

# **Training and Technical Assistance for Wastewater Treatment Works for the Prevention, Reduction, and Elimination of Pollution Request for Applications Frequently Asked Questions (FAQs)**

## **Funding Opportunity Number (FON): EPA-OW-OWM-20-02**

In accordance with EPA's Assistance Agreement Competition Policy (EPA Order 5700.5A1), EPA will respond to questions from individual applicants regarding threshold eligibility criteria, administrative issues related to the submission of the proposal, and requests for clarification about the announcement. However, consistent with the provisions in the announcement, 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. Applicants are responsible for the contents of their proposals.

### **Categories**

- A. Applicant Eligibility
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- C. Threshold Eligibility
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### **A. Applicant Eligibility:**

#### **A1: Am I eligible to apply for the Request for Applications (RFA)?**

Section III.A., Eligible Applicants, states “Eligible applicants under this competition are public or private nonprofit organizations, subject to Clean Water Act (CWA) Section 104(w), that are qualified and experienced in providing on-site training and technical assistance to small publicly owned treatment works.” Section III.A. also states “For-profit organizations, states, municipalities, tribal governments, and individuals are not eligible to apply. 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. EPA may ask applicants to demonstrate that they are eligible for funding under this announcement.”

#### **A2: How is a nonprofit organization defined in this RFA?**

Section III. A, Eligible Applicants, states “Nonprofit 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 nonprofit organization

because they are separately defined in the regulation: (i) institutions of higher education; and (ii) state, local and federally recognized Indian tribal governments. Institutions of Higher Education are defined at 20 U.S.C. 1001. Nonetheless, institutions of higher education who otherwise qualify as nonprofit organizations are eligible to apply as indicated in the Office of Management and Budget's July 2017 Frequent Questions on the Uniform Grant Guidance."

**A3: Will EPA respond to questions regarding this announcement?**

Section VII, Agency Contact, states "In accordance with EPA's Assistance Agreement Competition Policy (EPA Order 5700.5A1), EPA staff will not meet with individual applicants to discuss draft applications, provide informal comments on draft applications, or provide advice to applicants on how to respond to ranking criteria. Applicants are responsible for the contents of their applications. However, consistent with the provisions in the announcement, EPA will respond to questions from individual applicants regarding threshold eligibility criteria, administrative issues related to the submission of the application, and requests for clarification about any of the language or provisions in the announcement."

Section VII also states "Questions about this RFA must be submitted in writing via e-mail and must be received by the Agency Contact identified below by April 27, 2021 and written responses and answers to FAQs will be posted on EPA's website at [www.epa.gov/small-and-rural-wastewater-systems/technical-assistance-treatment-works](http://www.epa.gov/small-and-rural-wastewater-systems/technical-assistance-treatment-works)." The email address for submitting questions by the deadline is: [treatmentworksRFA@epa.gov](mailto:treatmentworksRFA@epa.gov).

**A4: Can funding be used to update wastewater system planning documents for small wastewater systems and/or disadvantaged communities?**

In Section I.B., National Priority, under Component 2. Protect Water Quality and Achieve Clean Water Act Compliance the RFA states "Examples of eligible training and technical assistance activities for rural, small, and tribal publicly owned treatment works and decentralized wastewater treatment systems to support compliance and protect water quality may include, but are not limited to, the following:" One example provided is to "Conduct preliminary engineering evaluations to assess wastewater treatment, storage and conveyance system issues, and identify low-cost alternative technology and management techniques". organizations.

**A5: Further clarification about the definition of an applicant is requested; for example, can a university submit more than one application if different Principal Investigators want to submit their own individual applications from the same university?**

Each applicant must be an eligible entity, and per the RFA, Section III.C "Under this competition, only one application can be submitted per applicant." Individuals are not eligible to apply. The RFA Section III.A, states "Eligible applicants under this competition are public and private nonprofit organizations, subject to CWA 104(w), that are qualified and experienced in providing on-site training and technical assistance to small publicly owned treatment works and decentralized wastewater treatment systems...[and]... institutions of higher education who otherwise qualify as nonprofit organizations are eligible to apply..." Meanwhile Section III.C. subpart 2 states "Under this competition, only one application can be submitted per applicant. If an applicant submits more than one application, EPA will contact them before the review process begins to determine which application(s) will be withdrawn. If the applicant is not able to communicate a decision within 48 hours of being contacted by EPA, EPA will accept the application received by Grants.gov first."

