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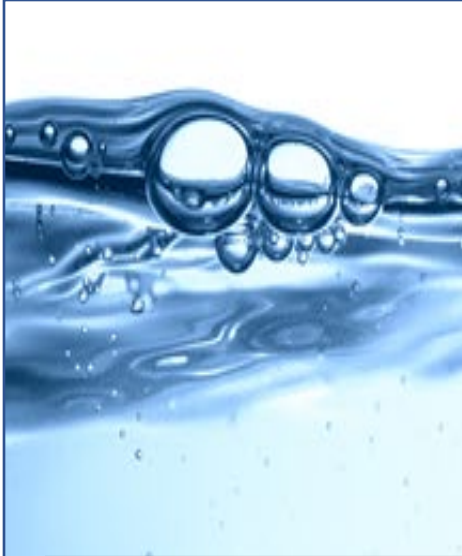
# State Lead Testing in School and Child Care Program Drinking Water Grant Implementation Document



## WATER INFRASTRUCTURE IMPROVEMENTS FOR THE NATION (WIIN) ACT

Section 1464(d) of the Safe Drinking Water  
Act (SDWA)

## SUMMARY



The Environmental Protection Agency (EPA) is providing funding to eligible states and territories for participation in the *Lead Testing in School and Child Care Program Drinking Water Grant Program*. States and tribes will use this funding to assist local and tribal educational agencies in testing for lead contamination in drinking water at schools and child care facilities.

Participating states shall ensure that each local educational agency that receives grant funds shall use the funds in accordance with [EPA's 3Ts for Reducing Lead in Drinking Water guidance](#) or applicable state regulations that are not less

stringent than the 3Ts guidance.

Participating local education agencies (LEAs) will make the testing results publicly available and notify parent, teacher, and employee organizations of the availability of the results.



EPA intends to award funds to states and territories based on an allocation formula. States and territories submit their notification of intent to participate (NOIP) in the Program to the EPA. The EPA continues to award funds according

to the allocation formula to states and territories with approved applications that choose to participate in the Program.

This document contains the state *Lead Testing in School and Child Care Program Drinking Water Grant Program* implementation information for both internal and external stakeholders. All public materials for the grant program are available at [www.epa.gov/safewater/grants](http://www.epa.gov/safewater/grants).

*A separate grant information document will be provided for tribal funding and is also located at [www.epa.gov/safewater/grants](http://www.epa.gov/safewater/grants). Also, the entity "state(s)" also implies territories where stated throughout the document.*

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## I. OVERVIEW

This document describes the programmatic requirements applicable to all grants to states and territories awarded through this Program. All projects funded with *Lead Testing in School and Child Care Program Drinking Water Grant Program* funds must meet all eligibility and funding requirements set forth in this program document.

This document identifies the application framework for preparing applications, workplans and budget narratives to submit for the grant awards and how they must be submitted using Grants.gov. Grantees shall follow the framework for grants management, requirements, and reporting using the Uniformed Grants Guidance (UGG) under 2 CFR 200.

This document provides information to EPA Regions and to participating states and territories on how the Agency intends to award and manage state *Lead Testing in School and Child Care Program Drinking Water Grant Program* funds. Some of the statutory provisions described in this document contain legally binding requirements. However, this document does not substitute for those provisions or regulations, nor is it a regulation itself. Thus, the document cannot impose legally binding requirements on EPA, states, territories, or the regulated community, and may not apply to all situations.

## II. STATUTORY AUTHORITY

Section 1464(d) of the Safe Drinking Water Act (SDWA), as amended by section 2107 of the 2016 Water Infrastructure Improvements for the Nation Act (WIIN) and by section 2006 of the 2018 America's Water Infrastructure Act (AWIA), authorizes EPA to award grants to states to assist local education agencies to test for lead contamination in drinking water at schools or *local education agencies* and *child care programs*. The SDWA section 1464(d)(1) defines *child care programs* and *local education agencies* as:

- (A) *Child Care Program*- The term 'child care program' has the meaning given the term 'early childhood education program' in section 103(8) of the Higher Education Act of 1965 (20 U.S.C. 1003(8)).
- (B) *Local Education Agency*- The term 'local education agency' means:
  - (i) a local education agency (as defined in section 8101 of Elementary and Secondary Education Act of 1965 (20 U.S.C. 7801));

