authorized by federal statute) eligible and allowable a recipient contributes to a federally funded project, as required by statute, regulation, or EPA policy. The amount of matching funds or cost-sharing is generally calculated as a percentage of total project costs. Recipients may meet their cost share or matching share obligation by providing cash, property, or in-kind services, including donated services contributed by third parties.

**negotiation:** The process of give and take by Project Officers and applicants to agree on work plans and funds available to carry out the work plan activities.

**nonfederal entity:** A state, local government, Tribe, institution of higher education, or nonprofit organization that carries out a federal award as a recipient or subrecipient.

**nonprofit organization:** Any corporation, trust, association, cooperative, or other organization, not including institutions of higher education, 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 net proceeds to maintain, improve, or expand the operations of the organization.

**outcome:** The environmental 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 must be quantitative, and they may not necessarily be achievable during a grant funding period. (See also "output" below.)

**output:** An environmental activity, effort, and/or associated work products related to an environmental goal or 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 a grant funding period. (See also "outcome" above.)

**participant support costs:** Direct costs for such items as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences or training projects.

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

**performance goal:** A target level of performance expressed as a tangible, measurable objective, against which actual achievement can be compared, including a goal expressed as a quantitative standard, value, or rate. In some instances (e.g., discretionary research awards), this may be limited to the requirement to submit technical performance reports (to be evaluated in accordance with agency policy).

**Performance Partnership Grant, or PPG:** A single grant combining funds from more than one environmental program grant. A PPG may provide for administrative savings or programmatic flexibility to direct grant resources where they are most needed to address public health and environmental priorities (see 40 CFR § 35.130). Each PPG has a single, integrated budget and recipients do not need to account for grant funds in accordance with the funds' original environmental program sources.

**personal property:** Property other than real property. It may be tangible, having physical existence, or intangible.

**program income:** As defined at 2 CFR § 200.1, gross income earned by the nonfederal entity that is directly generated by a supported activity or earned as a result of the federal award during the period of performance, except as provided in 2 CFR § 200.307(f). Program income includes, but is not limited to, income from fees for services performed, the use or rental of real or personal property acquired under federal awards, the sale of commodities or items fabricated under a federal award, license fees and royalties on patents and copyrights, and principal and interest on loans made with federal award funds. Interest earned on advances of federal funds is not program income. Except as otherwise provided in federal statutes, regulations, or the terms and conditions of the federal award, program income does not include rebates, credits, discounts, and interest earned on any of them. (See also 2 CFR § 200.407 and 35 U.S.C. §§ 200–212. 35 U.S.C. §§ 212, “Disposition of Rights in Educational Awards,” applies to inventions made under federal awards.)

**Project Officer:** The EPA official designated in the grant as the EPA's programmatic contact with the recipient. Project Officers are responsible for monitoring the project from a technical/programmatic standpoint.

**property:** Real property or personal property.

**real property:** Land, including land improvements, structures, and appurtenances thereto, but excluding moveable machinery and equipment.

**recipient:** An entity, usually but not limited to nonfederal entities, that receives a federal award directly from a federal awarding agency. The term recipient does not include subrecipients or individuals that are beneficiaries of the award.

**state:** The Toxic Substances Control Act definition of “state” (15 USC 2602(16)) means any state of the United States, the District of Columbia, the Commonwealth of Puerto Rico, the U.S. Virgin Islands, Guam, the Canal Zone, American Samoa, the Northern Mariana Islands, or any other territory or possession of the United States; “possessions” includes institutions of higher education.

**subaward or subgrant:** The term subaward or subgrant means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

**terms and conditions:** All requirements of the award or subaward, whether established in statute, regulations, or the award document.

**third-party in-kind contributions:** The value of non-cash contributions (i.e., property or services) that (a) benefit a federally assisted project or program and (b) are contributed by nonfederal third parties, without charge, to a nonfederal entity under a federal award (2 CFR § 200.1).

**total cost:** An amount comprising the allowable direct costs under an award, plus the allocable portion of allowable indirect costs, less applicable credits. The total cost includes the total federal share and total matching funds (as defined above).

