

**EPA Grants Complying with EPA Assistance Agreements Webinar,
September 22, 2022
Frequently Asked Questions (FAQ)**

- Q1: If our approved Indirect Cost increases between the time we completed our application and when we receive the award and the award reflects the lower percent rate. How do we get the percent allowed in our award to be increased to the correct percent?
- A1: In order to get your award to reflect the higher Indirect Cost (IDC) rate, it is best to submit an amendment request to your Grants Specialist for review and approval. Keep in mind that even though your IDC rate changed, the total amount of the grant award will not. In order to recoup IDC at the higher rate, it is likely you would have to make adjustments to your overall budget.
- Q2: What qualifies as "publishing" the policies?
- A2: "Publishing" is used to indicate communicating the policies. Organizations should ensure that staff are aware of the policies and any subsequent changes or updates.
- Q3: Have you already sent the EPA Administrative Capability Questionnaire?
- A3: The EPA Administrative Capability Questionnaire is only applicable to non-profit recipients slated to receive grant awards greater than \$200,000. EPA will provide the certificate questionnaire (referred to as Form 6600-09) to non-profit recipients who are awarded a grant greater than \$200K. The form can also be found on the EPA website: <https://www.epa.gov/grants/epa-grantee-forms>.
- Q4: Do policies and procedures have to be formally adopted or only formally adopted if that is what is called for in your policies and procedures?
- A4: For the purposes of pre-award certification, we are looking to assess the organization's overall operational policies and procedures. These policies and procedures should reflect the actual processes that are used to draw, expend, and document the use of Federal funds. Given that, the policies and procedures that are submitted should be the policies and procedures that your organization practices on a daily basis.
- Q5: Is it true you are required to draw down funds regularly and no more than 90 days should lapse between regular drawdowns to show programmatic capability of your organization?
- A5: Drawdowns should be based on actual costs and should not happen regularly if you are not incurring costs regularly. The funds should be disbursed on allowable costs within five days of the drawdown.
- Q6: Are electronic timesheets acceptable if the employee has to submit them via the Oracle system?
- A6: Absolutely! Electronic timesheets are acceptable.

- Q7: Are there examples of funding agreements that contain standard forms for reporting progress and supporting payment vouchers?
- A7: Not sure what is meant by “funding agreements”. The terms and conditions of the award will inform the organization how often they need to report. Unfortunately, the question cannot be answered more fully without additional information.
- Q8: What is allowed in the indirect rate?
- A8: Indirect costs are costs that are incurred for a common/joint objective. They are not easily identifiable to a specific assistance agreement. Indirect costs benefit the award and other work necessary for the overall operation of the organization. Indirect costs are stated as a percentage of direct costs. Examples of indirect costs are rent, utilities, office supplies, postage, and salaries of executive/general/administrative staff.
- Q9: Where can recipients, contractors, and vendors find guidance or forms for subrecipient or subcontractor funding agreements?
- A9: The prime recipient is responsible for providing oversight of subrecipients and subcontractors. Subrecipients/subcontractors are subject to the same federal regulations and cost principles as the prime recipient.
- Q10: For an organization applying for its first federal award, is it sufficient to have the policies and procedures drafted and finalized to go into effect upon receipt of an award? Or do you need to see that the organization has had the policies and procedures in place and successfully implemented for some period of time prior to the organization receiving an award?
- A10: We offer several tools/checklists to help applicants facilitate policy development. Many new recipients do not have written policies and procedures in place prior to the award. The Office of Grants and Debarment (OGD) Compliance Team will work with the recipient to develop written policies.
- Q11: What are the audit requirements for changes in compensation after approval of the original rates?
- A11: Essentially, the change in salary/compensation just has to be documented. The documentation must show the effective date of the new salary/rate and include signed approval by EPA.
- Q12: Best practices for changes in key staff?
- A12: Please contact your EPA Project Officer and Grant Specialist with any changes in key staff.
- Q13: Can we use GSA per diems?
- A13: Yes. Federal per diem rates are preferred, but not mandatory.
- Q14: Any guidance on Real Property?
- A14: [2 CFR 200.311](#) covers federal regulations for real property.

- Q15: Do you have a minimum list of what policies and procedures we need to have?
- A15: The policies and procedure that grantees must follow vary by the type of grant and recipient. This [overview of policies and procedures](#) may be helpful for you to review.
- Q16: There used to be defined 6 good faith efforts. Do these still exist?
- A16: This process is currently being revised. Definitions of the six good faith efforts are provided in the EPA training course, [Accurately Completing EPA Form 5700-52A: MBE-WBE Utilization Under Federal Grants and Cooperative Agreements](#).
- Q17: How are pre-award certification requirements different for small non-profit organizations with budgets <\$200k?
- A17: Pre-award certification is only required of non-profit organizations who are slated to receive awards greater than \$200,000. If your award is less than \$200,000, pre-award certification is not required.
- Q18: Is there a recommended place online to find vendors that meet the EPA definition of a qualified Minority Business Enterprise/Women-Owned Business Enterprise (MBE/WBE)?
- A18: EPA does not have a directory or list of certified MBE/WBE's at this time. However, EPA recommends checking with the Small Business Administration, U.S. Department of Transportation, or the state in which your organization intends to do business. One possible resource that may be useful is: <https://www.transportation.gov/DBE%20State%20Websites>.
- Q19: If a pass-through entity purchases real property/easement with EPA funds, what do you expect the pass-through entity do with regards to disposition, etc.?
- A19: Disposition instructions should be included in your grant's Terms and Conditions. If they are not included, please contact your Grant Specialist and EPA Project Officer for instructions.
- Q20: Will the PowerPoint be provided after?
- A20: The presentation from today's webinar is available from the Complying with EPA Assistance Agreements Webinar webpage at: <https://www.epa.gov/grants/complying-epa-assistance-agreements-webinar-september-22-2022>.
- Q21: When purchasing equipment for field work, do we need to look up three quotes for each item? For example, we need a field computer and there is only one company that I found that manufactures a field laptop.
- A21: A cost versus price analysis and/or lease versus purchase analysis is required for every procurement. Three quotes are ideal. However, in the absence of three quotes, a sole source justification is REQUIRED and must be well documented.
- Q22: Do you provide this training to tribes in specific awarded program agreements?
- A22: This training is available to all recipient types.