

**Climate Pollution Reduction Grants Program:
Implementation Grants General Competition
Notice of Funding Opportunity (NOFO)
EPA-R-OAR-CPRGI-23-07
Questions and Answers as of **October 23, 2023****

The U.S. Environmental Protection Agency (EPA) is accepting applications for funding under the Climate Pollution Reduction Grants Program: Implementation Grants General Competition (EPA-R-OAR-CPRGI-23-07) until **April 1, 2024 at 11:59 p.m. (ET)**.

The NOFO and all application forms are available at <https://www.epa.gov/inflation-reduction-act/cprg-implementation-grants>. EPA hosted informational webinars on September 21, 2023, and October 3, 2023. Recordings and material from those webinars can be found [here](#).

This document contains responses to questions raised in EPA's informational webinar and to questions submitted to the CPRG email inbox. EPA plans to update this document regularly with additional incoming questions regarding the CPRG Implementation Grants General Competition. (Note that responses to questions about the CPRG Implementation Grants Tribes and Territories Competition (EPA-R-OAR-CPRGT-23-09) are located in a separate document available [here](#)).

Please review all questions and answers in this document. Questions marked **NEW** or **UPDATED** have been added or revised since the last posting of this document. If you have any additional questions, please email CPRG@epa.gov by **March 15, 2024** in order for EPA to provide a response prior to the competition application closing date of April 1, 2024.

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I. Application Process and Timeline

Q1: What is the application deadline for the CPRG implementation grants general competition?

A1: Applications for the implementation grants general competition (EPA-R-OAR-CPRGI-23-07) are due on April 1, 2024.

Q2: What is the difference between the two notices of funding opportunity for CPRG implementation grants: the general competition and the competition for Tribes and territories?

A2: Generally speaking, eligible applicants for the general competition (EPA-R-OAR-CPRGI-23-07) are states, municipalities, Tribes, Tribal consortia, territories, and groups thereof, whereas eligible applicants for the Tribal and territories competition (EPA-R-OAR-CPRGT-23-09) are limited to Tribes, Tribal consortia, territories and groups thereof. Other important differences between these two competitions, such as funding amounts, evaluation criteria, and application deadlines, are described in detail in the Notices of Funding Opportunity (NOFOs) for these two competitions, both available at: <https://www.epa.gov/inflation-reduction-act/cprg-implementation-grants>.

Q3: Can eligible applicants from Tribes and territories apply for grants under both the general competition NOFO and the Tribes and territories NOFO?

A3: Yes. A Tribe or territory may submit applications in both the general competition and the Tribes and territories competition. Furthermore, a Tribe or territory may submit applications to implement the same measure under both competitions. Applicants must apply separately to each competition, and they must submit applications that meet the specific requirements of each competition, which are not the same. One application will not automatically serve for both programs.

In the event that both applications score well enough to be selected under the two separate competitions, EPA would only make one grant award to the applicant.

Q4: How do the implementation grants relate to the CPRG planning grants?

A4: As explained in Section I.A of the General Competition NOFO (page 5), the 2022 Inflation Reduction Act (IRA) established the CPRG program, which provides funds in two distinct but related phases:

1. Planning grants: \$250 million for states, U.S. territories, municipalities, air pollution control agencies, Tribes, and groups thereof to develop plans to reduce greenhouse gases (GHGs). The Priority Climate Action Plan (PCAP) is the first deliverable due under the CPRG planning grants.
2. Implementation grants: \$4.6 billion for competitive grants to eligible applicants to implement GHG reduction programs, policies, projects, and measures (collectively referred to as "GHG reduction measures," or "measures") identified in a PCAP developed under a CPRG planning grant.

Lead organizations for CPRG planning grants must submit their PCAPs to EPA by the deadline of March 1, 2024 in order for lead organizations and other eligible applicants to submit grant applications for the general competition to fund measures contained in those plans. For a list of the lead organizations for planning grants, see <https://www.epa.gov/inflation-reduction-act/cprg-planning-grant-information>

Q5: Do I have to submit a Notice of Intent (NOI) to Apply? What information is required for submitting a Notice of Intent to Apply? Will EPA provide any feedback in response to a NOI?

