

**Community-Based Research for Effective Programs, Policies, and Decisions to Mitigate Cumulative Health Impacts and Environmental Health Disparities in Underserved Communities  
Request For Applications (RFA)**

Informational Webinar Questions and Answers  
July 18, 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 who are considered to be key personnel can be listed as co-PIs or Investigators. An applicant is the Institution/Organization, not PI.

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 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 PIs 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 PIs or co-PIs.

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

Answer: You can search 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](#).

- **Do you expect this or a similar RFA to be available next year? Will there likely be a second round of funding if we are unable to submit a proposal by this deadline?**

Answer: You are required to apply by the deadline. We cannot provide information on future RFAs, but all funding opportunities and notices of intent are posted on the [Funding Opportunity Announcement page](#). You can stay up to date by checking the site periodically or signing up for the [Research Grants Listserv](#). Additionally, you can view [all of the research opportunities that have come out of our office since 1995](#).

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

Answer: No.

As stated in the RFA, “If you wish to submit applications for more than one STAR funding opportunity you must ensure that the research proposed in each application is significantly different from any other that has been submitted to the EPA or from any other financial assistance you are currently receiving from the EPA or other federal government agency.”

- **Is the Key Contacts form used instead of requiring Resume/Bio sketches/CV for the PI and Co-PI's?**

Answer: You must use both. The Key Contact form in [Grants.gov](#) asks for more information than just research personnel. Each resume/bio sketches/CV should not be more than two pages and there is no limit to the number of resumes. Resumes should be added to the project narrative attachment. There is also an Additional Key Contact form which can be added to the project narrative attachment to list investigators other than the PI.

- **Is the 20-page limit for research plan going to be the norm for future EPA RFAs, or is there anything special about this one that increases it from 15 to 20?**

Answer: Most of these RFAs have a 15-page limit on Research Plans, but this one will have a 20-page limit due to its additional research requirements.

- **Do we need to include a reference list in our 20-page document?**

Answer: Reference lists are required, but not counted in the 20-page research plan page limit.

- **Can the research focus on foreign populations?**

Answer: Research on foreign populations is allowed as long as the results of research under this RFA benefit the U.S. and are applicable/transferrable across the U.S.

- **How will EPA choose awardees?**

Answer: Eligible applicants are evaluated through a two-stage competitive review process. 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 review panels, 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 address this issue of "cooperative agreements" versus conventional grants? How will EPA determine when to fund as a cooperative agreement?**

Answer: 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 request to convert the grant to a cooperative agreement.

- **Is cost sharing required?**

Answer: No, cost sharing is not required.

- **What is the EPA Human Subjects Research Statement about?**

Answer: Please review the Human Subjects Research information in the RFA. Human subjects research statements are required when conducting research involving human subjects. The human subjects research plan or waiver must be reviewed by your institutional review board (IRB) and EPA's Human Subjects Research Review Officer. If you are selected for funding, the EPA Project Officer will help guide you through the Human Subjects Research Statements (HSRS) process.

It is important for PIs to ensure the rights and welfare of participants and follow EPA human subject protection regulations and best practices in ethics when conducting the human subject research (HSR). One of the important restrictions is intentional exposure research involving pregnant women, nursing women, and children, which is banned in EPA. [Intentional exposure is defined in 40 CFR Part 26.202 as the "...study of a substance in which the exposure to the substance experienced by a human subject participating in the study would not have occurred but for the human subject's participation in the study"]. For more detailed information, please carefully read pages 30-33 of RFA.

- **What is the impact of Human Subjects Research on community engagement restrictions?**

Answer: For community engagement, PIs should be cognizant of protecting personally identifiable information and the health and safety of participants. [EPA's Program in Human Research Ethics and Oversight \(PHREO\)](#) understands that research involving human subjects provides important data for decision-making and the formulation of regulatory standards at the Agency and willing to help PIs conduct human subjects research ethically and in compliance with the EPA regulations. Contact EPA's Human Subject Research Review Official (HSRRO) Monique Tadeo ([Tadeo.monique@epa.gov](mailto:Tadeo.monique@epa.gov)) with questions.

## Letters of Support and Community Partners

- **At the proposal stage, should we have our selected communities and letters of support?**

Answer: Yes, you should have selected communities and letter of support at the proposal stage.