### Are private and charter schools eligible beneficiaries of the grant?

The term "local education agency" (LEA) as defined in section 8101 of Elementary and Secondary Education Act of 1965 (20 U.S.C. 7801) means a public board of education or other public authority legally constituted within a state to administer a service for, public elementary schools or secondary schools in a city, county, township, school district, or other political subdivision of a state, or recognized in a state as an administrative agency for its public elementary schools or secondary schools. For example, this would include public school districts, Educational Service Agencies, such as Boards of Cooperative Educational Services (BOCES), Intermediate Educational Units, and those charter schools that operate as LEAs under state law. Private schools are not included within the definition of LEA.

States can use grant funding to test lead in drinking water at public and private child care facilities.

- (ii) a tribal education agency (as defined in section 3 of the National Environmental Education Act (20 U.S.C. 5502)); and
- (iii) a person that owns or operates a child care program facility.

This program is referred to as the *Lead Testing in School and Child Care Program Drinking Water Grant Program* (the Program). The Program is designed to reduce exposure of children, who are most vulnerable, to lead in drinking water at schools and child care facilities. While the Program provides grants to states and tribes, this document is for state funding only. A separate grant document will be provided for tribal funding and is also located at [www.epa.gov/safewater/grants](http://www.epa.gov/safewater/grants).

### III. ELIGIBLE APPLICANTS

EPA has chosen, under the authority provided in the SDWA 1464(d), to provide funds under the Program to “states” as defined by the Safe Drinking Water Act. This includes the 50 states, the District of Columbia, Puerto Rico, the Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands. Consistent with this definition, within this document, the term “state” will be used to describe the 50 states and the District of Columbia, Puerto Rico, Guam, the US Virgin Islands, American Samoa, and the Commonwealth of the Northern Mariana Islands. A separate grant information document will be provided for tribal funding and located at [www.epa.gov/safewater/grants](http://www.epa.gov/safewater/grants).

Written correspondence from the state governor or designee to the Administrator of EPA is required to certify one state agency as the recipient of funds who has the legal and administrative authority to enter into a grant or cooperative agreement with EPA. Upon receipt, EPA will consider the state agency designated by the governor, the lead agency for the state for the purposes of this grant program.

### IV. NOTICE OF INTENT

States that want to receive *Lead Testing in School and Child Care Program Drinking Water Grant Program* funding must submit a Notice of Intent to Participate (NOIP) indicating the lead agency charged with the state’s oversight and responsibility for receipt and actions pertaining to the grant program.

- A. **Notice of Intent to Participate:** States and territories must submit a Notice of Intent to Participate (NOIP) to initiate participation in the Program.
- B. **Submission of the NOIP:** The Notice can be submitted by email to [WIINDrinkingWaterGrants@epa.gov](mailto:WIINDrinkingWaterGrants@epa.gov). The Notice must be from an official within the governor’s office, the director of the designated agency, or other authorized official.
- C. **Review of the NOIP:** OGWDW will forward the Notices to the appropriate EPA Regional Office for review. Regions will work with the states as necessary to resolve any identified issues.

States that have already submitted a NOIP will not be asked to do this again in following grant years.

### V. ALLOCATION OF FUNDS

- A. **Allocation Formula:** EPA is providing funding to eligible states and territories for participation in the *Lead Testing in School and Child Care Program Drinking Water Grant Program*. If all 50

states, the District of Columbia, and the five qualifying territories participate in the Program, then each will be allocated funds based on an algorithmic formula that includes factors for population, disadvantaged communities, and lead exposure risk. Not more than 4 percent of grant funds accepted by a state may be used to pay the administrative costs of carrying out the Program. Approximately 6.44 percent of the allotment will aid tribal educational agencies. If fewer than all states submit a NOIP, the formula will be applied to any remaining unclaimed base funds, and these funds will be reallocated to all participating states. There is no match requirement for this program.

