

AGENCY: ENVIRONMENTAL PROTECTION AGENCY (EPA)

TITLE: Consumer Recycling Education and Outreach (REO) Grant Program

ACTION: Notice of Funding Opportunity (NOFO) – Questions and Answers

NOFO NUMBER: EPA-I-OLEM-ORCR-24-12

Updated on 9/13/2024

SUMMARY: The following are formal Agency responses to questions/comments regarding the Consumer Recycling Education and Outreach (REO) Grant Program. As this is the second round of REO funding, it is also referred throughout this document as “REO Round 2.” This list of questions and answers will be updated as questions about the funding opportunity are received. For more information on this funding opportunity, please see [EPA’s Recycling Education and Outreach Grant Program](#) web page, where you can find the Notice of Funding Opportunity (NOFO) and other resources.

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Q&As for the Recycling Education and Outreach (REO) Grant Program (EPA-I-OLEM-ORCR-24-12)

General

- 1. Question:** What is the structure of this REO Funding Opportunity?

Answer: REO Round 2 is structured as **one** cooperative agreement with **three projects**.

Project #1: Develop and Implement a National Consumer Wasted Food Reduction Campaign;

Project #2: Expand the Market and Sales of Compost; and

Project #3: Increase Education and Outreach to Households on Composting.

For more information, see *Section I.F. Scope of Work* in the NOFO. For more questions on activities, see “Eligible Activities” below.

- 2. Question:** Is this funding opportunity a grant, or a cooperative agreement?

Answer: This funding opportunity is a cooperative agreement, but EPA will often use the term “grant” to describe this program.

- 3. Question:** Will EPA accept applications from individual applicants?

Answer: No. EPA recognizes that there is a wide range of expertise required to be able to satisfy the three components of this cooperative agreement. Therefore, all applications for this opportunity **must** be coalition applications, not individual applications. For more information on this, see *Section I.G. Coalitions* in the NOFO, and “Eligible Entities” below.

- 4. Question:** Am I limited to apply to only **one** of EPA’s current recycling-related funding opportunities (SWIFR and REO)?

Answer: An entity may apply to both the Solid Waste Infrastructure for Recycling (SWIFR) Grant Program **and** the Consumer Recycling Education and Outreach (REO) Grant Program, assuming they are eligible for both opportunities. Applying or receiving one grant does not make you ineligible for the other. However, please note the differences in the funding opportunities as stated in *Section I.F. Scope of Work* in the NOFOs. SWIFR funds are used to implement projects related to solid waste infrastructure, while REO funds are used to implement projects related to education and outreach. More information about the SWIFR Funding Opportunities for Communities/Political Subdivisions may be found [here](#), and SWIFR Funding Opportunities for Tribes and Intertribal Consortia can be found [here](#).

- 5. Question:** Will my project need to report on all or just some of the outputs and outcomes listed in *Section I.L. Measuring and Reporting Environmental Results: Outputs and Outcomes*?

Answer: For REO Round 2, all of the outputs and outcomes in *Section I.L. Measuring and Reporting Environmental Results: Evaluation, Outputs and Outcomes* of the NOFO are required for reporting. Please note that some are specific to certain projects, and some would apply to all three projects. Please see “EPA Recycling Education and Outreach Grant (Round 2): A Quick Reference Guide for Evaluating Progress and Reporting Achievements Over Time” which is available on [EPA’s Recycling Education and Outreach Grant Program](#) web page for more details.

- 6. Question:** What should I consider as the period of performance of these grants?

Answer: The estimated start date for the REO grant is **September 2025**. All project activities must be completed within the negotiated project performance period of five years.

- 7. Question:** How will grant funds be disbursed?

