

AGENCY: ENVIRONMENTAL PROTECTION AGENCY (EPA)

TITLE: COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT, SECTION 128(a) STATE IMPLEMENTATION SUPPORT GRANT

ACTION: Request for Proposals (RFP) – Frequently Asked Questions

RFA NO: EPA-OLEM-OBLR-17-02

CATALOG OF FEDERAL DOMESTIC ASSISTANCE (CFDA) NOS.: 66.814

SUMMARY: The following are frequently asked questions related to the subject solicitation.

1. What is the closing date of the Technical Assistance to Brownfields Communities Addressing Brownfields solicitation? The closing date and time for receipt of proposals is January 31, 2017 at 11:59 pm EST.

2. What is the total maximum award amount? The maximum award for the cooperative agreement is \$1,000,000.

3. What non-profit organizations are eligible to apply for this cooperative agreement? For this solicitation, proposals will be accepted from non-profit organizations (including universities) only. Non-profit organization, as defined by 2 CFR Part 200, means any corporation, trust, association, cooperative or other organization 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 its net proceeds to maintain, improve and/or expand its operations. Note that 2 CFR Part 200 specifically excludes the following types of organizations from the definition of “non-profit organization” because they are separately defined in the regulation: (i) institutions of higher education; and (ii) state, local and federally-recognized Indian tribal governments. While not considered to be a “non-profit organization(s)” as defined by 2 CFR Part 200, Institutions of Higher Education are, nevertheless, eligible to submit applications under this RFP. For-profit colleges, universities, trade schools, and hospitals are ineligible.

4. Would it be acceptable to EPA for an applicant to work with another agency or organization as partners? It depends. EPA awards funds to one eligible applicant as the “recipient” even if other eligible applicants are named as ‘partners,’ ‘co-applicants,’ members of a ‘coalition,’ or ‘consortium.’ The recipient is accountable to EPA for the proper expenditure of funds. Generally, applicants may work with another agency or organization as a partner. If cooperative agreement funding is to be used to provide a subaward to the partner organization, the recipient must comply with applicable requirements for subawards including those contained in 2 CFR Part 200. The terms of the solicitation reference the rules that must be followed in these instances in Section 4E.

5. The RFP states on page 12 that “the successful applicant may receive 50% of its established indirect cost rate under the cooperative agreement that will be awarded.” If the established indirect cost rate is only applied to some of the direct costs (for example

salary & fringe) so that overall the indirect cost are less than 50% when applied to the total direct costs, can 100% of the established indirect cost rate be applied to a portion of the direct costs? For example, if the total direct cost is \$100,000, but the indirect cost is only applied to \$50,000 of the direct costs, can the full indirect cost rate be applied to the \$50,000 so that only 50% of the indirect costs is received when calculated based on the total direct costs? No. Because half the funding is subject to the statutory administrative cost prohibition, the successful applicant may only charge half of its established indirect cost rate to all direct charges. All project activities must be completed within the negotiated project performance period of 60 months.

6. What grant activities cannot be paid for with grant funds under this solicitation? Grant funds may only be used for eligible, reasonable, allowable and allocable activities and may not be used for any activity that does not meet these criteria or for the payment of:

- a penalty or fine;
- a federal cost-share requirement (for example, a cost share required by other federal funds);
- a response cost at a brownfield site for which the recipient of the grant or loan is potentially liable under CERCLA §107;
- a cost of compliance with any federal law, excluding the cost of compliance with laws applicable to the cleanup in the case of cleanup grants; or
- unallowable costs (e.g., lobbying and fund raising) under 2 CFR Part 200.

7. If I am a successful applicant, will EPA reimburse me for the costs of paying a consultant to prepare my grant application? No. Proposal preparation costs of the applicant are prohibited administrative costs.

8. If my proposal is successful, will EPA reimburse me for eligible programmatic costs I incurred prior to the award? It depends. EPA may reimburse successful applicants for pre-award costs incurred up to 90 days prior to award, even if the applicant did not request prior approval to incur pre-award costs provided the costs are eligible, allowable, reasonable, allocable and included in the approved budget and work plan for the grant. For example, costs for contracts are allowable only if the contract was entered into in a manner that complies with the competitive procurement provisions of EPA's grant regulations. Costs incurred more than 90 days prior to award require specific approval of an EPA award official.

Please note that applicants incur pre-award at their own risk and that EPA is not obligated to reimburse applicants for pre-award costs that are not included in the work plan and budget the Agency approves. EPA has no obligation to reimburse unsuccessful applicants for pre-award costs.