**work plan:** The document that identifies how and when the applicant will use funds from environmental program grants and is the basis for management and evaluation of performance under the grant agreement to produce specific outputs and outcomes. The work plan must be consistent with applicable federal statutes, regulations, circulars, executive orders, and EPA delegations, approvals, or authorizations.



## Appendix B: How to Register to Apply for Grants

*Note: The registration process can take a month or longer. We advise you to start the process as soon as possible so that it does not overlap or interfere with finalizing your application.*

Applicants should visit [How to Register to Apply for Grants](#) for additional information. All EPA grant applications must be submitted online, except in limited circumstances. Organizations must be registered in two government systems to apply for EPA grants:

1. The System for Award Management ([SAM.gov](#)) registers organizations to conduct business with the U.S. government, which includes federal grants.
2. [Grants.gov](#) is the official system for managing all federal grant applications.

These two systems share information. Together, they provide access to everything needed to identify federal grant opportunities and complete the online application process.

Note that individuals can access both systems through a single user account set up in [Login.gov](#). Creating a Login.gov account is easy. If you do not have a Login.gov account, you will be prompted to create one when you register with SAM.gov or Grants.gov. [Learn more about Login.gov](#).

If you have done business with the federal government previously, you can and should check your entity status using your government issued Unique Entity Identifier (UEI) to determine whether your registration is active. SAM.gov requires you to renew your registration every 365 days to keep it active. Organizations should ensure that their SAM.gov registration includes a current e-Business point of contact (EBiz POC) name and email address. The EBiz POC is critical for Grants.gov registration and system functionality. If the EBiz POC has changed, you may need to contact the [Federal Service Desk](#) for help with your SAM.gov account: 866-606-8220. The Federal Service Desk hours of operation are Monday–Friday, 8:00 a.m.–8:00 p.m. ET.

Please note that SAM.gov registration is different from obtaining a UEI. Obtaining a UEI only validates your organization’s legal business name and address. Please review the [Frequently Asked Questions](#) webpage for additional details.

Follow these steps to register to apply for EPA grants. **Start the registration process early.** The process can take a month or longer. Errors or inconsistencies in registration in the two systems can prolong the process. Applicants are encouraged to start the registration process **before beginning their applications.** To access the SIRG grant opportunity and view application materials, visit Grants.gov under the CDFA 66.032 listing. (The EPA has also included a link to Grants.gov on the [SIRG Resources](#) webpage.)

### **Step 1. Register Your Organization in SAM.gov**

Organizations must register with SAM.gov to obtain a UEI, which is a 12-character alphanumeric identifier assigned to each unique organization. There is no fee for registering with SAM.gov, and registration must be renewed annually.

Registration in SAM.gov requires providing assertions, representations and certifications, and other information so that the federal government can verify the existence and uniqueness of the organization.

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

Follow these steps to get started:

1. Go to the [SAM.gov Entity Registration](#) webpage. Review the “Before You Get Started” section and download the Entity Registration Checklist to help prepare.
2. Click the “Get Started” button when you are ready. You may be prompted to accept the usage terms and sign in through Login.gov. If necessary, click the “Get Started” button again after you sign in.
3. You will be prompted to choose what you want to do. Most grant applicants will select the option to “Register for Financial Assistance Awards Only.”
4. Select the appropriate option and click the “Next” button.
5. Proceed through the registration process by answering the questions and providing the necessary information.

Organizations will need to designate an EBiz POC. The EBiz POC is likely to be your organization’s chief financial officer or authorizing official. There can be only one EBiz POC for each unique organization. The EBiz POC will—

- Manage the SAM.gov account and login.
- Set up the Grants.gov profile for the organization (see Step 2 below).
- Oversee all activities for the organization within Grants.gov.
- Assign all roles in Grants.gov for individuals from the organization who will be involved in applying for grants, including the Authorized Organization Representative (AOR), Expanded AOR roles, Workspace Manager, and Custom roles (see Step 3 below).

Note that the EBiz POC does not submit grant proposals for the organization. Proposals are submitted by the AOR in Grants.gov. After the information submitted through the registration process is authenticated, the EBiz POC will receive an email from SAM.gov indicating that the registration is active.