Answer: Grant funds will be available once awards are made. Recipients must draw funds from the Automated Standard Application for Payments (ASAP) system for the minimum amounts needed for actual and immediate cash requirements to pay employees, contractors, subrecipients or to satisfy other obligations for allowable costs under this assistance agreement. Recipients do not have to pay employees, contractors and subrecipients before obtaining payment from ASAP but must disburse the funds for the incurred costs within 5 working days of receiving the ASAP payment subject to a 5% of the amount of payment or \$1,000 cushion for calculation errors. EPA’s Award Official may make exceptions to the 5-business day disbursement basis based on documented circumstances that prevent the recipient from complying with that requirement. Recipients must return excess funds that cannot be spent within 5 days through ASAP.

For additional information, please refer to [EPA's General Terms and Conditions](#).

- 8. Question:** Where can I learn more about SAM.gov registration, UEI numbers, and/or Grants.gov registration?

Answer: Please review *Section IV.B. Submission Instructions* of the REO NOFO. Also, <https://www.grants.gov/support.html> or <https://sam.gov/content/about/contact>. You will be able to live chat or call an expert who will be able to help you with your issue.

Eligible Activities

1. Question: What activities are eligible under this funding opportunity?

Answer: REO Round 2 will fund one cooperative agreement to complete three projects:

Project #1: Develop and Implement a National Consumer Wasted Food Reduction Campaign;

Project #2: Expand the Market and Sales of Compost; and

Project #3: Increase Education and Outreach to Households on Composting.

Activities may include but are not limited to:

- public service announcements;
- door-to-door education and outreach campaigns;
- social media and digital outreach;
- an advertising campaign on food waste reduction or composting;
- translation and transcreation of outreach materials;
- the development and dissemination of
 - a toolkit for implementation of outreach and education programs;
 - information on the importance of quality in the composting stream;
 - information on the economic and environmental benefits of food waste reduction and composting; and
 - information on what happens to materials after the materials are placed into a residential composting program;
- businesses composting outreach; and
- bin, cart, and other receptacle labeling and signs.

See *Section I.F. Scope of Work* in the NOFO for more information.

2. Question: Using grant funds, may grantees purchase small incentives for participants in project activities, such as gift cards, meal vouchers, a compost bin for contest winners, etc.?

Answer: Yes, reasonable costs for gift cards and similar incentives for program participation are allowable (with prior approval of the Award Official) under the EPA Guidance on Participant Support Costs (<https://www.epa.gov/sites/default/files/2020-11/documents/epa-guidance-on-participant-support-costs.pdf>) as long as EPA determines that the incentives further the statutory objective of the Grant Program. Grant recipients should include this information within their project budget with their application.

- 3. Question:** Can the funds be used to establish baselines and measure the impact of education and outreach (say by funding a waste characterization study)? The baseline and measurements would be in conjunction with educational projects.

Answer: Yes, as long as the baselines and measures are developed to evaluate the education and outreach activities undertaken with EPA funding and the evaluation process is described in the scope of work for the EPA grant.

- 4. Question:** Can I use grant funding to pay for projects already underway (i.e., reimbursement)?

Answer: *Our anticipated announcement of REO selections is in Spring 2025 and any costs incurred prior to an applicant receiving notification of selection would not be approved by an EPA award official.* Costs incurred after selection but up to 90 days prior to the award, under 2 CFR Part 1500.9, may be allowable even if the applicant did not request prior approval to incur pre-award costs provided the costs are eligible and allowable. Pre-award costs should be “directly pursuant to the negotiation and in anticipation of the Federal award where such costs are necessary for efficient and timely performance of the scope of work.” See 2 CFR 200.458. Costs incurred more than 90 days prior to award require specific approval of an EPA award official.

For example, costs for contracts (including consultants) are allowable only if the contract was entered into in a manner that complies with the competitive procurement provisions of EPA’s grant regulations (2 CFR 200.318 – 200.320) within a reasonable time frame (typically 5 years) such that the pricing under the contract reflects current market conditions. Selected applicants must include the pre-award costs in their final budget and workplan submitted to EPA and provide the date the pre-award costs were incurred. For more information, please see EPA’s term and condition on pre-award costs ([EPA's General Terms and Conditions](#)).

