

Gulf of Mexico Innovative Nutrient Reduction: Farmer to Farmer and Watershed-based Non-Agriculture Approaches 2022 Request for Applications Q&A

Updated 11/30/22

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NOTE TO APPLICANTS: We are able to respond to questions from individual applicants regarding threshold eligibility criteria, administrative issues related to the submission of the application, and requests for clarification about the announcement. We are unable to respond to questions requesting input on a project idea, format of an application, or other project specific questions that may compromise the competitive process.

In addition, if you have not successfully been awarded an EPA grant previously, you may want to review the recorded webinar and/or presentation found here: <https://www.epa.gov/grants/epa-grants-award-process-webinars>

[New Questions](#)

New Questions Added 11/30/22

Q: Are construction costs allowable?

A: Costs to undertake construction as a part of the demonstration project are allowable. The funds requested would not be classified as construction funds as a line item in the SF424a and would instead be a part of one of the other line items (typically contractual and supplies).

Q: Is a “current and pending support” type document required for key personnel (i.e., as required for NSF proposals)?

A: No such document is required.

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Overview

Q. How much funding is available for this RFA?

A. The total estimated funding expected to be available is approximately \$16 million (a maximum of \$1.5 million per award) unless additional funding becomes available.

Q. Will there be more funding available in the future?

A. Funding for the Gulf of Mexico Program is dependent each year on allocations in the federal budget approved by Congress and the program priorities during that time.

Q. Is this funding opportunity available each year? Will it be available next fiscal year?

A. Funding for the EPA Gulf of Mexico Program is dependent each year on allocations in the federal budget approved by Congress and the program priorities during that time.

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Submitting an Application

Q. Where do I start?

A. You should start by closely reading the funding announcement and determining whether your project is within the scope requested. If so, you should determine whether your organization is eligible by reviewing Section III, Eligibility Information. Carefully consider the Scope of Work and the Environmental Results (Sections I.B-I.C). Read Content of Application (Section IV.B) and Evaluation Criteria (Section V.A) to ensure your application includes all required information.

Q. What kind of materials do I need to submit for the application?

A. To be considered for a GMD Grant, EPA requires that each submission contain a set of common elements that are described in Section IV.B (Content of Application Submission.) Section IV.D goes into detail about every item that must be included in the application package.

Q. What is the application submission deadline?

A. Applications must be submitted through Grants.gov as stated in Section IV of this announcement (except in the limited circumstances where another mode of submission is specifically allowed for as explained in Appendix A) on or before the application submission deadline.

Q. How will EPA review applications?

A. Please see Section V of the RFA.

Q. Are applicants required to follow the format detailed in Appendix C of the RFA?

A. It is highly recommended that you explain each aspect of your application clearly and address each topic by following the format provided in Appendix C., include the headings as given, and do not reorder the paragraphs, or you risk the possibility of information being left out by you as the applicant, or overlooked or not fully comprehended by the reviewers when the project is scored.

Q. Can someone be PI on one application and co-PI on another? Are multiple submissions from one organization generally encouraged or discouraged?

A. There is no limit to the number of applications an individual can be involved in nor the number of applications an organization can submit. We do, however, receive a high volume of applications and are only able to fund a small percentage.

Q. May a logic model be used to summarize some of the application components?

A. A logic model can be used to address some of the project components.

Q. Is the budget narrative included within the 12-page narrative?

A. Yes, the budget narrative should be included within the 12-page limit of the application narrative. The budget table does not count towards that 12 page limit.

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Eligibility/Project Eligibility

Q. How can I tell if I am eligible to apply for a grant?

A. Please refer to Section III.A. of the RFA.

Q. I am a nonprofit but do not have a 501c3. Am I eligible to apply?

A. Consistent with the definition of Nonprofit organization at 2 CFR § 200.1, the term nonprofit organization means any corporation, trust, association, cooperative, or other organization that is operated mainly for scientific, educational, service, charitable, or similar purpose in the public interest and is not organized primarily for profit; and uses net proceeds to maintain, improve, or expand the operation of the organization. The term includes tax-exempt nonprofit neighborhood and labor organizations.

Nonprofit organizations that are not exempt from taxation under section 501 of the Internal Revenue Code must submit other forms of documentation of nonprofit status; such as certificates of incorporation as nonprofit under state or tribal law.

