

FY10 Guidelines for Brownfields Job Training Grants

OVERVIEW

AGENCY: ENVIRONMENTAL PROTECTION AGENCY (EPA)

TITLE: BROWNFIELDS JOB TRAINING GRANTS

ACTION: Request for Proposals (RFP)

RFA NO: EPA-OSWER-OBLR-09-07

CATALOG OF FEDERAL DOMESTIC ASSISTANCE (CFDA) NO.: 66.815

DATES: Proposals are due December 1, 2009. Proposals may be sent through the U.S. Postal Service (USPS), commercial delivery service, or via e-mail to bfcompetition@epa.gov. Only one method should be used for the submission of the original, complete proposal. Proposals sent through the U.S. Postal Service or sent via a commercial delivery service must be postmarked by December 1, 2009. Proposals sent via e-mail must be received by 11:59 p.m. Eastern Time on December 1, 2009. Please refer to Section IV.B., *Due Date and Mailing Instructions*, for further instructions.

SUMMARY: The Small Business Liability Relief and Brownfields Revitalization Act (“Brownfields Law”, P.L. 107-118) requires the U.S. Environmental Protection Agency (EPA) to publish guidance to assist applicants in preparing proposals for grants. This notice announces the availability of funds and solicits proposals from eligible entities, including non-profit organizations to deliver environmental job training. Applicants must propose to serve a community that currently receives, or has received, financial assistance from EPA for a brownfields assessment, revolving loan fund, or cleanup grant, a targeted brownfield assessment, and/or site-specific brownfields work carried out under a state or tribal response program.

For the purposes of these guidelines, the term “grant” refers to the cooperative agreement that EPA will award to a successful applicant. Please refer to Section II.C. for a description of EPA’s anticipated substantial involvement in the financial assistance agreements awarded under these guidelines.

EPA urges applicants to review the Frequently Asked Questions, which can be found at <http://www.epa.gov/brownfields>.

FUNDING/AWARDS: The total funding available under the national competition for job training grants is estimated at \$2.6 million. EPA anticipates awarding an estimated 12-13 job training cooperative agreements from this competitive opportunity.

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SECTION I – FUNDING OPPORTUNITY DESCRIPTION

The statutory authority for this action is Section 104(k)(6) of the “Comprehensive Environmental Response, Compensation, and Liability Act” (CERCLA) of 1980, as amended by the Small Business Liability Relief and Brownfields Revitalization Act (Brownfields Law), 42 U.S.C. 9604(k)(6) which authorizes EPA to provide, or fund eligible entities, including nonprofit organizations to provide, training to individuals and organizations, as appropriate, to facilitate assessment, remediation, or preparation of brownfield sites.

Brownfields are sites where expansion, redevelopment, or reuse may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant, including mine-scarred lands or sites contaminated by petroleum or the manufacturing of illegal drugs. More than 600,000 brownfield sites are thought to exist within the United States, where once productive, industrial, manufacturing, and commercial plants lie abandoned or underused due to the presence or perceived presence of contamination. Brownfields, while a predominantly urban issue, also contribute to environmental and economic stagnation in rural areas.

I.A. Description of Grant

Brownfields Job Training Grants provide funding to governmental entities and nonprofit organizations to recruit, train, and place local unemployed and under-employed, predominantly low-income and minority residents. The goal of the training is to provide these individuals with skills needed to acquire full-time, sustainable careers in the green economy and brownfields redevelopment work. Brownfields Job Training Grants help residents take advantage of the jobs created by the assessment, cleanup, and redevelopment of brownfields in their communities. While Brownfields Job Training Grants focus on hazardous waste remediation and cleanup, the program emphasizes the need to provide training on innovative and environmentally sustainable technologies and certifications aimed at equipping graduates with a diversified portfolio of skills needed to secure permanent work in a growing green jobs economy. Through the link to on-the-ground brownfields redevelopment activities, brownfields job training programs expand upon local workforce development efforts by training residents of brownfields-impacted communities for environmental jobs that cleanup contractors might otherwise fill from outside the community.

A critical part of EPA’s job training efforts is to ensure that residents living in communities historically affected by economic disinvestment, health disparities, and environmental contamination have an opportunity to reap the benefits from brownfields redevelopment. EPA’s Brownfields Program has a rich history rooted in environmental justice and is committed to helping communities revitalize brownfield properties, mitigate potential health risks, and restore economic vitality.

To date, EPA has funded 157 Brownfields Job Training grants totaling over \$33 million. As of August 2009, more than 5,000 people had completed training; and more than 3,250 obtained employment in the environmental field with an average starting hourly wage of \$13.82.

I.B. Uses of Grant Funds

Proposed training programs must target unemployed and underemployed individuals residing in brownfields-impacted communities. Applicants must establish procedures to ensure that graduates will be employed in brownfields and/or environmental work that involve assessing and cleaning up contaminated sites with a focus on the graduates' respective communities.

Eligible uses of grant funds to be provided under this competitive opportunity include the following activities and similar ones that provide training directly related to inventory, assessment, remediation, and preparation of brownfield sites and community involvement:

- Recruiting job training participants from communities impacted by brownfields and for outreach activities directed toward engaging prospective employers to be involved in the job training program;
- Training participants for the handling and removal of hazardous substances, including training for jobs in environmental sampling, analysis, and site remediation;
- Training in the inventory, assessment, and remediation of facilities at which hazardous substances, pollutants, contaminants, or petroleum contamination are located, transported, or disposed;
- Training for response activities often associated with cleanups (i.e., demolition and groundwater extraction);
- Training participants in the use of techniques and methods for cleanup of hazardous substances, petroleum, and pollutants, training in asbestos abatement, lead abatement, mold remediation, and cleaning up sites contaminated by the manufacturing of illegal drugs (i.e., methamphetamine labs) or mine-scarred lands;
- Training in environmental chemistry, toxicology, and geology to the extent necessary to train individuals to inventory, assess, assess, remediate and prepare brownfield sites;
- Training in the requirements and conduct of all appropriate inquiry, as required in CERCLA 101.35B and 40CFR part 312, and due diligence, which can be defined as the process of evaluating a property for the potential presence of environmental contamination and assessing potential liability for any contamination present at the property;
- Training in site surveying, inventorying, mapping, and geographic information systems (GIS);
- Training participants in planning and conducting ecological restoration of abandoned and devalued land, including general botanical classes or introductory horticultural

classes related to land restoration or indigenous species revegetation, landscaping, soil science, and preparing brownfields sites for water or storm management systems;

- Training participants in debris recycling and the reuse of biosolids and other industry residuals associated with remediation of contaminated lands;
- Training in remediation technologies or site preparation for the installation of technologies that use alternative energy (solar, wind, or geothermal power) or alternative fuels (i.e., biofuels), or the training of “greener” remediation technologies such as phytoremediation, bioremediation, or soil amendments;
- Training in building trades relating to constructing beams, caps, synthetic barriers, pumping facilities and similar structures to remediate contamination;
- Training in first-aid and CPR;
- Training in commercial drivers license (CDL), forklift, and machine operations;
- Personnel costs for instructors to conduct training, fringe benefits, and/or personnel costs for tasks associated with programmatic reporting requirements;
- Costs associated with procuring a contractor, if reasonable;
- Costs for screening and placing individuals of the training program;
- Costs for training materials and work gear associated with the training curriculum, if reasonable;
- Costs associated with health exams (i.e., pulmonary function tests), drug testing, or licensing fees directly related to the training and/or the placement of graduates in environmental work, if reasonable. (Any funding used to pay for such fees must be applied before training is completed and expended before the close of the grant);
- Costs used to cover rental fees associated with training facilities or minor alteration of existing facilities, if reasonable;
- Costs associated with transportation for trainees for site visits during training or for trainees getting to and from class, if reasonable; and
- Development and refinement of existing curricula for training.

