

# **FY 2021 Training and Technical Assistance to Improve Water Quality and Enable Small Public Water Systems to Provide Safe Drinking Water**

## **Frequently Asked Questions**

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 application, 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 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.

## **Categories**

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

#### **A1: Am I eligible to apply for the RFA?**

Eligible applicants under this competition are nonprofit organizations, nonprofit private universities and colleges, and public institutions of higher education. For-profit organizations are not eligible to apply. States, municipalities, or tribal governments are not eligible to apply.

#### **A2: How does EPA define nonprofit organization?**

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. While defined separately from nonprofit organization(s) as defined by 2 CFR Part 200, public and other

nonprofit Institutions of Higher Education are, nevertheless, eligible to submit applications under this RFA. For-profit colleges, universities, trade schools, and hospitals are ineligible.

Nonprofit organizations described in Section 501(c)(4) of the Internal Revenue Code that engage in prohibited lobbying activities as defined in Section 3 of the Lobbying Disclosure Act of 1995 are not eligible to apply.

**A3: Are states, municipalities, or tribal governments eligible to apply for the RFA?**

No. States, municipalities and tribal governments are not eligible to apply. Eligible applicants are described in Section III.A., where it is stated: “Eligible applicants under this competition are nonprofit organizations, nonprofit private universities and colleges, and public institutions of higher education. For-profit organizations are not eligible to apply. 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.”

**A4: If I have questions regarding this announcement, will EPA respond to them?**

It depends. 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 the announcement. Questions must be submitted via e-mail to ([smallsystemsrf@epa.gov](mailto:smallsystemsrf@epa.gov)) by November 18, 2021. However, EPA staff will NOT 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.

**A5: Can individual non-profit water systems apply for a grant to make improvements to their systems?**

No, individual water systems are not eligible for funding under this announcement. It is designed to provide funding to eligible non-profit organizations (as described in section III.A. “Eligible Applicants” of the Request for Applications, quoted below), which in turn will provide training and technical assistance to eligible drinking water and wastewater systems and private well owners.

Section III.A. “Eligible Applicants” of the Request for Applications states: “Eligible applicants under this competition are nonprofit organizations, nonprofit private universities and colleges, and public institutions of higher education. For-profit organizations are not eligible to apply. 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.”

**A6: Are public health agencies eligible to apply?**

If your public health agency is an agency of your county government, then you are not eligible to apply. For this Request for Applications, EPA does not consider units of government such as counties as well as their component agencies to be nonprofit organizations.

**A7: Do you foresee any similar funding opportunities for which states will be eligible to apply?**

In accordance with Section III.A of the competitive announcement, states are not eligible to apply for the funding. EPA cannot speculate regarding future grant opportunities in which states would be eligible to apply. This is EPA's ninth round of competitive funding for small system training and technical assistance grants, and Congress has stipulated in each case that eligibility is limited to non-profit organizations. You may wish to monitor the [Grants.gov](https://www.grants.gov) web site in the future to see if there are any other grant competitions that may include states as eligible applicants.

**A8: I work as an environmental engineer for a state drinking water program. I am in the process of starting a nonprofit organization that would apply for the training and technical assistance grants to improve water quality and provide safe drinking water. In the event that the nonprofit organization I started earned a grant, I would quit my job with the state and begin working full time as the technical assistance provider for the nonprofit. Given my position, may I, as acting director of the nonprofit organization, apply for the grants?**

Eligibility criteria describes in Section III.A. "Eligible Applicants" of the Request for Applications states:

"Eligible applicants under this competition are nonprofit organizations. For-profit organizations, states, municipalities, or 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. The EPA may ask applicants to demonstrate that they are eligible for funding under this announcement."

Section III. C. Threshold Eligibility Criteria, states in part "These are requirements that if not met by the time of application submission will result in the elimination of the application from consideration for funding. Only applications that meet all of these criteria will be evaluated against the ranking factors 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." Section III.C.1 states "An applicant must meet the eligibility requirements in Section III.A of this announcement at the time of application submission."