Q. What is ineligible for funding?

A. Section III in the RFA identifies eligible and ineligible entities and activities. EPA also conducts a threshold eligibility review of all applications (Section III.F). Applicants deemed ineligible for funding

consideration as a result of the threshold eligibility review will be notified within 15 calendar days of the ineligibility determination.

Q. A funding idea was submitted and GMP was asked for input and/or requested a phone call to discuss project. The following response was provided to all potential applicants who requested input on their specific project idea or design.

A. In order to ensure a fair competitive process, the EPA's Gulf of Mexico Program does not provide specific input on project ideas to applicants.

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Environmental Outputs and Outcomes

Q. What are "Outputs and Outcomes"?

A. Outputs and outcomes are explained in Section I.C. of the RFA. The terms outputs and outcomes are derived from the EPA's focus on environmental results (EPA Policy Order 5700.7 Environmental Results). Therefore, EPA's priority is to support projects that are likely to achieve **quantifiable** outputs and outcomes. Applicants must include specific statements describing the environmental results of the proposed project in terms of well-defined "outputs" and "outcomes".

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Project Monitoring

Q: Will a QAPP need to be developed and approved by EPA for each project funded through this RFA?

A. Please see the RFA Section VIII. A for additional information about required QAPPs.

Q. What is the definition of Environmental Data?

A. EPA's Environmental Data Definition: Environmental information or data is defined as any measurements or information that describe environmental processes, location, or conditions; ecological or health effects and consequences; or the performance of environmental technology.

Q. We are currently working on our application for the RFA, and have run into a question about the Environmental Data Statement. Based on the information provided in the RFA and links, we have drafted the following statement:

"We acknowledge that if funded for this project, we will be required and are prepared to demonstrate competency to assess the quality of work to meet project requirements, and acknowledge that a Quality Management Plan (QMP) and/or Quality Assurance Project Plan (QAPP) may be required."

Is this what this section is requiring, or do we need to provide further demonstration of competency (ex. provide current accreditation or certification certificate with scope of accreditation and accrediting body plus contact information) attached to the application?

A. A statement, such as what is written, is all that is needed. It is a step designed to ensure that the applicant is fully aware that if data collection is planned and the award is over \$200k, that a QAPP will be required. In addition, please schedule time for QAPP development and approval. *If the organization does not have an EPA approved Quality Management Plan, please note that this may also need to be developed and approved by EPA.*

Q. There is a statement in the RFA that says: If the organization does not have an EPA approved Quality Management Plan, please note that this must also be developed and approved by EPA. Inquiry through pre-awards and grant management for our organization has not turned up such a plan. Our assumption is that this is a document not specifically related to the current grant application, but an institutional-type document. Would you please provide more information on this requirement, including directions for preparing such a plan?

A: Thank you for your question about the development of the QMP. As you identified, the QMP is meant to be an institutional level document and not a project specific document. Recipients may be required to submit both a QMP and a QAPP. Instructions for development of both documents can be found at this [link](#). There is no expectation for either document to be developed prior to notification of funding.

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Match Requirement

Q. Is there a match requirement?

A. No matching funds are required under this competition. Although cost-sharing/matching is not required as a condition of eligibility under this competition, under [Section V.A](#) of this announcement EPA will evaluate proposals based on a leveraging criterion.

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Contracts and Subawards

Q. Can grant funding be used by the applicant to make subawards, acquire contract services, or fund partnerships?

A. Yes, funds can be used for contracts and subawards in accordance with the additional provisions instructions which can be found on [the EPA Solicitation Clauses](#) page. EPA awards funds to one eligible applicant as the "recipient" even if other eligible applicants are named as "partners" or "co-applicants" or members of a "coalition" or "consortium." The recipient is accountable to EPA for the proper expenditure of funds and reporting requirements.

Q. May EPA grant recipients enter into agreements with federal agencies to carry out tasks/activities under the grant work plan?

A. Reimbursable Agreement- Grant recipients may enter into reimbursable agreements with federal agencies as long as those federal agencies are authorized under applicable federal laws to enter into

such agreements with federal grant recipients. This is the mechanism by which a grant recipient can work with a federal agency as a partner. Reimbursable agreements do not have to be competed, but grant recipients must provide a brief explanation as to why they are selecting a federal agency to carry out the work.

Q. If awarded a grant, can a grantee sole source a subcontract to a for profit entity?

A. A for profit can be selected as a sole source subcontractor, but the burden of proof is on the applicant or recipient to demonstrate why this is the only entity able to complete the task.