Grant funds cannot be used for the following activities:

- Conducting site assessments or actual cleanups outside the context of on-the-job training;

- Conducting response activities often associated with cleanups except within the context of on-the-job training assignments (i.e., landscaping, demolition, and groundwater extraction). Assessment, cleanup, and associated activity costs must be funded through other means;
- General or life skills education activities, such as remedial classes in math and reading; job readiness training, such as developing resumes and acquiring interview skills; job placement costs; GED costs; Web site development; vehicle or medical insurance; or child care and daycare costs;
- Stipends for students or scholarship funds to support students' enrollment in college courses;
- Providing food or light refreshments to employees, instructors, and trainees - except at graduation ceremonies;
- Costs that are unallowable (e.g., lobbying, fund-raising, alcoholic beverages) under Cost Principals 2 CFR Part 220 (universities), 2 CFR Part 225 (state, tribal, and local governments), or 2 CFR Part 230 (nonprofit organizations), as applicable;
- Matching any other Federal funds unless there is specific statutory authority for the match. CERCLA does not provide this authority. Grant funds may be used to match state or local funds, if authorized by the relevant state statute or local ordinance;
- Construction of substantial rehabilitation of buildings of other facilities to house training;
- Proposal preparation costs; and
- Administrative costs, penalties, or fines. (Refer to Appendix 1: Prohibitions on Use of Funds).

See the Brownfields FAQ at <http://www.epa.gov/brownfields> for additional information on ineligible grant activities.

I.C. EPA Strategic Plan Linkage

EPA's Strategic Plan defines goals, objectives, and sub-objectives for protecting human health and the environment. Brownfields Job Training Grants support progress towards EPA Strategic Plan Goal 4 (Healthy Communities and Ecosystems), Objective 4.2 (Communities), and Sub-objective 4.2.3 (Assess and Cleanup Brownfields). Specifically, recipients of these grants will further goals of the Brownfields Job Training Program by training and placing residents from communities impacted by brownfields in careers in the environmental field. As a consequence, this project promotes facilitation and cleanup of brownfield sites contaminated with hazardous substances, pollutants, contaminants, or petroleum. Simultaneously, it ensures economic benefits derived from brownfields redevelopment

activities remain with affected residents in those communities.

I.D. Measuring Environmental Results: Anticipated Outcomes/Outputs

Pursuant to EPA Order 5700.7, “Environmental Results under EPA Assistance Agreements,” EPA requires that all grant recipients adequately address environmental outputs and outcomes.

EPA must report on the success of its Brownfield Program through measurable outputs and outcomes such as the number of individuals recruited, trained, certified, and placed directly in green jobs. Applicants must discuss in their proposals how funding will help EPA achieve environmental outputs and outcomes. **Outputs specific to each project will be identified as deliverables in the work plan negotiated after a grant is awarded.** Grantees will be expected to report progress toward the attainment of project outputs during the project performance period.

Outputs and Outcomes are defined as follows:

1. **Outputs:** The term “outputs” refers to 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 the project period.

The expected outputs for the grants awarded under this announcement may include but are not limited to the number of individuals recruited, trained, certified, and placed in environmental careers in brownfields-impacted communities. EPA anticipates a national minimum of at least 250 persons completing training per year with a minimum job placement rate of at least 65%. Other outputs include:

- Classroom style training, practical training, and curricula modules;
- Appropriate certification in environmental sampling and site cleanup methods;
- Certification in OSHA 29 CFR 1910.120 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) training; and
- Training in innovative environmental technologies and related subjects, including: lead and asbestos abatement, mold remediation, and specialized knowledge of brownfields problems and solutions.

2. **Outcomes:** The term “outcomes” refers to the result, effect, or consequence that will occur from carrying out the activities under the grant. Outcomes may be environmental, behavioral, health-related, or programmatic, must be quantitative, and may not necessarily be achievable during the project period.

EPA anticipates the outcomes from the projects awarded under this announcement will be an increase in the capacity of governmental entities and nonprofit organizations to:

- Help residents take advantage of jobs created by the assessment and

- cleanup of brownfields;
- Provide training that leads to sustainable employment in the environmental field and green economy;
- Improve community involvement and stimulate the development of constructive partnerships;
- Foster self-sufficiency and enhance the skills and availability of labor for environmental remediation in communities impacted by brownfields; and
- Enable residents to participate in the promotion of environmental health and occupational safety, both on the job and in their communities.

(View EPA's Strategic Plan on the internet at: <http://www.epa.gov/ocfopage/plan/2003sp.pdf> and view EPA's Order 5700.7 at <http://www.epa.gov/ogd/grants/award/5700.7.pdf>)

SECTION II – AWARD INFORMATION

II.A. What is the amount of available funding?

The total estimated funding available under this competitive opportunity is approximately \$2,600,000.

EPA reserves the right to make additional awards under this competition, consistent with Agency policy, if additional funding becomes available. Any additional selections for awards will be made no later than four months from the date of the original selection decision. EPA reserves the right to reject all proposals and make no awards under this announcement or make fewer awards than anticipated.

In appropriate circumstances, EPA reserves the right to partially fund proposals by funding discrete portions or phases of proposed projects. To maintain the integrity of the competition and selection process, EPA, if it decides to partially fund a proposal, will do so in a manner that does not prejudice any applicants or affect the basis upon which the proposal, or portion thereof, was evaluated and selected for award.

II.B. What is the project period for award(s) resulting from this solicitation?

The project period for Brownfields Job Training Grants is up to two years.

II.C. Substantial Involvement

The Brownfields Job Training Grant will be awarded in the form of a cooperative agreement. Cooperative agreements permit the EPA Project Officer to be substantially involved in overseeing the work performed by the selected recipients. Although EPA will negotiate precise terms and conditions relating to substantial involvement as part of the award process, the anticipated substantial federal involvement for this project may include:

- Close monitoring of the recipient's performance to verify the results.
- Collaborating during performance of the scope of work.

- Reviewing substantive terms of proposed contracts.
- Reviewing qualifications of key personnel (EPA will not select employees or contractors employed by the award recipient).
- Reviewing and commenting on reports prepared under the cooperative agreement (the final decision on the content of reports rests with the recipient).
- Review outcomes and outputs to ensure substantial progress has been made in accordance with the cooperative agreement terms and conditions.