**A6: The limitation in section III.C Eligibility Threshold states "Under this competition, only one application can be submitted per applicant" is each applicant defined as an**

**organization (i.e. an institution of higher education) or is this referring to each Principal Investigator within an organization? For example, can a university submit more than one application if different Principal Investigators want to submit their own individual applications from the same university?**

Each applicant must be an eligible entity, and per the RFA, Section III.C “Under this competition, only one application can be submitted per applicant.” Individuals are not eligible to apply. The RFA Section III.A, states “Eligible applicants under this competition are public and private nonprofit organizations, subject to CWA 104(w), that are qualified and experienced in providing on-site training and technical assistance to small publicly owned treatment works and decentralized wastewater treatment systems...[and]... institutions of higher education who otherwise qualify as nonprofit organizations are eligible to apply...” Section III.C. subpart 2 states “Under this competition, only one application can be submitted per applicant. If an applicant submits more than one application, EPA will contact them before the review process begins to determine which application(s) will be withdrawn. If the applicant is not able to communicate a decision within 48 hours of being contacted by EPA, EPA will accept the application received by Grants.gov first.”

**A7: Our organization is planning to apply for this grant, and we are a branch, within a division, of a state Health and Human Services Department. We are planning to partner with local health departments and universities to provide trainings and to educate homeowners with septic (decentralized) systems in the rural, small economically distressed communities in our state. Is our branch eligible to apply for this grant?**

As per the RFA, Section III.A, and question A.1. in the FAQ: “For-profit organizations, states, municipalities, and tribal governments are not eligible to apply.” In addition, question A.2 in the FAQ “...institutions of higher education who otherwise qualify as nonprofit organizations are eligible to apply ...”.

**A8: It appears that municipalities would be able to apply for this technical assistance grant for wastewater treatment works, however after reading Section III.A. Eligible Applicants this looks more like a funding opportunity for non-profit organizations. Can you please confirm if a municipality would be able to apply to this program directly for technical assistance?**

As per the RFA, Section III.A, and question A.1. in the FAQ: “For-profit organizations, states, municipalities, and tribal governments are not eligible to apply.” Section III.A also states, “Eligible applicants under this competition are public or private nonprofit organizations ... that are qualified and experienced in providing on-site training and technical assistance to small publicly owned treatment works.”

**A.9: Due the traveling restrictions related to COVID-19, we are proposing to work with tribal communities within a single state which may serve as proof-of-concept project that could be replicated in other states or regions once the COVID-19 pandemic is over. We would like to ask whether this single-state approach may match with the scope of the RFA indicating that training and technical assistance activities provided should be made available nationally.**

As per the RFA, Section I. C. “Providing Training and Technical Assistance on a National Basis“ (page 12): “ Applications will be evaluated based on the criteria in Section V, including the demonstrated ability and described approach to making training and technical assistance available nationally in the maximum number of states, tribes and U.S. territories through face-to-face/on-site and/or remotely. EPA will give priority consideration to applications that describe a

thorough, quality, and flexible approach that tailors the training and technical assistance techniques and resources to address the specific needs of the target audience in as many states, tribes and U.S. territories as possible.” In addition, Section V.A, “Selection Criteria” evaluation criteria #2 identifies that applications “... will be evaluated based on [the applicant’s] ability and approach for making training and technical assistance available nationally in a maximum number of states, tribes and U.S. territories.” Evaluation criteria #2 and the associated weights per sub-criteria are noted below:

“2) Providing Training and Technical Assistance on a National Basis Under this criterion, applicants will be evaluated based on their ability and approach for making training and technical assistance available nationally in a maximum number of states, tribes and U.S. territories (see Section I.C of this announcement) taking into account the following factors.

