

**National Priorities: Evaluation of Antimicrobial Resistance in Wastewater and Sewage Sludge Treatment and its Impact on the Environment Request for Applications (RFA)**

Informational Webinar Questions and Answers

June 1, 2023

**Application Information**

- **On an application, can there be only one principal investigator (PI) per university or only one PI for the project?**

Answer: There can be only one Lead PI on the application. Other investigators considered to be key personnel can be listed as co-PIs or Investigators.

As stated in the RFA: “Multiple Investigator applications may be submitted as: (1) a single Lead Principal Investigator (PI) application with Co-PI(s) or (2) a Multiple PI application (with a single Contact PI). If you choose to submit a Multiple PI application, you must follow the specific instructions provided in Sections IV and V of this RFA.” For further information, please see the [EPA Implementation Plan for Policy on Multiple Principal Investigators](#).

- **Can universities submit a joint application (e.g., from 2 universities)?**

Answer: Yes, universities can submit a joint application. One university must serve as the applicant/lead institution and the other universities would be subawardees. In addition, applicant/lead institutions and PIs may submit more than one application if each application is significantly different.

As stated in the RFA: “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.”

- **Should foreign national investigators be listed as Co-PIs or Service Providers?**

Answer: Foreign institutions cannot be the lead institution on an application, and investigators at foreign institutions cannot serve as the lead PI. Investigators at foreign institutions can participate as Co-PIs. Foreign nationals who are affiliated with an eligible American institution may serve as lead PIs or co-PIs.

- **Where can I find similar funding opportunities?**

Answer: You can search [EPA Research Funding Opportunities](#) for funded grants under [research recipients](#) and [research results search pages](#). You can also find links to previous RFAs on our [Past Research Funding Opportunities page](#). To be notified of grant opportunities, please sign up for our [listserv](#). You can also search for other funding opportunities at [grants.gov](#).

- **Are there limits to how many projects a faculty member can join?**

Answer: No; however, applications with the same PIs should be substantially different from each other.

- **Is there a page limit for the research plan?**  
 Answer: The research plan should not exceed fifteen pages. Appendices may be included but must remain within the 15-page limit.
- **Can the research focus on foreign populations?**  
 Answer: Research on foreign populations is allowed as long as the results of research benefit the U.S. and are applicable/transferrable to the U.S.
- **How will EPA choose awardees?**  
 Answer: Eligible grant applications are subject to external peer review to evaluate scientific merit. Applications receiving peer review scores of Excellent or Very Good will then undergo an internal relevancy review to evaluate relevance. Final funding decisions are made by the EPA selection official based on the results of the two reviews, past-performance history review, and the evaluation of the Scientific Data Management Plan. In addition, in making the final funding decisions, the selection official may also consider program balance and available funds. Please see Section V of the RFA for more information on the application review process.
- **Can you explain the difference between cooperative agreements and grants? How will EPA determine when to fund as a cooperative agreement?**  
 Answer: All applications will be funded as grants. After the award is made, if there is a need from the grantee that EPA can address, and there is capacity and interest within EPA to collaborate, then EPA may consider a grantee request to convert the grant to a cooperative agreement.
- **The RFA instructions state that biosketches are limited to two pages but it also states that the longer National Institute of Health biosketch format can be used. Which one is correct?**  
 Answer: Regardless of format, the resume or biosketch must be limited to two pages.
- **For the Quality Assurance Statement (QAS), can the Quality Assurance Manager (QAM) be the PI? Is the Operations Manager (OM) considered to be the PI? Could the PI be the QAM and the OM be the project's Lab Manager? How much time should be anticipated for the quality assurance project plan review and approval at the start of the project?**  
 Answer: The RFA does not state anything preventing the PI from being the QAM. However, reviewers may question whether the PI has the time to be the QAM given other research responsibilities. If an application is selected for funding, recipients will have 90 days after the grant award to develop a Quality Assurance Project Plan (QAPP). This will contain more detail than the QAS.
- **Is there a letter of intent submission required for this grant?**  
 Answer: The RFA does not contain a requirement to obtain letters of intent or support. However, it is recommended to obtain letters of support if external parties are supporting research (e.g., by providing access to facilities or material support for cost share). Applicants may not include letters of support from EPA employees. Any letters of support must be included in the application package at the time it is submitted to grants.gov.