A5: To allow for efficient management of the competitive process, EPA requests submittal of an informal *Notice of Intent (NOI) to Apply* by February 1, 2024, to CPRG@epa.gov. As described on page 1 of the NOFO, please include in the body of the email the dollar amount of the anticipated funding request and one to two sentences about the scope and sector(s) of the greenhouse gas (GHG) reduction measures likely to be included in the potential implementation grant application. Additionally, if intending to apply as the lead applicant representing a coalition, please list all anticipated coalition members.

Submission of an NOI is optional and non-binding; it is a process management tool that will allow EPA to better anticipate the resources required for efficient evaluation of submitted applications. EPA will not be able to provide feedback in response to an NOI.

Q6: Will a list of organizations that have submitted NOIs be released?

A6: EPA does not anticipate publishing a list of organizations that submit NOI's.

Q7: How many applications can I submit?

A7: As described on page 20 of the NOFO, each eligible applicant is limited to submitting two grant applications: one as an individual applicant and one as the lead applicant for a coalition. Applicants may participate in more than one coalition but may only serve as lead applicant for one coalition.

Q8: What is the timeframe for the grants? How much time will a grantee have to complete the projects?

A8: The estimated period of performance for awards resulting from this solicitation will be up to five years. The estimated project start date for awards is October 1, 2024. See Section II.F of the NOFO.

Q9: When are PCAPs due? Does EPA have to approve the PCAPs?

A9: As explained in Section I.A of the NOFO, PCAPs are due March 1, 2024, for states and Metropolitan Statistical Areas (MSAs) and for any Tribes, Tribal consortia, or territories that plan to apply to the CPRG implementation grants general competition (otherwise, PCAPs are due April 1, 2024, for Tribes, Tribal consortia, and territories).

Lead organizations for CPRG planning grants must submit their PCAPs to EPA by the deadline of March 1, 2024, in order for lead organizations and other eligible applicants to submit grant applications for the general competition to fund measures contained in those plans.

EPA project officers will review submitted deliverables, including PCAPs, to ensure they meet the requirements of the [CPRG Planning Grant Program Guidance and the terms and conditions of the planning grants](#). EPA will not approve or provide feedback on the list of GHG measures included in a PCAP or analyses related to those measures.

Q10: Is it possible to submit my PCAP earlier than the due date to get further guidance on our implementation grants to increase chances of an implementation award?

A10: Due to the competitive nature of the implementation grant phase of the CPRG program, EPA will not be able to provide feedback on PCAPs.

Q11: Where and when will I be able to find the PCAPs? Are there any requirements or expectations that PCAP lead organizations make publicly available their draft plans or some level of information prior to the PCAP deadline?

A11: The CPRG planning grant program guidance specified that when developing a PCAP, lead organizations must coordinate and collaborate with other eligible entities within their jurisdictions and ensure that priority measures are included in the plan that can be implemented by those entities (page 19 of CPRG Planning Grant Program Guidance [for States, Municipalities, and Air Pollution Control Agencies](#); page 13 of CPRG Planning Grant Program Guidance [for Federally Recognized Tribes, Tribal Consortia, and U.S. Territories](#)). In all cases, the lead organizations for CPRG planning grants are required to make their PCAPs available to other entities for their use in developing implementation grant applications, and EPA will publicly post all PCAPs received on the [CPRG website](#).

EPA strongly encourages lead organizations to make draft versions of their PCAPs available as early as possible so that entities considering whether to submit an implementation grant application can begin development of their applications well before the April 1, 2024, application deadline. Please see page 7 of the NOFO for more information.

EPA also encourages eligible applicants that are considering applying for a CPRG implementation grant to participate in the PCAP development process and provide input on priority measures to include in the plan, in collaboration with other participants and stakeholders. Section 8.4.3 of the Planning Grants Program Guidance for States, Municipalities, and Air Pollution Control Agencies and Section 7.4.3 of the Planning Grants Program Guidance for Federally Recognized Tribes, Tribal Consortia, and U.S. Territories provides more information on coordination and engagement.