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.

**A9: I represent a nonprofit organization interested in applying for the following opportunity. As long as we are the lead organization, can we include institutions of higher education (universities) as subcontractors for this grant opportunity?**

Eligible grant applicants under this competition include nonprofit private universities and colleges, and public institutions of higher education.

Funding may be used to provide subawards of financial assistance, which includes using subawards to fund partnerships, provided the recipient complies with applicable requirements for subawards including those contained in 2 CFR Part 200 and [EPA's Subaward Policy](#). EPA has also posted [Additional Resources](#) on Subawards for applicants to consult.

If you name subawardees/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 <http://www.epa.gov/grants/epa-solicitation-clauses>.

**A10: May successful applicants charge fees for training and technical assistance services that are funded in whole or in part under their EPA cooperative agreements?**

As discussed in Section I.E, the statutory authorities for the awards expected to be made under this announcement are section 1442(e) of the SDWA and section 104(b)(3) of the CWA.

Under the statutory authority for the cooperative agreements, Section 1442(e) of the Safe Drinking Water Act and Section 104(b)(3) of the Clean Water Act, a prohibition on charging fees does not apply.

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## **B. Project Eligibility:**

**B1: The RFA restricts training and technical assistance to small PWSs, serving 10,000 or less people. We have several water system owners including municipal owners, which have both small PWSs and large PWSs. Would these water system owners be eligible for training under the RFA contracts? If so, we have only one large system that would not be eligible for the training. Would the selected technical assistance provider be allowed to provide and charge for training to this large system?**

The training and technical assistance described in National Priority Area 1 is specific to addressing the short and long-term needs of small systems in meeting the requirements of the Safe Drinking Water Act. Personnel receiving training and assistance should be associated specifically with systems that meet the criteria of this funding announcement, namely those

systems serving 10,000 persons or fewer. We presume that you are asking whether a technical assistance provider could provide services to a large system without using EPA funds by charging the large system a fee to finance the services. That decision would be up to the technical assistance provider rather than EPA. However, the provider would need to maintain accounting data to demonstrate that it did not charge the cost for providing technical assistance to a large system to its EPA cooperative agreement.

**B2: Does an onsite/decentralized wastewater system include an individual home sewerage system?**

A home septic system is an example of an onsite/decentralized system. The funding opportunity is intended for technical assistance activities that would help multiple onsite/decentralized systems (e.g., a community, a collection of houses, part of a watershed, a geographic region, etc.) to improve their performance. In Section I.B of the Request for Applications, onsite/decentralized systems are defined as: publicly-owned or privately-owned 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).

**B3: Will the funds enable small water systems/disadvantaged communities to update water system planning documents?**

A nonprofit organization that receives funding under this announcement could potentially provide technical assistance to small water systems/disadvantaged communities to update water system planning documents if such an activity were included in its EPA-approved scope of work. The Request for Applications includes the following as an example of eligible activities:

“Conduct preliminary engineering evaluations to assess treatment, storage and distribution system issues, and identify low-cost alternative technology and management techniques.”  
(Request for Applications, Section I.B.)

**B4: What types of projects are eligible to apply for these funds? For example, I work with a number of small communities who need funds to conduct or update their technical, managerial, and financial assessments for water systems, do planning and/or design work for needed water or wastewater system improvements, and to construct improvements to their systems. Which of these activities would qualify? And can we request funds for specific communities, or does it have to be broader, i.e. across a number of states?**

The types of activities and services that are eligible for funding are described in Section I.B. of the announcement, under “National Priority Areas.” Additionally, the funding opportunity is intended to provide training and technical assistance on a national basis. In accordance with Section V, criterion number 2, “Providing Training and Technical Assistance on a National Basis,” applicants will be evaluated on a number of factors, such as providing training and technical assistance in a maximum number of states and U.S. territories, demonstrating an effective process for reaching out to tribally-owned and operated systems, addressing the specific needs of the target audience in as many states and U.S. territories as possible, and transferring

results, effective compliance strategies, and resources developed, to interested stakeholders nationally.