## Research Projects

- **Are wastewater treatment plants (WWTP) model approaches to investigate antibiotic resistant bacteria (ARB) and antibiotic resistant genes (ARG) emergence frowned upon?**  
Answer: Research Area 1 does not include modeling as a potential output or research need. That said, applicants may also consider other significant questions that need to be investigated to meet the objectives of the research area, so you would need to justify and describe how modeling, if included, would contribute to Research Area 1 research questions and objectives. Research Area 2 outputs include risk assessments along with development of risk models and source apportionment studies, so modeling could be expected in Research Area 2.

- **Is a state agency funded project match still considered non-federal even if the funds that the state is awarding are "pass-through" from the CDC?**

Answer: CDC grant money may not be used for cost-share even if the CDC funds are originally awarded to a state and the state passes-through those funds to a recipient or third party through a subaward. The only exception would be based on CDC statutory authority for their funds to be used as cost-share for other Federal grants.

This situation is covered by 2 CFR 200.306(b)(5) which provides that cost share may not be “paid by the Federal Government under another Federal award, except where the Federal statute authorizing a program specifically provides that Federal funds made available for such program can be applied to matching or cost sharing requirements of other Federal programs”.

- **The project description focuses on bacteria. Will research on antibiotic resistant yeasts such as Candida be considered responsive to this RFA?**

Answer: Yeasts and other organisms may be included in addition to bacteria if they contribute to antimicrobial resistance in wastewater and/or sewage sludge or have human/animal health and environmental impacts. However, focusing on yeast alone may not be considered responsive. Be sure to justify the inclusion of these organisms in your application.

- **What is the earliest start date? What is the latest start date?**

Answer: The start date is flexible and can be changed after the grant has been awarded. Funding is typically awarded six to nine months after the RFA closes, depending on the internal review process. We expect awards to be made in summer 2024.

- **It was mentioned that Research 1 focuses on WWTP processes, but not the collection system. WWTP is also a collection system. To understand the removal by different treatment processes, it is also necessary to include the influent. Can you clarify if investigation of WWTP influent ARB and ARGs should be part of the research?**

Answer: Yes, sampling WWTP influent may be included to help understand influent levels of ARBs and ARGs along with removal and potential proliferation of ARBs and ARGs in WWTP treatment processes. EPA is not requesting research/sampling on levels of ARBs and ARGs within the collection system.

## Eligibility

- **Are small businesses or for-profit firms eligible to apply? Are they eligible to receive subawards?**

Answer: No, small businesses are not eligible to apply and may not be a subawardee. Small businesses should consider applying for the [Small Business Innovation Research Program \(SBIR\)](#). If you are interested in doing business with EPA, please read [Resources for Small Businesses](#).

As stated in the RFA: “Profit-making firms are not eligible to apply nor receive assistance agreements from the EPA under this program. For-profit colleges, universities, trade schools, and hospitals are ineligible. 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.”

- **Can a single state agency or group of agencies apply?**

Answer: State and local government agencies may not apply but may serve as subawardee organizations. There is no limit to the number of state and local government agencies that may receive subawards.

As stated in the RFA: “This solicitation is available to public and private nonprofit institutions and public and private universities and colleges located in the United States and its territories or possessions. Foreign entities, U.S. States, territories and possessions, the District of Columbia, State and local government departments, and Federally Recognized Indian Tribal Governments of the U.S. are not eligible to apply under this RFA. Profit-making firms and individuals are not eligible to receive assistance agreements from the EPA under this program.”