- B. **Allocation Notification:** After receiving all NOIP's, OGWDW will calculate the final allocations, and EPA Regions will notify state and territory contacts via e-mail. Each state and territory must then submit a workplan and budget narrative and send these documents to their EPA Regional contacts for review. EPA will review the workplan and budget narrative and provide comments so that the state or territory can correct any issues prior to submitting their complete application through Grants.gov.

## VI. APPLICATION PACKAGE AND SUBMISSION INFORMATION

- A. **Content of Application Package:** The application package will include all the following materials:

### Mandatory

- a. **Standard Form (SF) 424**, Application for Federal Assistance
- b. **Standard Form (SF) 424A**, Budget Information
- c. **Key Contacts Form**
- d. **EPA Form 4700-4**, Pre-award Compliance Review
- e. **Project Narrative Attachment Form** An optional sample is available at [www.epa.gov/safewater/grants](http://www.epa.gov/safewater/grants) to prepare the Work Plan and Budget Narrative.

### B. Grants.gov Application Instructions

- a. Your organization's authorized official representative (AOR) must submit your complete application package electronically to EPA through [Grants.gov](http://Grants.gov).
- b. Follow the instructions available on Grants.gov to submit an application package through [Grants.gov](http://Grants.gov). The application package contains the required forms listed above.
  1. Go to [Grants.gov](http://Grants.gov)
  2. Search by **Funding Opportunity Number: EPA-CEP-02**
  3. From the list of Opportunity Package(s) currently available, click on the "Apply" link corresponding with CFDA#: **66.444**.

## VII. ELIGIBLE USES

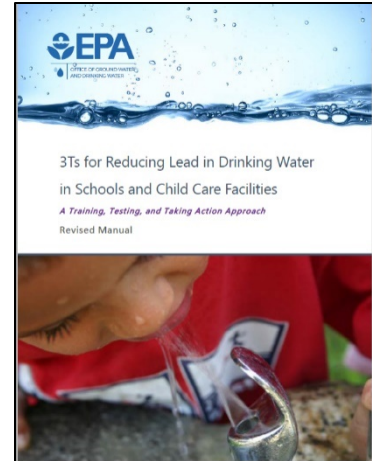
SDWA 1464(d) allows states to use grant funds provided under the *Lead Testing in School and Child Care Program Drinking Water Grant Program* to assist local educational agencies in testing for lead contamination in drinking water at schools and child care facilities. The state's workplan must describe how the state will ensure that projects selected for funding support the programmatic priorities listed below.

The funds are subject to the following:

**A. Project and Budget Period:** Anticipate that funds awarded under this program will have a two-year project period.

**B. Eligible Activities:** Funds for the eligible activity of testing for lead contamination in drinking water in schools and child care facilities must be used in accordance with the following:

- EPA's *3Ts for Reducing Lead in Drinking Water* guidance (found at [www.epa.gov/safewater/3ts](http://www.epa.gov/safewater/3ts)); or
- Applicable state regulations or guidance regarding reducing lead in drinking water in schools and child care facilities that are not less stringent.



This may include sample collection and analysis, first draw and flush sampling, the development of sampling plans, training in preparation of sampling, communication related to sampling efforts, use of a contractor to support sampling efforts, and sampling after remediation. Examples of additional assistance activities funding can include, but are not limited to, the following.

1. Conduct outreach on the importance of implementing a 3Ts program that ensures protection of children's health at the school, facility, and community level.
2. Conduct training for the individuals or team that are conducting the drinking water testing in the facilities.
3. Provide technical assistance in assessment of premise plumbing and identifying appropriate sampling locations.
4. Develop monitoring, maintenance, and/or sampling plans that protect children from lead exposure both now and in the future.
5. Maintain records/documentation of the sampling, monitoring, and actions related to testing conducted for each facility and/or school district.

### Potential Child Care Program Partner

EPA encourages states to engage with the following state child care organizations as a resource and partner in reaching out to and prioritizing childcare facilities:

- Child Care Licensing Agencies
- Child Care Resource Referral Agency
- Child Care Development Fund Administrators



NOTE: Funds under this grant program **cannot** be used for remediation, only for testing and costs associated with testing as described above. States will need to describe the activities in their application. See section VI Application Package and Submission Information.

### C. Notification:

Below are the reporting and notification requirements for sharing testing results.