Contact the [Federal Service Desk](#) for help with your SAM.gov account, to resolve technical issues, or chat with a help desk agent: 866-606-8220. The Federal Service Desk hours of operation are Monday–Friday, 8:00 a.m.–8:00 p.m. ET.

Once your SAM.gov account is active, you must register in Grants.gov. Grants.gov will electronically receive your organization information, such as EBiz POC email address and UEI.

### ***Step 2. Create a User Account and Applicant Profile in Grants.gov***

After obtaining a UEI, an organization must create an applicant profile in Grants.gov.

The EBiz POC will set up the applicant profile in two steps:

1. Create a user account in Grants.gov with the same email address used by the EBiz POC in SAM.gov. The email address is used to match the EBiz POC from SAM.gov to Grants.gov.
2. Create the applicant profile in Grants.gov using the UEI obtained from SAM.gov.

Grants.gov registration is **free**. If you have never applied for a federal grant before, please review the Grants.gov applicant registration instructions. As part of the Grants.gov registration process, the EBiz POC is the only person who can affiliate and assign applicant roles to members of an organization. In addition, at least one person must be assigned as an AOR. Only person(s) with the AOR role can submit applications in Grants.gov. Please review the [Intro to Grants.gov—Understanding User Roles](#) and [Learning Workspace—User Roles and Workspace Actions](#) for details on this important process.

Applicants need to ensure that the AOR who submits the application through Grants.gov and whose UEI

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

is listed on the application is an AOR for the applicant listed on the application. Additionally, the UEI listed on the application must be registered to the applicant organization's SAM.gov account. If not, the application may be deemed ineligible.

Visit the Grants.gov [Self-Service Knowledge Base](#) for assistance or contact Grants.gov via telephone at 1-800-518-4726 or email at [support@grants.gov](mailto:support@grants.gov) to resolve technical issues with Grants.gov. Applicants who are outside of the United States 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. The Grants.gov Support Center is available 24 hours a day, 7 days a week, excluding federal holidays.

### **Step 3. Create Individual Grants.gov Accounts for Organization Members**

There is no fee for registering with Grants.gov. Each member of the organization who will participate in the online grant application process needs to register an individual account on Grants.gov.

1. Go to the [Grants.gov registration](#) page.
2. Complete the form, which includes specifying a username and password. This username and password combination is used to create the Grants.gov account. You will be prompted to link the Grants.gov account to your Login.gov account.
3. Associate your individual account with the organization's UEI. You will also enter the organization's profile name and your job title.

The organization's EBiz POC can delegate administrative roles to other Grants.gov users associated with the UEI, as necessary. Learn more about [managing roles in Grants.gov](#).

### **Step 4. Learn How to Use Workspace in Grants.gov**

Workspace is the application in Grants.gov that an organization's grant team uses when applying for federal grants. Workspace is a role-based tool, in which the user's assigned role controls permissions to perform specific actions, such as accessing and editing application forms. As noted in Step 3 above, the EBiz POC has the initial responsibility to assign roles to individuals.

The core roles include—

- Expanded AOR: has the most privileges.
- Standard AOR: allows a user to submit the final application and perform other actions.
- Workspace Manager: the minimum role required to create a workspace and begin work on an application.

Custom roles can also be created. Becoming familiar with Grants.gov Workspace roles and understanding the process will help applicants be better prepared to submit applications. The videos on this [EPA grants page](#) are just two of many Grants.gov training resources to help applicants get started.

If your organization has no access to the internet or access is very limited, you may request an exception for the remainder of this calendar year by following the procedures outlined in [Exceptions to the Grants.gov Submission Requirement](#) webpage. Please note that your request must be received at least 15 calendar days before the application due date to allow enough time to negotiate alternative submission methods.

### **Application Process:**

To begin the application process under this grant announcement, go to [Grants.gov](#) and click the "Search Grants" tab. Search the opportunity number associated with this opportunity; to access the SIRG grant

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

opportunity and view application materials, visit [Grants.gov](https://www.grants.gov) under the CDFA 66.032 listing. (The EPA has also included a link to [Grants.gov](https://www.grants.gov) on the [SIRG Resources](#) webpage.). Once the opportunity has been selected, click the red “Apply” button at the top of the view grant opportunity page.