- **Can international organizations apply?**

Answer: Foreign entities and universities not located in the U.S. cannot apply for this research grant. However, funding awarded to eligible U.S. institutions through this RFA can be used to support the research of students enrolled in a university outside the U.S. if they are a subawardee listed on the application. Foreign students legally present in the United States and enrolled in an eligible U.S. institution may be supported by research funds if their university is awarded a grant.

- **Can an EPA employee be part of the application as a co-PI, advisor or in another role?**

Answer: No, EPA employees are not allowed to participate in any application. In addition, letters of support or intent from EPA employees are prohibited. If a cooperative agreement is proposed, an EPA employee may collaborate with the grant recipient to the extent permitted under EPA policy.

As stated in the RFA: “In accordance with the Federal Grant and Cooperative Agreement Act, 31 U.S.C. 6301 et seq., the primary purpose of an assistance agreement is to accomplish a public purpose of support or stimulation authorized by federal statute, rather than acquisition for the direct benefit or use of the Agency. In issuing a grant, the EPA anticipates that there will be no substantial EPA involvement in the design, implementation, or conduct of the research.

However, the EPA will monitor research progress through annual reports provided by grantees and other contacts, including site visits (as needed), with the Principal Investigator(s).”

- **Can individuals from academia partner with other consultants?**

Answer: A lead institution from academia may propose consultants in their application, but the grant recipient must follow the competitive procurement procedures described in the RFA. Consultants are not to be listed as PIs or co-PIs.

As stated in the RFA: “Any procurement of services from individual consultants or commercial firms (including space for workshops) must comply with the competitive procurement requirements of 2 CFR Part 200.317-200.327. Please see [EPA’s Solicitation Clauses](#) for more details. EPA provides detailed guidance on procurement requirements in the Agency’s [Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#).”

- **Can research university employees with federal government affiliation serve as key personnel on a project?**

Answer: EPA employees are not allowed to participate in any application.

As stated in the RFA: “Federal employees are not eligible to serve in a principal leadership role on an assistance agreement. Federal employees may not receive salaries or augment their Agency’s appropriations through awards made under this program unless authorized by law to receive such funding.

The applicant institution may enter into an agreement with a Federal Agency to purchase or utilize unique supplies or services unavailable in the private sector to the extent authorized by law. Examples are purchase of satellite data, chemical reference standards, analyses, or use of instrumentation or other facilities not available elsewhere. A written justification for federal involvement must be included in the application. In addition, an appropriate form of assurance that documents the commitment, such as a letter of intent from the Federal Agency involved, should be included.”

- **Are non-profit organizations outside of the U.S. eligible? Can the study be done outside of the U.S.?**

Regarding non-US researchers, you cannot be a primary applicant, but could potentially be a sub-awardee if partnered with an eligible US institution (assuming you’re not a banned entity under US sanctions). Some of the research can be done in a foreign country, as long as the applicant clearly identifies how this research would have applicability in the US (or in parts of the US) as well.

## Peer Review

- **Are there any minimum requirements for a peer reviewer?**

Answer: Peer reviewers should have a depth of experience in the research areas of the RFA and in research project management and should not be applicants or have a conflict of interest with a submitted application. Peer reviewers may also not be EPA employees. If you are interested in becoming peer reviewer, please contact Ron Josephson ([josephson.ron@epa.gov](mailto:josephson.ron@epa.gov)).

- **Can we be involved with an application as well as be involved in peer-review?**

Answer: No. Peer reviewers may not be involved with any application or have a conflict of interest with a submitted application, including submitting a letter of support or intent. If someone else from your institution is applying for the grant, and you do not otherwise have a conflict of interest with this application, you can still be a peer reviewer; however, you will not be able to participate in discussions involving that application.

