

Grants Administrative Updates

Winter Regional Tribal
Operations Committee
(RTOC)

February 3, 2021

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What we will cover today



R9 Application Guide FY21



Changes in Regulations



COVID-19 Administrative
Flexibilities



Prevent Non-Compliance
& Other General Updates

2021 Application Guide



R9 Application Guide

Ways to Avoid Delays in your award

Review

Review the R9 Application Guide

- Note: we added a reference to the regulation change to CEPs

Double Check

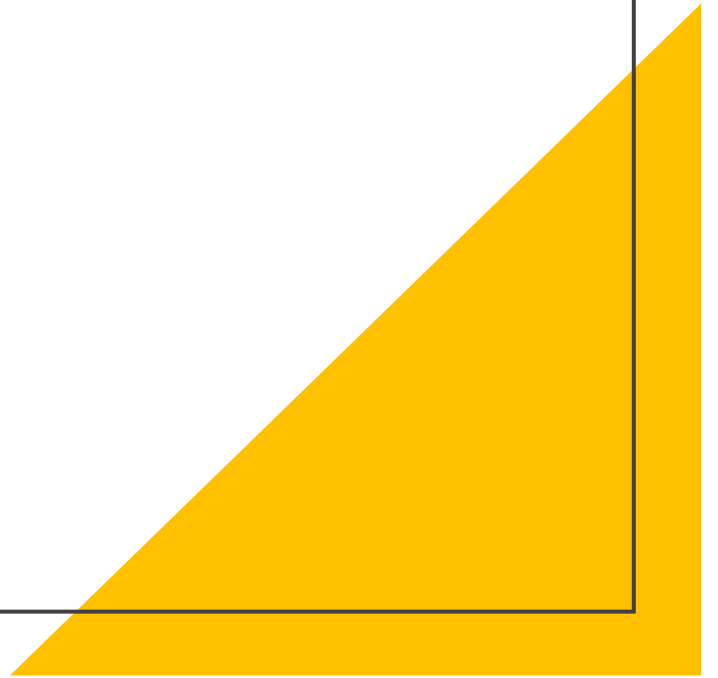
Ensure all required forms are signed appropriately & included, especially your latest IDC approved rate agreement & signed Lobbying Certification (required if federal funding awarded is greater than \$100,000 for the life of the grant)

Register

Check if your SAM.gov registration is up to date

- Starting in Dec 2020, recipients must transition to a Unique Entity Identifier. Don't wait to register!

Any
Questions?





Changes in Regulations

2 CFR §200 (Federal Register; Vol. 85, No. 157; August 13, 2020)

- Support implementation of the President's Management Agenda
 - ✓ Improve governmentwide approach to performance & risk assessment
 - ✓ Emphasize stewardship & results-oriented grants
 - ✓ Work toward shifting the balance between compliance & performance while reducing burden
- Implement statutory requirements from National Defense Authorization Acts (NDAAAs) and the Federal Funding Accountability and Transparency Act (FFATA), as amended by the Digital Accountability and Transparency Act (DATA Act).
- Implement revisions to 2 CFR §200 to clarify areas of misinterpretation--revisions are intended to reduce recipient burden by improving consistent interpretation.



Changes in Regulations

2 CFR §200 (Federal Register; Vol. 85, No. 157; August 13, 2020)

- Updated EPA General Terms & Conditions (as of November 12, 2020)
<https://www.epa.gov/grants/grant-terms-and-conditions>
Example: Prohibition on Certain Telecommunications and Video Surveillance Services or Equipment
- 2 CFR §200.344 Closeout – Annual (interim) Federal Financial Reports (FFR; SF 425) are due 90 days after the reporting period & the final reports (including the Final FFR) are due 120 days after grant expiration
Frequent Questions about Closeouts: OGD has updated the frequent questions about closeouts to reflect the regulatory changes at <https://www.epa.gov/grants/frequent-questions-about-closeouts>

REMINDER: ASAP will lock down after 120 days from the grant's project end date. If this happens, the grantee must submit their Final FFR to RTPFC in order to access the final draw down. RTPFC will open ASAP to release the funds after reconciliation of the grant's Final FFR.