- Make available a copy of the results of any testing for lead in drinking water carried out using grant funds, if applicable, in the school and child care program administration offices and, to the extent practicable, on the internet website of the local educational agency for inspection by the public; and
- Notify parent, teacher, and employee organizations of the availability of the results.

**D. SDWA 1464(d) Programmatic Priorities:** The principal objective of the assistance to be awarded under this program is to provide grants to states to help local education agencies to test schools and child care facilities for lead contamination in drinking water, utilizing EPA's *3Ts for Reducing Lead in Drinking Water* guidance or applicable state regulations or guidance regarding reducing lead in drinking water in schools and child care facilities that are not less stringent. The objective of the Program is to:

- (1) Reduce children's exposure to lead in drinking water;
- (2) Help states target funding toward schools and child care programs unable to pay for testing;
- (3) Utilize the 3Ts model or model no less stringent to establish best practices for a lead in drinking water prevention program;
- (4) Foster sustainable partnerships at the state and local level to allow for more efficient use of existing resources and exchange of information among experts in various educational and health sectors; and
- (5) Enhance community, parent, and teacher cooperation and trust.

Project workplans should detail how the state will expend grant funds in accordance with:

- EPA's *3Ts for Reducing Lead in Drinking Water* guidance; or
- Applicable state regulations or guidance regarding reducing lead in drinking water in schools and child care facilities that are not less stringent.

If the grant recipient intends to use state regulations or guidance that is not less stringent than EPA's 3T document, the grantee must demonstrate that the state program or regulation is no less stringent than the following elements outlined in the 3T's guide. This should be described in the grant recipient workplan:

1. **Communication** – must be integrated throughout the development and implementation of the lead testing in drinking water in schools and child care facilities. Communication should establish key partnerships to support the Program as well as keeping the public informed.
2. **Training** – school and child care program officials to raise awareness of the potential occurrences, causes, and health effects of lead in drinking water. Utilize partnerships to develop program plans and to assign responsibilities that provide the framework for an



effective program. Training may include contacting or developing a team that may need to train or already be able to provide technical assistance to reach the testing objectives under the 3T's. It may indicate what the process is to train and build a capable workforce that can execute the testing and the various steps in the 3T's process for to move towards the testing objectives.

3. **Testing** – drinking water in schools and child care facilities to identify potential problems utilizing existing states guidance for testing or, when not established, utilizing 3Ts guidance for testing.
4. **Taking Action** – by developing and implementing a plan to reduce lead contamination in drinking water and communicate to parents, staff, and the larger school and child care program community.

Children six years and younger are most susceptible to the effects of lead

Lead is particularly dangerous to children because their growing bodies absorb more lead than adults and their brains and nervous systems are more sensitive to the damaging effects of lead.

To learn more about lead visit: [www.epa.gov/ground-water-and-drinking-water/basic-information-about-lead-drinking-water](http://www.epa.gov/ground-water-and-drinking-water/basic-information-about-lead-drinking-water)

To learn more about these elements, please visit [www.epa.gov/safewater/3Ts](http://www.epa.gov/safewater/3Ts).

**Prioritize:** In accordance with the America's Waters Infrastructure Act (AWIA) of 2018 section 2006, which amended the Water Infrastructure Improvement Act (WIIN) of 2017 section 2107, states or territories will assist in testing for lead contamination in drinking water at schools and child care facilities that are in low-income areas. States must prioritize funding to target:

- Schools and child care programs in low-income areas (e.g., Schools with at least 50% of the children receiving free and reduced lunch and Head Start facilities);

EPA recommends states also prioritize:

- Elementary and child care programs that primarily care for children 6 years and under;
- Older facilities that are more likely to contain lead plumbing; schools and child care facilities built before 1988 are more likely to have lead pipes, fixtures, and solder; and
- Established and sustainable child care programs without factors indicating that the building may not be serving as a child care facility in the future.

If resources are available to a state or LEA from any other federal agency, a state, or a private foundation for testing for lead contamination in drinking water, the state or local educational agency must demonstrate that the funds provided from the SDWA 1464(d) grant will not replace those resources. Grant funding can be used to create or supplement and enhance existing state resources.