Applicants are asked to describe a process for consulting with appropriate agencies in each state or territory prior to initiating training and technical assistance activities. This process would take place before assistance is provided to individual communities or systems.

Also, please note that this funding opportunity is designed to provide funding for eligible nonprofit organizations, nonprofit private universities and colleges, and public institutions of higher education (as described in section III.A. "Eligible Applicants" of the Request for Applications), which in turn will provide training and technical assistance to eligible drinking water and wastewater systems and private well owners.

For-profit organizations, states, municipalities, or 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. The EPA may ask applicants to demonstrate that they are eligible for funding under this announcement.

**B5: Is this grant just for training or more than that? We are a small private (Board run) drinking water system that serves 1,281 at present. Would this grant help us with repairs/replacement to existing lines? Is there another choice that would be better?**

This funding opportunity is designed to provide funding for eligible non-profit organizations, nonprofit private universities and colleges, and public institutions of higher education (as described in Section III.A. of the announcement, quoted below). These organizations in turn will provide training and technical assistance to eligible drinking water and wastewater systems and private well owners. Successful grant applicants will provide the training and technical assistance using their own personnel, contracting with other individuals or organizations, through subawards, or through some other approved mechanism. State, tribal, and municipal government entities, and individuals are not eligible for receiving funding under this announcement.

Section III.A. of the Request for Applications states: "Eligible applicants under this competition are nonprofit organizations, nonprofit private universities and colleges, and public institutions of higher education. For-profit organizations are not eligible to apply. 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."

Repairs or replacement of existing water lines would not be eligible for funding under this announcement. The funding announcement covers training and technical assistance activities only.

**B6: We have a population of 1,779 in our municipality and are currently undergoing a mandatory upgrade to our wastewater treatment facility. Will this project meet the criteria of the grant monies to be awarded, or is this type of grant for training only?**

This funding opportunity is only for training and technical assistance projects. A project for adding new equipment or upgrading, retrofitting, or rehabilitating existing equipment would not be eligible for funding under this announcement.

**B7: The RFA states the performance period will be for up to 18 months. May an applicant submit a two-year period proposal? If so submitted, will it be viewed negatively?**

Section II.A of the RFA states that cooperative agreements funded under this announcement will have a project period up to 18 months. Thus, an applicant can submit an application with a project period and milestone schedule that is 18 months or shorter. The milestone schedule should provide a breakout of the project activities into phases with associated tasks and a timeframe for completion of tasks and an approach for ensuring that awarded funds will be expended in a timely and efficient manner. In accordance with Section V, criterion number 4 “Milestone Schedule/Detailed Budget,” applicants will be evaluated on a number of factors such as adequacy and completeness of the milestone schedule, including timeframes and major milestones to complete significant project tasks, and an approach to ensure that awarded funds will be expended in a timely and efficient manner.

**B8: Are “urban” communities ok for us to service as long as they are below 10,000 in population? Is that the same for decentralized wastewater systems?**

As indicated in the announcement, the systems targeted to receive training and technical assistance under National Priority Area 1 include “small public water systems,” which are defined as “community and non-community water systems serving a population of less than 10,000 persons.” The systems targeted for assistance under National Priority Area 2 are “small publicly-owned wastewater systems” or “onsite/decentralized systems.” “Small publicly-owned wastewater systems” are defined as “wastewater systems or treatment facilities that have permitted and actual flows of less than 1 million gallons per day (MGD) and 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).” “Onsite/decentralized systems” are defined as “publicly-owned or privately-owned 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).” There is no size designation for onsite/decentralized systems, and as long as the criteria in the above definitions are met, any of the water and wastewater systems described above may be located in either rural or urban communities.