The electronic submission of your application to this funding opportunity must be made by an official representative of your organization who has been registered as an AOR and is authorized by your organization to sign applications for federal financial assistance. If the “Submit” button is grayed out, it may be because you do not have the appropriate role to submit in your organization. Contact your organization’s EBiz POC or contact [Grants.gov](https://www.grants.gov) for assistance at 1-800-518-4726 or [support@grants.gov](mailto:support@grants.gov)

Applicants need to ensure that the AOR who submits the application through [Grants.gov](https://www.grants.gov) and whose UEI is listed on the application is an AOR for the applicant listed on the application, specifically on the SF-424. Additionally, the UEI listed on the application must be registered to the applicant organization’s [SAM.gov](https://www.sam.gov) account. If not, the application may be deemed ineligible.

Applications submitted through [Grants.gov](https://www.grants.gov) will be date and time stamped electronically. Please note that successful submission of your application through [Grants.gov](https://www.grants.gov) does not necessarily mean your application is eligible for award. Any application submitted after the application’s date and time deadline will be deemed ineligible and not be considered.

### *Technical Issues with Submission:*

If you experience technical issues during the submission of an application that you are unable to resolve, follow these procedures **before** the application deadline date:

1. Contact [Grants.gov](https://www.grants.gov) Support Center **before** the application deadline date.
2. Document the [Grants.gov](https://www.grants.gov) ticket/case number.
3. Send an email with “[Enter FON]” in the subject line to [radon@epa.gov](mailto:radon@epa.gov) before the application deadline time and date. The email **must** include the following:
  - a. [Grants.gov](https://www.grants.gov) ticket/case number(s).
  - b. Description of the issue.
  - c. The entire application package in PDF format.

Without this information, the EPA may not be able to consider applications submitted outside of [Grants.gov](https://www.grants.gov). Any application submitted after the application deadline time and date deadline will be deemed ineligible and will **not** be considered.

Please note that successful submission through [Grants.gov](https://www.grants.gov) or email does not necessarily mean your application is eligible for award.

The EPA will make decisions concerning acceptance of each application submitted outside of [Grants.gov](https://www.grants.gov) on a case-by-case basis. The EPA will only consider accepting applications that were unable to submit through [Grants.gov](https://www.grants.gov) due to [Grants.gov](https://www.grants.gov) or relevant [SAM.gov](https://www.sam.gov) system issues or for unforeseen exigent circumstances, such as extreme weather interfering with internet access. Failure of an applicant to submit prior to the application submission deadline date because they did not properly or timely register in [SAM.gov](https://www.sam.gov) or [Grants.gov](https://www.grants.gov) is **not** an acceptable reason to justify acceptance of an application outside of [Grants.gov](https://www.grants.gov).

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

### *Application Materials:*

The following forms and documents are required under SIRG announcements.

#### Mandatory Documents:

- Standard Form 424, Application for Federal Assistance. Please note that the organizational UEI must be included on the SF-424. Applicants are advised to begin the SAM.gov registration process early so that they have an active UEI prior to beginning this step. Otherwise, progress can be delayed on other parts of the application.
- Standard Form 424A, Budget Information for Non-Construction Programs.
- EPA Form 4700-4, Pre-Award Compliance Review Report.
- EPA Form 5700-54, Key Contacts Form.
- Project Narrative Attachment Form.

#### Optional Attachment Documents:

Use the “Other Attachments” form identified under the “Mandatory Documents” tab to submit the following:

- Project team biographies.
- Negotiated Indirect Cost Rate Agreement. (Note that this will be required if the application is selected for funding.)
- Partnership letter(s).
- [Climate and Economic Justice Screening Tool](#) (or CEJST) or [EJScreen](#) results.
- Approval letter (to use alternate means to submit initial application, if applicable).

## Appendix C: Budget Details

To determine whether the proposed budget provides a detailed breakout by funding type included in the proper budget category for each activity requesting funds, applicants should consult the [EPA Interim General Budget Development Guidance for Applicants and Recipients of EPA Financial Assistance](#).