Please note that applicants incur pre-award at their own risk. EPA is not obligated to reimburse applicants for pre-award costs that are not included in the workplan and budget EPA approves. EPA has no obligation to reimburse unsuccessful applicants or selectees for pre-award costs. Selected applicants should discuss pre-award costs with their EPA Project Officer.

Surveys/Information Collection

- 1. Question:** Can grant recipients conduct surveys with EPA grant funds?

Answer: If the applicant intends to use EPA funds to develop and administer surveys or other information collections with identical questions to 10 or more persons, the applicant must comply with the OMB regulations implementing Paperwork Reduction Act (PRA).

See 5 CFR Part 1320. This applies to both the applicant and any contractors or subaward recipients supported with EPA funding as well.

Compliance with the OMB PRA regulations will require a considerable amount of time. Therefore, EPA strongly encourages applicants to obtain other sources of funding to develop and administer robust and replicable evaluation tools (e.g., surveys, focus groups, etc.). EPA funds can be used to evaluate survey results and do other types of evaluation and measurement.

Please see *Section I.L. Measuring and Reporting Environmental Results: Evaluation, Outputs and Outcomes* and *Section III.F. Ineligible Costs or Activities and Other Considerations* for more information.

For additional information on the Paperwork Reduction Act, refer to <https://pra.digital.gov/do-i-need-clearance/>.

- 2. Question:** How would direct mailing/door hanger/sticker marketing pieces that drive people to a specific website, etc. intersect "information collection"? For instance, could the grant recipient direct people to a website that allows them to sign up for a newsletter?

Answer: Collecting information for a mailing list would generally not trigger the Paperwork Reduction Act, as long as the sign-up process does not involve the collection of information beyond that "necessary to ensure proper transmission" of the information. It cannot, for example, also include questions intended to collect demographic information.

Please refer to this excerpt from [OMB's 2010 Guidance on Social Media: Electronic subscriptions to agency notifications or publications.](#)

OMB does not consider mailing addresses collected for agency mailing lists to be information subject to the PRA. Similarly, an agency is not collecting information when it collects email addresses for agency updates, alerts, publications, or email subscription services; mobile phone numbers for text notification lists; or addresses for RSS feeds, which allow individuals to customize and subscribe to updates from websites.

If, however, the agency requests a member of the public to provide additional information (e.g., age, sex, race/ethnicity, employment, or citizenship status) beyond what is necessary to ensure proper transmission of responses, the collection of that additional information is covered under the PRA. As with non-electronic mailing lists, the use of email lists to survey subscribers (about, for example, satisfaction with government program design) is an information collection under the PRA.

If an agency authorizes website users to share content, such as "send to a friend" using a web form, this authorization is not covered by the PRA unless the agency collects the "friend's" email address or username to use it for some purpose other than sharing the

content selected by the sender. Agencies should provide notice to users on the web form if they intend to retain email addresses for future use.

Eligible Entities

- 1. Question:** What is the difference between “lead applicant” and “coalition member” for this opportunity?

Answer: For purposes of this grant program, all applications for this funding opportunity are required to be coalition applications.

One entity will be responsible for the grant (i.e., the **grant recipient/lead applicant**) and the other entities (“coalition members” or “coalition member subrecipients”) would be brought on via subawards. A coalition is a group of two or more eligible applicants that share a strong and substantial commitment to the projects (e.g., financially, materially, or operationally) such that withdrawal by any single member from the coalition would fundamentally alter the design or expected outputs and outcomes of the projects. The grant recipient that administers the grant and subawards will be accountable to EPA for proper expenditure of the funds and reporting and will be the point of contact for the coalition. As provided in 2 CFR 200.332, all subrecipients are accountable to the grant recipient for proper use of EPA funding and the grant recipient is required to report on their subaward monitoring activities under 2 CFR 200.332(d). Please see *Section I.G. Coalitions, Section III.A. Eligible Applicants, Section III.C. Threshold Eligibility Criteria, and Section III.E. Subrecipients* for more information.

