

Frequently Asked Questions (FAQs)

General Application Questions

A1. How much money will be awarded?

The total estimated amount of federal funding available under the FY 2022 announcement is \$20 million. It is anticipated that a total of three to seven assistance agreements, each with a project period of up to four years, will be awarded under the announcement.

The following is the expected total of awards in each of the two National Priority Areas.

- One to two awards are anticipated under NPA 1: *Reduction of Lead Exposure in the Nation's Public Water Systems through Lead Service Line Replacements and Corrosion Treatment Improvements* with a potential total of up to \$10,000,000.
- Two to five awards are anticipated under NPA 2: *Reduction of Children's Exposure to Lead in Drinking Water in Schools and Child Care Facilities*, with a potential total of up to \$10,000,000.

A2. Are matching funds required? Is a waiver available for the required 20 percent non-federal cost-share/ match?

No, for the current funding, EPA is applying a waiver to all grant applicants of the statutory 20 percent cost-share due to the financial constraints caused by the COVID-19 pandemic across the country.

A3. What is an eligible project under the *Reduction in Lead Exposure via Drinking Water Grant* program?

The EPA is soliciting applications from eligible applicants, as described under Eligibility Information (Section III.A. of the RFA), to reduce lead in drinking water in disadvantaged communities through infrastructure and/or treatment improvements or facilities remediation in schools and child care facilities. National Priority Areas identified in this announcement are for: (1) Reduction of Lead Exposure in the Nation's Drinking Water Systems through Infrastructure and Treatment Improvements and (2) Reduction of Children's Exposure to Lead in Drinking Water at Schools and Child Care Facilities. Refer to the RFA Summary section for more information.

A4. Should the application include complete project planning and design?

Applicants should include a description of the completed project planning and design phases. See Expedient Project Readiness to Proceed (Section I.C in the RFA) for more information.

A5. When is the application deadline?

The closing date and time for receipt of application submissions is **April 19th, 2022 by 11:59 PM, Eastern Time**, in order to be considered for funding.

A6. When does EPA expect to send notification of award status, as related to *Reducing Lead in Drinking Water*?

Please refer to **SECTION VI. A. Award Notices** which states “Following EPA’s evaluation of the applications, all applicants, including those who are not selected for funding, will be notified regarding their status. Notification will be made to the original signer of the Standard Form (SF) 424, Application for Federal Assistance and will be sent to the original signer of the application or the project contact listed in the application. This notification, which informs the applicant that its application has been selected and is being recommended for award, is not an authorization to begin work. The official notification of an award will be made by the Grants and Interagency Agreements Management Division.

Applicants are cautioned that only an Award Official is authorized to bind the Government to the expenditure of funds; selection does not guarantee an award will be made. For example, statutory authorization, funding or other issues discovered during the award process may affect the ability of EPA to make an award to an applicant. The award notice, signed by an EPA Award Official, is the authorizing document and will be provided through electronic or postal mail. The successful applicant may need to prepare and submit additional documents and forms (e.g., workplan), which must be approved by EPA, before the assistance agreement can officially be awarded. The time between notification of selection and award of a grant can take up to 90 days or longer.”

A7. Is there a ranking criterion established?

Please refer to **Section V.A., Evaluation Criteria**. All eligible applications, based on the Section III threshold eligibility review, will be evaluated based on the evaluation criteria and weights (100 total point scale). Points will be awarded based on how well and thoroughly each criterion and/or sub-criterion is addressed in the application package.

A8. How will the projects be awarded funding?

Please refer to **Section II.B. Type of Funding**, the RFA states “*It is anticipated that grants and/or cooperative agreements may be funded under this announcement. When cooperative agreements are awarded, the EPA will have substantial involvement with the project work plan and budget. Although the EPA will negotiate precise terms and conditions relating to substantial involvement as part of the award process, the anticipated substantial federal involvement for the project selected and funded as a cooperative agreement may include the following.*”

A9. Given the small amount of funds available, is it possible for the applicant to apply for funds to cover only the post construction monitoring?

Please refer to **Section I.B. National Priority Areas:**

National Priority Area One: Reduction of Lead Exposure in the Nation’s Drinking Water Systems through Infrastructure and Treatment Improvements

“Under this National Priority Area, the EPA is soliciting applications to reduce lead in drinking water in disadvantaged communities through infrastructure and/or treatment projects, such as lead service line replacement and corrosion control practices.”

National Priority Area Two: Reducing Children’s Exposure to Lead in Drinking Water in Schools and Child Care Facilities

“Under this National Priority Area, the EPA is soliciting applications for projects in disadvantaged communities that will reduce children’s exposure to lead in schools and child care facilities through removal and/or replacement of lead-containing drinking water fixtures, fountains, outlets, and plumbing materials.”

ELIGIBILITY QUESTIONS

B1. What applicants are eligible to apply for the funding?

Please refer to Section III.A, Eligible Applicants, of the RFA. Eligible applicants under this competition include the following. Individuals and for-profit organizations are not eligible to apply. The EPA may ask applicants to demonstrate that they are eligible for funding under this announcement.

- Community water systems, for example a town’s drinking water system.
- Water systems located in an area governed by an Indian Tribe.
- Non-transient non-community water systems, for example schools and hospitals that have their own water systems.
- Qualified nonprofit organizations servicing a public water system.
- Municipalities.
- State, interstate, or intermunicipal agencies, such as a department of environmental protection, an interstate environmental commission, or a joint municipal pollution control board.