Applicants should provide a detailed breakout by funding type included in the proper budget category for each activity requesting funds. Applicants should use the instructions and budget object class descriptions to complete the detailed budget section of the project narrative. The budget detail and budget table should be included in the project narrative; they count toward the maximum 10-page limit. Additional budget documents, excluding the SF-424 and SF-424A forms, or project narratives pages that are more than the page limitation will not be reviewed. Applicants should include applicable rows of costs for each budget category in their budget table to accurately reflect the proposed project budget. Applicants must itemize costs related to personnel, fringe benefits, travel, equipment, installation or labor supplies, contractual costs, other direct costs (i.e., subawards, [participant support costs](#)), indirect costs, and total costs. If providing a voluntary cost share, the budget detail must clearly specify the amount of federal funding and the cost share amount for each category. For applicants proposing to implement a participant support cost or rebate program, the rebates are appropriately listed under the “Other” budget category as “Participant Support Costs.” For more information on participant support costs, visit [RAIN-2018-G05-R1](#), “EPA Guidance on Participant Support Costs.”

- **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 nonemployee 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); related to proposed project activities



## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

(e.g., attendance at meetings); or related to a technical training or workshop that supports effective implementation of the project activities. Include only travel costs for employees in the travel category. Travel costs do not include (1) costs for travel of contractors (including consultants), which are included in the “Contractual” category, or (2) travel costs for employees of subrecipients under subawards and nonemployee program participants (e.g., trainees), which are included in the “Other” category. Furthermore, 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 of the United States, that travel must be specifically identified. All proposed foreign travel must be approved by the EPA’s Office of International and Tribal Affairs prior to being taken.

- **Equipment—Identify each item to be purchased that has an estimated acquisition cost of \$5,000 or more per unit and a useful life of longer 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 § 200.1, “Equipment.” The budget detail must include an itemized listing of all equipment proposed under the project. If installation costs are included in the equipment costs, labor expenses shall be itemized with the detailed number of hours charged and the hourly wage. If the applicant 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). Nontangible goods and services associated with supplies—such as printing services, 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. The [EPA Subaward Policy](#) and [Subaward Frequent Questions](#) webpages have detailed guidance available for differentiating between contractors and subrecipients. Leased or rented goods (equipment or supplies) should be included in the “Other” category.

The 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 noncompetitive), if known. Any proposed non-competed/sole source contracts more than \$3,500 must include a justification. Note that it is unlikely that the EPA will accept proposed sole source contracts for goods and services (e.g., consulting) that are widely available in the commercial market. Refer to the [EPA Best Practice Guide for Procuring Services, Supplies, and Equipment Under the EPA Assistance Agreements](#) for the Agency’s policies on competitive procurements and encouraging the use of small and disadvantaged business enterprises.

- **Other—List each item in sufficient detail for the EPA to determine the reasonableness and allowability of its cost.** This category should include only those types of direct costs that do not

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

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 nonemployee 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-R1](#), “EPA Guidance on Participant Support Costs.”

Subawards (e.g., subgrants) and participant support costs 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 even if the agreement is referred to as a contract. Rebates, subsidies, and similar one-time lump-sum payments to program beneficiaries for purchase of eligible emission control technologies are considered participant support costs. “Other” 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 the [EPA Subaward Policy](#) and [Subaward Frequent Questions](#) webpages 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 benefits more than one cost objective or project and is not readily assignable to specific cost objectives or projects as a direct cost. 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 ( $\text{Indirect Rate} \times \text{Personnel} = \text{Indirect Costs}$ )
  - Personnel and Fringe ( $\text{Indirect Rate} \times \text{Personnel \& Fringe} = \text{Indirect Costs}$ )
  - Modified Total Direct Costs ( $\text{Indirect Rate} \times \text{Modified Total direct costs} = \text{Indirect Costs}$ )
  - Direct Costs minus distorting or other factors such as contracts and equipment
    - ( $\text{Indirect Rate} \times (\text{total direct cost} - \text{distorting factors}) = \text{Indirect Costs}$ )

Additional indirect cost guidance is available in [RAIN-2018-G02-R](#), “Indirect Cost Guidance for Recipients of EPA Assistance Agreements.”