SECTION III – APPLICANT ELIGIBILITY INFORMATION AND TRESHOLD CRITERIA

III.A. Who Can Apply?

The following information indicates what entities are eligible to apply for a Brownfields Job Training Grant:

- General Purpose Unit of Local Government. (For purposes of the brownfields grant program, EPA defines general purpose unit of local government as a “local government” as defined under 40 CFR Part 31.)
- Land Clearance Authority or other quasi-governmental entity that operates under the supervision and control of, or as an agent of, a general purpose unit of local government.
- Government Entity created by State Legislature.
- Regional Council or group of General Purpose Units of Local Government.
- Redevelopment Agency that is chartered or otherwise sanctioned by a State.
- State.
- Indian Tribe other than in Alaska. (The exclusion of Alaskan tribes from brownfields grant eligibility is statutory at CERCLA §104(k)(1). Intertribal Consortia are eligible for funding in accordance with EPA’s policy for funding intertribal consortia published in the Federal Register on November 4, 2002, at 67 Fed. Reg. 67181. (This policy also may be obtained from your Regional Brownfields Job Training Coordinator listed in Section VII.)
- Alaskan Native Regional Corporation, Alaska Native Village Corporation and the Metlakatla Indian Community. (Alaskan Native Regional Corporation and Alaska Native Village Corporation as those terms are defined in the Alaska Native Claims Settlement Act (43 U.S.C. 1601 and following.)
- Nonprofit organizations. For purposes of the Brownfields Grant program, the term “nonprofit organization” means any corporation, trust, association, cooperative, or other organization that is operated mainly for scientific, educational, service, charitable, or similar purpose in the public interest; is not organized primarily for profit; and uses net proceeds to maintain, improve, or expand the operation of the organization. Workforce Investment Boards that meet these criteria may be eligible nonprofit organizations. Public and nonprofit private educational institutions are

eligible to apply. However, nonprofit organizations described in Section 501(c)(4) of the Internal Revenue Code that engage in lobbying activities as defined in Section 3 of the Lobbying Disclosure Act of 1995 are not eligible to apply. For-profit or proprietary training organizations or trade schools are not eligible to apply.

III.B. Threshold Eligibility Criteria

This section contains the threshold eligibility criteria that ensure that applicants are eligible to receive Brownfields Job Training Grants. Threshold criteria are evaluated on a pass or fail basis. **Only those proposals that specifically address and pass each of the four threshold criteria listed below will be evaluated against the ranking criteria in Section V. of this announcement.** Applicants deemed ineligible for funding consideration as a result of the threshold eligibility review will be notified within 15 calendar days of the ineligibility determination.

In addition, proposals must substantially comply with the proposal submission instructions and requirements set forth in Section IV of this announcement or they will be rejected. Pages in excess of the page limitations described in Section IV will not be reviewed.

Proposals must be postmarked, or received via e-mail, by December 1, 2009. Proposals must be delivered using only one method, postmarked hard copy **or** via e-mail. Proposals postmarked or received via e-mail after the proposal deadline will be considered late and will not be reviewed unless the applicant can clearly demonstrate that it was late due to EPA mishandling. Applicants must confirm receipt of their proposal with the appropriate Regional Brownfields Job Training Coordinator listed in Section VII as soon as possible after the submission deadline. Failure to do so may result in your proposal not being reviewed. Facsimile delivery of proposals is not permitted and will not be considered.

For purposes of the threshold eligibility review, EPA, if necessary, may seek clarification of applicant information and/or consider information from other sources, including EPA files. Your responses to these items must be included in the Narrative Proposal and transmittal letter you submit to EPA. See Section IV.C for a complete list of required proposal content.

1. Applicant Eligibility - Describe how you are an eligible applicant as described in Section III.A., *Who Can Apply?* For entities other than cities, counties, tribes, or states, please attach documentation of your eligibility (non-profit status, resolutions, statutes, etc.).
2. Limitation on Applicants that Received Funding in Fiscal Year 2009 (including American Recovery and Reinvestment Act funding) - State whether or not you received a Brownfields Job Training Grant in Fiscal Year 2009.

Applicants that received a Brownfields Job Training Grant from EPA in Fiscal Year 2009 are not eligible to apply in Fiscal Year 2010. This includes entities that received American Recovery and Reinvestment Act Brownfields Job Training Grant funds in 2009. Brownfields Job Training Grants awarded in Fiscal Year 2009 are listed on the

Brownfields Website, <http://www.epa.gov/brownfields/pilot.htm#previous>. Applicants who received a Brownfields Job Training Grant in, or before, Fiscal Year 2008 are eligible to apply for this competition.

3. Location of the Proposed Project - Applicants must propose to serve a community that currently receives, or has received, financial assistance from EPA for a brownfields assessment, revolving loan fund, or cleanup grant, a targeted brownfield assessment, and/or site-specific brownfields work carried out under a state or tribal response program. Explain how you meet this criterion (list the financial assistance recipient(s) of brownfields grants, the grant type received, etc.).
4. Required Training - Affirm that the OSHA 29 CFR 1910.120 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) training will be incorporated into the proposed curriculum and be provided to all individuals entering training.

SECTION IV – PROPOSAL SUBMISSION INFORMATION

IV.A. How to Obtain an Application Package

Electronic copies of these guidelines can be obtained from the EPA brownfields Website (<http://www.epa.gov/brownfields/applicat.htm>) or through www.grants.gov. Hard copies may be requested by contacting your Regional Brownfields Job Training Coordinator listed in Section VII.

In order to maintain the integrity of the competition process, EPA staff cannot meet with individual applicants to discuss draft proposals, provide informal comments on draft proposals, or provide advice to applicants on how to respond to ranking criteria. However, EPA staff will respond to questions regarding threshold eligibility criteria, administrative issues related to the submission of the proposal, and requests for clarification about the RFP.

Applicants may download individual grant application forms or electronically request a paper application package and an accompanying computer CD of information related to applicants/grant recipients roles and responsibilities from EPA's Grants and Debarment website by visiting: http://www.epa.gov/ogd/grants/how_to_apply.htm.

IV.B. Due Date and Mailing Instructions

Proposals are due December 1, 2009. Applicants may submit their proposals through the U.S. Postal Service, commercial delivery service, or via e-mail through bfcompetition@epa.gov. Only one method should be used for the submission of the original, complete proposal as described in IV.C below.

1. Hard Copy Submissions
Proposals sent through the U.S. Postal Service or a commercial delivery service must be postmarked by December 1, 2009. **Two copies of the complete proposal are required.**

Mail **one** copy to:
Environmental Management Support, Inc.
Attn: Mr. Keith Arnold
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910
Phone 301-589-5318

(Note: Overnight mail must include Mr. Arnold's phone number in the address.)

A **second** complete copy of the proposal must be mailed to the appropriate EPA Regional Brownfields Job Training Coordinator listed in Section VII.

Proposals postmarked by the USPS/commercial delivery service after December 1, 2009 will not be considered.