B2. 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. Institutions of Higher Education are defined at 20 U.S.C. 1001. 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.

B3. What are the requirements to be eligible as a qualified nonprofit organization servicing a public water system?

Please refer to Section III, A. Eligible Applicants of the RFA, which states that a “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” Applicants should demonstrate in the application that they are a qualified nonprofit organization servicing a public water system. During the application process, the applicant should define or describe how the organization is servicing a public water system. For example, describe the working relationship between the applicant (that is a non-profit) and the public water system that would be served under the application.

B4. Are territories of the United States eligible to apply to this RFA?

Yes. For purposes of this RFA, territories of the United States are considered States and are eligible entities. Any eligible entity located in a territory may apply and compete to receive funding under this competition, so long as the applicant meets the requirements described in Section III of the RFA.

B5. Does the community being served by the project need to be disadvantaged?

Yes. These projects must be in one or more disadvantaged communities as determined by the state’s Drinking Water State Revolving Fund (DWSRF) affordability criteria.

B6. What is considered a disadvantaged community?

Each state establishes affordability criteria under section 1452(d)(3) of the Safe Drinking Water Act (SDWA), and a disadvantaged community is defined as “the service area of a public water system that meets affordability criteria.” The affordability criteria must be met for the community for which the project will be performed. More information about a state’s affordability criteria can be found in a state’s most current final Intended Use Plan or by contacting the state Drinking Water State Revolving Fund program. See Threshold Criteria (Section III.C.3 in the RFA) for more information.

B7. Are schools and child care facilities that are considered public water systems (PWS) eligible applicants for this funding opportunity?

Yes. A school or child care facility that is a community water system, water system located in an area governed by an Indian Tribe, or non-transient non-community water system is an eligible entity under this RFA. See Eligible Applicants (Section III.A) for more information.

B8. Are privately-owned public community water systems eligible for funding under this WIIN Grant as one of the eligible entities addressed below?

- Community water systems, for example a town’s drinking water system.
- Water systems located in an area governed by an Indian Tribe.
- Non-transient non-community water systems, for example schools and hospitals that have their own water systems.
- Qualified nonprofit organizations servicing a public water system.
- Municipalities.
- State, interstate, or intermunicipal agencies, such as a department of environmental protection, an interstate environmental commission, or a joint municipal pollution control board

There are 151,000 public water systems in the US. The EPA breaks those down into 3 categories (public water systems, non-transient non-community water systems, and transient water systems). Community water systems (CWSs) are a subset of the public water systems. They can be publicly- or privately-owned. For example, the City of Baltimore’s water system is a publicly-owned CWS. Boise, Idaho’s water system is also an example of a privately-owned CWS.

B9. Are school districts eligible to apply for funds under this RFA? Do they qualify as municipalities or intermunicipal agencies?

Please refer to SECTION III. A. Eligible Applicants, in the RFA, which defines the applicants that are eligible. Please see response to question B8. Whether a school district is considered a municipality or an inter-municipality may vary by state and may be dependent on state, municipal, or local regulations. Contact your state or proper authority administration or department of education for further information. Applicants should demonstrate in the application submission that they meet the eligibility requirements.

B10. We are a not-for-profit Church and a not-for-profit School sharing a building and water system. How do we go about applying for Grant money?

Please refer back to question B3, above, to understand how applicants describe or define how the organization is servicing a public water system. For example, describe the working

relationship between the applicant (that is a non-profit) and the public water system that would be served under the application.

B11. Does the District of Columbia qualify to participate in applying for the Request for Application if there is no established definition for “disadvantaged communities” under the jurisdiction? How should it proceed?

Congress did not authorize the establishment of drinking water state revolving loan fund programs in the District of Columbia and the U.S. territories of U.S. Virgin Islands (USVI), Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands (CNMI). Therefore, those jurisdictions do not have disadvantaged community criteria under SDWA section 1452(d)(3). However, the EPA allots a portion of the national Drinking Water State Revolving Fund (DWSRF) appropriation as construction grants for drinking water infrastructure in those jurisdictions. These RFA applicants must demonstrate that the proposed project services a disadvantaged community.

B12: Are the terms of disadvantage community and affordability criteria interchangeable as used in the RFA or do you expect them to have two different sets of criteria for water systems to meet?

Affordability criteria are fundamental to the state’s definition of a disadvantaged community under SDWA 1452(d). If a state designates a community as disadvantaged, then it has already taken into consideration the affordability of the community. Therefore, for the purposes of this grant, the two terms can be considered interchangeable.

SDWA 1452(d) Assistance for disadvantaged communities states:

(3) "Disadvantaged community" defined

In this subsection, the term "disadvantaged community" means the service area of a public water system that meets affordability criteria established after public review and comment by the State in which the public water system is located.

B13. Would a state and/or non-profit organization be eligible to apply without the involvement of a water utility or state entity that is responsible for Lead and Copper Rule testing? If it is not needed, is it still preferred for scoring?

A state and/or a non-profit organization (as consistently defined at 2 CFR § 200.1) are eligible applicants for the competition, refer to **Section III.A.** in the RFA under eligible applicants. Selected applications must meet the Threshold Criteria (**Section III.C**) including “affordability criteria” established by each state under section 1452(d)(3) of the SDWA, and a disadvantaged community is defined as “the service area of a public water system that meets affordability

criteria". Scoring of the selected applications will be evaluated based on the Evaluation Criteria (Section. V).