Q. We would like to have a placeholder of \$XXX for a contractor to provide _____ for our project. We plan to go through a competitive process to hire a contractor, but it will not be able accomplished prior to the application deadline. Is it okay to include a placeholder amount and wait to ensure the project is funded prior to beginning the competitive process?

A. Yes.

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Standard Form (SF) 424 and SF 424 A

Q. How do we answer question 19 in the SF 424?

A. Mark A and submit your application to your intergovernmental review state point of contact if **BOTH** of the following are true of your project:

1. Project involves land use planning or construction associated with demonstration projects.
2. Please follow this link: <https://www.whitehouse.gov/wp-content/uploads/2020/04/SPOC-4-13-20.pdf>. If your state is listed on this link, your project will need to be submitted to your state for review and select a or b as applicable.

Otherwise, select C.

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Budget

Q. Are preaward costs eligible?

A. In certain circumstances, costs incurred within 90 days prior to the grant award may be eligible for reimbursement. However, this does not include any costs associated with responding to this solicitation or in finalizing the application package. If costs are incurred before the award, they are incurred at the applicant's own risk.

Q. What are indirect or overhead costs?

A. Indirect costs represent the expenses of doing business that are not readily identified with a particular grant, contract, project function or activity, but are necessary for the general operation of the organization and the conduct of activities it performs (source: Indirect Cost Overview, Dept. of Education). In order to charge indirect costs to the grant, the applicant must have an up-to-date approved indirect cost rate agreement with its cognizant agency (the federal agency the applicant receives the most funding from). EPA does recognize indirect cost agreements negotiated with other federal agencies.

Q. What if we don't have an indirect cost rate agreement?

A. Any non-Federal entity that has never received a negotiated indirect cost rate may elect to charge a de minimis rate of 10% of modified total direct costs (MTDC) which may be used indefinitely.

Q. We want to apply for the 10% de minimis indirect cost rate. Where do we send out application to use the 10% de minimis?

A. You do not need to apply to use the 10% Federal de Minimis. Any non-Federal entity that has never received a negotiated indirect cost rate may elect to charge a de minimis rate of 10% of modified total direct costs (MTDC) which may be used indefinitely. For more information, please see: 2 CFR 200.414 (f) https://www.ecfr.gov/cgi-bin/text-idx?node=se2.1.200_1414&rgn=div8.

Q. How do I ensure I'm putting the costs in the correct budget categories?

A. There are several guidelines used for federal budgets. The recorded webinar and presentation found here <https://www.epa.gov/grants/epa-grants-award-process-webinars> provides an overview of the grant application process, including what should be included in the budget categories and the cost principles EPA utilizes. In addition, Appendix A of the RFA provides a link to EPA's Interim Budget Guidance as well as helpful hints and sample language. If you have a question about a particular item, please feel free to email the question to gmp-rfp@epa.gov.

Q. Can these projects fund international travel?

A. It depends on the relevance of the travel to the project. In any case where international travel is requested, however, the award will need to go through an additional layer of review and approval.

Q. We plan to use EPA's suggested budget template to complete our budget. Should we put both subawardees and subcontractors in the "Contractual" section?

A. Subcontractors should be in the Contractual category, but subawardees should be listed in the "other" budget category.

Q. Please advise if the suggested Budget Table template should also be used by lower tier subawardees, then rolled up into our Budget Table template?

A. We recommend our budget table template for the applicant, but any subawardee information can be presented in the way that makes the most sense for your application.

Q. Does this opportunity allow funding to be used for staff position? Is there a cap on the personnel costs? I can't seem to find details of what costs (and how much) are eligible under this funding opportunity.

A. In Appendix B of the RFA, there is a link to [EPA budget development guidance](#). It does not discuss a cap on personnel costs, because there isn't one that is directed, but all costs should be reasonable based on the activities that will take place during the project period and should only cover the identified project period.

Q: I am using the suggested budget template and need to add another line for Contractual services (beyond the ones in the Additional Lines C-H) but it will not allow me to.

A: Contact mills.calista@epa.gov for questions regarding the budget template.

Q: The excel spreadsheet for the budget table template requires a password.

A: The template is secured to ensure formulas are not modified. Instructions for using the template are located in Tab 1 Budget Guidelines. Tab 2 is an example of the required line-item budget. To create your own line-item budget, please edit Tab 4 to reflect all planned expenditures. Enter project specific information in the yellow cells and the spreadsheet will auto calculate. Additional lines are available in tabs 5 and 6 if needed.

Q: Can the budget template be edited to add match/cost share?