## E. EPA Strategic Plan Linkage and Anticipated Outputs/Outcomes

Pursuant to Section 6a of EPA Order 5700.7, “Environmental Results under EPA Assistance Agreements,” recipients’ workplans must link proposed assistance agreements with the Agency’s Strategic Plan. EPA also requires that grant applicants adequately describe environmental outputs and outcomes to be achieved under assistance agreements (see EPA Order 5700.7, Environmental Results under Assistance Agreements, [www.epa.gov/sites/production/files/2015-03/documents/epa\\_order\\_5700\\_7a1.pdf](http://www.epa.gov/sites/production/files/2015-03/documents/epa_order_5700_7a1.pdf)).

**1. Linkage to EPA Strategic Plan:** The activities to be funded under this announcement support EPA’s FY 2018-22 Strategic Plan. Awards made under this announcement will support Goal 1, “Core Mission: Deliver real results to provide Americans with clean air, land, and water, and ensure chemical safety,” Objective 1.2, “Provide for Clean and Safe Water: Ensure waters are clean through improved water infrastructure and, in partnership with states and tribes, sustainably manage programs to support drinking water, aquatic ecosystems, and recreational, economic, and subsistence activities.” Applicants must explain in their workplan how their project will further this objective.

Please read EPA’s FY 2018-2022 Strategic Plan ([www.epa.gov/planandbudget/strategicplan](http://www.epa.gov/planandbudget/strategicplan)) for more information.

Applicants must include specific statements in the workplan describing the environmental results of the proposed project in terms of well-defined outputs and, to the maximum extent practicable, well-defined outcomes that will demonstrate how the project will contribute to the priorities described above. Specifically, the proposed activities must assist schools and child care programs to test for lead contamination in drinking water, utilizing EPA’s *3Ts for Reducing Lead in Drinking Water* guidance or applicable state regulations or guidance regarding reducing lead in drinking water in schools and child care facilities that are not less stringent.

**2. Outputs:** The term “output” means an environmental activity, effort, and/or associated work product related to an environmental goal and 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 an assistance agreement funding period.

Expected outputs from the projects to be funded under this announcement include, but are not limited to:

- Use EPA’s *3Ts for Reducing Lead in Drinking Water* guidance to implement the state program.
- Develop a state lead testing in drinking water in schools and childcare facilities management strategy that supports a robust training, monitoring, and maintenance plan that protects children from lead exposure now and in the future.
- Prioritize testing to target vulnerable communities and populations: schools and child care programs in underserved and/or low-income communities (e.g., Schools with at least 50% of the children receiving free and reduced lunch and Head Start facilities); elementary and child care programs that primarily care for children 6 years and under; and older facilities that are more likely to contain lead plumbing. Schools and child care facilities built before 1988 are more likely to have lead pipes, fixtures, and solder.
- Provide results of any testing for lead contamination in school and child care facility drinking water carried out using grant funds, if applicable, in the school or childcare facility administration offices and, to the extent practicable, on the internet website for inspection by

the public; and notify parent, teacher, and employee organizations of the availability of the results.

Other potential outputs may include, but are not limited to:

- Establish a memorandum of understanding/memorandum of agreement (MOU/MOA), or partnership, and letters of support with state and local agencies and nongovernmental organizations that support schools and childcare programs (e.g., an MOU between the state education, health and environment agencies, state Child Care Licensing Agency, Child Care Resource Referral Agency, and Child Care Development Fund Administrators). The MOU/MOA encourages collaboration and efficient use of resources, as well as coordination of technical assistance, training, and mitigation solutions.

**3. Outcomes:** The term “outcome” means the result, effect, or consequence that will occur from carrying out an environmental program or activity that is related to an environmental or programmatic goal or objective. Outcomes may be qualitative and environmental, behavioral, health-related, or programmatic in nature, but must also be quantitative. They may not necessarily be achievable within an assistance agreement funding period.

