

**U.S. Environmental Protection Agency - Region 10
Indian Environmental General Assistance Program
FY23 Funding Availability**



November 8, 2021

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I. OVERVIEW

The U.S. Environmental Protection Agency, Region 10, is announcing the opportunity for federally recognized tribes and intertribal consortia to apply for an Indian Environmental General Assistance Program (GAP) grant for Federal Fiscal Year (FY) 2023. EPA provides GAP funds to tribal governments and intertribal consortia to assist them in planning, developing, and establishing the capacity to implement federal environmental programs administered by EPA and to assist in implementation of tribal solid and hazardous waste programs that are consistent with applicable provisions of law, including the Solid Waste Disposal Act (which was amended by the Resource Conservation and Recovery Act, or RCRA). EPA administers this program in accordance with the *Indian Environmental General Assistance Program Act of 1992*.

As described in the GAP Guiding Principles (<https://www.epa.gov/sites/production/files/2018-11/documents/gap-guiding-principles-memo-09-19-17.pdf>), GAP supports tribal government efforts to develop core environmental program capacities (administrative, financial management, information management, environmental baseline needs assessment, public education/communication, legal, and technical/analytical) and baseline capacities for media-specific programs (e.g., ambient air quality, water quality, managing waste, and other EPA-administered statutory programs). See Section II.B. for a discussion of allowable activities under the GAP grant.

Applicants may request funding between \$75,000 and \$125,000 for FY23, depending on program need and existing balances.

Tribes with large reservations may request a higher level of funding. For Umatilla, Spokane, and Quinault, funding may be up to \$150,000. For Coeur d'Alene, Nez Perce, Shoshone Bannock, and Warm Springs, funding may be up to \$160,000. For Colville and Yakama, funding may be up to \$170,000.

Applicants are not guaranteed to be funded at the requested amount.

Region 10 will determine award amounts based on:

- the amount of GAP funding Region 10 receives;
- the number of tribes and intertribal consortia submitting applications;
- the applicant's level of unexpended GAP funds;
- whether proposed activities are eligible; and
- whether proposed activities meet the review factors, including past performance and whether the applicant is current on all reporting requirements.

See Section IV for details.

High Balances

EPA recommends that grantees with a high balance of unspent GAP funding from previous years contact their Tribal Coordinator to discuss whether a no-cost extension or reduced award would be appropriate.

A. TIMELINE

Steps	Details
1. Review the Notice of Funding Availability.	<ul style="list-style-type: none"> EPA issues the Notice of Funding Availability (NOFA) in November 2021.
2. Submit budget worksheet(s) and work plan(s) to your Tribal Coordinator.	<ul style="list-style-type: none"> Budget worksheets and work plans should be emailed to EPA or submitted in GAP Online (GO3) no later than Friday, February 18, 2022. Applicants are encouraged to submit proposals earlier. If requesting indirect costs, submit a copy of the approved indirect cost rate, proposal for a new rate, or an exception request by February 18. COVID-19: Applicants who cannot meet the February 18 deadline because of COVID 19 impacts must email an extension request to their EPA Tribal Coordinator by February 7 describing their situation and to establish a submission date.
3. Obtain a DUNS Number if you do not have one.	<ul style="list-style-type: none"> Applicants must have a DUNS number to register with Grants.gov: http://www.grants.gov/web/grants/applicants/organization-registration/step-1-obtain-duns-number.html
4. Register with the System for Award Management (SAM).	<ul style="list-style-type: none"> It is vital to keep the organization's SAM registration active at all times. EPA recommends renewing one month before your organization's SAM.gov expiration date. Register or renew SAM registration at http://www.grants.gov/web/grants/applicants/organization-registration/step-2-register-with-sam.html. Tribes initially registering in SAM need to submit a notarized letter appointing their Authorized Entity Administrator. The Procurement Technical Assistance Center (PTAC) is available to assist tribes with SAM registration. See Section VI.B for details.
5. Register in Grants.gov.	<ul style="list-style-type: none"> Register at http://www.grants.gov/web/grants/applicants/organization-registration.html. <i>EPA strongly recommends that tribes check that their registration in Grants.gov, including the designated eBusiness Point of Contact, is current and that the person who will be submitting the funding request has an Authorized Organization Representative account. This will be essential to submitting your application in Grants.gov.</i>
6. Submit consortia eligibility documentation <u>once every four years</u> .	<ul style="list-style-type: none"> Intertribal consortia resolutions (or other supporting documentation) from all GAP-eligible member tribes authorizing the consortium to apply for and receive funding on their behalf are due to EPA by March 30, 2022. This requirement applies only to consortia applying for a new grant – that is, the first year of the four-year funding cycle.