B14. It appears that there will only be 3 to 7 awards with amounts up to \$10,000,000. Can a State University apply and only request funding to be used for a specific state?

Awards will be made to 3 to 7 proposed projects for the two National Priority Areas up to \$10 million for each priority area. As defined by 2 CFR 200.1, public or nonprofit Institutions of Higher Education are, nevertheless, eligible to submit applications under this RFA.

B15. Our organization is working with a county on identifying federal funding opportunities. They are interested in this recent RFA that was announced by the EPA. Can a county submit an application on behalf of municipalities? Will there be any potential conflicts if a municipality inside a county and the county respond to this application?

Yes. Referring to section III.A of the RFA, municipalities are eligible applicants. A county may submit on behalf of municipalities.

As noted under Section III. A of the Threshold Eligibility Criteria: "Eligible organizations may submit more than one application under this competition as long as each one is separately submitted and addresses only one National Priority Area. Applications that address more than one National Priority Area in a single application will not be reviewed." They will be considered two separate applicants and therefore, be considered two separate proposals.

NATIONAL PRIORITY AREA 1: Reduction of Lead Exposure in the Nation's Drinking Water Systems through Infrastructure and Treatment Improvements

C1. Can eligible applicants use funding to replace privately owned portions of lead service lines?

Yes. An eligible entity may use funding to replace privately-owned portions of lead service lines.

C2. Can eligible applicants use funding to perform partial lead service line replacements?

Partial lead service line replacement is not an eligible activity unless the replacement is a remnant of previous replacement efforts. An eligible entity must ensure that no section of lead service line remains in place at the completion of the replacement.

C3. Are projects eligible that replace lead lines if the State requires a Water System to replace them regardless of lead action level values?

Applicants should also refer to *Section V.A. Application Review Information* indicating “All eligible applications, based on the Section III threshold eligibility review, will be evaluated based on the evaluation criteria and weights below (100 total point scale). Points will be awarded based on how well and thoroughly each criterion and/or sub-criterion is addressed in the application package.”

Applicants should refer to the following sections under Section V.A. regarding the lead infrastructure projects submitted as part of the application for scoring:

Section V.A.1.ii, states, “The extent and quality to which the applicant describes a known lead issue in the disadvantaged community. (6 points)”

Section V.A.1.v. states, “The degree to which the proposed project support environmental justice by prioritizing lead reduction projects at drinking water systems with at least one lead action level exceedance(s) within the last three years, in schools with at least 50% of the children receiving free and reduced lunch, in Head Start facilities, and/or in areas with additional environmental health burdens (e.g., areas with older buildings likely to have lead-based paint). (4 points)”

C4. For NPA 1 projects, are identification and replacement of lead service lines an allowable use of funds for grant applications submitted for this National Priority Area?

Eligible project proposals can include both identification and replacement of lead service lines as part of their application package. Please refer to **Section I.B.** in the RFA.

C5. For NPA 1 projects, is a standalone city-wide LSL inventory an eligible activity under NPA1?

Eligible project proposals may include lead service line inventory as part of the overall proposed project application package. Applicants should refer to **Section I.B.** of the RFA:

Under this National Priority Area, EPA is soliciting applications to reduce lead in drinking water in disadvantaged communities, as defined based on the affordability criteria each state establishes under section 1452(d)(3) of the SDWA, through full lead service line replacements and/or treatment projects, such as lead service line replacement and corrosion control practices.

Further, under **Section III.C.**, the Threshold Criteria provides information regarding criteria if not met by the time of application submission that would result in the elimination of the application from consideration, including:

10. If an application is submitted that includes any ineligible tasks or activities, that portion of the application will be ineligible for funding and may, depending on the extent to which it affects the application, render the entire application ineligible for funding. As an example, applications that include projects solely comprised of planning, training, and technical assistance projects are not eligible for funding under this announcement.

An eligible applicant can be a municipality, refer to **Section III.A.** in the RFA under eligible applicants.

NATIONAL PRIORITY AREA 2: Reducing Children’s Exposure to Lead in Drinking Water in Schools and Child Care Facilities

D1. Can this grant be used to support remediation following testing conducted under the [Lead Testing in School and Child Care Program Drinking Water Grant Program](#)?

Yes. The Lead Testing in School and Child Care Program Drinking Water Grant creates a voluntary program to assist states with testing for lead in drinking water at schools and child care programs using the EPA’s 3Ts for Reducing Lead in Drinking Water in Schools and Child Care Facilities guidance or applicable state regulations or guidance regarding reducing lead in drinking water in schools and child care programs that are not less stringent.

Under National Priority Area 2, the EPA is soliciting applications for projects in disadvantaged communities that will reduce children’s exposure to lead in schools and child care facilities through removal and/or replacement of lead-containing drinking water fixtures, fountains, outlets, and plumbing materials.

Applicants should describe the known lead issue in the disadvantaged communities’ schools and/or childcare facilities by describing for example: drinking water fixtures, fountains, outlets and/or plumbing that need to be removed or replaced. The description may include prior use of the 3Ts, or applicable state regulations or guidance that are not less stringent, for identification and prioritization of drinking water fixtures, fountains, outlets and/or plumbing that need to be removed or replaced. See National Priority Area Two (Section I.B in the RFA) for more information.