Q12: Can an applicant apply for an implementation project before a PCAP is complete?

A12: As described in the project narrative requirements section of the NOFO (page 29), applicants for the CPRG implementation grants must include applicable PCAP reference(s) with their application including PCAP lead organization, PCAP title, PCAP website link, list of GHG reduction measures, and PCAP page numbers, which will not be available until the PCAP is complete.

Q13: Will this grant require matching funds?

A13: As explained in Section III.B of the NOFO (page 20), no cost sharing, matching funds or leveraged resources are required as a condition of eligibility under this competition.

Q14: Will EPA offer additional rounds of funding, including for measures in the Comprehensive Climate Action Plans? Or is this the only opportunity for CPRG implementation grants?

A14: EPA plans to award all available implementation grant funds (totaling \$4.6 billion through the two competitions that were announced on September 20, 2023) by the end of 2024. EPA anticipates awarding funds for the general competition by October 2024 and funds for the competition for Tribes and territories by December 2024. No additional rounds of CPRG implementation funding are anticipated at this time.

Q15: What tools, resources, and technical assistance will EPA provide for applicants? Will EPA host webinars or trainings on the NOFOs?

A15: Section IV of each NOFO provides important guidance on the information EPA would like to be provided in the grant application; and section V of each NOFO describes the evaluation criteria and

scoring breakdown. EPA has provided example templates for the cover page and budget, and additional guidance in appendix E on calculation methodologies for the GHG reduction measures included in the application.

EPA has compiled publicly available tools and technical resources to assist eligible applicants with climate planning and made them available on EPA's [CPRG website](#). EPA's Office of Grants and Debarment offers training and resources to assist applicants with preparing and submitting grant applications at: <https://www.epa.gov/grants/epa-grants-overview-applicants-and-recipients>.

EPA held informational webinars about the general competition on September 21st and October 3rd. Materials from these webinars are available [here](#). To stay informed about any additional webinars for implementation grant applicants, please visit the CPRG website for updates, and please sign up for the [CPRG Newsletter](#).

Q16: How will EPA responses to questions be documented?

A16: EPA will periodically update this Q&A document with new questions that received through the cprg@epa.gov inbox and during the EPA informational webinars. Updated versions of this document will be posted publicly to the EPA CPRG website: <https://www.epa.gov/inflation-reduction-act/cprg-implementation-grants>.

New questions posted October 23, 2023

NEW *Q17: Should this NOFO inform what I put in my PCAP?*

A17: As explained on page 7 of the NOFO, applications for CPRG implementation grants under the general competition must seek funding to implement measures that are included in a PCAP developed with funding from a CPRG planning grant. EPA has published the competition details well in advance of the application deadline so that entities considering whether to submit an implementation grant application will be able to take elements of the implementation evaluation criteria into consideration when developing their PCAP. EPA encourages eligible applicants that are considering applying for a CPRG implementation grant to participate in the PCAP development process and provide input on priority measures to include in the plan, in collaboration with other participants and stakeholders.

NEW *Q18: Will EPA extend the deadline for either the PCAP or the implementation grant application, or both?*

A18: EPA does not intend to alter the deadlines of the planning grant requirements, including the PCAP, or the implementation grant application deadline.

NEW *Q19: How should we determine the scope of measures to include in our application?*

A19: An eligible applicant, including lead organizations for CPRG planning grants, may apply for implementation funding for one, some, or all of the GHG measures included in an applicable PCAP that could be implemented by that applicant (not all measures in a PCAP may be appropriate for implementation by all eligible applicants). Eligible applicants should review Sections IV and V of the NOFO to determine what information and what level of specificity to include in an application. An eligible applicant that is not the lead organization for a planning grant should coordinate and communicate with the lead organization for the planning grant so that the PCAP includes priority measures that the eligible applicant may implement.

II. Eligible Applicants

Q1: Who is eligible to apply for an implementation grant under the general competition?