2. Electronic Submissions

Proposals submitted via e-mail must be submitted to bfccompetition@epa.gov and be received by 11:59 p.m. Eastern Time on December 1, 2009. **Proposals received after 11:59 p.m. Eastern Time on December 1, 2009 will not be considered.** All required documents listed in Section IV.C of this announcement must be attached to the e-mail as a scanned Adobe PDF file. Please note that if you choose to submit your materials via e-mail, you are accepting all risks attendant to e-mail submission including server delays and transmission difficulties. E-mail submissions exceeding 15MB will experience transmission delays that will affect when they are received by the Agency. For these size submissions, applicants should submit their application materials via hardcopy because if they are sent via e-mail they may be received late and not considered for funding.

If you have not received a confirmation of receipt from EPA within 30 days of the proposal deadline, please contact **Joe Bruss at 202-566-2772 or bruss.joseph@epa.gov**. Failure to do so may result in your proposal not being reviewed.

IV.C. Content and Form of Proposal Submission

Proposals must substantially conform to the outline below or they will be rejected. Pages exceeding stated page limits will not be reviewed. Upon receipt, proposals will be reviewed for content and threshold eligibility and copied for distribution to evaluators. Do not include binders, spiral binding, or color printing. All application materials, including support letters, must be submitted in English. Photos and graphics will not be considered. The narrative proposal and transmittal letter must be typed, on letter-sized paper, with a font size no smaller than 12 point. Attachments are limited to those identified in IV.C.3. Applicants are responsible for submitting a complete proposal, as described below, by the due date.

All proposals must substantially conform to the following outline and content:

- Transmittal Letter (2 pg limit) – See IV.C.1 below
- The narrative proposal, which includes the responses to applicable **threshold** and all **ranking** criteria (18 pg limit) – See IV.C.2 below
- Attachments including: (20 pg limit) – See IV.C.3 below
 - References list
 - Training program outline
 - Milestones description
 - General letters of support from partners as identified in your proposal

Note: Documentation of applicant eligibility does NOT count towards the page limitation.

IV.C.1. Transmittal Letter

The transmittal letter must identify the applicant and a contact for communication with EPA. The transmittal letter, including the applicant identification information, must not exceed two pages single spaced. Any pages submitted over the page limit will not be considered. The transmittal letter must be written on your organization’s official letterhead, and signed by an official with the authority to commit your organization to the proposed project. Each transmittal letter must include:

1. Applicant Identification: Provide the name and full address of the entity applying for funds. This is the agency or organization that will be receiving the grant and will be accountable to EPA for proper expenditure of funds.
2. Funding Requested:
 - a. Grant type: Indicate Brownfields Job Training Grant
 - b. Federal Funds Requested: \$_____ (must not exceed \$200,000)
3. Location: City, county, and state or reservation, tribally owned lands, tribal fee lands, etc., of the brownfields community(ies) that you propose to serve.
4. Contacts:
 - a. Project Director: Provide the name, phone/fax numbers, email address, and mailing address of the project director assigned to the proposed project. This person may be contacted if other information is needed.
 - b. Chief Executive/Highest Ranking Official: Provide the name, phone/fax numbers, email address, and mailing address of the applicant’s Chief Executive (e.g., mayor of a city, executive director of a nonprofit, etc.). This person may be contacted if further information is needed.
5. Date Submitted: Date proposal is submitted to EPA via U.S. Postal Service, commercial delivery service, or via e-mail through bfcompetition@epa.gov.
6. Project Period: Project period must not exceed two years for Brownfields Job Training Grants.

7. Population: Provide the general population of your jurisdiction. If you are not a municipal form of government, provide the population of the area addressed by your application. Tribes must provide the number of tribal/non-tribal members affected. Your jurisdiction's population can be found at: <http://www.census.gov>.

IV.C.2. Narrative Proposal

The Narrative Proposal includes responses to all four threshold (see section III.B.) criteria as well as responses to all six ranking (see section V.B.) criteria. The narrative proposal must not exceed 18 pages single spaced. Any pages over the page limit will not be evaluated. The narrative proposal must be clear, concise, and specifically address all of the applicable threshold and ranking criteria. Responses to the criteria must include the criteria number and title but need not restate the entire text of the criteria. Proposals must provide sufficient detail to allow for an evaluation of the merits of the proposal. Factual information about your proposed project and community must be provided. Do not include discussions of broad principles that are not specific to the proposed work or project covered by your proposal. Do not provide photos or extraneous materials.

IV.C.3. Attachments

The following documents should be included as attachments to the "Narrative Proposal." The attachments (items 2-5) to the narrative proposal must not exceed a total of 20 pages single spaced in length and **are not** included in the 18-page limit for the narrative proposal.

1. **Documentation of Applicant Eligibility:** For entities other than cities, counties, tribes, or states, please attach documentation of your eligibility (non-profit status, resolutions, statutes, etc.). *Note: This documentation will not count against page limitations.*
2. **References List:** (These organizations may be contacted by EPA during the evaluation of your application.) Attach a brief **list** with contact information, **NOT letters**, from the following entities:
 - a. **Two employers who have hired participants from your job training program (if applicable).** Provide the names of the participants who were placed with the employers you listed above, the names of the employers, and phone numbers of the person to contact in these organizations. If your organization already has experience working with environmental employers, provide the names of the employers, phone numbers, and persons to contact at these organizations.
 - b. **At least two neighborhood and/or community-based organizations you are currently working with in developing your proposed job training program.** Provide the names and phone numbers of persons to contact at these organizations.

- c. **Two organizations from the employer community who have been involved in the development of the proposed job training program.** These employers may include local businesses, environmental contractors, and/or brownfield site owners. Involvement may include curriculum development, advisory councils, apprenticeships, and mentoring. Provide the names of these organizations, and contact person(s) with phone numbers. Please note whether any of the employers listed above have expressed a commitment and/or intent to hire graduates of your proposed job training program.
3. **Training Program Outline:** This should include curriculum topics, number of hours, duration of the course(s), schedules, and certifications that participants will be eligible to attain. Please note that your curriculum must provide OSHA 29 CFR 1910.120 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) training to each student. Also include, in table format as displayed in the example below, the major training tracks (you may have one or multiple tracks, such as environmental technician and construction industry) and how many students will be recruited, enrolled, and anticipated to complete each track.

Course Titles	Planned Recruitment	Planned Enrollment	Anticipated Graduates
Environmental Technician	30	25	20
Weatherization Training	20	15	12

4. **Milestones Schedule:** This should indicate start times and completion dates of significant tasks under your program (e.g., outreach, procurement of a contractor, recruitment, frequency of classes to be offered and length, instruction, placement, and tracking).
5. **General Support Letters:** See Sections V.B.4 and V.B.5 of this solicitation, if applicable. Note: Letters of support will only impact scoring of the subfactors listed in Section V.B.5, which directly request support letters. Support letters will not impact scoring for other unassociated ranking criteria. Support letters must be received with your proposal; letters received separately will not be considered.