- **How many letters of support are reasonable?**

Answer: There is no minimum or maximum. Having letters of support or intent help substantiate aspects of your research plan in which you describe partners and facilities where you plan to conduct sampling, donated materials, etc. While there are no maximum or minimum number of letters of support or intent, letters that exceed one paragraph/page (including letterhead and signatures) will be counted in the 20-page research plan page count.

- **Is LOS from city or state government agencies allowed? Are LOS from community partners recommended?**

Answer: Yes, Letters of Support (LOS) from city or state government agencies are allowed, but we recommend obtaining at least one LOS from any community groups with which you plan on partnering in your Community Engagement Plan. Part of the Community Engagement Plan asks researchers to include evidence of community support of an active partnership with a community engagement research committee, a community-based organization or advisory group members. Keep in mind the focus of the RFA is *Community-Based Research*, which should be done in partnership with, and not to, a community. The RFA is generally under the context of Environmental Justice, which means that the focus should be on underserved communities.

- **Are the LOS included under the "Other Attachments" form or part of the Research Plan?**

Answer: The LOS is not included under the "Other Attachments" form on Grants.gov. Letters of Support or Intent are part of the Project Narrative, though, and if kept within one page each, do not count as part of the Research Plan (which is also part of the Project Narrative). For more details about Current and Pending support and Letters of Intent/Letters of Support, please see sections IV.C.5iv of the RFA.

- **How many communities are considered enough for this RFA?**

Answer: There is no minimum or maximum number of communities, but a Community Engagement Plan is required.

- **Is this RFA more for multiple community research, compared to comprehensive research in one community?**

Answer: There is no minimum or maximum number of communities, but a Community Engagement Plan is required.

- **What are some examples of how community partners can be included? Co-PIs? Sub-awardees? Perhaps as a contractor or recipient of a stipend?**

Answer: There are many possible methods that could be employed, including, but not limited to:

- Including substantial contributions from, or leadership by, community groups in application development and project execution.

- Budgeting for subawards to eligible organizations for their involvement in the proposed research (must comply with [EPA's Subaward Policy](#)).
- Assessing community needs and interest through workshops.
- Forming an advisory board to gain diverse perspectives on various aspects of the project's communications.
- Analyzing, sharing and communicating data in ways that maximizes meaning and usefulness for communities and that lead to accurate lessons for communities and individuals.
- Sharing data through a website or through other means.
- Holding events to share research plans or research results.

### **New Applicant Award**

- **In the announcement it was said that at least one new award will be given out. Does that mean the funded groups from the previous round will be priorities and only one or two new awardees will be selected?**

Answer: No, current EPA grantees are not given priorities for funding. The intent is to increase the number of grants awarded to institutions that have not traditionally received awards. A total of five awards are anticipated to be made under this RFA, and the intent is that at least one award will be made to a "new awardee" as defined in Section V.F. Funding Decisions. New awardees are applicants/institutions that never received a STAR grant or one who received one before 2017. Funding decisions are based on funding levels, quality of application and other applicable considerations. EPA reserves the right to change the ratio of awards for existing and recent recipients and new awardees based on the results of the competition and Agency priorities.

- **Do we have to explicitly identify ourselves as a "new" applicant if that is the case and we want to be considered for that track, or do you automatically assess this for all submissions?**

Answer: EPA will assess if each submission meets the definition of "new" applicant as described in the RFA; you do not need to self-identify as a new applicant.

- **Does the new applicant status apply only to the PI/lead institution or do all investigators/institutions need to meet that requirement?**

Answer: The new applicant status applies to the lead institution.

### **Research Projects**

- **Can you explain what you mean by non-chemical stressors and give examples?**

Answer: Chemical stressors refer to pollutants and contaminants in air, water or land. Non-chemical stressors include factors such as extreme heat, climate change, extreme events,

environmental justice stressors, social determinants of health, etc. Non-chemical stressors may influence or modify human health impacts from chemical stressors. For purposes of the RFA, it is important to include both chemical and non-chemical stressors to fully address the research question.

- **Does a proposal need to consider both non-chemical and chemical stressors?**

Answer: Yes, proposals need to consider both non-chemical and chemical stressors to fully address the research question.

- **Can you please explain what "mixed method approaches" refers to? Does this refer to specific statistical methods (mixed effects models etc) or something more generic? Can you provide some references for the "mixed methods" issue?**

Answer: Mixed method approaches refer to combining both quantitative and qualitative methods so that results from assessments may be more comprehensive.