- 2. Question:** What types of entities are eligible to be lead applicants or coalition members for this opportunity?

Answer: Eligible lead applicants or coalition members must be one of the following:

- a U.S. State, including the District of Columbia;
- Puerto Rico, Virgin Islands, Guam, American Samoa, Commonwealth of the Northern Mariana Islands, and any agency or instrumentality thereof;
- a unit of local government as defined in the *Local government* provision of 2 CFR 200.1;
- an Indian Tribe (as defined in section 4 of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 5304));
- a Native Hawaiian organization (as defined in section 6207 of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 7517));
- the Department of Hawaiian Home Lands;
- the Office of Hawaiian Affairs;
- a nonprofit organization; or
- a public-private partnership.

See *Section III.A. Eligible Applicants* for more information.

While coalition members must be “eligible applicants” as defined above and by statute, they will be brought on by subawards (non-competitive) through the lead applicant consistent with EPA’s subaward regulations.

3. Question: I am a not-for-profit university. Am I eligible to apply for the REO grant?

Answer: Nonprofit organizations are eligible to apply for REO round 2, so if your university is a nonprofit organization, you are an eligible entity. Please refer to *Section I.C. Key Definitions* and *Section III.A. Eligible Applicants*

4. Question: Are federal agencies eligible entities?

Answer: No, federal agencies are not an eligible entity in *Section III.A. Eligible Entities* of the NOFO.

5. Question: How should public-private partnerships apply to this opportunity in SAM.gov and Grants.Gov?

Answer: If the P3 has created an incorporated legal entity, separate from either the public or private partner, the P3 may register in SAM.gov with that entity’s legal business name and date/state of incorporation. If the P3 does not have an incorporated legal existence, then the public entity of the partnership must apply as the lead applicant using its own account in SAM.gov and Grants.gov. The partnership may not use the private entity’s SAM.gov and Grants.gov accounts. All P3 applications should include a copy of the legally binding agreement establishing the P3 in their application.

Procurement and Subawards

1. Question: What types of entities are eligible to be subrecipients?

Answer: Eligible subrecipients are as follows:

- Nonprofit organizations;
- Tribal governments (both federally recognized and state-recognized) and intertribal consortia as defined by 40 CFR 35.504;
- Local governments (as defined by 2 CFR 200.1 – includes cities, towns, municipalities, and counties, public housing authorities and councils of government);
- Institutions of higher education (e.g., private and public universities and colleges, including community colleges);
- U.S. Territories and States;
- a Native Hawaiian organization (as defined in section 6207 of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 7517));

- the Department of Hawaiian Home Lands; and
- the Office of Hawaiian Affairs.

Ineligible Subrecipients are as follows:

- Individuals
- For-profit businesses

See *Section III.E. Subrecipients* in the NOFO for more details on subrecipients.

2. Question: Do I need to list contractors in my application?

Answer: The EPA does not require and advises against applicants naming procurement contractors (including individual consultants) in applications for grant funding. However, if an applicant chooses to identify a procurement contractor(s) to conduct work proposed in this application, the applicant must comply with the requirements in *Section III.D. Named Contractors* in the NOFO, even if the entity is referred to as a “partner” or “collaborator” in the application.

3. Question: What is the difference between “contractor” and “coalition member”? Do I need to name my coalition members in my application?

Answer: Eligible coalition members must be one of the following:

- a U.S. State, including the District of Columbia;
- Puerto Rico, Virgin Islands, Guam, American Samoa, Commonwealth of the Northern Mariana Islands, and any agency or instrumentality thereof;
- a unit of local government as defined in the *Local government* provision of 2 CFR 200.1;
- an Indian Tribe (as defined in section 4 of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 5304));
- a Native Hawaiian organization (as defined in section 6207 of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 7517));
- the Department of Hawaiian Home Lands;
- the Office of Hawaiian Affairs;
- a nonprofit organization; or
- a public-private partnership.

