Administrative Requirements for Community Grants Recipients Webinar, June 2024

Questions and Answers

1. Do Community Grants recipients use form SF-424C for our construction projects?

No, recipients should use the SF-424A form, Budget Information for Non-Construction Programs forms for Community Grants applications. More information on application forms is available in Appendix D: Application Forms and Attachments, of the Community Grants Implementation Guidance.

2. When completing the SF424A, are we required to show match and total project costs or just represent the amount of the award? We have a \$25 million project, and we are receiving \$1 million from the appropriation.

EPA recommends that the budget forms do not reflect more than the appropriated funding amount and required cost share amount (unless cost share requirement is waived). Once voluntary cost sharing funds are included in a grant award, these funds become a legally binding commitment that the recipient is required to provide. Any voluntary cost share funding will be subject to the grant terms and conditions as well as applicable requirements and must be used on eligible activities.

3. Will you send the guidance document to participants?

Community Grants Program Implementation Guidance is currently available online at https://www.epa.gov/sustainable-water-infrastructure/epa-community-grants.

4. Is there a training on domestic preference documentation required?

EPA provides information on implementing BABA and AIS, including training materials online at: https://www.epa.gov/cwsrf/build-america-buy-america-baba-resources and https://www.epa.gov/cwsrf/state-revolving-fund-american-iron-and-steel-ais-requirement.

5. If a community is already working with a consultant on the project that the grant funding will be used for, can the community continue working with that specific consultant? What about a subcontractor that is already doing work on the project out in the field?

Whenever a recipient purchases supplies or hires a contractor, this is considered a procurement action. The term "procurement" covers many different, but coordinated actions, such as how the request for proposals or contract documents (plans and specifications) are prepared and advertised.

By statute, Community Grants projects identified in the FY 2024 or prior Appropriations Acts are not subject to compliance with Federal procurement requirements for competition and methods of procurement applicable to Federal financial assistance if the recipient has:

(1) procured services or products through contracts entered into prior to March 9, 2024; and

(2) complied with state and/or local laws governing competition.

If you believe your Community Grant project qualifies for this flexibility, please reach out to your EPA Regional Point of Contact and provide a statement affirming that your contract was entered into prior to March 9, 2024, and that you complied with state and/or local laws governing competition (including laws/policies relating to participation by disadvantaged business enterprises as applicable). The terms and conditions of your grant agreement will require recipients to retain documentation demonstrating compliance with state and/or local laws governing competition in their own files.

Additional information on procurement is available online:

- Procurement and Subawards in-depth training
- <u>EPA's Best Practice Guide for Procuring Services</u>, <u>Supplies</u>, and <u>Equipment Under EPA</u>
 Assistance Agreements
- Reminders for Preparing Solicitation Documents

6. Could you explain how recipients are not required to pay for costs incurred out of pocket prior to requesting payment. Isn't CDS a reimbursement-based grant?

Recipients submit payment requests to EPA for incurred costs. (Incurred costs are financial obligations: costs owed by an entity as a result of a transaction. The costs may have been paid or remain unpaid.) In some cases, pre-award costs may be included. Once the payment request is approved, the recipient can draw down the requested amount. As required by 2 CFR 200.305(b), EPA requires that recipients of EPA financial assistance participate in the Automated Standard Application for Payments (ASAP) system. Recipients must request payment for the minimum amounts needed for actual and immediate cash requirements of the recipient in carrying out the purpose of the approved project. Recipients will submit a payment request including supporting documentation such as copies of bills (vouchers, invoices, etc.), along with a description of services rendered, time spent, and charges for EPA review and approval. After review and approval, EPA will pay the recipient for the federal share of the allowable costs shown on the payment request. Information on ASAP is available online. This information is described in the Community Grants Program Implementation Guidance.

7. When will the grant application period open?

Applications can be <u>submitted through Grants.gov</u>. Recipients are encouraged to review the Community Grants Implementation Guidance to understand requirements applicable to Community Grants, and to reach out to their <u>Regional Points of Contact</u> to ensure development of complete application packages and discuss any pre-award compliance, such as compliance with the National Environmental Policy Act (NEPA).

8. Is the application process required for federal appropriations funding that was already signed into law?

Yes. The identification of projects in appropriations acts does not constitute issuance of a grant award. Recipients will need to submit a full grant application through Grants.gov. See instruction in EPA's Community Grants Program Implementation Guidance.

9. Where on the Grants.gov webpage do we search "EPA-CEP-01" to find the application package?

From the How to Apply for Grants section of the Applicants Tab in Grants.gov, scroll down to the Funding Opportunity box to enter "EPA-CEP-01." Complete instructions for accessing the application package are available online at https://www.epa.gov/sustainable-water-infrastructure/epa-community-grants-funding#application.

10. I already have a Sam.gov identifier - would this be the number used on the application?

You can only successfully submit an application package if your organization has an active account in SAM.gov. The registration must be renewed annually by the E-Business Point of Contact, so recipients should ensure the account is active and will not expire before the application is submitted. Recipients may refer to SAM.gov for information on how to begin and may obtain SAM.gov assistance via the Federal Service Desk at 1-866-606-8220, or the Federal Service Desk web site.

11. Is there an upper dollar amount / limit for each grant?

EPA is not authorized to provide funds in excess of the amounts listed in the Appropriations Acts for this program. Recipients may reach out to their respective Congressional representatives to inquire about additional, future Community Grants funding. Recipients seeking additional funds to support their projects can explore EPA's CWSRF and DWSRF programs and search for other federal grant opportunities available through Grants.gov.

12. If a community had an income survey conducted by a third party within the last two years that demonstrates MHI is less than 80%, can it be used to support a cost share waiver?

The Community Grants Implementation Guidance provides the criteria and associated data sources as provided by the U.S. Census Bureau that EPA will use when determining cost share waiver approval.

13. Is the NEPA an eligible cost for reimbursement?

EPA may fund the recipient's development of an Environmental Information Document (EID) or other analysis for cross cutting authorities or executive orders in order to provide supporting information, however, EPA has the legal obligation to make the NEPA related decision, to issue the NEPA documents, to sign NEPA determinations, and to fulfill other cross-cutting Federal requirements before approving or paying for design and/or construction. Therefore, EPA grant funds cannot be used to prepare a federal document, such as an Environmental Assessment (EA) or Environmental Impact Statement (EIS).

14. Does the SF 424 need to be submitted prior to the Grant Agreement paperwork? Or is that the Grant Agreement Paperwork?

That is part of the application package. Most of the documents will be submitted together, through Grants.gov, including the SF-424.

15. Does every person need to fill out the lobbying form?

One form is required per applicant. It is not required per person. This is true for all of the required forms.

16. Is the Project Narrative and Workplan is the only "traditional grant application" format?

There is not a specific format that is required for the workplan, however Appendix E of the <u>Community Grants Program Implementation Guidance</u> does spell out the content that should be included in the workplan.

Please refer to the Community Grants Program's full set of Frequently Asked Questions for more.