7. Enter the application package in Grants.gov.	<ul style="list-style-type: none"> • After negotiating the work plan and budget, your Tribal Coordinator will ask you to submit the application package in Grants.gov. See Attachment F. • EPA expects applications to be submitted by the date applicants negotiate with their Tribal Coordinators. • All GAP applications should be entered into Grants.gov no later than Friday, May 20, 2022. PPG applicants should also strive to submit applications by this date. • Grants.gov staff can assist tribes with technical issues. See Attachment F for details.
8. EPA issues FY23 GAP awards to tribes and intertribal consortia.	<ul style="list-style-type: none"> • EPA expects FY23 GAP awards will be made to eligible applicants by September 30, 2022.
9. EPA hosts webinars for applicants.	<ul style="list-style-type: none"> • EPA Region 10 will host one or more webinars on the FY23 NOFA. Dates will be posted on the Region 10 Tribal Environmental GAP Webinars page: https://www.epa.gov/r10-tribal/region-10-tribal-environmental-webinars.

B. HIGHLIGHTS

- **PPG Applicants:** EPA has issued a class exception to the PPG match requirement outlined in 40 CFR 35.536. *Therefore, tribes no longer need to submit letters requesting match waivers.*
- **Period of Performance:** Tribes are encouraged to request multi-year funding if they are meeting all grant requirements. See Section I.E for details.
- **Tribal Leaders Summit:** The Tribal Caucus of the EPA Region 10 Tribal Operations Committee (RTOC) will host a regional Tribal Environmental Leaders Summit in 2023. Applicants whose tribal leaders and environmental staff are interested in attending may wish to include travel for this event in their FY23 GAP work plans and budget worksheets. Details will be posted at <http://region10rtoc.net/>.
- **Webinars:** EPA Region 10 will host one or more webinars associated with this announcement. Details will be shared on the EPA Region 10 Tribal Programs website, <https://www.epa.gov/r10-tribal>, and in the R10 Tribal Info Box.

We highly recommend that applicants review the first three webinar recordings before submitting their draft proposal and the fourth webinar before submitting their final application:

1. **Developing a GAP Budget**, Dec. 6, 2017
2. **Developing a GAP Work Plan**, Nov. 29, 2017
3. **EPA's New Indirect Cost Rate Policy**, Dec. 10, 2018
4. **Grants.gov Informational Session for Tribes**, February 2019

Information on how to access the webinar materials is available at <https://www.epa.gov/r10-tribal/region-10-tribal-environmental-webinars>.

- **Forms:** All applicants must include these forms when submitting applications in Grants.gov:
 - **SF-424**
 - **SF-424A**
 - **Preaward Compliance Review**
 - **EPA Form 4700-4**
 - **EPA Key Contacts Form**

These forms are saved in Workspace in Grants.gov and can be accessed, edited, and used for your FY23 GAP application submission. See Attachment F.

Examples of the SF-424 and SF-424A are available in Attachments G and H for PPG and GAP applicants. Please refer to these examples when completing your application.

New applicants (those entering the first year of their four-year funding cycle) applying for greater than \$100,000 must also submit:

- **Certification Regarding Lobbying, EPA Form 6600-06**

Find the Certification Regarding Lobbying form at https://www.epa.gov/system/files/documents/2021-08/epa_form_6600_06.pdf.

- **Solid Waste Implementation (REMINDER):** A tribe seeking funding for solid waste and recovered materials collection, transportation/backhaul, or disposal services (solid waste implementation) should have an Integrated Solid Waste Management Plan. If a plan is not in place, the tribe may add a work plan commitment to develop one. A tribe seeking financial assistance for solid waste implementation activities should also include a work plan commitment to identify where the serviced materials came from and the type of materials serviced. See Section II.B for details.

C. REVIEW CRITERIA

To qualify for funding in FY23, *all applicants* must have:

- active/updated DUNS, SAM, and Grants.gov registrations;
- a single or program-specific audit in compliance with 2 CFR Part 200 if the applicant spends \$750,000 or more in federal funds annually;
- completed (or updated) an EPA-Tribal Environmental Plan (ETEP) during the previous 5 years or included a commitment to complete an ETEP in FY23 (tribes only); and
- included all information requested in this Notice of Funding Availability in the proposal.