IV.D. Use of Funds to Make Subawards, Contract Services, or Fund Partnerships

EPA awards funds to one eligible applicant as the “recipient” even if other eligible applicants are named as “partners” or “co-applicants” or members of a “coalition” or “consortium.” The recipient is accountable to EPA for the proper expenditure of funds.

Funding may be used to provide subgrants or subawards of financial assistance, which includes using subawards or subgrants to fund partnerships, provided the recipient complies with applicable requirements for subawards or subgrants including those contained in 40 CFR Parts 30 or 31, as appropriate. Applicants must compete contracts for services and products, including consultant contracts, and conduct cost and price analyses to the extent required by the procurement provisions in 40 CFR Parts 30 or 31, as appropriate. The

regulations also contain limitations on consultant compensation. Applicants are not required to identify subawardees/subgrantees and/or contractors (including consultants) in their proposal. However, if they do, the fact that an applicant selected for award has named a specific subawardee/subgrantee and/or contractor or consultant in the proposal EPA selects for funding does not relieve the applicant of its obligations to comply with competitive procurement requirements as appropriate. Please note that applicants may not award sole source contracts to consulting, engineering, or other firms assisting applicants with the proposal solely based on the firm's role in preparing the proposal.

Successful applicants cannot use subgrants or subawards to avoid requirements in EPA grant regulations for competitive procurement by using these instruments to acquire commercial services or products from for-profit organizations to carry out its assistance agreement. The nature of the transaction between the recipient and the subawardee or subgrantee must be consistent with the standards for distinguishing between vendor transactions and subrecipient assistance under Subpart B Section 210 of [OMB Circular A-133](#), and the definitions of "subaward" at 40 CFR 30.2(ff) or "subgrant" at 40 CFR 31.3, as applicable. EPA will not be a party to these transactions.

IV.E. Evaluation of Subawardees or Contractors

Section V of these guidelines describes the ranking criteria and evaluation process that will be used by EPA to make selections under this announcement. During this evaluation, except for those criteria that relate to the applicant's own qualifications, past performance, and reporting history, the review panel will consider, if appropriate and relevant, the qualifications, expertise, and experience of the following:

- (i) An applicant's named subawardees/subgrantees identified in the proposal if the applicant demonstrates in the proposal that if it receives an award that the subaward/subgrant will be properly awarded consistent with the applicable regulations in 40 CFR Parts 30 or 31. For example, applicants must not use subawards/subgrants to obtain commercial services or products from for-profit firms or individual consultants.

- (ii) An applicant's named contractor(s), including consultants, identified in the proposal if the applicant demonstrates in its proposal that the contractor(s) was selected in compliance with the competitive procurement standards in 40 CFR Part 30 or 40 CFR 31.36 as appropriate. For example, an applicant must demonstrate that it selected the contractor(s) competitively or that a proper non-competitive sole-source award consistent with the regulations will be made to the contractor(s), that efforts were made to provide small and disadvantaged businesses with opportunities to compete, and that some form of cost or price analysis was conducted. EPA may not accept sole source justifications for contracts for services or products that are otherwise readily available in the commercial marketplace.

EPA will not consider the qualifications, experience, or expertise of named subawardees/subgrantees and/or named contractor(s) during the proposal evaluation process unless the applicant complies with these requirements.

IV.F. Confidential Information

Proposals received by EPA may be subject to the Freedom of Information Act; therefore, in accordance with 40 CFR 2.203, applicants may claim all or a portion of their proposal as confidential business information. EPA will evaluate confidentiality claims in accordance with 40 CFR Part 2. Applicants must clearly mark proposals or portions thereof that they claim as confidential. If no claim of confidentiality is made, EPA is not required to make the inquiry to the applicant otherwise required by 40 CFR 2.204(c)(2) prior to disclosure. However, competitive proposals are considered confidential and protected from disclosure prior to the completion of the competitive selection process.

IV.G. Management Fees

When formulating budgets for proposals, applicants must not include management fees or similar charges in excess of the direct costs or at the rate provided for by the terms of the agreement negotiated with EPA. The term “management fees” or similar charges refers to expenses added to the direct costs in order to accumulate and reserve funds for ongoing business expenses, unforeseen liabilities, or for other similar costs that are not allowable under EPA assistance agreements. Management fees or similar charges may not be used to improve or expand the project funded under this agreement, except to the extent authorized as a direct cost of carrying out the scope of work.

SECTION V – PROPOSAL REVIEW INFORMATION

V.A. Review and Selection Process

Proposals initially will be reviewed by the appropriate EPA Regional Office to determine compliance with the applicable threshold criteria for Brownfields Job Training Grants (Section III.B). All proposals that pass the threshold criteria review will then be evaluated by national evaluation panels chosen for their expertise in the range of activities associated with the National Brownfields Program. The national evaluation panels will be composed of EPA staff and may include other federal agency representatives. Regional Offices will not participate on national evaluation panels that consider applicants originating within their Region, with the exception of the “Programmatic Capability” criterion. National evaluation panels will base their evaluations solely on the responses to the applicable ranking criteria and will assign a total point score to each proposal.

EPA Regions will provide a score and information to the evaluation panels on an applicant’s response to the “Programmatic Capability” ranking criterion. This information may take into account the Regional Office’s experience, if any, with the applicant’s performance on grants managed by the Region. When evaluating applicants under the programmatic capability criterion, EPA will consider information supplied by the applicant and may consider information from other sources, including agency files and prior brownfields grantees (e.g., to verify and/or supplement the information provided by the applicant).

Completed evaluations will then be referred to the Selection Official, who is responsible for further consideration of the proposals and final selection of grant recipients. Proposals will be selected for award by this official based on their evaluated point scores, the availability of funds, and consideration of other factors, if any, described in Section V.C.

V.B. Ranking Criteria for Job Training Grants

Respond to all six ranking criteria below. If your proposal passes the threshold criteria review (see section III.B.), your responses to the ranking criteria below will be evaluated and scored by national evaluation panels. Each proposal will be rated under a points system, with a total of 100 points possible.