REMINDER

Per 40 CFR §35 Subpart B for continuing environmental programs (CEPs) for Tribes, the grantee must submit its application to EPA before the beginning of the proposed funding period in order for any resulting preaward costs are to be considered for reimbursement.

Examples of CEPs: CAA 105, CWA 106, CWA 319, GAP

Refer to 40 CFR §35.513 regarding Reimbursement for Pre-award Costs. [66 FR 3795, Jan. 16, 2001, as amended at 79 FR 76055, Dec. 19, 2014]

Any Questions?



Common Questions – COVID-19 Flexibilities

- In response to the COVID-19 crisis, the Office of Management and Budget (OMB) issued three memoranda providing class exceptions.
- These allowed Federal awarding agencies to grant various administrative, financial and audit requirement flexibilities to their applicants and recipients.
- Now that the March 19, 2020 and April 9, 2020 OMB Guidances are partially rescinded, OGD has updated the FQs to reflect the rescission and the changes described in the June 18, 2020 OMB Guidance.

Link: [EPA Grants COVID-19 FQs](#)


Q: Can EPA grant recipients continue to compensate employees whose work on EPA financial assistance agreements has been interrupted due to the impact of COVID-19?

A: Not without a regulatory exception or policy waiver

This flexibility provided in the June 18, 2020 OMB Guidance (PDF) was time limited and has expired. Therefore, EPA will consider providing exceptions to the regulations on cost allowability at 2 CFR 200.403 on a case-by-case basis if there are compelling reasons for a recipient to use EPA funds to continue to compensate employees who are unable to work on activities that the recipient carries out under EPA financial assistance agreements. Please contact your Project Officer and Grants Specialist.

*Link: [EPA Grants COVID-19 FAQs](#)





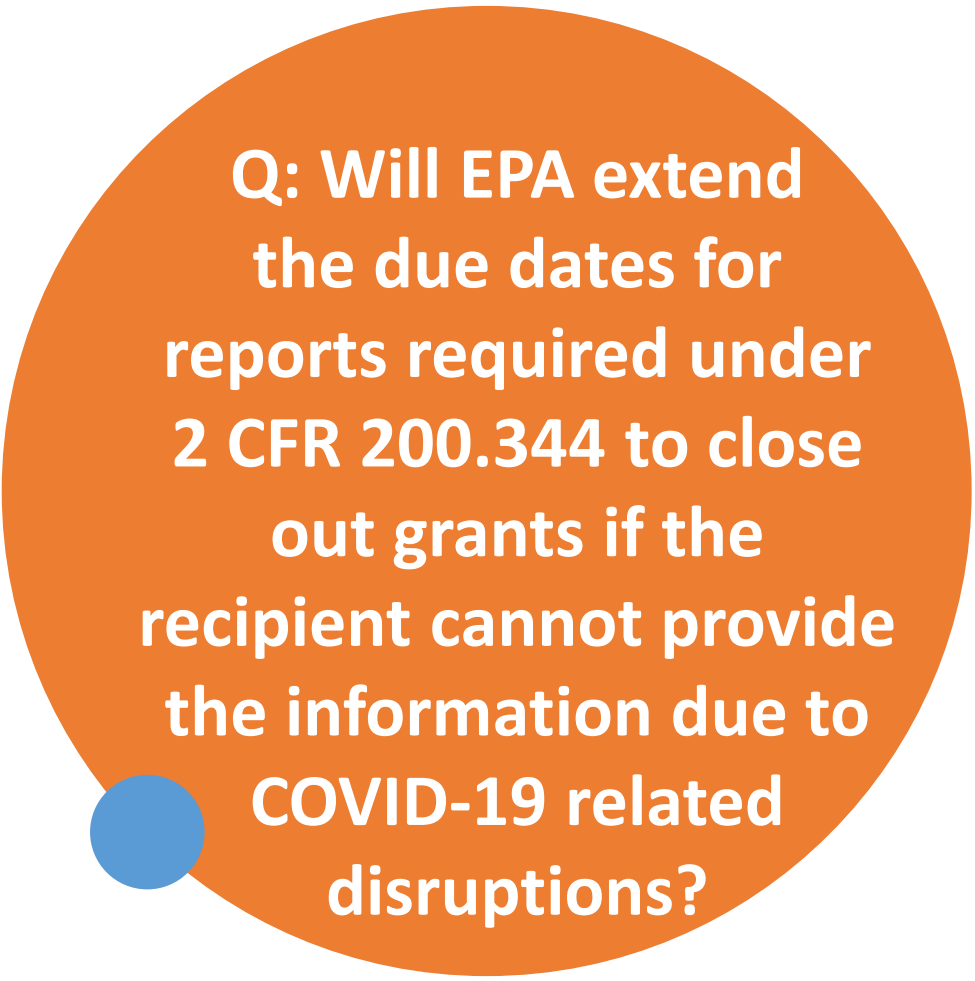
Q: Will EPA modify workplans, adjust budgets, and extend project periods of grants if necessary?