- i. The extent and quality to which the applicant demonstrates the ability to provide training and technical assistance in a maximum number of states and U.S. territories through face-to-face/on-site training and/or through remote means. (10 points)
- ii. The extent to which the applicant demonstrates an effective process for reaching out to tribally owned and operated treatment works and decentralized wastewater treatment systems and providing training and technical assistance to these systems. (5 points)
- iii. The extent and quality to which the applicant’s strategy utilizes flexibility to tailor the training and technical assistance techniques and resources to address the specific needs of the target audience in as many states, tribes, and U.S. territories as possible. (5 points)
- iv. The extent and quality of an approach to transfer results, effective compliance strategies, and resources developed to interested stakeholders nationally. (5 points)

**A10: Could you please provide a summary of the eligible project costs for the grant solicitation? Specifically, if a non-profit is the lead, however contracts with a consulting firm to bring in the technical expertise for training/education etc. would the consultant be an eligible cost and the proposed implementation structure (Non-profit with specialty consultants) for support be eligible?**

As per Section III.C “. An applicant must meet the eligibility requirements in Section III.A of this announcement at the time of application submission” and subawardees/subgrantees/consultants/contractors are not considered part of the nonprofit applicant. Page 1 of the RFA states: “Note to Applicants: Following EPA’s evaluation of applications, all applicants will be notified regarding their status. If you name subawardee/subgrantees and/or contractor(s) including individual consultants in your application as partners to assist you with the proposed project, pay careful attention to the information in the CONTRACTS AND SUBAWARDS provision found at EPA’s Solicitation Clauses (<http://www.epa.gov/grants/epa-solicitationclauses>).” Section IV: Subpart D.2.C.5 states “Applicants must itemize costs related to personnel, fringe benefits, contractual costs, travel, equipment, supplies, other direct costs, indirect costs and total cost. All subawardee funding should be located in the “other” cost category. Describe itemized costs in enough detail for EPA to determine the allowability of costs for each project component/task, as well as the cost-effectiveness and reasonableness of all costs.” Section IV: Subpart D.2.C.6 states “If you choose

to identify any partner organizations who will receive subawards or procurement contracts (including consultants) please refer to Section IV.E before doing so as EPA will not consider their qualifications unless you select them in compliance with applicable regulations and provisions. A biographical sketch must be submitted for each major project manager, support staff member or other major project participant.” The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, which include guidance on allowable costs, can be found at 2 C.F.R. Part 200 et. seq.

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## **B. Project Objectives:**

### **B1: Does a decentralized wastewater treatment system include an individual home sewage system?**

Section I.B., National Priority, states “Decentralized systems” are defined as: septic or onsite or clustered systems used to collect, treat, and disperse or reclaim wastewater from a small community, tribe, or service area that are publicly or privately-owned and/or serve tribal communities (with the exception of systems that are owned by U.S. federal entities). For further details refer to the EPA “Overview of Clean Water State Revolving Fund Eligibilities” decentralized chapter at: <https://www.epa.gov/cwsrf/overview-clean-water-state-revolving-fund-eligibilities>. Applicants should describe their proposed approach for providing training and technical assistance and disseminating information to rural, small, and tribal treatment works and to communities served by onsite/decentralized wastewater treatment systems. Training and technical assistance may be provided through face-to-face trainings and site visits or through remote learning approaches. This assistance may also include circuit-rider and multi-state regional technical assistance programs and training. Example activities are described in the further detailed component descriptions below.” A privately-owned home septic system (sewage system) is an example of a decentralized system.