1. Community Need (a maximum of 15 points may be awarded for this criterion)

- A. Provide a detailed description of your community. Include demographic indicators, such as the poverty rate, minority populations, and the unemployment rate that are present in your community. How do these indicators relate to current brownfields challenges and environmental justice concerns in your community, including environmental, social, public health, and economic issues? (5 points)
- B. Describe the specific populations that you hope to target with the proposed job training project. Why are you targeting these specific populations? How will these sensitive populations directly benefit from the proposed job training project? (5 points)
- C. Describe the labor market assessments you have conducted for your community that indicate a demand for skilled environmental professionals with the certifications you are proposing to incorporate into your curriculum. To what extent will the certifications graduates earn ensure employment and apply to the hiring needs of employers in your community? (5 points)

2. Training Program Description, Anticipated Outcomes and Outputs (a maximum of 25 points may be awarded for this criterion)

- A. Describe the structure of your proposed training program. This should support the training program outline you attach to this proposal, and include the following: the number of training cycles, the number of hours per cycle, the number and type of certifications to be earned, the names of courses, and the schedule of classes. (5 points)
- B. How many participants do you expect to enroll in the proposed curriculum? How many students do you anticipate will complete the proposed training program? What is your targeted placement rate of those students that complete the program into environmental remediation jobs? Describe your plan for tracking and measuring your progress towards achieving the expected short term and long term project outputs and outcomes, including those identified in Section 1.D. (5 points)

- C. Describe the process you plan to utilize to recruit students for your Brownfields Job Training Program. How will you market your program? From which areas in your community will you recruit? Describe the screening process for applicants. How will you address retention and attrition issues? Discuss your timeline for achieving deliverables of the project as reflected in your milestones attachment. (5 points)
- D. To what extent will your organization provide job search support and resources for participants of your job training program? How will your organization assist with initial job placement, retention and continuous employment for participants? How will your organization track graduates and for how long (must be a minimum of one year)? Describe local hiring incentives (e.g., first-source or local hiring ordinances, tax incentives, wage subsidies, etc.) that can be utilized to increase the likelihood of employment for program graduates. (5 points)
- E. Describe how the proposed job training program will meet the needs of the students. What fees, if any, will program participants be required to pay (e.g., licensing, certification, and medical examination fees)? Please note that any fees you collect will be considered “program income” under 40 CFR Part 30 and 31. To what extent are the training facilities accessible (e.g., proximity to public transportation, parking, etc.)? (5 points)

3. Programmatic Capability (a maximum of 15 points may be awarded for this criterion)

If you have ever received an EPA brownfields grant, please respond to item **i**. If you have not received an EPA brownfields grant, but have received other federal or non-federal assistance agreements (an assistance agreement is a grant or cooperative agreement and not a contract) please respond to item **ii**. If you have never received any type of federal or non-federal assistance agreements please indicate this in your proposal and you will receive a neutral score (8 points) for this criterion. (Failure to indicate anything in response may result in zero points for this criterion.) In evaluating an applicant’s response to this criterion, EPA may consider relevant information from EPA files and/or from other federal and/or non-federal grantors to verify or supplement information provided by the applicant.

- i) Currently or Has Ever Received an EPA Brownfields Grant
- Identify the EPA Brownfields grant(s) you currently have or have received in the past. Please provide information on no more than five of your most recent grants. Demonstrate how you successfully managed the grant, and successfully performed all phases of work under the previous or existing grant(s) by providing information on:
 - Funds Expenditure: the balance of grant funds not drawn down (funds remaining).
 - Compliance with grant requirements: information regarding your compliance with the work plan, schedule, terms and conditions, and timely reporting (*specifically* quarterly reports, financial status reports, ACRES, and any other required submittals) and reporting on whether

or not you were making progress towards achieving the expected results under the grants and if not whether you explained why not.

- Accomplishments: Describe your success in implementing the goals of your EPA grant funds. If you were a prior Brownfields Job Training grantee, what was the number of individuals you trained and placed? If the original anticipated training and placement goals were not met, what steps were taken to improve the program?
 - Describe the management system you will have in place to direct activities under the grant. Include a brief description of your project manager and staff and a discussion of the expertise, qualifications, and experience. Discuss the means you will use to retain project leadership or recruit qualified staff should employee turnover occur. Describe the system(s) you have in place to acquire additional expertise and resources required to perform the proposed project. If you intend to contract for the necessary expertise, describe the system you have in place to acquire that expertise. Please refer to IV.E.
 - Describe any adverse audit findings. If you have had problems with the management of your brownfields grants or any other grant(s) (e.g., compliance reporting, expenditure of funds, etc.) please describe how you corrected, or are correcting, the problems.
- ii) Has Not Received an EPA Brownfields Grant but has received other federal or non-federal assistance agreements
- Identify current and/or prior federally and non-federally funded assistance agreements. Please provide information on no more than five of your most recent assistance agreements. Describe your history of successfully managing these agreements and performing the agreements including meeting and complying with reporting requirements, submitting final acceptable technical reports, and reporting on whether you were making progress towards achieving the results under those agreements and if not whether you explained why not.
 - Describe the management system you have in place to direct activities under this grant. Include a description of your project manager and staff and a discussion of the expertise, qualifications, and experience. Discuss the means you will use to retain project leadership or recruit qualified staff should employee turnover occur. Describe the system(s) you have in place to acquire additional expertise and resources required to perform the proposed project. If you intend to contract for the necessary expertise, describe the system you have in place to acquire that expertise. Please refer to Section IV.E.
 - Describe any adverse audit findings. If you have had problems with the administration of any grants (e.g., compliance reporting, expenditure of

funds, etc.), please describe how you have corrected, or are correcting, the problems.

4. Institutional Capacity (a maximum of 10 points may be awarded for this criterion)

- A. Describe your organization's experience in delivering an effective environmental job training program that illustrates experience in working with minority, unemployed, and/or under-employed individuals in the community you propose to serve. (5 points)
- B. Provide information regarding your training provider's experience and success in delivering a job training program in the target community. What criteria did you use to select this provider? Is the provider certified? Please provide a letter of commitment from this provider. If you haven't identified an institution or instructor and are considering subcontracting or sub-granteeing to acquire these services, what criteria will you use to select these services? What steps will you use to ensure the instructors have these skills? (5 points)

5. Community and Employer Partnerships (a maximum of 20 points may be awarded for this criterion)

- A. What specific efforts have been made to collaborate with brownfield assessment, revolving loan fund, and cleanup grantees, contractors, and/or brownfield site owners in your community? Please identify the specific entities in your area that have received prior EPA brownfields funding (see threshold criteria III.B.3). To what extent will these efforts enhance and foster future employment for job training graduates in the community? If applicable, please provide letters of support for any commitments these organizations have made to assist with your training program (e.g., providing on-the-job training or to hire graduates). (5 points)
- B. Discuss your plan for involving the affected community (e.g., local community groups, Workforce Investment Boards, and academic institutions located in or near the brownfield community) in the proposed job training program. Did you take any steps to notify or involve the community or hold any public comment sessions before applying or during the development of your proposal? If any partners have committed to providing non-environmental training such as GED attainment, life skills training, placement assistance, etc., please attach letters of support indicating commitments these organizations have made. To what extent will your program and partners' expertise ensure trainees are job ready and have the pre-employment skills needed to secure full-time work? (10 points)
- C. To what extent has the employer community (e.g., local businesses, environmental contractors, labor unions, brownfield site owners) been involved in the development of the proposed job training program (e.g., curriculum development, advisory councils, apprenticeships, and mentoring)? Discuss specific efforts, meeting dates, etc. that occurred during the preparation of this proposal. Please provide letters of support from prospective employers. (5 points)

6. Budget/Resources (a maximum of 15 points may be awarded for this criterion)

The package will be evaluated based on the extent that the budget is clearly stated, detailed, and appropriate to achieve the project’s objectives, whether the budget proposal demonstrates the ability to effectively sustain the proposed project, and whether the budget describes the applicant’s plan for managing the budget and how the applicant will manage the project within cost parameters.