**B9: Will unique approaches to technical assistance to small PWS be considered?**

Yes, unique approaches to technical assistance to small PWS will be considered. Section I.B. of the RFA states that “EPA encourages applications that include non-traditional or innovative

approaches in addition to conventional or traditional approaches for training and technical assistance. The applicant should demonstrate how these non-traditional or innovative approaches in conjunction with conventional or traditional approaches show the potential to more effectively reach the intended audience than only conventional or traditional means.”

**B10: If a county/municipality operates several distinct "systems" that are not connected to each other, and one of these distinct systems serves less than 10,000 people, would it qualify as a "small system," or do we aggregate all the distinct systems operated by single entity to determine "smallness"?**

Yes, the system you describe, a distinct system serving 10,000 persons or fewer, is eligible for receiving training or technical assistance from a grant recipient under this funding announcement. However, the Request for Applications also requires funding recipients to prioritize the use of their funds by working with the state or territory where they are providing assistance, to identify the systems in greatest need of assistance. The Request for Applications, Section I.B., "National Priority Areas" states:

“Applicants should also describe a process whereby they will consult with the appropriate regulatory authority (such as the state or territorial primacy agency or EPA regional direct implementation coordinators) in each state, tribe or territory in which the assistance is to be expended or otherwise made available prior to providing training and technical assistance in that state, tribe or territory. In particular, applicants should indicate how they will work with the state, territory or the EPA to identify the systems in greatest need of assistance and identify the training topics of greatest need to the small public water systems; how they will keep those agencies, the EPA grant project officer and appropriate EPA regional coordinators informed regarding the assistance provided; and how they will document these results.”

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### **C. Threshold Issues:**

**C1: If I put charts and exhibits in my proposal 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. Section IV.D.2, Project Narrative, states in part:

“...It is recommended that applicants use a standard 12-point type with 1-inch margins. While these guidelines establish the minimum type size recommended, applicants are advised that readability is of paramount importance and should take precedence in selection of an appropriate font for use in the Project Narrative.” EPA recommends that all of the project narrative, including any charts and/or exhibits, is in a 12-point font.

**C2: Is there a grant ceiling & floor for applications?**

There is a ceiling but no floor for the amount of funds applicants may request. The Request for Applications (RFA) section III.C., “Threshold Eligibility Criteria,” states that: “Applications for awards under National Priority Area 1 cannot exceed \$19,000,000 in federal funds; applications for awards under National Priority Area 2 cannot exceed \$1,000,000 in federal funds; and applications for awards under National Priority Area 3 cannot exceed \$1,700,000 in federal funds. Applications exceeding the amount for the National Priority Area it addresses will be rejected.” EPA has not established a minimum amount of funding for applicants.

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#### **D. Evaluation Issues:**

**D1: Section II. B., regarding anticipated substantial federal involvement mentions a review of qualifications of key personnel with a caveat that EPA "does not have the authority to select employees or contractors employed by the recipient." Since staff expertise/qualifications are part of the scoring criteria upon which an award is based, can EPA elaborate on this review? Is this limited to new employees or contractors selected by the recipient? What further review of identified staff would be conducted for a successful recipient?**

Regarding staff expertise and qualifications of key personnel, the EPA application review panel members will review the information provided by the applicant and conduct their scoring in accordance with the selection criteria. The information reviewed by the panel includes the project narrative itself as well as biographical sketches and resumes submitted along with the narrative. If an applicant proposes future changes in key personnel after an application has been selected for funding, then the EPA Project Officer must approve of these changes after reviewing biographical and qualifications information provided by the applicant, before the project can proceed or continue.

**D2: Will entities that already provide technical assistance to small public water suppliers have an advantage in the proposal selection? Is this RFA primarily intended for national organizations that work with small water suppliers on an ongoing basis?**

All eligible applicants, based on the threshold eligibility review, will be evaluated based on the evaluation criteria provided in Section V.A. Applications will be evaluated on the applicant’s ability to successfully complete and manage the proposed project considering their programmatic capability, experience and community support. Under the past performance evaluation factors, applicants will be evaluated on their past performance. Applicants with no relevant or available past performance information or reporting history must indicate that in the application and they will receive a neutral score for the past performance criterion.