A: As stated in Section III.C. on page 12 of the RFA: "There is no cost-sharing or matching requirement as a condition of eligibility under this RFA." Because matching/cost share funds are not required, it will not be part of the evaluation process and it is not necessary to include in the application. A budget template that includes match was not released with this RFA.

Q. What are the key pieces of information necessary (questions to answer) to justify the selection of a sole-sources contract?

A. Please see the following screen shot, but basically, If you decide on a sole source contract you need to identify what activities the contractor will be responsible for and why they are the only contractor capable of providing this work (that would be the justification for a sole source contractor). For a contract that you bid out, you just need to say a contractor will be competitively selected and which activities the contractor will be responsible for. If you are bidding it out, you should not do so until you are selected for award and the award is final.

a. The applicant should list the proposed contract activities along with a brief description of the scope of work or services to be provided, proposed duration, and proposed procurement method (competitive or non-competitive) in its budget narrative.

b. EPA does not require applicants to identify contractors (including consultants) in the work plan, and the terms of EPA's competitive announcements warn applicants not to do so unless they have already complied with the 2 CFR Part 200 Procurement Standards. Refer to the Sole Source Guidance in Subsection C. 3. Of the

[Interim General Budget Development Guidance for Applicants and Recipients of EPA Financial Assistance](#)

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Other Questions

Q. In the presentation posted for the Gulf Innovative Nutrient Reduction grant, the underserved evaluation criteria is worth 5 points and there is a total of 125 points, but in the RFA, the underserved criteria is worth 10 points and the total available is 130 points. Which one is correct?

A. The RFA is correct. The total points available is 130 points and the underserved evaluation criteria is worth 10 points.

Q. Are letters of support encouraged or required?

A. Letter of support are required to substantiate partner involvement described under Evaluation Criteria V.A.3.

Q. Can references cited be added as supporting material or must literature cited fit into the page limit?

A. A references cited page may be added as supporting material and would not be included in the page limit.

Q. Is it a disadvantage for the lead organization to be one that has a current GMP award?

A. It is neither an advantage or disadvantage. All applications will be evaluated based on the criteria identified in the RFA.

Q. Where should the Indirect Cost Rate Agreement be uploaded into the Grants.gov package?

A. The Indirect Cost Rate Agreement can go in the "Optional Attachments Form" section.

Q. How do I submit an additional question that has not been addressed in this document?

A. We are able to respond to questions from individual applicants regarding threshold eligibility criteria, administrative issues related to the submission of the application and requests for clarification about the announcement. You may submit your questions via email to gmp-rfp@epa.gov.

Q. For the resumes, is there a required format or a page limit?

A. There is neither a required format nor a page limit.

Q. With regards to Applicant Capability and Past Performance, will the experience of the applicant and co-applicant be evaluated together or separately?

A. The applicant is considered the manager of the grant and as such is the organization that is evaluated under applicant capability.

Q. We have a question concerning submission of forms. Are all forms required by applicant and co-applicant separately or can a single package be submitted by applicant only?

A. Based on your question, I believe you are forming a coalition with another organization. This is welcome, but one entity must be the responsible entity for the grant. That entity would be the one completing the application package and all required forms. The other organization would be a subawardee. For more information about coalitions, please see the following:

" Groups of two or more eligible applicants may choose to form a coalition and submit a single application under this RFA; however, one entity must be responsible for the grant. Coalitions must identify which eligible organization will be the recipient of the grant and which eligible organization(s) will be subrecipients of the recipient (the "pass-through entity"). Subawards must be consistent with the definition of that term in 2 CFR 200.1 and comply with [EPA's Subaward Policy](#). The pass-through entity that administers the grant and subawards will be accountable to EPA for proper expenditure of the funds and reporting and will be the point of contact for the coalition. As provided in 2 CFR 200.332, subrecipients are accountable to the pass-through entity for proper use of EPA funding. For-profit organizations are not eligible for subawards under this grant program but may receive procurement contracts. Any contracts for services or products funded with EPA financial assistance must be awarded under the competitive procurement procedures of 2 CFR Part 200 and/or 2 CFR Part 1500, as applicable. The regulations at 2 CFR 1500.10 contain limitations on the extent to which EPA funds may be used to compensate individual consultants. Refer to the [Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#) for guidance on competitive procurement requirements and consultant compensation. Do not name a procurement contractor (including a consultant) as a "partner" or otherwise in your application unless the contractor has been selected in compliance with competitive procurement requirements."

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