A1: As explained in Section III.A (page 17) of the general competition NOFO, entities eligible to apply for an implementation grant under the general competition are states (including the District of Columbia and Puerto Rico), municipalities, air pollution control agencies, Tribes, territories, and groups thereof. States, municipalities, Tribes, and territories that directly received a CPRG planning grant are eligible to apply. In addition, municipalities, air pollution control agencies, and Tribes that did not directly receive a planning grant but that seek funding to implement one or more GHG reduction measures that are included in an applicable PCAP submitted to EPA by March 1, 2024, are also eligible to apply. An applicable PCAP is one that geographically covers the entity and contains GHG reduction measures that can be implemented by the entity. Please consult Table 2 of the NOFO for additional detail.

Q2: If I didn't receive a planning grant, am I still eligible to apply? Can any local government apply for an implementation grant, or do they need to be one of the 79 MSAs that received a planning grant? Do I have to develop my own PCAP to apply?

A2: Table 2 in Section III.A of the general competition NOFO explains who is an eligible applicant for this competition. Municipalities, air pollution control agencies, and Tribes that did not directly receive a planning grant but that seek funding to implement one or more GHG reduction measures that are included in an applicable PCAP submitted to EPA by March 1, 2024, are eligible to apply. An applicable PCAP is one that geographically covers the entity and contains GHG reduction measures that can be implemented by the entity.

Municipalities that did not directly receive a planning grant but that seek funding to implement one or more GHG reduction measures that are included in an applicable PCAP (submitted to EPA by March 1, 2024) are eligible to apply. Municipalities not covered by one of the 79 MSAs that received a planning grant may be eligible to apply if they are covered by a PCAP developed by a lead organization for the planning grant (e.g., a state PCAP). A municipality that did not receive a planning grant should coordinate with the lead organization developing the applicable PCAP for its state and/or MSA (if located in one of the 79 MSAs that received a planning grant) to ensure that priority measures are included in the plan that can be implemented by the municipality. See Section III.A of the general competition NOFO for more information.

Q3: What does it mean to be covered by a PCAP? Can I be covered by multiple PCAPs?

A3: As explained in Section III.A of the NOFO, municipalities, air pollution control agencies, and tribes that did not directly receive a planning grant but that seek funding to implement one or more GHG reduction measures that are included in an applicable PCAP (submitted to EPA by March 1, 2024) are eligible to apply. An applicable PCAP is one that geographically covers an entity and contains GHG reduction measures that can be implemented by the entity.

An entity may be covered by multiple PCAPs in some cases. For example, an applicable state PCAP and an applicable MSA PCAP may each include measures that a particular municipality could implement. The municipality could reference measures from either or both PCAPs in its application.

Q4: Are multiple agencies or offices within a state government or municipal government able to apply?

A4: Yes, multiple agencies, departments, or other executive branch-level offices from a state or municipality are each eligible to apply. However, EPA recommends that such agencies coordinate with each other to avoid submitting more than one application to implement the same GHG reduction measure in the same geographic location. See Table 2 (page 17) of the NOFO for more information.

Q5: Are there any restrictions on the size and type of coalition I can organize for an implementation grant application?

A5: As explained in Section III.A of the NOFO, a coalition consists of two or more eligible applicants applying to jointly implement one or more measures. A coalition may be comprised of any combination of eligible applicants, at the same or different levels of government. For example, a coalition could include multiple cities in an MSA; multiple MSAs; multiple states; a state and multiple cities; and/or a state and one or more tribes. In all cases, each coalition member must be an eligible applicant and be covered by a PCAP that contains the measure(s) for which the coalition seeks funding.

As explained in section 1 of the workplan expectations (page 30 of the NOFO), a coalition application should briefly describe the role(s) and responsibilities of each coalition member in the project design and implementation. The application should also include an explanation of how each GHG reduction measure included in the application relates to a GHG reduction measure included in the relevant PCAP(s), why each measure was selected as a priority, and a description of how each measure will meet the goals of the CPRG program. To implement a measure as a coalition, each coalition member needs to have the same measure included in their respective PCAP.