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## **E. Timing and Logistics:**

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

EPA anticipates making funding awards by Spring 2022, but this is only an estimate, and not a guarantee.

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## **F. Budget Concerns:**

### **F1: The RFA states a project period of up to 18 months. Do you anticipate that this type of funding would be available in future years?**

The funding announcement is based on EPA's current budget and funding availability under FY 2021. The Agency is not making any commitment to future funding.

### **F2: If an applicant applies for a certain amount...e.g., \$1,200,000...and after reviewing the applications the agency feels that the work in the proposal is eligible but that there is only \$750,000 available, would the agency go back to the applicant and invite a revised application for the lower amount? Or would the application be rejected because the amount was higher than the funds available?**

EPA would not necessarily reject an otherwise meritorious application if the Agency did not have adequate funding to provide the full amount the applicant requested, provided the applicant did not request more funding than specified in section III C. 3 of the RFA.

The following provision of the RFA (section II A) would apply:

“In appropriate circumstances, the EPA reserves the right to partially fund applications by funding discrete portions or phases of proposed projects. If the EPA decides to partially fund an application, it will do so in a manner that does not prejudice any applicants or affect the basis upon which the application or portion thereof, was evaluated and selected for award, and therefore maintains the integrity of the competition and selection process.”

### **F3: If when calculating the total cost, we propose \$19 million for the cost of the program plus \$1.9 million for cost share/matching, would the total cost be \$20.9 million, which would be over the \$19 million maximum or is it looked at that the \$19 million would be the award amount and \$1.9 million would be the cost share/match?**

The "not to exceed" dollar amounts listed under threshold criterion 3 (under section III.C. of the Request for Applications) include **only the requested federal funding**, and do not incorporate any cost share/matching amounts. In your example, if an applicant submitted an application requesting \$19 million, the amount does not exceed the threshold requirement and is an

acceptable amount to request. The additional \$1.9 million in cost share/matching is a separate condition that must be met to comply with the requirements of the threshold. The application would be evaluated as a \$19 million federal funding request for the purposes of determining compliance with the threshold requirement in Section III C. 3. The application would comply with the requirement in your example.

**F4: When determining cost share/match, can the average hourly wage of the trainees attending the courses be used as cost share?**

No. Trainees would not be performing services for the applicant and, accordingly, their wages would not meet the standards at 2 CFR 200.306 for allowability as cost share. Applicants may pay trainee travel as a "participant support cost" with their own funds and include those costs as a match. However, EPA has determined that other forms of participant support costs such as trainee stipends or child care expenses are unallowable and applicants may not count these costs towards their cost share.

**F5: If the applicant develops curriculum for training delivery, can that curriculum be used as voluntary cost share/match? And if so, who then owns the curriculum?**

Yes, provided the applicant can meet the requirements at 2 CFR 200.306 for documenting that the amount of cost share it claims reflects the fair market value of the curriculum. The applicant will "own" the curriculum. However, if the applicant uses the costs (i.e., personnel or contractor expenses) for developing the curriculum as cost share, EPA would have a "federal purpose" license to use the curriculum under 2 CFR 200.315.

**F6: If the applicant develops curriculum for training delivery, will the developer be able to use the material developed for systems not targeted by the grant? For example: municipalities larger than the target group.**

Yes. The applicant will "own" the curriculum and can use it for its own purposes as long as the cost of the additional use of the curriculum is not charged to this grant.

**F7: To reach private well owners, there is a need to market in unconventional ways, including advertising the training and technical assistance developed under this RFA. Is it allowable to include advertising costs in the proposals for this RFA, as long as the advertising is only used to market and promote training and technical assistance under this RFA?**

Federal grant regulations and policies do not prohibit the use of grant funds to advertise the services offered by the grantee, as long as the advertising is specifically for making the intended audience aware of the specific training and technical assistance services available to them under this grant. General marketing of the grantee or its services outside of the scope of this grant would be beyond the scope of the grant and would not be appropriate.