D2. What is the remediation trigger level for lead drinking water in schools and child care facilities?

There is no recommended remediation trigger level in the EPA’s 3T’s (Training, Testing, and Taking Action) toolkit. The EPA encourages schools to prioritize remediation efforts based on the highest lead sample results and to use the steps in the 3T’s toolkit to pinpoint potential lead sources to reduce their lead levels.

All 50 states and the District of Columbia are participating in the EPA's Lead Testing in School and Child Care Program Drinking Water grant. In establishing and conducting programs for lead in drinking water in schools, states have the discretion, but are not required, to identify remediation levels for their program. Program contacts are available at: [\[https://www.epa.gov/dwcapacity/wiin-2107-lead-testing-school-and-child-care-program-drinking-water-state-grant-program\]](https://www.epa.gov/dwcapacity/wiin-2107-lead-testing-school-and-child-care-program-drinking-water-state-grant-program). Schools and child care facilities also are encouraged to check with state and local health department as they may have guidance or requirements.

D3. Can grant funding be used to support remediation in private schools or child care facilities?

For the purposes of this RFA, a child care facility is a Head Start program or an Early Head Start program, a state licensed or regulated child care program, a state pre-kindergarten program, or a program operated by a local educational agency serving children from birth through age six.

For the purposes of this RFA, a school is a nonprofit institutional day or residential school, including a public charter school, that provides elementary or secondary education, as determined under state law, up through grade twelve. Additionally, for the purposes of this RFA, the definition of a school includes a school or community college that is controlled by an Indian tribe, band, or nation, including any Alaska Native village, which is recognized as eligible for special programs and services provided by the United States to Indians because of their status as Indians. Facilities administered by the Bureau of Indian Affairs are not included in this definition for the purposes of this announcement.

D4. What types of supporting documentation to demonstrate project readiness to proceed can be provided that is not included in the Project Narrative page limitation?

Section I.C. Expedient Project Readiness to Proceed in the RFA states, *“Supporting documentation demonstrating this readiness to proceed, such as bid documents, construction schedules, easements, and any legal agreements to access private property to complete the project, may be submitted as optional attachments, as referenced in Section IV of the solicitation. These documents are not subject to the 25-page limitation under the Project Narrative.*

Section IV.D.2. Project Narrative states Additional pages beyond the 25-page limit will not be considered. The following documents may be included as supporting materials and do not count towards the 25 page limitation. These include, as mentioned in Section D.1, parts f. through i (f. Biographical Sketches, g. Negotiated Indirect Rate Cost Agreement, h. Supporting documentation demonstrating readiness to proceed, and i. Supporting documentation describing the known lead issue). Additionally, reduced cost share/waiver request letter, full resumes and QA/QC documentation are not included within the page limitation.”

D5. The RFA indicates “no technical assistance projects are eligible”. Remediation work with schools and childcare facilities often require some form of planning, training and technical assistance as part of the implementation process. Are these activities eligible to ensure successful program implementation to reduce lead in schools and childcare facilities or are these activities not allowable?

Section I.A, Program Objectives, states “The EPA expects that successful applications will demonstrate that projects are ready to proceed expeditiously upon award. All applications must be for lead reduction projects that support the goals and objectives identified below. Planning, training, and technical assistance projects are not eligible for funding under this announcement.”

Section I.C, Expeditious Project Readiness to Proceed states, “Applications for projects under both of the National Priority Areas described above must demonstrate the applicant’s ability and readiness to proceed expeditiously upon receiving an award. Applicants must describe the plan and approach to proceed expeditiously to implement the project upon award of funding. Applicants should describe past and current practices being implemented to reduce exposure of lead in drinking water (such as public education and outreach, existing corrosion control treatment, or the use of control measures to reduce exposure from fountains or fixtures where elevated lead levels have been detected in schools or child care facilities). Applicants should include a description of the completed project planning and design phases. Applications must demonstrate that all required permits and approvals from the appropriate regulatory authority (such as the primacy agency, municipality, or school board) have been obtained.

Supporting documentation demonstrating this readiness to proceed, such as bid documents, construction schedules, easements, and any legal agreements to access private property to complete the project, may be submitted as optional attachments, as referenced in Section IV of the solicitation. Please note the “Expeditious Project Readiness to Proceed” evaluation criteria in Section V.

Section V.A, Selection Criteria, states, Expeditious Project Readiness to Proceed:

Under this criterion applicants will be evaluated based on their ability, plan, and approach to proceeding expeditiously to implement the project upon award (see Section I.C of this announcement) taking into account the following factors.

- i. The extent and quality to which the application describes past and current practices being implemented to reduce exposure lead in drinking water. (5 points)
- ii. The extent and quality to which the applicant demonstrates completion of planning and design, and securement of necessary approvals to proceed expeditiously. (10 points)

Section I.B, National Priority Area 2 states, “The projects are expected to result in reduction of lead in drinking water in schools and/or childcare facilities in disadvantaged communities.

Examples of eligible drinking water lead reduction activities to support this National Priority Area may include, but are not limited to, the following. The projects are expected to result in reduction of lead in drinking water in schools and/or childcare facilities in disadvantaged communities. Examples of eligible drinking water lead reduction activities to support this National Priority Area may include, but are not limited to, the following.