- **To what extent should the project be focused specifically on a "cumulative impact assessment"?**

Answer: A cumulative impact assessment is integral to a research proposal.

- **For the purpose of this proposal, how do you envision the requested Cumulative Impact Assessment different to a Cumulative Risk Assessment? Is there a definition of what a cumulative impact assessment is, per the EPA?**

Answer: EPA defines a Cumulative Risk Assessment as an analysis, characterization, and possible quantification of the combined risks to health and/or the environment from multiple agents and/or stressors.

This RFA defines Cumulative Impact Assessment as a process of evaluating both quantitative and qualitative data representing cumulative impacts to inform a decision. Cumulative impact assessment requires a systematic approach to characterize the combined effects from exposures to both chemical and non-chemical stressors over time across the affected population group or community. It evaluates how stressors from the built, natural, and social environments affect groups of people in both positive and negative ways. This RFA is interested in Cumulative Impacts Assessment, as this RFA has a strong EJ component.

- **Would electric vehicle infrastructure programs be considered eligible if they do mitigate CO2 levels?**

Answer: As long as the applicant meets the eligibility requirements cited under Section III: Eligibility, EV proposals are allowed as they reduce CO2 and other emissions. CO2 is considered a pollutant under the Clean Air Act. This is documented in the "Endangerment Finding," which was upheld by the Supreme Court ruled in *Massachusetts v. EPA*. See [U.S. Court of Appeals–D.C. Circuit Upholds EPA's Action to Reduce Greenhouse Gases Under the Clean Air Act](#) for more information.

- **In Research Area #2, what is the definition of "practical" in "practical programs, policies, and decisions...?"**

Answer: The word "practical" means the programs/policies/decisions would not be merely possible, but would need to be feasible and effective, and supported by robust scientific reasoning (that the applicants will provide). Actual implementation is not a required component. Your research should be practical and investigate how cumulative impact assessment approaches and/or methods may be used to shape programs, policies, and decisions to eliminate environmental health disparities.

- **The RFA mentions in the research questions section "how can community-based scientific research results be translated and/or applied to provide effective solutions to reduce climate change impacts on human health in underserved communities?" But the research areas do not mention this question. Could you clarify?**

Answer: This RFA is considered as a follow-up RFA to the previous RFA the [Cumulative Health Impacts at the Intersection of Climate Change, Environmental Justice, and Vulnerable Populations/Lifestages: Community-Based Research for Solutions](#). This RFA is seeking research that not only will investigate the cumulative health impacts from climate change in underserved communities but also how to use the research results and scientific knowledge to develop potentially effective and practical policies/programs/decisions at community-level.

## 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) (<https://www.epa.gov/sbir>). If you are interested in doing business with EPA, please read [Resources for Small Businesses](#).

As stated in the RFA: "Profit-making firms and individuals are not eligible to apply. 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? Can U.S. Territories apply?**

Answer: State and local government agencies and U.S. territories may apply and 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: “Public and private nonprofit institutions/organizations, public and private institutions of higher education (IHEs), and hospitals located in the U.S. and its territories or possessions; state and local governments; Federally Recognized Indian Tribal Governments; and U.S. territories or possessions are eligible to apply. Profit-making firms and individuals are not eligible to apply.”

- **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 or advisor?**

Answer: No, EPA employees are not allowed to participate in any application. In addition, letters of support or intent from EPA employees are prohibited; however, Federal employees from other agencies may submit letters of support or intent.

- **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 <https://www.epa.gov/grants/epa-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: No, Federal employees are not allowed to participate as PIs or co-PIs 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 Federally-Funded Research and Development Centers (FFRDCs) eligible to apply?**

Answer: No, National laboratories funded by Federal Agencies (Federally-Funded Research and Development Centers, “FFRDCs”) may not apply. However, FFRDC employees may cooperate or collaborate with eligible applicants within the limits imposed by applicable legislation and regulations. They may participate in planning, conducting, and analyzing the research directed by the applicant, but may not direct projects on behalf of the applicant organization. An award recipient may provide funds through its assistance agreement from the EPA to an FFRDC for research personnel, supplies, equipment, and other expenses directly related to the research.

- **Can you please explain more about Federally Funded Research and Development Centers (FFRDC). Would an NIH R52 Health Disparities Center be considered a FFRDC?**

Answer: The National Science Foundation (NSF) maintains a [list of FFRDCs](#). The NIH R52 Health Disparities Center appears to be an office within a federal agency, and thus would not be eligible to apply for the grant or be listed as a subawardee. You 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.