To qualify for funding in FY23, *current grant recipients* must:

- be current with all reporting requirements (progress reporting, closeout requirements for prior GAP/PPG grants, and annual Federal Financial Reports);
- be making satisfactory progress (completing workplan commitments, outputs, and deliverables) and, if not, have a corrective action plan in place;
- be making regular drawdowns per the terms and conditions of the grant agreement and not have a high balance of unexpended funds;

- have updated their ETEP within the previous 5 years (required for tribes but not for consortia);
- ensure that the proposed work plan is not identical to previous work plans; and
- be responsive to EPA requests for information and modifications.

See Section IV for details.

D. FUNDING PRIORITIES

Based on Region 10's GAP budget allocation, EPA will prioritize applicant funding in the following order:

1. **Individual Tribes.** The primary purpose of GAP grants is to build tribal capacity for developing and administering environmental protection programs. Therefore, providing GAP grants to individual tribal governments is our highest priority.
2. **Intertribal Consortia.** EPA will consider funding for intertribal consortia after it has funded individual tribes' proposals. Consortia work plans must meet the capacity-building needs of their member tribes without duplicating members' efforts.

E. PERIOD OF PERFORMANCE

Tribes are encouraged to work with their Tribal Coordinator to seek multi-year GAP funding if they are completing proposed activities as scheduled, submitting progress reports on time, fulfilling closeout requirements, regularly drawing funds down, and meeting all other grant requirements. ***A GAP work plan and budget worksheet must be included for each year of funding requested.*** Applicants should discuss this option with their EPA Tribal Coordinator before submitting a multi-year proposal.

Tribes with PPGs may submit consolidated work plans and budgets. PPG tribes should also submit a list of the environmental programs and the amount of funds for each program that will be combined in the PPG.

F. HOW TO APPLY

Applicants should submit a draft proposal to their EPA Tribal Coordinator by email on or before Friday, February 18, 2022. The Tribal Coordinator will then contact the tribe to schedule a time to negotiate the proposal. When negotiations are complete, the Tribal Coordinator will provide a date for the tribe to submit their final, approved application in Grants.gov, along with instructions on how to apply.

Initial proposals include the following items:

Initial Proposals (Submit to EPA Tribal Coordinator or Tami Fordham, Alaska Operations Office Director)		
Who	What	When
All Applicants	<ul style="list-style-type: none"> Draft work plan (or work plans if a multi-year proposal) Draft budget worksheet (or budgets worksheets if a multi-year proposal) <p>See Section III for details.</p>	By February 18, 2022
All Applicants Using an Indirect Rate	<ul style="list-style-type: none"> A copy of the current indirect cost rate letter of approval or a copy of the proposal to the agency requesting a rate or a copy of the exception submitted to EPA. <p>See Section III.C for details.</p>	

Final applications submitted in Grants.gov must include the following elements. See Attachment F for Grants.gov submission instructions.

GAP/PPG Application Requirements (Submit in Grants.gov)		
Who	What	When
All Applicants	<ul style="list-style-type: none"> Application for Federal Assistance (SF-424) Budget Information for Non-Construction Programs (SF-424A) EPA Key Contacts Form Pre-award Compliance Review (EPA Form 4700-4) Certification Regarding Lobbying (EPA Form 6600-06) – due in the first year of the four-year grant cycle if the grant exceeds \$100,000 <p>See Attachment F for details.</p>	By date negotiated between the applicant and the EPA Tribal Coordinator
All Applicants Using an Indirect Cost Rate	<ul style="list-style-type: none"> A copy of the current indirect cost rate letter of approval or a copy of the proposal to the agency requesting a rate or a copy of the exceptions request submitted to EPA <p>See Section IV.C for details.</p>	

Please review the following pages for detailed information on applying for a GAP grant. If you have questions after reviewing this material, contact your Region 10 Tribal Coordinator:
<https://www.epa.gov/r10-tribal/forms/contact-us-about-tribal-programs-pacific-northwest-and-alaska#coordinators>

II. ELIGIBILITY INFORMATION

A. Eligible Applicants

Indian tribal governments (tribes) and intertribal consortia are eligible to receive funds under this program (40 C.F.R. § 35.543). These terms are defined in 40 C.F.R. § 35.502 as follows:

An Indian tribal government (tribe), except as otherwise defined in statute or applicable program specific regulation, is any Indian tribe, band, nation, or other organized group or community, including any Alaska Native Village, which is recognized as eligible by the U.S. Department of the Interior for the special services provided by the United States to Indians because of their status as Indians.

An intertribal consortium is a partnership between two or more tribes authorized by the governing bodies of those tribes to apply for and receive assistance under [GAP].