Expected outcomes from the projects to be funded under this announcement include, but are not limited to:

- Schools or child care programs, unable to pay for testing, implement a testing program and mitigate lead exposure by utilizing the 3Ts toolkit in determining best action to take for remediation.
- Reduce children’s exposure to lead in drinking water.
- Improve knowledge of staff of lead in drinking water and other environmental harms.
- Develop a regular lead testing program.
- Improve water quality.
- Establish routine practices such as those outlined in the newly revised 3Ts toolkit.

Other potential outcomes may include, but are not limited to:

- Foster sustainable partnerships at the state and local level to allow for a more efficient use of resources and exchange of information among experts in various areas of school, child care, utility, and health sectors.
- Enhance community, parent, and teacher trust.

## VIII. USE OF FUND REQUIREMENTS

The budget narrative must detail funding expenditures that demonstrate adherence to the following:

- A. Federal Matching Funds:** No funds awarded under the Program shall be used for matching funds for other federal grants unless expressly authorized by statute.
- B. Administrative Costs Expense Cap:** No more than 4 percent of the state’s total award may be used to cover administrative type costs (e.g. record keep, reporting, personnel, benefits, travel, and office supplies).
- C. Expenses Incurred Prior to the Project Period:** The allowability of pre-award costs are governed by 2 CFR §200.458 and 2 CFR §1500.8. Pre-award costs are those incurred prior to the effective date of the Federal award directly pursuant to the negotiation and in anticipation of the Federal award where such costs are necessary for efficient and timely performance of the scope of work. Such costs are allowable only to the extent that they would have been allowable if incurred after the date of the Federal award and only with the written approval of the Federal awarding agency. EPA defines pre-award costs as costs incurred prior to the award date, but on or after the start date of the project/budget period. Under EPA’s interpretation of [2 CFR 200.309](#), all eligible costs must be incurred during the budget/project period as defined by the start and end date shown on the grant award to receive EPA approval. This policy is implemented in a grant-specific Term and Condition entitled “Pre-award Costs”. No funds awarded under the Program shall be used for reimbursement of previous testing efforts prior to the project/budget period. All costs incurred before EPA makes the award are at the recipient's risk. EPA is under no obligation to reimburse such costs if for any reason the recipient does not receive a Federal award or if the Federal award is less than anticipated and inadequate to cover such costs.
- D. Cannot Displace Existing Funds:** If resources are available to a state or local educational agency from any other federal agency, a state, or a private foundation for testing for lead contamination in drinking water, the state, or local educational agency must demonstrate that the funds provided from the SDWA 1464(d) grant will not displace those resources.

What can this grant fund?

Examples of projects and activities as a result of section 1464(d) of the Safe Drinking Water Act funding can include:

1. Training the individuals or team that are leading the testing in drinking water in schools and child care facilities;
2. Staff travel, and administrative oversight required to report information collected to the states and the validation/consistency of the testing;
3. Testing kits and testing of the drinking water at the schools and child care facilities
4. Lab fees to analyze the drinking water samples;
5. Provide schools and child care programs with resources and tools to communicate the results of the testing to the community at large; and
6. Develop state monitoring and maintenance plan that protects children from lead exposure now and in the future.

**IX. AWARD ADMINISTRATION INFORMATION**

**A. 2 CFR part 200 and 2 CFR part 1500:** The requirements of 2 CFR part 200 (OMB Uniform Grant Guidance) and 2 CFR part 1500 (EPA Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards) apply to this grant funding.

**B. Terms and Conditions:** General administrative and programmatic terms and conditions applicable to EPA assistance agreements under this Program may be viewed at: [www.epa.gov/grants/grant-terms-and-conditions](http://www.epa.gov/grants/grant-terms-and-conditions). EPA Headquarters will provide EPA Regions with a list of terms and conditions that will also be applicable to the Program. EPA Regional teams will ensure that all applicable terms and conditions are included.

**C. Quality Assurance Project Plan (QAPP):** Awards funded under this Program will include the collection of environmental data, and will require the development of a Quality Assurance Project Plan (QAPP). The structure of the QAPP is intended to step through the thought process of planning a project, as well as to provide a framework for documenting the plan. A QAPP is prepared as part of the project planning process and should be completed and approved before data collection is started. For more information, visit: [www.epa.gov/quality/quality-assurance-project-plan-development-tool](http://www.epa.gov/quality/quality-assurance-project-plan-development-tool).