Budget. Use the table format below to identify specific tasks for which EPA funding will be used. Show the costs (by budget category) associated with each task. In addition to the budget table, describe in narrative format each task in detail, including the basis for the estimated cost as well as the projected outputs where possible (e.g., student safety equipment for 100 students at a cost of \$500 each for a total of \$5,000). (Refer to section I.D. for a definition and examples of “outputs.”) (10 pts.)

Do not include tasks for activities or costs that are ineligible uses of funds under EPA’s brownfields grants as described in Appendix 1. Note particularly the prohibition on using grant funds for indirect costs. Please refer to the Brownfields FAQs at: <http://www.epa.gov/brownfields> for additional examples of ineligible uses of funds. For questions not covered by the FAQ, contact your Regional Brownfields Job Training Coordinator listed in Section VII.

Project Funding	Instruction	Outreach	Program Mgmt	Placement/ Tracking	Total
EPA Project Funding					
Personnel					
Fringe benefits					
Travel					
Contractual					
Supplies					
Other (Please be specific)					
Total EPA Funds					
Non-EPA Project Funding					
Other (Please be specific)					
Total Non-EPA Funds					

B. Leveraging. Describe any in-kind and/or partner commitments to providing services/resources to the proposed job training program (e.g., staff time, life skills

training, pre-employment training, GED preparation, child care, academic enhancement, placement assistance, counseling, etc) and whether these commitments have already been committed, and if not, what the likelihood these commitments will materialize during the project. How will your organization be able to manage this grant in light of the administrative cost prohibition? (5 points)

V.C. Other Factors

In making final selection recommendations, EPA’s Selection Official may consider the following factors if, and as, appropriate:

- Fair distribution of funds between urban and non-urban areas;
- Fair geographic distribution of funds between EPA’s ten Regions;
- Fair distribution of funds between new applicants and previous brownfields grant recipients;
- Whether the applicant is a federally recognized Indian Tribe or United States Territory;
- Applicants affected by natural disasters;
- Designation as an Empowerment Zone or Renewal Community; and
- Environmental Justice – a community that bears a disproportionate impact of environmental contamination.

V.D. Proposal Checklist

Before you submit your proposal for a job training grant, please ensure the following documents are included in your package submitted to EPA and EPA’s contractor.

<input type="checkbox"/> Transmittal Letter (2-page limit) (see section IV.C.1)	
<input type="checkbox"/> The Narrative Proposal, which includes the responses to all 4 threshold and all 6 ranking criteria (18-page limit) (see section IV.C.2)	
Attachments including: (20-page limit)	
<input type="checkbox"/> References List (see section IV.C.3.2)	
<input type="checkbox"/> Training Program Outline (see section IV.C.3.3)	
<input type="checkbox"/> Milestones Description (see section IV.C.3.4)	
<input type="checkbox"/> General letters of support from partners as identified in your proposal (see section V.B.4 and V.B.5)	
<input type="checkbox"/> Documentation of applicant eligibility if other than city, county, state, or tribe (see section IV.C.3.1) <i>Note: This documentation will not count against page limitations.</i>	

SECTION VI – AWARD ADMINISTRATION INFORMATION

VI.A. Award Notices

EPA Regions will notify applicants who fail threshold eligibility requirements within 15 calendar days of the Agency’s determination of ineligibility. EPA will notify applicants who

have not been selected for award based on the ranking criteria and other factors within 15 calendar days of EPA's final decision on selections for this competition.

EPA anticipates notification to both successful and unsuccessful applicants will be made via telephone, electronic, or postal mail. The notification will be sent to the original signer of the proposal or the project contact listed in the proposal. This notification, which informs the applicant that its proposal has been selected and is being recommended for award, is not an authorization to begin work. The successful applicant must prepare a work plan and submit application forms, which must be approved by EPA, before the cooperative agreement can officially be awarded. The award notice, signed by an EPA Grants Officer, is the authorizing document and will be provided through postal mail. The time between notification of selection and award of cooperative agreement can take up to 90 days or longer.

VI.B. Administrative and National Policy Requirements

1. Funding will be awarded as a cooperative agreement. The applicants whose proposals are selected will be asked to submit a cooperative agreement application package to their EPA Regional office. This package will include the application (Standard Form 424), a proposed work plan, a proposed budget, and other required forms. An EPA Project Officer will work with you to finalize the budget and work plan.
2. Approved cooperative agreements will include terms and conditions that will be binding on the grant recipient. Terms and conditions specify what grantees must do to ensure that grant-related and Brownfields Program related requirements are met. Applicants also will be required to submit progress reports in accordance with grant regulations found in 40 CFR 30.51 or 40 CFR 31.40. A listing and description of general EPA regulations applicable to the award of assistance agreements may be viewed at http://www.epa.gov/ogd/AppKit/applicable_epa_regulations_and_description.htm.
3. All applicants are required to provide a Dun and Bradstreet (D&B) Data Universal Numbering System (DUNS) number as part of their cooperative agreement application package. Applicants can receive a DUNS number, at no cost, by calling the dedicated toll-free DUNS number request line at 1-866-705-5711 or visiting the D&B website at <http://www.dnb.com>.

VI.C. Reporting Requirements

During the life of the cooperative agreement, recipients are required to submit progress reports to the EPA Project Officer within thirty days after each reporting period. The reporting period (i.e., quarterly, annually) is set forth in the terms and conditions of the cooperative agreement. These reports shall cover work status, work progress, difficulties encountered, an accounting of financial expenditures, preliminary data results, anticipated activities, and any changes of key personnel involved with the project.

Grant recipients will be required to register and enter output data electronically into an on-line database called ACRES.

At the end of the cooperative agreement, a final project report also is required. The final report will summarize accomplishments, expenditures, outcomes, outputs, lessons learned, any other resources leveraged during the project and how they were used.

VI.D. Disputes

Disputes related to this competition will be resolved in accordance with the dispute resolution procedures published in 70 FR (Federal Register) 3629, 3630 (January 26, 2005), which can be found at <http://www.epa.gov/ogd/competition/resolution.htm>. Copies of these procedures also may be requested by contacting the Agency contact identified in Section VII of this announcement.

VI.E. Pre-Award Administrative Capability Review for Nonprofits

Nonprofit applicants that are recommended for funding will be subject to pre-award administrative capability reviews consistent with Sections 8.b, 8.c, and 9.d of [EPA Order 5700.8](#), EPA Policy on Assessing Capabilities of Non-Profit Applicants for Managing Assistance Awards. In addition, nonprofit applicants that qualify for funding may, depending on the size of the award, be required to fill out and submit to the Grants Management Office the Administrative Capabilities Form with supporting documents contained in Appendix A of EPA Order 5700.8.

VI.F. Brownfields Programmatic Requirements

1. Collection of Post Grant Information

Under the Government Performance and Results Act, EPA reports on the many benefits of Brownfields funding. One such measure provides information on additional resources leveraged as a result of the use of brownfields grant funds. These leveraged, non-EPA funds may include additional funding from state, tribal, and local governments, or private organizations. As many of these activities occur beyond the grant period, please note that EPA may contact you well after the grant period of performance to collect this information.