Intertribal Consortia

Funding for consortia will be considered after the needs of individual tribes are met.

Under EPA's regulations, (40 C.F.R. § 35.504), an intertribal consortium is eligible to receive GAP financial assistance when the consortium documents that:

- A majority of its members are eligible to receive GAP grants;
- All member tribes that meet GAP eligibility requirements authorize the consortium to apply for and receive the award; and
- Accounting controls are in place to ensure that only members that meet the eligibility requirements will benefit directly from the award and the consortium agrees to an award condition to that effect.

This means that a consortium may receive a GAP grant even if the consortium includes groups that are not federally recognized tribes, as long as the consortium meets the requirements specified above. Authorization of the consortium to apply for and receive a GAP grant is required from all GAP-eligible member tribes. For purposes of determining intertribal consortia eligibility, a "GAP-eligible tribe" is any tribe that meets the definition of Indian tribal government (tribe) in 40 CFR 35.502.

At the beginning of each four-year grant cycle, an intertribal consortium must provide EPA with adequate documentation of (1) the existence of the partnership between eligible tribal governments; and (2) authorization by all GAP-eligible member tribes for the consortium to apply for and receive the new or supplemental GAP funding.

This documentation ensures that EPA can consider individual tribal needs and priorities when awarding GAP funds to intertribal consortia. Tribal authorization may be provided by a tribal council resolution or other written certification from a duly Authorized Representative of each GAP-eligible member tribe. **Documentation should be provided to the EPA Tribal Coordinator by March 30. Consortia that may not meet the March 30 deadline should work with their Tribal Coordinator to establish a submission date.** Applications that do not contain adequate documentation from all GAP-eligible tribes are incomplete and will not be considered for funding.

Proposals from intertribal consortia must describe in their work plans how work plan activities will support the ETEP and environmental priorities of the GAP-eligible tribes they serve.

B. Allowable Activities

GAP provides funding for activities that build the capacity of tribal governments to plan, develop, and establish environmental protection programs consistent with the federal laws that EPA implements. In developing work plans, tribes should refer to the core environmental protection program capacities provided in Appendix 1 of the 2013 GAP Guidance: <http://www2.epa.gov/sites/production/files/2015-05/documents/gap-guidance-final.pdf>. EPA also provides tribes financial assistance under GAP for solid waste and recovered materials collection, transportation, backhaul, and disposal services.

Following is a brief summary of allowable capacity-building and solid and hazardous waste program implementation activities.

1. Capacity-Building Activities: Tribal Environmental Program

Capacity building may include developing the appropriate administrative and legal infrastructure, establishing tribal technical capability, and planning and establishing an integrated tribal environmental management program to be implemented by a tribe with technical and financial assistance from other EPA program-specific grants. See the GAP Guidance, Appendix I: <http://www2.epa.gov/sites/production/files/2015-05/documents/gap-guidance-final.pdf>.

2. Capacity-Building Activities: Waste Management

For recommendations on developing solid and hazardous waste management capacity, see Appendix I of the GAP Guidance.

Region 10 encourages the development, periodic revision, and implementation of Integrated Waste Management Plans, which outline how a tribe will reduce, manage, and dispose of its solid and hazardous waste. An effective integrated waste management system considers how to prevent, recycle, and manage solid and hazardous waste in ways that most effectively protect human health and the environment. To learn more, visit <https://www.epa.gov/tribal-lands/developing-tribal-integrated-waste-management-plans>.

3. Implementation Activities: Waste Management

EPA strongly encourages tribes to include work plan tasks that promote the development of a self-sustaining solid and hazardous waste management program and to consider developing partnerships to increase cost-effectiveness.

Once a tribe has established appropriate solid and hazardous waste capacities, GAP funds may be used for the following implementation activities, listed below in order of priority (see Section E.4 of Appendix I of the 2013 GAP Guidance):

- (1) Program administration
- (2) Compliance and enforcement
- (3) Solid waste management, resource recovery, and resource conservation support

(4) Cleanup and closure

The following criteria apply if the applicant seeks funding for solid waste and recovered materials collection, transportation/backhaul, or disposal services:

- **Integrated Waste Management Plans:** A tribe should have an Integrated Waste Management Plan in place. If a plan is not in place, the tribe must add a workplan commitment to develop one. EPA Tribal Coordinators can connect tribes with technical resources and assist with developing a timeline for completing the plan.
- **Consortia:** A consortium's work plan should support implementation activities related to member tribes' integrated solid waste management plans.
- **Waste Reporting:** A tribe seeking financial assistance for solid waste and recovered materials collection, transportation, backhaul, and disposal activities should include a work plan commitment to identify (1) where the serviced materials came from (residential, institutional, or commercial sources), and (2) what type of materials were serviced (municipal solid waste, recovered materials, or mixed waste).¹

EPA encourages applicants to consider the following resources when developing work plans with solid waste components. To learn about allowable solid/hazardous waste activities, visit https://www.epa.gov/sites/default/files/2019-12/documents/solid_hazardous_waste_allowable_unallowable_activies_gap_v2_0.pdf.