9. How do I know if my grant proposal was received by the deadline? The grant proposal and the required federal forms comprise your application package. Your organization's Authorized Organization Representative (AOR) must submit the application package electronically through www.grants.gov. If submitted successfully, the AOR will receive a Submission Receipt email confirming the application package was initially received. Note, you

can track the status of your application package anytime by using the link provided at the bottom of the email.

Next, www.grants.gov will process the application package to ensure it is error-free. If the application package passes this step, the AOR will receive a Submission Validation Receipt for Application email. Alternatively, if the application package has an error, the AOR will receive an email indicating the application package was “rejected with errors” and what those errors are. This gives you the opportunity to resolve the error and for the AOR to re-submit the application package before the submission deadline.

If you did not receive a confirmation email, then your proposal has NOT been accepted. If you need assistance with submitting your application package, or have questions, contact the www.grants.gov Help Desk at 1-800-518-4726 or support@grants.gov. The Help Desk is open 24 hours a day, 7 days a week; closed on federal holidays. You must contact the Help Desk if you have difficulty submitting your proposal.

Additionally, the www.grants.gov website has an Applicant Tools and Tips section (<http://www.grants.gov/web/grants/applicants/applicant-tools-and-tips.html>) which includes a series of videos on various aspects of the submission process.

10. I know my organization is registered in www.sam.gov. Should I check to make sure the account is active? Yes! You can only successfully submit an application package if your organization has an active account in www.sam.gov. The registration must be renewed annually by the E-Business Point of Contact, so make sure the account does not expire before the proposal submission deadline.

11. Can I apply for grant funding if the www.sam.gov account is not active, or is in the process of being updated or re-activated? No. Your organization must have an active account in www.sam.gov in order to apply for funding.

12. Can someone other than the Authorized Organization Representative submit the application package in www.grants.gov? No. The Authorized Organization Representative, designated by the E-Business Point of Contact, must sign and submit the application package.

13. Why is the E-Business Point of Contact important to the application submission process? The E-Business Point of Contact (EBiz POC) is the individual in your organization who oversees all activities within www.grants.gov and grants permissions to Authorized Organization Representatives (AOR).

If your organization is already registered in www.sam.gov, take note of who is listed as the EBiz POC. If you’re not registered yet, it is the EBiz POC within your organization who must register your organization with www.sam.gov.

The EBiz POC is issued a Marketing Personal Identification Number (MPIN) by www.sam.gov, which gives the EBiz POC the authority to designate who in your organization can submit applications through www.grants.gov (i.e., the Authorized Organization Representative).

The EBiz POC is also responsible for approving role requests in www.grants.gov. Upon creating an account in www.grants.gov, the AOR role request is automatically sent to your organization's EBiz POC for approval.

Note, there can only be one EBiz POC per DUNS number.

14. My organization has several departments and corresponding DUNS numbers? Can I use a different department's DUNS number to submit the brownfields application package? No. You must use the DUNS number assigned to the department that is submitting the application package. Additionally, this DUNS number must correspond to the DUNS number in www.sam.gov.

15. Can I use another organization's DUNS number to submit the brownfields application package? No. You must use the DUNS number assigned to the organization that is submitting the application package. Additionally, this DUNS number must correspond to the DUNS number in www.sam.gov.

16. The grant proposal has several attachments. Should I upload them separately or submit as one file in www.grants.gov? While not required, EPA strongly recommends consolidating all grant proposal documents (the Cover Letter, Narrative, responses to the threshold criteria, required attachments, etc.) into one pdf file. This ensures that EPA receives your entire submission and the submission is in the order that you intended. Please review the Tips of Submitting Proposals Through www.grants.gov for additional proposal submission tips (https://www.epa.gov/sites/production/files/2016-08/documents/tips_for_submitting_proposals_through_grants-gov.pdf).

17. What is the "Catalog of Federal Domestic Assistance Number" and the "CFDA Title that should be used on the Application for Federal Assistance (SF-424)?" The "Catalog of Federal Domestic Assistance (CFDA) Number" is 66.814 and the "CFDA Title" is Technical Assistance for Tribal Communities Addressing Brownfields.

18. How should I respond to Question 19 on the SF-424 "Application for Federal Assistance?" Question 19 on the SF-424 references Executive Order 12372, Intergovernmental Review of Federal Programs. Applicants must choose one of three options:

a. This application was made available to the State under the Executive Order 12372

Process for review on (enter date).

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

Applicants applying for this solicitation are not subject to Executive Order 12372 and may answer c.