Details on what costs are allowable related to advertising and public relations are contained in [https://www.epa.gov/sites/default/files/2018-05/documents/recipient\\_guidance\\_selected\\_items\\_of\\_cost\\_final.pdf](https://www.epa.gov/sites/default/files/2018-05/documents/recipient_guidance_selected_items_of_cost_final.pdf).

**F8: Does EPA have a limit on indirect costs that can be charged?**

While there is no “limit”, per se, 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 Request for Applications, section IV.D.1.h:

“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>.

**F9: Under this RFA, are indirect/facilities and administrative costs eligible for a waiver of the cost share?**

As described in the RFA under Section III.B., “The non-federal cost-share/match may be provided in cash or can come from in-kind contributions, such as use of volunteers and/or donated time, equipment, expertise, etc., and is subject to the regulations governing matching fund requirements described in 2 CFR 200.306, as applicable.”

For more information, please read policy (Section 6.5) at <https://www.epa.gov/sites/production/files/2018-08/documents/indirect-cost-policy-for-recipients-of-epa-assistance-agreements.pdf>) and EPA’s Indirect Cost Guidance for Recipients of EPA Assistance Agreements (Section 6.7) at <https://www.epa.gov/sites/production/files/2018-08/documents/indirect-cost-policy-guidance-for-recipients-of-epa-assistance-agreements.pdf>.

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**G. Funding Clarifications:**

**G1: Can the funds for this grant program be used for the purchase of sewer maintenance/inspection equipment?**

Equipment purchases solely for the purpose of providing training or technical assistance are eligible under this funding announcement. Equipment purchases would need to be included in the application budget and approved by EPA as part of the final project work plan. In general, equipment purchases should represent a small portion of the total project budget.

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## **H. Miscellaneous:**

**H1: Page two of the announcement states, "EPA has previously awarded financial assistance agreements to nonprofit organizations to provide technical assistance activities that are similar to those described in this announcement." What programs are being referenced in this section and what applicants received those funds?**

Training and technical assistance activities similar in scope have been funded in recent years through competitively-awarded grants to several organizations. Examples of the FY19 competition are summarized below.

Example projects include classroom training on operation and maintenance, board training, on-site rule education and public health training, training on private wells and contaminants, on-site technical assistance, and creation of educational videos, among others.

For EPA-OW-OGWDW-20-02, National Priority Area 1, EPA selected the University of New Mexico, the Rural Community Assistance Partnership (RCAP) and the National Rural Water Association (NRWA) to help small public water systems to achieve and maintain compliance with the SDWA, including improving financial and managerial capacity. For EPA-OW-OGWDW-20-02, National Priority Area 2, EPA selected the University of New Mexico to work with small publicly-owned wastewater and onsite/decentralized wastewater systems to help improve water quality.

For EPA-OW-OGWDW-20-02, National Priority Area 3, EPA selected the Rural Community Assistance Partnership (RCAP) to work with private well owners to help improve water quality.

**H2: Will EPA seek external reviewers for the Training and Technical Assistance to Improve Water Quality and Enable Small Public Water Systems to Provide Safe Drinking Water RFA?**

No. EPA will not seek external reviewers for this announcement. Section V.B of the RFA states that a panel(s) comprised of EPA staff will review the eligible applications by National Priority Area based on the evaluation criteria listed in Section V.A.

**H3: What systems will we work with, how are those systems chosen, who will choose them, and who has the contact information?**

Identifying the small public water systems to work with will be the responsibility of the successful applicant. EPA will evaluate your approach to identifying systems to serve under the "National Priority Area" and "Providing Training and Technical Assistance on a National Basis" described in section V.A. of the Request for Applications (RFA).

As required by section I.B. of the RFA, the successful applicant must work with the appropriate regulatory authorities "...to identify the systems in greatest need of assistance..." Your application should describe a process that you propose to follow to assure proper consultation

with the appropriate regulatory authority such as the state or territorial primacy agency or EPA regional direct implementation coordinator.