1. Removing or replacing drinking water fixtures, fountains, or outlets demonstrated to be sources of lead in schools and/or child care facilities drinking water.
2. Replacing plumbing materials determined to be sources of lead in schools and/or child care facilities drinking water.
3. Conducting follow-up monitoring, public education, and outreach to ensure the long-term performance of the remediation.

The EPA also encourages applicants to propose other types of activities the objectives of this National Priority Area to meet the objective of addressing the reduction of lead exposure.”

D6. What is the expectation around the requirements for Expeditious Project Readiness to Proceed--can we describe that we have template for these things and what our process would be without having the concrete example for each school?

Please refer to Section **C. *Expeditious Project Readiness to Proceed***, which states “Applications for projects under both of the National Priority Areas described above must demonstrate the applicant’s ability and readiness to proceed expeditiously upon receiving an award. Applicants must describe the plan and approach to proceed expeditiously to implement the project upon award of funding. Applicants should describe past and current practices being implemented to reduce exposure of lead in drinking water (such as public education and outreach, existing corrosion control treatment, or the use of control measures to reduce exposure from fountains or fixtures where elevated lead levels have been detected in schools or child care facilities). Applicants should include a description of the completed project planning and design phases. Applications must demonstrate that all required permits and approvals from the appropriate regulatory authority (such as the primacy agency, municipality, or school board) have been obtained. Supporting documentation demonstrating this readiness to proceed, such as bid documents, construction schedules, easements, and any legal agreements to access private property to complete the project, may be submitted as optional attachments, as referenced in Section IV of the solicitation. Please note the Expeditions Project Readiness to Proceed evaluation criteria in Section V.” In Section V, this information is included in Criteria #2. Expeditious Project Readiness to Proceed.

Selection Criteria 2) Expeditious Project Readiness to Proceed

“Under this criterion applicants will be evaluated based on their ability, plan, and approach to proceeding expeditiously to implement the project upon award (see Section I.C of this announcement) taking into account the following factors.

i. The extent and quality to which the application describes past and current practices being implemented to reduce exposure lead in drinking water.

ii. The extent and quality to which the applicant demonstrates completion of planning and design, and securement of necessary approvals to proceed expeditiously.”

D7. Do specific schools, school districts, and childcare facilities have to be identified at the time of proposal submittal, or is listing the state, county, and/or disadvantaged communities with known lead challenges and DAC status, acceptable?

Section V.A. Selection Criteria include, but are not limited to, the following,

1. *“National Priority Area Under this criterion the applicant will be evaluated based on their ability and approach for effectively addressing the National Priority Area that is the subject of their application. In conducting this evaluation, the following factors will be evaluated:*

i. The extent and quality of the overall approach to addressing the National Priority Area that is the subject of the application.

ii. The extent and quality to which the applicant describes a known lead issue in the disadvantaged community.

iii. The extent and quality to which the application demonstrates plans to provide public education, conduct outreach, and conduct post-implementation monitoring.

iv. The extent and quality to which the application demonstrates plans to maintain lead reduction after project completion.

v. The degree to which the proposed project benefits drinking water systems who had at least one lead action level exceedance within the last three years, or in schools/childcare programs with at least 50% of the children receiving free and reduced lunch, in Head Start facilities, and/or in areas with additional environmental health burdens (e.g., areas with older buildings likely to have lead-based paint), and/or for purposes of the Justice40 Initiative delivers at least 40 percent of the benefits from the project to disadvantaged communities.

2. *Expeditious Project Readiness to Proceed, Under this criterion applicants will be evaluated based on their ability, plan, and approach to proceeding expeditiously to implement the project upon award (see Section I.C of this announcement) taking into account the following factors.*

i. The extent and quality to which the application describes past and current practices being implemented to reduce lead exposure in drinking water.

ii. The extent and quality to which the applicant demonstrates completion of planning and design, and securement of necessary approvals to proceed expeditiously.

D8. Can a state apply for the grant to remediate disadvantaged schools that have been determined to have high lead levels, which are unknown until the testing conducted under the Voluntary Lead Testing in Schools program reveals which schools have remediation needs?

Please refer to **Section I.B. National Priority Areas: National Priority Area Two: Reducing Children’s Exposure to Lead in Drinking Water in Schools and Child Care Facilities**

“Under this National Priority Area, the EPA is soliciting applications for projects in disadvantaged communities that will reduce children’s exposure to lead in schools and child care facilities through removal and/or replacement of lead-containing drinking water fixtures, fountains, outlets, and plumbing materials.”

Applicants should note criterion **2) Expeditious Project Readiness to Proceed** in **Section V. A. Selection Criteria**: *“Under this criterion applicants will be evaluated based on their ability, plan, and approach to proceeding expeditiously to implement the project upon award (see **Section I.C of the RFA**) taking into account the following factors.*

i. The extent and quality to which the application describes past and current practices being implemented to reduce exposure lead in drinking water.

ii. The extent and quality to which the applicant demonstrates completion of planning and design, and securement of necessary approvals to proceed expeditiously.”

Applicants should note **Section IV.D.2. Projective Narrative** subsection **“4. Milestone Schedule**: *Provide a projected milestone schedule for the proposed project period (up to four years). The milestone schedule should provide a breakout of the project 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. The project start date will follow award acceptance by the successful applicant.”*

D9. Is initial sampling to discover and/or confirm a lead exceedance exists an eligible project activity/cost under NPA 2 in WIIN Act Section 2105 or if this only applies to post-implementation monitoring?