**D. Funding to Other State Agencies:** EPA's general policy, based on the definitions of the terms "Non-federal entity" (2 CFR §200.69), "Pass-through entity (2 CFR §200.74) "Recipient" (2 CFR §200.86) and "State" (2 CFR §200.90), is that the state itself is the legal entity that receives EPA funds even if one particular component of the state is named in the assistance agreement as the recipient. Transfers of EPA funds between state agencies to perform a particular financial assistance agreement would, therefore, be governed by state law. Additionally, 2 CFR §200.417 "Interagency Services" contemplates situations in which one agency provides services to another agency within the same unit of government as a direct cost of performing the EPA assistance agreement.

If using interagency service agreements between state agencies under 2 CFR §200.417, the expenditures the state agency makes to carry out the Interagency Service Agreement should be shown in the corresponding direct cost categories (Personnel, Travel, Contractual, etc.). If state law characterizes agreements under which one state agency provides services to another state agency as a procurement contract, then the costs would be placed in the contractual category. In interagency service situations, 2 CFR §200.417 provides the state may charge a pro-rated share of indirect costs for the service, or 10% of the ". . . direct salary and wage cost of providing the service (excluding overtime, shift premiums, and fringe benefits) may be used in lieu of determining the actual indirect costs of the service." Centralized services included in central service cost allocation plans subject to Appendix V of 2 CFR Part 200 are accounted for separately.

There may be situations in which state law provides that state agencies or instrumentalities are legally separate for the purposes of financial transactions between them or when state financial management policies for Federal assistance agreements require separate instruments for accounting purposes (e.g. due to differences in indirect cost rates). In those situations, a state may characterize appropriate funding transfers as subawards. Note, however, that if one state agency provides a subaward to another state agency, the state agency acting as the pass-through entity must comply with applicable provisions of 2 CFR Part 200 (including 2 CFR §200.331), the National Term and Condition for Subawards, and the EPA Subaward Policy unless EPA provides an exception. Also, should a state choose to provide subawards, the state can only provide subawards to LEAs as identified in the SDWA 1464(d)(1) and the awards must be governed by the subaward policy. The aggregate cost estimates for subawards to other state agencies or instrumentalities should be included as line items in the "Other" budget category. The link to the Subaward policy is [www.epa.gov/grants/grants-policy-issuance-gpi-16-01-epa-subaward-policy-epa-assistance-agreement-recipients](http://www.epa.gov/grants/grants-policy-issuance-gpi-16-01-epa-subaward-policy-epa-assistance-agreement-recipients).

More information about the Agency's National Term and Condition for Subawards under the UGG and EPA's Subaward Policy can be found at: [www.epa.gov/sites/production/files/2016-02/documents/gmc\\_subaward\\_policy\\_appendix\\_b\\_national\\_t\\_and\\_c.pdf](http://www.epa.gov/sites/production/files/2016-02/documents/gmc_subaward_policy_appendix_b_national_t_and_c.pdf).

**E. Procurements:** When procuring property and services under a Federal award, a state must follow the same policies and procedures it uses for procurements from its non-Federal funds. The state will comply with §200.322 Procurement of Recovered Materials and ensure that every purchase order or other contract includes any clauses required by section §200.326 Contract provisions. All other non-Federal entities, including subrecipients of a state (other than another state agency), will follow §200.318 General Procurement Standards through §200.326 Contract Provisions.

**F. Performance Partnership Grants:** Funds awarded under this program are not eligible for inclusion with the state's Performance Partnership Grants.

**G. Public Notification:** Not later than 60 days after the date of the award of a subaward by a state, the state shall publish the following on the website of the state:

- For subawards provided to local educational agencies, the total number and dollar amount of subawards.

**H. Testing Results Notification Requirements:** Eligible entities receiving assistance will adhere to the statutory requirements as noted in SDWA 1464(d):

- “(B)(i) make available, if applicable, in the administrative offices and, to the extent practicable, on the Internet website of the local educational agency for inspection by the public (including teachers, other school personnel, and parents) a copy of the results of any voluntary testing for lead contamination in school and child care program drinking water carried out using grant funds under this subsection; and “(ii) notify parent, teacher, and employee organizations of the availability of the results...”