### **SAM.gov/Grants.gov**

- **What is SAM.gov?**

Answer: The System for Award Management (SAM.gov) is an official website of the U.S. Government. There is no cost to use SAM.gov. You can use this site to:

- Register to do business with the U.S. Government
- Update, renew, or check the status of your entity registration
- Search for entity registration and exclusion records
- Search for assistance listings (formerly CFDA.gov), wage determinations (formerly WDOL.gov), contract opportunities (formerly FBO.gov), and contract data reports (formerly part of FPDS.gov).
- View and submit BioPreferred and Service Contract Reports
- Access publicly available award data via data extracts and system accounts

All applicant institutions must have SAM.gov registration “Active” prior to submitting applications via Grants.gov. Otherwise, Grants.gov will not accept the application. Not having a SAM.gov registration active is not considered a valid reason to have a late submission to our grant programs.

- **Are SAM.gov registrations required for individual PIs or their institutions?**

Answer: For the purposes of this funding opportunity, applicant institutions are required to be registered in Sam.gov, not individuals. If you have further questions or need assistance with the SAM.gov registration process, please contact the Federal Service Desk via [the online portal](#) or phone at 866-606-8220.

- **If non-governmental organizations are co-PIs, do they need to be registered at SAM.gov?**

Answer: No, organizations of co-PIs do not have to be registered. Only the lead institution submitting the application needs to be registered at SAM.gov.

- **What if I have technical difficulties with submitting my application through Grants.gov?**

Answer: All applications must be submitted through Grants.gov. EPA will make decisions concerning acceptance of each application submitted outside of Grants.gov on a case-by-case basis. EPA will only consider accepting applications that were unable to submit through Grants.gov due to Grants.gov or relevant SAM.gov system issues or for unforeseen exigent circumstances, such as extreme weather interfering with internet access. Failure of an applicant to submit prior to the application submission deadline date because they did not properly or timely register in SAM.gov or Grants.gov is not an acceptable reason to justify acceptance of an application outside of Grants.gov.

If you are experiencing problems resulting in an inability to upload the application to Grants.gov, it is essential to call Grants.gov for assistance at 1-800-518-4726 or via email ([support@grants.gov](mailto:support@grants.gov)) before the application deadline. Be sure to obtain a case number from

Grants.gov. Report this information to our grants mailbox ([electronic-grant-submissions@epa.gov](mailto:electronic-grant-submissions@epa.gov)) before the close of the funding opportunity.

## Budget

- **What can the budget go towards? How does budget justification work?**

Answer: Grant funds can be used to cover costs for personnel, fringe benefits, travel, equipment, supplies, contractual support, other, and indirect costs. The budget justification should identify the amount requested for each of the above budget category (i.e., categories in Section B of SF-424A) and describe the basis for calculating the total request in each budget category. Please refer the RFA or contact the Technical Contact listed in the RFA for more guidance.

- **How can the budget go towards subawards?**

Answer: Subawards, such as those with other universities or nonprofit research institutions for members of the research team, should be included in the “other” category. The budget justification should provide the total costs proposed for subawards as a separate line item in the budget justification and brief description of the activities to be supported for each subaward or types of subawards if the subrecipients have not been identified. Subawards may not be used to acquire services from consultants or commercial firms.

- **In the budget example for the Annual Review meeting, the example of Washington D.C. gives a different lodging cost from GSA. Which rate should we use? What inflationary rate can we use for 2024?**

Answer: These numbers are examples and may not be representative of the current D.C. rates and should not be used as such. They are for example purposes only. Applicants can use their institution’s approved travel cost policy to determine rates. If your institution does not have a travel policy, please use the Federal rates. Federal lodging and per diem rates are available [on GSA’s website](#).

- **For budgeting, what annual increment is allowed (e.g. annual increments in salary)? An example in the budget section of the RFA shows 3% increments, but that seems inadequate given current economic conditions.**

Answer: Check the sample budget table that shows examples for increases in percentage (indirect costs, personnel costs). Then, include what you feel is appropriate.