Please refer to **Section I.B. National Priority Area Two: Reducing Children’s Exposure to Lead in Drinking Water in Schools and Child Care Facilities** for eligible projects/activities The RFA states, *“The projects are expected to result in reduction of lead in drinking water in schools and/or childcare facilities in disadvantaged communities. Examples of eligible drinking water*

lead reduction activities to support this National Priority Area may include, but are not limited to, the following.

- *Removing or replacing drinking water fixtures, fountains, or outlets demonstrated to be sources of lead in schools and/or child care facilities drinking water.*
- *Replacing plumbing materials determined to be sources of lead in schools and/or child care facilities drinking water.*
- *Conducting follow-up monitoring, public education, and outreach to ensure the long-term performance of the remediation. “*

Applicants should also refer to **Section I.C Expeditious Project Readiness to Proceed** states, *“Applications for projects under both of the National Priority Areas described above must demonstrate the applicant’s ability and readiness to proceed expeditiously upon receiving an award. Applicants must describe the plan and approach to proceed expeditiously to implement the project upon award of funding. Applicants should describe past and current practices being implemented to reduce exposure of lead in drinking water (such as public education and outreach, existing corrosion control treatment, or the use of control measures to reduce exposure from fountains or fixtures where elevated lead levels have been detected in schools or child care facilities). Applicants should include a description of the completed project planning and design phases. Applications must demonstrate that all required permits and approvals from the appropriate regulatory authority (such as the primacy agency, municipality, or school board) have been obtained.*

Supporting documentation demonstrating this readiness to proceed, such as bid documents, construction schedules, easements, and any legal agreements to access private property to complete the project, may be submitted as optional attachments, as referenced in Section IV of the solicitation. Please note the “Expeditious Project Readiness to Proceed” evaluation criteria in Section V.”

D10. The RFA references “drinking water fountains” as a point source that may be addressed under the grant. Are these fountains inclusive of those located on the exterior of the building (such as around playgrounds and ball fields)?

Please refer to **Section I.B. National Priority Areas**. Under this National Priority Area, the EPA is soliciting applications for projects in disadvantaged communities that will reduce children’s exposure to lead in schools and child care facilities through removal and/or replacement of lead-containing drinking water fixtures, fountains, outlets, and plumbing materials.”

“Applicants should describe the known lead issue in the disadvantaged communities’ schools and/or childcare facilities by describing for example: drinking water fixtures, fountains, outlets and/or plumbing that need to be removed or replaced. The description may include prior use of the 3Ts, or applicable state regulations or guidance that are not less stringent, for identification

and prioritization of drinking water fixtures, fountains, outlets and/or plumbing that need to be removed or replaced.”

D11. Under national priority area 2, do lead service lines qualify as plumbing materials that are determined to be sources of lead? Can applicants use funding under priority area 2 to replace lead service lines?

Applications are divided under 2 National Priority Areas under Section I.B. of the RFA. There is **National Priority Area One: Reduction of Lead Exposure in the Nation’s Drinking Water Systems through Infrastructure and Treatment Improvements**. The RFA states “Under this National Priority Area, the EPA is soliciting applications to reduce lead in drinking water in disadvantaged communities through infrastructure and/or treatment projects, such as lead service line replacement and corrosion control practices. For the purposes of this announcement “drinking water system” means a community water system, a nontransient noncommunity water system, and a water system located in an area governed by an Indian Tribe. **National Priority Area Two: Reducing Children’s Exposure to Lead in Drinking Water in Schools and Child Care Facilities**. The RFA states, “Under this National Priority Area, the EPA is soliciting applications for projects in disadvantaged communities that will reduce children’s exposure to lead in schools and child care facilities through removal and/or replacement of lead-containing drinking water fixtures, fountains, outlets, and **plumbing materials**.”

Applicants should note **Section III.C. Threshold Eligibility Criteria**, where the RFA states “These are requirements that if not met by the time of application submission will result in the elimination of the application from consideration from funding. Only applications that meet all of these criteria will be evaluated against the ranking factors in Section V of this announcement. This includes:

“2. Applications must address one, and only one, of the two National Priority Areas listed in Section I.B. Eligible organizations may submit more than one application under this competition as long as each one is separately submitted and addresses only one National Priority Area. Applications that address more than one National Priority Area in a single application will not be reviewed.”

D12. We heard that some states that have begun remediation measures and that there is still a need for additional support to help with the ongoing O&M, training of school staff, need for more funds for additional filter cartridges, setting up sampling programs, support on communications with the public etc. Would these WIIN lead remediation funds able to help provide these wraps around services to ensure the solutions that have begun locally or have been partially stood up are up to EPA’s/3Ts standards and are sustainable over time?

The project period under this *Reducing Lead in Drinking Water* WIIN grant anticipates 4 years to accomplish. Under NPA 2, referring to **Section I.B** of the RFA, applicants should describe the known lead issue. The description may include prior use of the 3Ts, or applicable state regulations or guidance that are not less stringent, for identification and prioritization of drinking water fixtures, fountains, outlets, and/or plumbing including lead service lines that need to be removed or replaced. Examples of eligible drinking water lead reduction activities to support this NPA may include, but are not limited to, the following.