A: Yes, however, EPA will comply with any statutory restrictions.

Contact your Project Officer and provide a description of the action you want EPA to take and a justification for how COVID-19 has impacted your ability to comply with a requirement in the agreement.

*Link: [EPA Grants COVID-19 FQs](#)






Q: Will EPA extend the due dates for reports required under 2 CFR 200.344 to close out grants if the recipient cannot provide the information due to COVID-19 related disruptions?



A: It depends.

Contact your Project Officer and provide a description of the action you want EPA to take and a justification for how COVID-19 has impacted your ability to comply with a requirement in the agreement.

*Link: [EPA Grants COVID-19 FQs](#)



**To see the latest in EPA
Grants, visit EPA Office of
Grants & Debarment
[Website](#).**

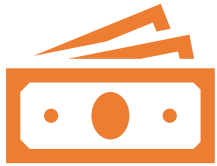
Any Questions?





GRANT COMPLIANCE

Best Practices to Avoid Noncompliance



Do not drawdown grant ALL money before completing the work. *The recipient agrees to draw cash only as needed for its disbursement.*



Indirect cost draw downs must follow recipient's written procedures and the Generally-Accepted Accounting Principals.



Maintain Strong financial records including all supporting documents to support grant expenditures.



Monitor workplan activities closely and consider a request to renegotiate workplan before grant expires when needed.

Best Practices



**Maintain constant communication with
Grants Specialist and Projects Officer.**

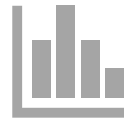


Ensure Workplans are SMART

S.M.A.R.T.



Specific



Measurable



Achievable



Relevant



Time-bound

Updates Impacting Noncompliance




Disputes: 2 CFR §1500

<https://www.federalregister.gov/documents/2020/09/30/2020-16894/uniform-administrative-requirements-cost-principles-and-audit-requirements-for-federal-awards>



Questions



New POC for Research Triangle Park Finance Center (RTPFC)



- RTP Finance Center's primary email box:
rtpfc-grants@epa.gov
- RTP Finance Center's website:
<https://www.epa.gov/financial/grants>
- Contact Information for Region 9 assigned Finance Specialist:
Krisondra Lione
Email: Lione.Krisondra@epa.gov
Phone: (919) 541-7906
- The address for recipients to send refund checks (for non-routine cases):

US Environmental Protection Agency,
RTP-Finance Center (Mail Code AA216-01),
4930 Page Road, Durham, NC 27703



Final Thoughts...

- If you have any questions about your award, please refer to page one of your grant award document to find your assigned EPA Grants Specialist and Project Officer.
 - Our presentation will be available on the RTOC website along with any Q&A's. We will include all supporting materials such as the federal registers.
 - **Our Team of Presenters:**
 - Susan Chiu, Team Lead in R9 EPA Grants Branch, Chiu.Susan@epa.gov
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