## Cost Sharing

- **Can you please expand on what is considered a cost-share?**

Answer: As stated in Section III.B. of the RFA: “Each applicant must contribute a minimum non-federal cost share/match of 25% of the federal funds awarded. This is equivalent at a minimum to 20% of the total project costs. Cost share may include in-kind contributions. To be eligible for funding consideration, applicants must demonstrate in their applications how they will meet the required minimum 25 percent cost share/match in accordance with 2 CFR §200.306.

All contributions, including cash and third party in-kind, shall be accepted as cost sharing or matching when such contributions meet all of the following criteria: (1) Are verifiable from the non-Federal entity’s records; (2) Are not included as contributions for any other Federal award;

(3) Are necessary and reasonable for proper and efficient accomplishment of project or program objectives; (4) Are allowable under Subpart E—Cost Principles of 2 CFR Part 200; (5) Are not paid by the Federal Government under another Federal award, except where the Federal statute authorizing a program specifically provides that Federal funds made available for such program can be applied to matching or cost sharing requirements of other Federal programs; (6) Are provided for in the approved budget when required by the Federal awarding agency; and (7) Conform to other provisions of 2 CFR Part 200, as applicable.”

- **Is cost-sharing required?**

Answer: Cost sharing is required under this RFA. Applications which do not include the minimum 25% non-federal cost share/match will not be considered.

As stated in the RFA: “A minimum 25% non-federal cost share/match of the federal funds awarded, which may include in-kind contributions (see Section III.B. for more details), is required. For example, if an applicant requests \$2,375,000 in EPA funds, a minimum of \$593,750 must be included. Including matching, total project costs can exceed \$2,968,750 (if the applicant proposes more than the minimum required non-federal cost share/match), however, the federally-funded portion of the budget must not exceed \$2,375,000. Applications which do not include the minimum 25% non-federal cost share/match will not be considered. The total project period requested in an application submitted for this RFA may not exceed 3 years.” Please also note that the cost share must be itemized in the “Budget Justification” section of the application.

- **Does the 25 percent consist of cost sharing per institution when there are several institutions involved?**

Answer: The cost share is total for the application. The Agency does not specify how applicant institutions may allocate that cost share among subawardees.

- **Can for-profit organizations contribute to the cost share and participate in the project?**

Answer: Yes. Profit making organizations can contribute to the cost share and participate in the project, but they are not eligible to apply.

- **What is the correct rate for indirect costs for applicants at universities?**

Answer: There is not a maximum indirect cost (IDC) rate limit. EPA accepts IDC rates that are negotiated for each recipient on behalf of all Federal agencies by a cognizant Federal agency, which is the agency that typically provides the most direct funding to the recipient. For more information, please see the [EPA Indirect Cost Policy](#).

- **Are the maximum fund limits for direct costs or direct and indirect costs?**

Answer: The funding total includes both direct and indirect costs. Under this funding opportunity, the maximum federally funded amount per award is \$2,375,000. In addition, a 25% non-federal cost share/match is required.

- **Can unrecovered indirect costs be considered as cost share contribution and how can this be approved?**

Answer: Unrecovered indirect costs can be used as a cost share contribution; however, you would need to adequately describe how the unrecovered indirect costs will be applied towards cost share in your application (i.e., budget and budget justification). Approval would come at the



award stage and would be contingent upon the Award Official approving the contribution if the application is selected for funding.

- **Is the cost-share included in the max \$2.375 M?**

Answer: The cost share is in addition to the Federal funds requested. Please see the RFA, Section II and the second bullet in this section on cost share.

As stated in the RFA, "Requests for amounts in excess of a total of \$2,375,000 in federal funds per award, including direct and indirect costs, will not be considered. In addition, a minimum 25% non-federal cost share/match of the federal funds awarded, which may include in-kind contributions (see Section III.B. for more details), is required.