- Removing or replacing drinking water fixtures, fountains, or outlets demonstrated to be sources of lead in schools and/or child care facilities' drinking water.
- Replacing plumbing materials determined to be sources of lead in schools and/or child care facilities drinking water, including full replacement of lead service lines serving such facilities.
- Conducting follow-up monitoring, public education, and outreach to ensure the long-term performance of the remediation.
- Providing filters certified to remove lead, in accordance with applicable standards established by ANSI or NSF post full lead service line remediations, along with no less than three months of replacement cartridges, notifying the schools and/or child care facilities of premise flushing instructions within 24 hours of the conclusion, and post-remediation lead testing(s).

D. 13. Regarding National Priority Area Two: Reducing Children’s Exposure to Lead in Drinking Water in Schools and Child Care, can this grant funding be applied retroactively to projects that began before the application date and/or award date? If so, what is the earliest start date? The RFA states "The activities to be funded under this announcement support the Agency’s Strategic Plan for Fiscal Year (FY) 2022 – 2026" and the RFA also refers to both past and current efforts. FYI, some schools in Maryland began remediation efforts years ago (NOTE: Some States' schools have been testing for lead in drinking water using the 3Ts protocol since the 2017-2018 school year and have been identifying outlets that require remediation).

The funding in this RFA does not apply retroactively to projects. Selected applications for this RFA must meet the Threshold Criteria (Section III.C) and the scoring of the selected applications will be evaluated based on the Evaluation Criteria (Section. V). Both the threshold and evaluation criterion look for applications with “Expeditious Project Readiness to Proceed”.

In Section I.C, Expeditious Project Readiness to Proceed states, “Applications for projects under both of the National Priority Areas described above must demonstrate the applicant’s ability and readiness to proceed expeditiously upon receiving an award. Applicants must describe the plan and approach to proceed expeditiously to implement the project upon award of funding. Applicants should describe past and current practices being implemented to reduce exposure of

lead in drinking water (such as public education and outreach, existing corrosion control treatment, or the use of control measures to reduce exposure from fountains or fixtures where elevated lead levels have been detected in schools or child care facilities). Applicants should include a description of the completed project planning and design phases. Applications must demonstrate that all required permits and approvals from the appropriate regulatory authority (such as the primacy agency, municipality, or school board) have been obtained.

GENERAL PROJECT RELATED QUESTIONS

F1. What is the project length of time?

It is anticipated that a total of three to seven assistance agreements, each with a project period of up to four years, will be awarded under this announcement.

F2. We are applying for the *Reduction of Lead Exposure in the Nation's Drinking Water Systems through Infrastructure and Treatment Improvements* grant. We need assistance determining whether the Quality Assurance/Quality Control is required for the proposed project. What documents do you need to determine this?

Please refer to Section II, Part A. Project Narrative, Subsection C. Workplan, #8 Reduced Cost Share/Match Waiver Request Letter and Quality Assurance/Quality Control, part B of the RFA (page 28), which explains what an application project narrative should describe as Quality Assurance/Quality Control (QA/QC) should they plan to collect or use environmental data or information. The application should explain how the applicant plans to comply with the Quality Assurance/Quality Control requirements. Additionally, information can be found on the Agency's *Enterprise Quality Management Division* (EQMD) webpage that includes documents to assist in the development and implementation of a suitable Quality System for both EPA and non-EPA organizations. The documents include FAQs, and may provide guidance. They can be found on the following website: <https://www.epa.gov/quality>.

F3. For the start date of the project, can I pick a date in the past? Or do I need to make the start date the date of when I make the application?

No. Refer to **SECTION VI** of the RFA. **Award Administrative Information, Part C. Administrative & National Policy Requirements**, the general award and administration process for assistance agreements to be funded under this announcement are governed by regulations at 2 CFR 200.

2 CFR §200.458 Pre-award costs states "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."

F4. Is a water system's comprehensive project subject to grant reporting requirements if the grant was sought for and used to complete a phase of the project versus the whole project?

Grant reporting requirements apply to the federal funds and associated non-federal cost-share/match for awards made under this announcement. Please refer to **Section VI.D.**

Reporting in the RFA, which states, *"In general, recipients are responsible for managing the day-to-day operations and activities supported by the assistance funding, to assure compliance with applicable federal requirements, and for ensuring that established milestones and performance goals are being achieved.... Recipients will be required to report direct and indirect environmental results from the work accomplished through the award."*

Section III.B. Cost Sharing or Matching, states *"Cost-share/match must be used for eligible and allowable project costs. Cost-share/matching funds are considered grant funds and are included in the total award amount and should be used for the reasonable and necessary expenses of carrying out the workplan. All grant funds are subject to federal audit. Any restrictions on the use of grant funds also apply to the use of the cost-share/match."*

F5. Is a QA/QC required for the proposed project? Which QA/QC requirements apply? The project is for lead service line replacement and we are designing the project with post-implementation monitoring as described in the RFA. What are the next steps for determining what QA/QC requirements apply.

Please refer to the response in the FAQ under F2. Additionally, the EPA Office of Environmental Information's Enterprise Quality Management Division (EQMD) oversees implementation of the EPA Quality Program which provides requirements for conducting quality management activities for environmental data collection and environmental technology programs performed by or for the Agency. The EQMD welcomes questions and suggestions. More information can be found at <https://www.epa.gov/quality/forms/contact-us-about-managing-quality-environmental-information>

F6. Regarding the cost-share waiver (page 14 section IIIB), is there a reduced score on the proposal review if you use it?