All applications for this funding opportunity are required to be coalition applications. To demonstrate the other members’ commitment to the coalition, the lead applicant must include in their application a signed letter of intent from each coalition member stating the member’s intent to sign the MOA if the coalition application is selected. The lead applicant for any coalition application selected for award will be required to submit a Memorandum of Agreement (MOA) signed by all coalition members by March 1, 2025. (The MOA does not need to be submitted at the time of application.) Please note that if

an identified coalition member withdraws from an application after the submission deadline, it may impact the evaluation and/or selection of the application.

See *Section I.G. Coalitions* and *Section III.A. Eligible Applicants* and *Appendix A: Guidelines for a Memorandum of Agreement for a Coalition* in the NOFO for guidance on recommended elements of an MOA.

Unlike coalition members, EPA does not require and advises against naming contractors in applications for grant funding. See *Section III.D. Named Contractors* in the NOFO for more information.

- 4. Question:** What is the 20% statutory set-aside requirement? Will an applicant receive more points in the evaluation if they set aside **more** than 20% of their funds for subawards?

Answer: As provided in Section 70402(d)(2) of the BIL, EPA must allocate at least 20% of the funding Congress appropriated each fiscal year for:

- low-income communities;
- rural communities; and
- communities identified as Native American pursuant to section 2(9) of the Native American Graves Protection and Repatriation Act (25 U.S.C. 3001(9)).

Please see *Section I.C. Key Definitions* and *Section III.E. Subrecipients*.

To meet this 20% statutory set aside, the grant recipient must allocate 20% of the total funding requested to low-income, rural, and Native American communities through subawards to entities that target authorized education and outreach activities to members of those communities. However, applications that allocate **more** than 20% of the total amount requested to competitive campaign implementation subawards are more likely to receive a higher evaluation score (see evaluation criterion #6 in *Section V.A. Evaluation Criteria*).

- 5. Question:** Are there budgetary limits for each subaward?

Answer: No. For Project #1 and Project #3, the grant recipient is required to conduct a competitive process to administer subawards for implementing outreach and education locally, but EPA is not specifying overall limits or individual subaward limits. For project #2, subawards for local outreach and implementation are allowed but not required (and EPA is not specifying that any such subawards for Project #2 would need to be done via a competitive process). See *Section I.F. Scope of Work* in the NOFO for more information on overall budget requirements, including a table.

See *Section III.E. Subrecipients* in the NOFO for more information.

6. Question: Can an applicant's project budget include funding a fiscally-sponsored organization (not an incorporated legal entity themselves), in order for that organization to execute part of the applicant's project initiatives?

Answer: No. An entity must be incorporated with its own legal existence in order to enter into a legal subaward agreement with the applicant. However, a fiscal sponsor may receive a subaward from the applicant and employ individuals from the unincorporated entity to carry out the work, but the fiscal sponsor remains accountable to EPA for the proper management and expenditure of funds and for effective project performance. The fiscal sponsor would also have to comply with all applicable statutory and regulatory requirements, including competitive procurement requirements for hiring contractors and consultants. A fiscal sponsor of an incorporated entity may be able to enter into a subaward agreement with the applicant and provide a sub-subaward to the incorporated entity.

In addition, EPA does not recognize or accept a "fiscal sponsorship" relationship in which an eligible applicant such as a non-profit organization applies for funding on behalf of an ineligible organization such as a for-profit firm that will provide services necessary to execute a project. We have made that point clearly and directly in previous webinars on compliance with competitive procurement requirements contained in 2 CFR Parts 200 and 1500. EPA does not recognize "fiscally-sponsored organization" relationships that could be used to circumvent competitive procurement requirements. Any contracts between eligible applicants and for-profit service providers must comply with the competition requirements in 2 CFR 200.319 and 2 CFR 200.320 as interpreted by [EPA's Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#). Note in particular the restrictions in 2 CFR 200.319(b) on potential contractors assisting applicants or recipients in preparing Requests for Proposals.