### **B2: How are “small publicly-owned treatment works” defined in the RFA?**

Section I.B, National Priority, states “For purposes of this announcement, rural and small wastewater treatment systems are systems that treat up to 1 million gallons per day (MGD) of wastewater or serve a population of less than 10,000 persons and may also serve operations such as, but not limited to hospitals, schools, and restaurants...[and]... For the purposes of this announcement, “publicly owned treatment works” are defined as wastewater systems or treatment facilities that are owned by a public entity (such as a municipality) or not-for-profit entity (such as regional sewer districts), and/or serve tribal communities (with the exception of systems that are owned by U.S. federal entities).“

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## **C. Threshold Eligibility:**

### **C1: If charts and exhibits are included in the application Project Narrative can they be a smaller font than the 12-point font that is required of the body of the proposal?**

The RFA does not establish a required minimum 12-point font for the Project Narrative or any charts and/or exhibits; however, the RFA does indicate that readability is of paramount importance. EPA recommends that all text in the Project Narrative, including any charts and/or exhibits is in a 12-point font. Note that Section III.C, Threshold Eligibility Criteria, establishes a page limitation for the Project Narrative: “ Where a page limit is expressed in Section IV.D.2 with respect to the Project Narrative, pages in excess of the page limitation

will not be reviewed. Section IV.D.2 establishes a 20-page, single-spaced Project Narrative page limit.”

**C2: Is there a minimum or maximum amount of federal funding that can be requested in the application?**

Section III.C, Threshold Eligibility Criteria, states “Applications under this RFA may not exceed \$12,000,000 in federal funds; applications exceeding \$12,000,000 in federal funding will be rejected.” The RFA does not establish a minimum federal funding request.

**C3: Can an eligible applicant submit more than one application?**

No. Section III.C, Threshold Eligibility Criteria states “Under this competition, **only one application can be submitted per applicant**. If an applicant submits more than one application, EPA will contact them before the review process begins to determine which application(s) will be withdrawn. If the applicant is not able to communicate a decision within 48 hours of being contacted by EPA, EPA will accept the application received by Grants.gov first.”

**C4: Can an application address only one component identified in Section I.B, National Priority?**

No. Section III.C, Threshold Eligibility Criteria states “Applications must address all three components identified in Section I.B. Applications that do not address the three components will be rejected.” Section I.B, National Priority, provides additional information about the three required components and states “EPA is soliciting applications from eligible applicants that address the following three components:

- Component 1: Acquisition of Financing
- Component 2: Protect Water Quality and Achieve Clean Water Act Compliance
- Component 3: Disseminate Planning, Design, Construction, and Operation Information

Applications **must address all three components** which are further discussed below [in Section I.B.]”

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**D. Application Evaluation:**

**D1: How will the application be evaluated?**

All eligible applications, based on the Section III.C., Threshold Eligibility Criteria, will be evaluated based on the evaluation criteria provided in Section V.A., Selection Criteria.

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**E. Timing and Logistics:**

**E1: When does EPA anticipate that awards will be announced?**

EPA anticipates making funding awards in Fall 2021, but this is only an estimate, and not a guarantee.

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**F. Budget:**

**F1: Is there a match requirement for these funds?**

No. A non-federal cost-share or match is not required.

**F2: If the applicant develops curriculum for training, can that curriculum be used for systems not targeted by the grant? For example: municipalities larger than the target group.**

Yes. In accordance with 2 CFR 200.315, The Non-Federal entity may copyright any work that is subject to copyright and was developed, or for which ownership was acquired, under a Federal award. The Federal awarding agency reserves a royalty-free, nonexclusive, and irrevocable right to reproduce, publish, or otherwise use the work for Federal purposes, and to authorize others to do so.

**F3: Does EPA have a limit on indirect costs that can be charged?**

Indirect cost rates must be negotiated with the cognizant federal funding agency in accordance with the procedures in 2 CFR 200 Subpart E “Cost Principles”. As specified in the RFA, Section IV.D.1.g: “You must submit a copy of your organization’s Indirect Cost Rate Agreement as part of the application package if your proposed project budget includes indirect costs.”

For more information, please read the EPA’s Indirect Cost Guidance for Recipients of EPA Assistance Agreements at <https://www.epa.gov/grants/rain-2018-g02>.

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**G. Miscellaneous:**

**G1: Will EPA seek external reviewers for the Training and Technical Assistance for Wastewater Treatment Works for the Prevention, Reduction, and Elimination of Pollution RFA?**

No. Section V.B of the RFA states “A panel comprised of EPA staff will review the eligible applications based on the evaluation criteria listed in Section V. “

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[End of document.]