¹ Municipal solid waste is trash from homes, schools, hospitals, businesses, and industry. Mixed waste includes any waste types with different properties—residential, industrial/commercial, hazardous, and/or radioactive waste. Recovered materials are those that are diverted from the waste stream for reuse or recycling.

Solid Waste Resources

- *Advancing Sustainable Materials Management: Facts and Figures:*
<https://www.epa.gov/smm/advancing-sustainable-materials-management-facts-and-figures>
- *Allowable and Unallowable Solid Waste and Program Implementation Costs:*
https://www.epa.gov/sites/default/files/2019-12/documents/solid_hazardous_waste_allowable_unallowable_activies_gap_v2_0.pdf
- *Building a Self-Sustaining Tribal Solid Waste Program:*
<https://www.epa.gov/sites/default/files/2018-11/documents/building-self-sustaining-tribal-solid-waste-program-region-10.pdf>
- *Building Solid Waste, Hazardous Waste, and Underground Storage Tank Capacities:* See Appendix I, Section E.3, of the GAP Guidance: <http://www2.epa.gov/sites/production/files/2015-05/documents/gap-guidance-final.pdf>
- *Developing Tribal Integrated Waste Management Plans:* <https://www.epa.gov/tribal-lands/developing-tribal-integrated-waste-management-plans>
- *Landfill reports from the State of Alaska's Solid Waste Information Management System:*
<http://dec.alaska.gov/Applications/EH/SWIMS/Default.aspx>
- *A Manager's Roadmap for Funding Sustainable Solid Waste Programs in Rural Alaska:*
<https://www.epa.gov/sites/production/files/2016-06/documents/ak-tribal-solid-waste-managers-roadmap-01272016.pdf>
- *Solid Waste Program Budgeting for Alaska Tribal Communities:*
<https://www.epa.gov/sites/production/files/2016-10/documents/ak-tribal-solid-waste-costing-tool.pdf>

III. PROPOSAL REQUIREMENTS

All requirements must be met prior to receiving GAP funding.

Current GAP/PPG recipients should direct questions and submit their proposal to their EPA Tribal Coordinator. New applicants that have not received a GAP grant before may email their proposal to Tami Fordham, Director, Alaska Operations Office, Fordham.Tami@epa.gov. General questions can be directed to any [Region 10 Tribal Coordinator](#).

A. Work Plan

1. General Work Plan Requirements

Applicants must submit a work plan detailing their proposed activities. Work plans must not duplicate prior efforts; they should demonstrate progress in building capacity or specify new focus areas. Exact duplicates of prior work plans will be rejected by the EPA Tribal Coordinator.

See Attachment D for an optional work plan template and work plan template instructions. This template is not required, but all work plans must include the following elements:

- Components
- Capacity indicators
- Personnel
- Long-term and intermediate outcomes
- **NEW!** The tribal priority in the ETEP that matches each work plan component
- Estimated work years
- Estimated cost per component
- Commitments
- Outputs and deliverables
- EPA roles and responsibilities
- Joint performance evaluation
- Statutory authority

2. Mandatory Tasks

The following tasks are mandatory for all applicants:

a) Update or Complete an EPA-Tribal Environmental Plan

In accordance with the GAP Guidance, tribes seeking GAP financial assistance are required to develop and implement an EPA-Tribal Environmental Plan. The purpose of an ETEP is to develop a complete picture of the environmental issues facing the tribe and establish a shared understanding of the issues the tribe will be working on and of the issues that EPA will address. ETEPs are instrumental for tribes and EPA to define

Tools!

Proposal Review Checklist

EPA encourages applicants to use the optional proposal review checklist before submitting their work plans and budgets to EPA. The checklist is intended to reduce errors and thereby reduce the time required for negotiations. See Attachment B.

FTE & Component Cost Calculator

See EPA Region 10's Tools page for an Excel spreadsheet that is designed to help applicants easily calculate estimated work years and cost per component: <https://www.epa.gov/r10-tribal/region-10-indian-environmental-general-assistance-program-gap#budget>.

mutual roles and responsibilities for environmental protection program implementation on tribal lands and help prioritize tribal work funded under GAP.