## **Appendix D: Further Information Regarding Contracts, Subawards, and Participant Support Costs**

### ***Background:***

The Standard Form 424A (SF-424A) includes a separate row for “contractual” costs and “other” costs. The “other” cost category on the SF-424A should be used to cover both subawards and participant support costs. Depending on the project, these costs may be applicable to a targeted airshed application. This appendix helps clarify these differences. Additional information about participant support costs is contained in [RAIN-2018-G05-R1](#), “EPA Guidance on Participant Support Costs.”

### ***Contracts:***

As described in 2 CFR § 200.331, a contract is for the purpose of obtaining goods and services for the recipient’s own use and creates a procurement relationship with the contractor. Characteristics indicative of a procurement relationship between the recipient and a contractor are when the contractor—

- Provides the goods and services within normal business operations.
- Provides similar goods or services to many different purchasers.
- Normally operates in a competitive environment.
- Provides goods or services that are ancillary to the operation of the federal program.
- Is not subject to compliance requirements of the federal program as a result of the agreement, although similar requirements may apply for other reasons.

Grant recipients that enter into procurement contracts must comply with the applicable procurement provisions in 2 CFR § 200.317–200.327.

### ***Subawards:***

Under 2 CFR § 200.1, “subrecipient” means a nonfederal entity that receives a subaward from a grantee to carry out part of a federal program; it does not include program beneficiaries receiving participant support costs. Grant recipients may make subawards to subrecipients to carry out a portion of the grant project; in such a case, the grant recipient is also known as a “pass-through entity.” Subawards establish a financial assistance relationship under which the subrecipient’s employees and contractors implement programs and projects to accomplish the goals and objectives of the grant. It is important to bear in mind that subrecipients are subject to the same federal requirements as the pass-through entity.

Under this competition, a nonfederal entity is eligible to receive a subaward even if it is not eligible to receive a grant from the EPA directly. Although there may be some situations in which a subaward to an individual may be appropriate, those situations are rare.

Subrecipients receive reimbursement only for their actual direct or approved indirect costs and do not “profit” from the transaction. For-profit entities participating in grant activities are typically contractors rather than subrecipients.

The EPA’s Award Official must approve subawards to for-profit entities and individuals on the basis of either a precise description of the subaward in the EPA-approved budget and project narrative or on a transaction-by-transaction basis.

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

The applicant's project narrative and budget narrative should include detailed descriptions of any proposed subawards and include cost estimates for subawards as line items under the "Other" budget category in the SF-424A. Should a recipient decide to make a subaward that was not described in the approved project narrative and budget, the recipient must obtain prior written approval from the EPA Award Official for the subaward.

If a recipient chooses to pass funds from its grant to other entities through subawards, the recipient must comply with applicable subaward provisions of 2 CFR Part 200, the EPA Subaward Policy, and the EPA's National Terms and Conditions for Subawards. Note that under 2 CFR § 200.331–200.333, extensive requirements exist for subrecipient monitoring and management that apply to pass-through entities.

Many of the federal administrative grant regulations in 2 CFR Part 200 and 2 CFR Part 1500, as well as the grant terms and conditions in the assistance agreement, "flow down" to subrecipients receiving a subaward. Such requirements need to be identified in the written subaward agreement between the recipient and subrecipient. Additionally, if a subrecipient intends to procure goods or services using targeted airshed grant funds, the subrecipient must comply with the applicable federal procurement standards in 2 CFR Part 200, 2 CFR Part 1500, and 40 CFR Part 33, as these requirements also "flow down" to subrecipients.

There is no requirement for recipients to compete subawards under this notice of funding opportunity; however, pass-through entities may choose to select subrecipients competitively provided doing so is consistent with applicable statutes, regulations, and the terms and conditions of their targeted airshed grant.

Recipients may use the subaward template contained in Appendix D of the EPA's Subaward Policy to assist them in complying with the "subaward content" requirements; however, the EPA does not mandate the use of this template.