2. Grant recipients will be required to have in place a system of tracking graduates of their program for a minimum of one year following the close of the grant. Any placements that take place following the close of the grant and final expenditure of grant funds must be reported to the EPA Project Officer and recorded in the Job Training Reporting Form which will be submitted on a quarterly basis with the “quarterly report” described above.

SECTION VII - AGENCY CONTACTS

EPA Brownfields Job Training Coordinators

Regions and States		Address and Phone Number
EPA Region 1 Kathleen Castagna	CT, ME, MA, NH, RI, VT	One Congress Street, Suite 1100 (Mail code HIO) Boston, MA 02114-2023 Phone (617) 918-1429 e-mail: castagna.kathleen@epa.gov
EPA Region 2 Schenine Mitchell	NJ, NY, PR, VI	290 Broadway, 18th Floor New York, NY 10007 Phone (212) 637-3283 e-mail: mitchell.schenine@epa.gov
EPA Region 3 Jeff Barnett	DE, DC, MD, PA, VA, WV	1650 Arch Street (3HS34) Philadelphia, PA 19103-2029 Phone (215) 814-3246 e-mail: barnett.jeff@epa.gov
EPA Region 4 Kathleen Curry	AL, FL, GA, KY, MS, NC, SC, TN	Atlanta Federal Center 61 Forsyth Street (SNFC, EPA Mail Room) Atlanta, GA 30303 Phone (404) 562-8660 e-mail: curry.kathleen@epa.gov
EPA Region 5 Linda Morgan	IL, IN, MI, MN, OH, WI	77 West Jackson Boulevard (SE-4J) Chicago, IL 60604-3507 Phone (312) 886-4747 e-mail: morgan.linda@epa.gov
EPA Region 6 Sam Reynolds Amber Perry	AR, LA, NM, OK, TX	1445 Ross Avenue, Suite 1200 (6SF-VB) Dallas, TX 75202-2733 Phone (214) 665-6682, (214) 665-3172 e-mail: reynolds.samuel@epa.gov, perry.amber@epa.gov
EPA Region 7 Ina Square	IA, KS, MO, NE	901 N. 5th Street (SUPR/STAR) Kansas City, KS 66101 Phone (913) 551-7357 e-mail: square.ina@epa.gov
EPA Region 8 Karen Reed	CO, MT, ND, SD, UT, WY	US EPA, Region 8 (EPR-B) 1595 Wynkoop Street Denver, CO 80202-1129 Phone (303) 312-6019 e-mail: reed.karen@epa.gov
EPA Region 9 Noemi Emeric-Ford and Wallace Woo	AZ, CA, HI, NV, AS, GU	75 Hawthorne Street (SFD 1-1) San Francisco, CA 94105 Phone (213) 244-1821, (415) 972-3270 e-mail: emeric-ford.noemi@epa.gov or woo.wallace@epa.gov
EPA Region 10 Laura Caparroso	AK, ID, OR, WA	US EPA Region 10; 1200 6 th Avenue, Ste 900 (ECL-112); Seattle, WA 98101 Phone (206) 553-6378 e-mail: caparroso.laura@epa.gov

Appendix 1

Prohibitions on Use of Funds

Funds awarded under Section 104(k)(6) of CERCLA are intended for Brownfields Job Training Grant activities and may not be used for:

1. A penalty or fine.
 2. Federal cost-share requirement (for example, a cost share required by other Federal funds).
 3. A response cost at a brownfield site for which the recipient of the grant or loan is potentially liable under CERCLA Section 107.
 4. A cost of compliance with any Federal law, excluding the cost of compliance with laws applicable to the cleanup.
 5. The payment of an administrative cost. In implementing the administrative cost prohibition, EPA has made a distinction between prohibited administrative costs and eligible programmatic costs.
- A. **Administrative Costs.** Prohibited administrative costs are direct costs including those in the form of salaries, benefits, contractual costs, supplies, and data processing charges incurred to comply with most provisions of the “Uniform Administrative Requirements for Grants” contained in 40 CFR Part 30 or 40 CFR Part 31. Direct costs for grant administration are ineligible even if the grantee or subgrantee is required to carry out the activity under the grant agreement. Prohibited administrative costs are also all indirect costs under OMB Circulars A-21 (Educational Institutions), A-87 (Governments), and A-122 (Nonprofit Organizations), and Subpart 31.2 (Commercial Organizations) of the Federal Acquisition Regulation.

Ineligible grant administration costs include expenses for:

1. Preparation of applications for Brownfields grants and sub-grants;
 2. Record retention required under 40 CFR 30.53 and 40 CFR 31.42;
 3. Record-keeping associated with supplies and equipment purchases required under 40 CFR 30.33, 30.34, and 30.35 and 40 CFR 31.32 and 31.33;
 4. Preparing revisions and changes in the budgets, scopes of work, program plans and other activities required under 40 CFR 30.25 and 40 CFR 31.30;
 5. Maintaining and operating financial management systems required under 40 CFR 30.20 and 40 CFR 31.20;
 6. Preparing payment requests and handling payments under 40 CFR 30.22 and 40 CFR 31.21;
 7. Non-Federal audits required under 40 CFR 30.26, 40 CFR 31.26, and OMB Circular A-133;
 8. Close out under 40 CFR 30.71 and 40 CFR 31.50.
- B. **Programmatic Costs.** EPA has determined that the administrative cost prohibition does not apply to “programmatic” costs, (i.e., costs for activities that are integral to achieving the purpose of the grant), even if the Agency considered the costs to be “administrative”

under the prior Brownfields Program.

1. The prohibition does not apply to direct costs of training. For example, costs for instructor(s)' salaries, program management salaries (to the extent that such costs are included in the scope of work for the brownfields job training grant), training materials (e.g. textbooks, equipment, and classroom supplies), necessary travel and transportation expenses, and medical tests required to qualify for hazardous substances related work are programmatic, not administrative.
2. Direct costs, as defined in the applicable OMB Cost Principle Circular, for the following programmatic activities are not subject to the administrative cost prohibition. These costs, however, must be allowable under the scope of work for the grant. Costs incurred for complying with procurement provisions of 40 CFR Part 30 and Part 31 are considered eligible programmatic costs only if the procurement contract is for services or products that are direct costs for training as described above. Costs for performance and financial reporting required under 40 CFR 30.51 and 30.52, and 40 CFR 31.40 and 31.41 are eligible programmatic costs. Performance and financial reporting are essential programmatic tools for both the recipient and EPA to ensure that grants are carried out in accordance with statutory and regulatory requirements.
3. If your organization intends to provide non-competitive subgrants to other nonprofit or governmental organizations, discuss the process you will follow to ensure that these agreements meet the standards for financial assistance contained in OMB Circular A-133, Section 210.

For further information on these prohibitions, contact your regional brownfields representative listed in Section VII.