When applying for GAP financial assistance, tribes should identify the tribal priority in the ETEP that matches each work plan component.

Tribes and EPA should jointly review the ETEP annually and update it as needed to reflect changes in environmental program administration priorities, adjust performance expectations, or account for changing environmental and administrative conditions. Tribes may include activities to update their ETEPs in their work plan proposal.

For any tribe seeking GAP funding for the first time or after several years without GAP funding that does not have an ETEP, ETEP development must be included as part of the tribe's application.

A tribe with an existing grant that does not have an ETEP in place may only apply for and receive GAP funds if: (a) the EPA Regional Office and the EPA American Indian Environmental Office have agreed upon an ETEP completion date, and (b) the tribe's work plan includes a commitment to finalize the ETEP by the agreed-upon date. EPA reserves the right to award funding only for work plan activities related to finalizing the ETEP.

b) Submit Quality Assurance Documentation

If a tribe plans to conduct any environmental measurements, including sampling and data collection activities and/or use existing environmental data, applicants should include commitments to attend any necessary training, develop a Quality Assurance Project Plan (QAPP), and submit it to their EPA Tribal Coordinator. **The QAPP must be approved by EPA before grant recipients can conduct environmental measurements.** EPA requires grant recipients to demonstrate competency before conducting any activities that involve collecting, analyzing, or using environmental data. Once approved by EPA, QAPPs are valid for 5 years unless changes in the work require earlier updates.

A term and condition will be included in grants that involve collection of environmental data to ensure competency is addressed. For laboratory analysis, documentation could include an accreditation certificate, a quality manual, or performance testing results. For field sampling, documentation could include standard operating procedures, training documents, or a training protocol specified within the QAPP. Competency may need to be reassessed as a result of staff turnover.

c) Complete Progress Reporting

Grantees must submit progress reports throughout the year. GAP grant recipients may enter their progress reports in GO3 (<https://gaonline.epa.gov/ords/gap/f?p=139:4>) if they wish. Alternatively, they may submit progress reports as attachments directly to their Tribal Coordinator by email. Several options are available for electronic reporting:

- To access optional Region 10 quarterly report templates, visit <https://www.epa.gov/tribal/region-10-tribal-environmental-gap-tools>.

- To access ANTHC’s quarterly report template, visit <https://anthc.org/what-we-do/community-environment-and-health/tribal-capacity-and-training/> and click on the GAP tab.
- Grantees may use a template that their Tribal Coordinator provides or develop one of their own if it meets grant requirements.

B. Detailed Budget Worksheet

A detailed budget worksheet must be submitted covering each year of funding requested.

- Budget worksheets should be clear, concise, detailed, and logical.
- Calculations must total up in the budget worksheet to match the workplan total.
- Budget worksheets must correspond to activities in the workplan. Any item in the worksheet must support a workplan commitment. For example, all personnel in GAP workplan must mirror those in the budget worksheet. All travel and training cost details (e.g., purpose, lodging, transportation, per diem, hotels, etc.) must be included in the budget worksheet.
- All budgeted costs must be necessary, reasonable, allowable, allocable, and in alignment with the Cost Principles which can be found at 2 CFR Part 200, Subpart E (Sections 200.400-200.475): <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-E>.

Budget worksheets should show a detailed description of the following items:

- Personnel
- Fringe benefits
- Travel
- Equipment
- Supplies
- Contractual
- Other
- Indirect costs, if applicable
- Program income, if any

The GAP grant does not require cost sharing or matching funds.

Two worksheets are provided in Appendix E to help applicants create a budget. These worksheets are intended only as an aid and their use is completely optional.

1. Indirect Cost Rate

If your tribe uses an indirect cost rate, please review EPA's new indirect cost policy, guidance, and restrictions, available at <https://www.epa.gov/grants/rain-2018-g02>. In summary:

- Before drawing down EPA funds for indirect costs and/or using unrecovered indirect costs for cost-sharing, recipients must have an approved rate and budget that includes an indirect cost rate.
- The policy defines different approved rate types and includes regulatory exception opportunities that can increase recipient options but also **require EPA approval**. The

options include:

- Use of the 10% de minimis rate even if a recipient has had an IDC rate in the past;
 - Continued use of fixed rates with carry-forward dates for up to four years past the expiration date; and
 - Providing exceptions if a recipient has been out of compliance with the indirect cost rate requirements in [2 CFR Part 200](#) before the effective date of the policy.
- Applicants may budget for indirect costs in their application if they provide proof that an indirect cost rate proposal has been submitted to their cognizant agency, or if applicants have submitted a request for a regulatory exception. **However, it is unallowable to draw down EPA funds for indirect costs until the indirect cost rate or regulatory exception has been approved.**

Requesting an Exception for an Indirect Cost Rate

Email your request to OGDwaivers@epa.gov and copy [Peggy Johnson \(Johnson.PeggyD@epa.gov\)](mailto:Peggy.Johnson@epa.gov) by **Friday, February 18, 2022**. Please also copy your EPA Tribal Coordinator. Find instructions on what to include in your request under “How to Request a Regulatory Exception to Continue to Use an Expiring/Expired Fixed Rate with Carry-Forward” at <https://www.epa.gov/sites/production/files/2018-08/documents/indirect-cost-policy-guidance-for-recipients-of-epa-assistance-agreements.pdf>.

2. Equipment Purchases

Equipment is defined as tangible, non-expendable, personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit, although a lower dollar amount threshold can be established by the tribe’s policies and procedures.

ALL equipment purchases require prior approval by the EPA Tribal Coordinator and the EPA Grants and Interagency Agreements Branch. Please include a detailed description of any proposed equipment purchases, including how the cost was estimated.

C. Work Plan/Budget Negotiation

EPA Tribal Coordinators will contact applicants to negotiate revisions to work plans and budgets and arrange a timeframe for completing those revisions. Tribes are responsible for responding to revision requests within the timeframes negotiated with their EPA Tribal Coordinator. EPA will contact the GAP staff member’s supervisor or Tribal Council if the staff member does not respond to revision requests or make revisions after three documented requests.

Submitting an initial proposal does not guarantee that a grant will be awarded.

IV. REVIEW CRITERIA

A. Review Criteria

GAP applications will be reviewed to determine:

- Are the proposed work plan activities consistent with the GAP Act and the GAP Guidance?
- Do the proposed activities include well-defined, achievable commitments, outputs, and outcomes (environmental results)?
- Is the proposed budget sufficient to accomplish the proposed project? Proposed costs must be necessary, allowable, allocable, reasonable, and sufficient to accomplish the proposed project.
- Does the work plan identify the expected intermediate and long-term outcomes of the proposed project? Work plans must identify expected changes in human health or the environment, or in the behavior or knowledge of community members.
- Do the proposed activities support achieving the priorities identified in the ETEP?
- Has the applicant included all information requested in this Notice of Funding Availability in the proposal?

Grant recipients must be current with all reporting requirements (progress reporting for current GAP/PPG grants, closeout requirements for prior GAP/PPG grants, and annual Federal Financial Reports) and be making satisfactory progress (completing workplan commitments, outputs, and deliverables).

Grant recipients with a history of performance issues should submit a statement describing those issues and how they have been resolved. Grant recipients that are out of compliance with the regulatory, programmatic, or administrative terms and conditions of existing or previous awards may be denied funding, receive a reduced award, and/or be designated as “high risk.”

B. No-Cost Extensions

EPA may recommend that grantees with a high balance of unspent GAP funding request a no-cost extension or reduced award. A no-cost extension allows the recipient to complete approved work plan tasks for up to a year using funds from prior years. No-cost extensions are not an option if the applicant is in the last year of a four-year GAP grant (but may be an option for PPGs). **Extensions are not automatic** and must be requested by the applicant at least 10 calendar days before the end of the project period. (2 CFR 200.308)

New funds require new work commitments. A no-cost extension allows time for a grant recipient to successfully complete previously approved work plans. No-cost extensions do not limit the amount of funds that may be requested in the future, and they do not reflect negatively on a grant recipient's future chances of receiving full funding.

V. PERFORMANCE PARTNERSHIP GRANTS

Performance Partnership Grants (PPGs) allow eligible tribes and intertribal consortia to combine funds from at least two eligible environmental grant programs into a single grant. Benefits can include improved environmental performance, increased programmatic flexibility, administrative savings (such as elimination of cost share), and stronger partnerships between tribes and EPA

Since multiple grants are involved, PPG proposals and applications may take longer to develop than single grant proposals. PPG deadlines may vary depending on the type of grants involved; however, tribes should strive to complete their applications no later than May 20, 2022.

To ensure a smooth process, tribes and intertribal consortia with PPGs should regularly update their Tribal Coordinator when applying for EPA program grants that the tribes/consortia want to fold into the PPG, including competitive grants.