### ***Participant Support Costs:***

Recipients may provide participant support costs (PSCs) to program beneficiaries to enable beneficiaries to participate in the recipient's program or project. PSCs include rebates, subsidies, stipends, or other payments to program beneficiaries by a grantee, subrecipient, or contractor. For example, PSCs might be used for the purchase of eligible technologies. Program beneficiaries, rather than the grant recipient, would own the new technology.

PSCs differ from subawards in that the beneficiary is participating in the grant recipient's project or program instead of implementing their own project or program. Program beneficiaries may include, but are not limited to, individual owner/operators, private or public fleet owners, or residents in the applicable area; however, program beneficiaries are not employees, contractors, or subrecipients of the grant recipient. Sales of radon test kits is an example of a PSC.

Recipients may also use PSCs to make purchases on behalf of program beneficiaries. In some situations, this approach allows grant recipients to achieve economies of scale and/or take advantage of existing purchase contracts. Competitive procurement requirements apply to the grant recipient when the recipient takes this approach.

The federal administrative grant regulations in 2 CFR Part 200 and 2 CFR Part 1500, as well as the grant terms and conditions in the recipient's grant agreement, generally do not "flow down" to program beneficiaries receiving PSCs, except that costs must be reasonable and incurred within the grant project

## State and Tribal Indoor Radon Grant (SIRG) Program Guidance

period. Requirements for compliance with civil rights laws and ensuring that program beneficiaries are eligible to receive federal financial assistance are applicable as explained in [RAIN-2018-G05-R1](#), “EPA Guidance on Participant Support Costs.” In addition, program beneficiaries must abide by requirements to ensure that the funds are used only for authorized purposes.

If a grantee, subrecipient, or contractor is issuing PSCs, it must have a written agreement in place. The written agreement should not be structured as a subaward agreement and should not refer to program beneficiaries as subrecipients consistent with 2 CFR § 200.1, “Subrecipient.” In addition, the written agreement should not include language requiring the program beneficiary to comply with the federal grant regulations at 2 CFR Part 200, 2 CFR Part 1500, or the terms and conditions found in the award between the EPA and the recipient, other than requiring that the costs must be reasonable, necessary, and allocable. The written agreement should also include the following:

- A description of the activities and amounts that will be supported by the PSCs.
- The program and/or statutory requirements that the program beneficiary must abide by to ensure that the funds are used only for authorized purposes.
- Specification of which party will have title to the technologies (e.g., vehicles, engines, equipment, and/or appliances), if any, purchased with PSCs.
- Source documentation requirements to ensure proper accounting of the PSCs.
- Any reporting that must be submitted by the program beneficiary.

The EPA’s Award Official must approve PSCs either on the basis of a precise description of the PSCs in the EPA-approved budget and work plan or on a transaction-by-transaction basis. The applicant’s project narrative and budget narrative should include detailed descriptions of any proposed PSCs and include cost estimates for PSCs as line items under the “Other” budget category. Should a recipient decide to issue PSCs that were not described in the approved work plan and budget, the recipient must obtain prior written approval from the EPA’s Award Official. Moreover, after a grant is awarded, should a recipient decide to modify the amount approved (upward or downward) for PSCs, prior written approval from EPA’s Award Official is also required.

When creating budgets, applicants/recipients must exclude PSCs from Modified Total Direct Costs for calculation of indirect costs as required by 2 CFR § 200.1, “Modified Total Direct Costs.”

### **Resources:**

- [RAIN-2018-G05-R1](#), “EPA Guidance on Participant Support Costs.”
- [Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#).
- [Grants Policy Issuance 16-01: EPA Subaward Policy for EPA Assistance Agreement Recipients](#), with attachments, includes—
  - EPA Subaward Policy.
  - EPA Subaward Policy Appendix A: Distinctions Between Subrecipients and Contractors.
  - EPA Subaward Policy Appendix B: National Term and Condition for Subawards.
  - EPA Subaward Policy Appendix C: Model Programmatic Subaward Reporting Requirement.
  - EPA Subaward Policy Appendix D: Subaward Agreement Template.