The grant requires using EPA's 3Ts for Reducing Lead in Drinking Water in Schools and Child Care Facilities, or a process no less stringent. The 3Ts guidance provides for flexible and effective preparation and coordination to deliver information swiftly, professionally and consistently, which includes maintaining reporting and recordkeeping. The process and the degree to which information is presented or maintained, however, is at the discretion of the state and as approved by EPA via the award process.

**G. Reports:** Quarterly and Annual performance progress reports are required, including grant fund reporting elements and summaries of the project activity and status of outputs during the reporting period. Quarterly and Annual reports are due 30 days after the end of the reporting period.

**Quarterly Reports:** The quarterly report will reflect information pertaining to the state and its agency with oversight and the work performed to meet the objectives of the program and the grant activity during the period of performance. Reporting must provide a comprehensive review of amount of testing performed; the total number of schools and/or child care facilities included in the testing

program; the number of schools and/or childcare facilities that completed testing; and the breakdown of financial and direct grant assistance which subsidized the testing during the reporting cycle. Participating states, territories and tribes should coordinate with the EPA regional offices on reporting elements after applications have been approved for awards.

**Annual Reports:** The annual report will reflect the participating entity's comprehensive efforts towards testing for lead in schools and/or child-care facilities over the course of the calendar year.

**Final Reports:** The final report must include: summary of the project or activity, testing benefits and other outputs and outcomes achieved, and costs of the project or activity. **The final report shall be submitted to EPA within 90 calendar days of the project/budget period end date.**

## X. RESOURCES

SDWA 1464(d) Lead Testing in School and Child Care Program Drinking Water Grant Program FAQs and Resources: [www.epa.gov/safewater/grants](http://www.epa.gov/safewater/grants)

3Ts for Reducing Lead in Drinking Water in Schools and Child Care Facilities:  
[www.epa.gov/safewater/3Ts](http://www.epa.gov/safewater/3Ts)

Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements:  
[www.epa.gov/grants/best-practice-guide-procuring-services-supplies-and-equipment-under-epa-assistance-agreements](http://www.epa.gov/grants/best-practice-guide-procuring-services-supplies-and-equipment-under-epa-assistance-agreements)

EPA Subaward Policy with attachments: [www.epa.gov/grants/grants-policy-issuance-gpi-16-01-epa-subaward-policy-epa-assistance-agreement-recipients](http://www.epa.gov/grants/grants-policy-issuance-gpi-16-01-epa-subaward-policy-epa-assistance-agreement-recipients)



## SUMMARY STATEMENT

### SCOPE OF WORK

#### A. State Goals and Priorities

#### B. Program Implementation and Activities

- i. Identify using either EPA 3Ts or another protocol that is no less stringent
- ii. Communication
- iii. Training
- iv. Testing
- v. Taking Action

#### C. Roles and Responsibilities

#### D. Timeline and Milestones

#### E. WIIN Programmatic Priorities and EPA's Strategic Plan Linkage

*The activities described in this workplan support the WIIN Programmatic Priorities and EPA's FY 2018-22 Strategic Plan, Goal 1, "Core Mission: Deliver real results to provide Americans with clean air, land, and water, and ensure chemical safety," Objective 1.2, "Provide for Clean and Safe Drinking Water: Ensure waters are clean through improved water infrastructure and, in partnership with states and tribes, sustainably manage programs to support drinking water, aquatic ecosystems, and recreational, economic, and subsistence activities."*

#### F. Outputs and Outcomes

- i. *Outputs: An environmental activity or effort, and/or associated work products that are produced or provided over a specific period of time. Outputs may be quantitative or qualitative but must be measurable during an assistance agreement funding period.*
- ii. *Outcomes: The result, effect, or consequence that will occur from carrying out an environmental program or activity that is related to an environmental or programmatic goal or objective. Outcomes may be environmental, behavioral, health-related, or programmatic in nature, must be quantitative, and may not necessarily be achievable within an assistance agreement funding period. EPA encourages recipients to identify outcomes wherever possible because they lead to environmental and/or public health improvement more clearly than outputs.*

#### G. Budget Narrative