NEW! EPA has issued an exception to the match requirements for program funds that are added to a PPG. Tribes and tribal consortia do not need to provide any match under a PPG, and no longer need to request match waivers.

PPGs: Eligible Grants

The following 20 grants are eligible for inclusion in a PPG:

Name	CFDA Number
1. Partnership Performance Grants	66.205
2. Multipurpose Grants to States and Tribes	66.204
3. Air Pollution Control Program Support	66.001
4. State Indoor Radon Grants	66.032
5. TSCA Title IV State Lead Grants Certification of Lead-Based Paint Professionals	66.707
6. Pollution Prevention Grant Program	66.708
7. 66.700 Consolidated Pesticide Enforcement Cooperative Agreements	66.700
8. 66.701 Toxic Substances Compliance Monitoring Cooperative Agreements	66.701
9. Indian Environmental General Assistance Program (GAP)	66.926
10. Hazardous Waste Management State Program Support	66.801
11. Underground Storage Tank Prevention, Detection, and Compliance Program	66.804
12. Hazardous Waste Management Grant Program for Tribes	66.812
13. State and Tribal Response Program Grants	66.817
14. Environmental Information Exchange Network Grant Program and Related Assistance	66.608
15. Water Pollution Control State, Interstate, and Tribal Program Support	66.419
16. State Public Water System Supervision	66.432
17. State Underground Water Source Protection	66.433
18. Nonpoint Source Implementation Grants	66.460
19. Wetland Program Development Grants	66.461
20. Beach Monitoring and Notification Program Implementation Grants	66.472

VI. SUBMISSION INSTRUCTIONS

A. Tribal Coordinator Notification

After applicants have submitted their initial proposals, they will enter into negotiations with their EPA Tribal Coordinator on their work plans and budgets. Once negotiations are complete, Tribal Coordinators will ask applicants to submit their full application package in Grants.gov. Notification will include:

- the amount of tentatively approved funding;
- any final requests for revisions; and
- the due date by which the application package must be submitted.

B. System for Award Management (SAM)

For EPA to process grant awards or make payments to grant recipients, the tribe or consortium must have a valid Data Universal Numbering System (DUNS) number and maintain an active SAM registration. SAM requirements apply to all federal funding.

SAM registration must be renewed annually and entities initially registering in SAM must submit a notarized letter appointing an authorized entity administrator. Entities with an existing SAM registration that have not submitted a notarized letter must do so. To register in SAM or update an existing registration, go to <https://www.sam.gov>. For assistance with SAM registration, contact your local PTAC at <http://www.dla.mil/HQ/SmallBusiness/PTAC.aspx>. Alaska tribes may also call 1-800-478-7232.

When submitting a grant application, tribes must use the name of the tribe as it appears on BIA's list of federally recognized tribes. ***If the tribe's SAM registration name is not exactly the same as the legal name on BIA's list, the tribe should contact their local PTAC as soon as possible. Changing a name can take several weeks.***

C. Grants.gov

All applicants must submit their applications in Work Space in Grants.gov by the date they negotiate with their Tribal Coordinators. **All GAP applications should be entered into Grants.gov by May 20, 2022. Tribes and consortia applying for PPGs should also strive to submit applications by this date.**

Who is your Authorized Representative?

On the **Key Contacts Form**, the “Authorized Representative” means the person responsible for the overall operation of a facility or an operational unit, e.g., the plant manager, superintendent or person of equivalent responsibility. (40 CFR § 260.10). For a tribe, this person is typically the Board President or First Chief.

This is different from the AOR, or “Authorized Organization Representative,” who is the person authorized to submit the application in **Grants.gov**; there may be multiple AORs in an organization, each with an individual Grants.gov account. Often, an AOR is the Tribal Administrator or Environmental Coordinator.

On the SF-424, “Authorized Representative” means the AOR who submits the application in Grants.gov.

D. Confidentiality

Applicants must clearly mark information in their application that they consider confidential. EPA will make confidentiality decisions consistent with Agency regulations found at 40 CFR Part 2, Subpart B.

PLEASE NOTE!

Once you successfully submit your application in Grants.gov, you will receive two email messages within 48 hours. The first email will confirm receipt of your application by the Grants.gov system, and the second will indicate that the application has been validated by the system. **Please forward these emails to your Tribal Coordinator.**

Once your application has been submitted and transmitted to EPA, do not submit any additional documents in Grants.gov, even if your application contains errors. Duplicate copies create problems in the award system and may delay application processing. Please work with your Tribal Coordinator to correct your application if needed.