- **Can scientists from a National Lab or FFRDCs serve as co-PI or subawardee?**

Answer: FFRDCs would be considered as subawardees. Scientists at FFRDCs may provide input, research advice, personnel, supplies etc., but cannot serve as PIs or co-PIs. For distinctions between subrecipients and contractors see [EPA’s Subaward Policy](#).

- **Are salaries for permanent FFRDCs allowed?**

Answer: Yes. Salaries for permanent FFRDC employees may be charged under the assistance agreement.

- **Are non-profit FFRDC-operators (not affiliated with national labs) eligible to apply?**

Answer: Yes, but for more details, email Ron Josephson ([josephson.ron@epa.gov](mailto:josephson.ron@epa.gov)).

- **Who are the peer reviewers? To clarify, are all of these peer review criteria weighed equally or do some carry more weight than others?**

Answer: External peer reviewers are confidential and include non-EPA scientists, engineers, social scientists, and/or economists who are accomplished in their respective disciplines and proficient in the technical subjects they are reviewing. Peer reviewers consider an application's merit based on the extent to which the application demonstrates the criteria listed under Section V.A., which are listed in descending order of importance.

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

Answer: Peer reviewers should have a depth of experience in at least one of the research areas of the RFA. The panel will be composed of experts with a variety of expertise and cannot be directly or financially involved or have certain other types of conflict of interest with a submitted application. Peer reviewers also cannot be EPA employees. If you are interested in becoming peer reviewer, please contact Aaron Wishnuff ([Wishnuff.Aaron@epa.gov](mailto:Wishnuff.Aaron@epa.gov)).

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

Answer: No. Peer reviewers cannot be directly or financially involved with any application for this RFA (you can still be on this peer review panel if involved with an application submitted to another EPA RFA) or have a certain type of 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 cannot 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 ([www.fsd.gov/gsafsd\\_sp](http://www.fsd.gov/gsafsd_sp)) and the phone number 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 [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.

- **Is it allowable to budget for organizational stipends for community partners?**

Answer: Yes, there is an [EPA participant support cost guidance](#), but there are limitations on amounts.

- **Can budget include construction of mitigation solutions?**

Answer: Budgets may include construction costs, but this is rare and requires extensive justification for construction. All purchases must be compliant with the Build America Buy America (BABA) Act.

The term “construction” is defined as “erection, alteration, or repair (including dredging, excavating, and painting) of buildings, structures, or other improvements to real property, and activities in response to a release or a threat of a release of a hazardous substance into the environment, or activities to prevent the introduction of a hazardous substance into a water supply.” Further, costs for:

- building or repairing facilities and related demolition and site preparation work or for remediating contamination are to be classified as “Construction”;
- architectural and engineering services are to be classified as “Contractual”; and
- construction activities carried out by the applicant’s own employees are to be classified as “Personnel.”

ORD’s regulations supplement the definition of construction to include the preliminary planning to determine the economic and engineering feasibility of a facility, the engineering, architectural, legal, fiscal, and economic investigations and studies, surveys, designs, plans, working drawings, specifications, procedures, and other action necessary to the construction of a facility, the erection, acquisition, alteration, remodeling, improvement, or extension of a facility, and the inspection and supervision of the construction of a facility.

Recipients are subject to the Buy America Sourcing requirements under the Build America, Buy America provisions of the [Infrastructure Investment and Jobs Act](#) (IIJA) (P.L. 117-58, §§70911-70917) for the types of infrastructure projects under the EPA program and activities specified in [EPA’s Identification of Federal Financial Assistance Infrastructure Programs Subject to the Build America, Buy America Provisions of the Infrastructure Investment and Jobs Act](#). None of the funds provided under this award may be used for a project of infrastructure unless all iron and steel, manufactured products, and construction materials that are consumed in, incorporated into, or affixed to an infrastructure project are produced in the United States. The Buy America preference requirement applies to an entire infrastructure project, even if it is funded by both Federal and non-Federal funds. The recipient must implement these requirements in its procurements, and these requirements must flow down to all subawards and contracts at any tier. For legal definitions and sourcing requirements, the recipient must consult [EPA’s Build America, Buy America website](#) and the Office of Management and Budget’s (OMB) [Memorandum M-22-11, Initial Implementation Guidance on Application of Buy America Preference in Federal Financial Assistance Programs for Infrastructure](#).