For the current funding FY22 cycle, the cost-share is waived. **Section III.B** of the RFA refers to the waiver on the cost-share. Additionally, the Agency has provided a general communication of the cost share waiver in a [memo](#) that can be found on the grant website. Selected applications must meet the Threshold Criteria (**Section III.C**). Scoring of the selected applications will be evaluated based on the Evaluation Criteria (**Section V**). Milestone and detailed budget are part of the scoring (16 points), including "The reasonableness of the budget and estimated funding amounts for each project component/task and the adequacy of the information provided in the detailed budget and whether the proposed costs are reasonable

and allowable. Total costs must include both federal and, if applicable, non-federal components.” (8 points).

F7. We are having difficulty finding information on what agency is administering this grant, what the schedule is for applications, or even how to apply.

EPA is administering the Request for Application under the Safe Drinking Water Act (SDWA) Section 145B, otherwise known as the *Reducing Lead in Drinking Water* grant. Refer to **Section III.A.** of the RFA, for the eligible applicants under this competition, which include the following:

- Community water systems, for example a town’s drinking water system.
- Water systems located in an area governed by an Indian Tribe.
- Non-transient non-community water systems, for example schools and hospitals that have their own water systems.
- Qualified nonprofit organizations servicing a public water system.
- Municipalities.
- State, interstate, or intermunicipal agencies, such as a department of environmental protection, an interstate environmental commission, or a joint municipal pollution control board.

Individuals and for-profit organizations are not eligible to apply.

Page one of the RFA outlines the deadlines for application and submission of questions. The closing date and time for receipt of application submissions is **April 19th, 2022, by 11:59 PM, Eastern Time**, in order to be considered for funding. Applicants may apply via grants.gov at the following link: <https://www.grants.gov/web/grants/view-opportunity.html?oppld=338182>. Questions about this RFA must be submitted in writing via e-mail and must be received by the Agency contact identified in Section VII by 11:59 PM Eastern Time, April 4, 2022.

Details regarding application instruction requirements and submission information, including the prerequisite to obtain a free Unique Entity Identifier (UEI) before proceeding to submitting an application, can be found at **Section IV** of the RFA.

F8. We are having significant trouble creating our account to be able to access the application. We have created login.gov and grants.gov accounts, and have attempted to set up a Profile. Our SAM UEI is not being recognized, what could we do?

For technical difficulties with the SAM UEI or DUNS number or application submission errors, contact the grants.gov support center at support@grants.gov or 1-800-518-4726 before the application deadline of April 19th, 2022, by 11:59 PM, Eastern Time.

F9. I have the following questions regarding Form SF-424:

- **SF-424, field 17: What dates should be entered for start and end?**

Field 17 in Form SF-424 asks for the anticipated start and end dates of the proposed project for your application. The anticipated milestone schedule for proposed projects of this RFA is up to four years (Section IV.C of the RFA).

- **SF-424, field 19: What response do I enter in field 19 if my state does not utilize E.O.?** Applicants should contact the State Single Point of Contact (SPOC) for Federal Executive Order 12372 to determine whether the application is subject to the State intergovernmental review process. After that is complete, select the appropriate box.

- **SF-424A: Are there specific instructions for completing this form relative to the WIIN application?**

No. This is the standard form and is not specific to the WIIN competition.

- **Are there required file naming conventions for attachments?**

Naming conventions for attachments should provide an idea to the reader of what type of document the applicant is uploading. An example of the naming convention for a file would be: **OtherNarrativeAttachments1_CostRateAgreement.pdf**

- **Where can I find additional information on filling out application forms such as SF-424A?** Documents to assist with filling out form SF-424A (or any other forms for the application) can be found at the “Form Instructions” column at grants.gov, at the following link: <https://www.grants.gov/forms/sf-424-family.html>.

An example SF-424 form is available at: https://www.epa.gov/sites/default/files/2020-08/documents/fy21_sample_federal_forms.pdf.

F10. In the online workspace forms, there is the mandatory Project Narrative Attachment Form that includes a place to upload the Project Narrative File (Option #1), as well as a second place to upload Optional Project Narrative Files (Option #2). There is also an optional Other Attachments Form. Should I use Option #1 for any attachments mentioned in Section D.1, parts f through i? May I use Option #2 above for other attachments such as Letters of Support or others not specifically mentioned?

Referring to Section IV.D.2, the Project Narrative (covering sections IV.D.2.A through IV.D.2.C) is limited to no more than twenty-five (25) typewritten, single-spaced 8.5x11-inch pages (a page is one side of a piece of paper) including the cover page and executive summary. The following documents **may** be included as supporting materials and do not count towards the 25 pages limitation. These include, as mentioned in Section D.1, parts f through i (*f. Biographical Sketches, g. Negotiated Indirect Rate Cost Agreement, h. Supporting documentation demonstrating readiness to proceed, and i. Supporting documentation describing the known lead issue*). Additionally, full resumes and QA/QC documentation are not included within the page limitation.

Yes, the Project Narrative file may be uploaded with the Project Narrative Attachment form (Option 1) - "Mandatory Other Attachment File". Optional documents, such as letters of support, may be uploaded via the Other Attachments form (Option 2)- "Add Optional Other Attachment".

F11. Are lead service line replacements considered construction and if so, do we need to fill out form SF-424C - Budget Information for Construction Programs? Form SF-424C was not included in the mandatory forms section of the grant package. Or would we budget for construction costs under form SF-424A?

Add your responses for construction costs in form SF-424A.