**H4: Does this RFA require a Significant Financial Interests Disclosure (SFI) such as that required by some other funding agencies?**

Under this funding announcement there is no requirement for a Significant Financial Interests Disclosure for key personnel or any equivalent requirement.

**H5: Section II. B., regarding anticipated substantial federal involvement, includes the statement "collaboration during performance of the scope of work, including participation in training and technical assistance activities such as attending specific trainings and workshops"; could EPA provide examples of substantial federal involvement? Will EPA provide trainers for workshops or simply be in attendance? Will EPA assist in developing agendas for workshops?**

Depending on the topic area and the specific location and timing of training or workshops, EPA may sometimes choose to be in attendance. It is less likely but certainly appropriate, that on some occasions EPA personnel may participate in developing workshop agendas or in conducting training activities in conjunction with the training being provided by the grantee and/or state regulatory officials. This would be determined on a case-by-case basis, in consultation with the grantee and state regulatory officials.

**H6: We are hoping to find more information or clarification on the two different applications offered (two different assistance listing numbers); we are not clear which application we should complete. Can you clarify the difference between the two applications?**

Assistance listing Number(s):

66.424 -- Surveys, Studies, Investigations, Demonstrations, and Training Grants - Section 1442 of the Safe Drinking Water Act

66.436 -- Surveys, Studies, Investigations, Demonstrations, and Training Grants and Cooperative Agreements - Section 104(b)(3) of the Clean Water Act

If you are applying for:

**National Priority Area 1** (Training and Technical Assistance for Small Public Water Systems to Achieve and Maintain Compliance with the SDWA, Including Improving Financial and Managerial Capacity) you should use the application for **assistance listing number 66.424**.

If you are applying for:

**National Priority Area 2** (Training and Technical Assistance for Small Publicly-Owned Wastewater Systems and Onsite/Decentralized Wastewater Systems to Help Improve Water Quality) you should use the application for **assistance listing 66.436**.

If you are applying for:

**National Priority Area 3** (Training and Technical Assistance for Private Drinking Water Well Owners to Help Improve Water Quality), you should use the application for **assistance listing 66.436**.

Applications will not be rejected solely for using an incorrect assistance listing number, and the number can be corrected later in the application process.

**H7: Our research program has been working with private well owners in rural communities. We are considering submitting a proposal addressing Priority Area 3.**

**We have worked with the U.S. Geological Survey and state agencies in the past. Could they be sub-awardees of the grant? The eligibility criteria indicate, "States, municipalities, tribal governments, and individuals are not eligible to apply." What role could they play?**

Generally, unless prohibited by statute, an entity/individual is eligible to receive a subaward even if it is not eligible to receive an assistance agreement. So, the state agencies could be eligible to be subawarders of this grant. However, one of the entities you inquired about, the U.S. Geological Survey (USGS), is a federal entity. OMB's revisions to the definition of Subrecipient in 2 CFR 200.1 and the regulatory coverage in 2 CFR 200.101, Applicability, provides that Federal agencies may receive subawards from pass-through entities when authorized by Federal statutes. In order to award a subaward to USGS, you must demonstrate that USGS has the statutory authority to receive subawards from pass-through entities. Additional information regarding Contracts and Subawards can be found at: <https://www.epa.gov/grants/epa-solicitation-clauses>.

**H8: Is EPA available to discuss the program and answer questions from an applicant on achieving the program objectives prior to submitting an application?**

As described in Section VII of the Request for Applications, EPA staff cannot meet with individual applicants to discuss draft applications.

"Section VII., Agency Contact, Note to Applicants: 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. Please note that applicants should raise any questions they may have about the solicitation language to the contact identified in

Section VII of this announcement as soon as possible so that any questions about the solicitation language may be resolved prior to submitting a proposal. In addition, if necessary, EPA may clarify threshold eligibility issues with applicants prior to making a final eligibility determination."