One entity must be the lead applicant (see Section III.A) and responsible for managing any grant awarded under this program (see Section IV.C). Multiple eligible entities may apply as a coalition if the group shares a strong and substantial commitment to the proposed measures such that withdrawal by any single member from the coalition would fundamentally alter the design or expected outputs and outcomes of the proposed measures.

Not all partnerships are coalitions. For example, an individual applicant can apply for an implementation grant and have a partnership or collaboration with organizations that are not eligible to serve as the lead applicant (e.g., non-profit organizations or private sector companies). This type of arrangement would not be considered a coalition under CPRG.

Both an individual applicant, and the lead applicant of a coalition, may make subawards to partners (subrecipients) or use contractual arrangements to carry out a portion of the grant's activities in accordance with the guidelines for subawards and procurement activities described in Appendix A of the NOFO.

Q6: Can I use a climate action plan that is not funded through a CPRG planning grant as the basis for my implementation grant application?

A6: No. Applications for implementation grants must seek funding to implement measures that are included in a PCAP developed with funding from a CPRG planning grant (see Section I.B of the NOFO). PCAPs must be submitted to EPA by March 1, 2024 for the general competition.

Q7: What entities are eligible to apply from Florida, Iowa, Kentucky, and South Dakota?

A7: State agencies in Florida, Iowa, Kentucky, and South Dakota are not eligible to apply for CPRG implementation grants. Municipalities in Florida, Iowa, Kentucky, and South Dakota are eligible to apply if they are covered by a PCAP developed by an MSA receiving a planning grant. Tribes and Tribal consortia within the geographical boundaries of these states that received a planning grant or are otherwise covered by an MSA or Tribal PCAP are eligible to apply.

Q8: Under a coalition, would coalition members be subgrantees of the coalition lead?

A8: Yes, coalition members would be subgrantees of the lead applicant for a coalition. However, the lead applicant for a coalition must submit a Memorandum of Agreement (MOA) signed by all coalition members as part of their application that includes, among other things, the proposed operating model and roles and responsibilities for all coalition members. All members of the coalition identified in the coalition's MOA must be listed as subrecipients, except the eligible applicant that will be the recipient of the grant (the lead applicant). See Section III.A, Section IV.C, and Appendix E for more information on coalitions.

Q9: Can I still apply for a planning grant to develop a PCAP?

A9: The funding opportunity for the planning grants is closed. Eligible applicants that did not receive a planning grant may still apply for an implementation grant if they are covered by a PCAP as discussed in Section III.A of the General Competition NOFO.

Q10: Would EPA accept a less formal type of agreement for a coalition than a Memorandum of Agreement (MOA)? What if I am unable to get an MOA signed by all coalition members by the deadline for the application?

A10: For the general competition, coalition applications must include an MOA signed by all coalition members (see Section III.A of the NOFO). EPA does not have a specific format for the MOA, but it should contain the elements provided in Appendix E of the NOFO. As described in Section III.C of the NOFO, if a lead applicant submits an application for a coalition without an MOA signed by all eligible applicants participating in the coalition, that application will be treated as an individual application for the lead applicant.

Q11: Does the MOA need to be complete by the time I submit a Notice of Intent to Apply (NOI)?

A11: No, the MOA does not need to be completed before the submission of the NOI but NOIs should list anticipated coalition members to the extent known. As the NOI is strongly recommended but optional, applicants will not be evaluated on the information included in the NOI.

Q12: Can I add someone to the coalition after I apply?

A12: EPA will not consider information submitted to EPA after the close of the NOFO, including additions of new members to a coalition. However, in the event that an applicant needs to make updates or changes to a submitted application *prior* to the application deadline, including adding coalition members and an updated MOA, they may submit a revision to the application *as long as it is prior to the deadline*. Grants.gov provides [instructions](#) for applicants to make modifications to their application and resubmit their Grants.gov Workspace.

New questions posted October 23, 2023

NEW Q13: *Are there benefits of applying as a coalition? Would EPA prefer states interested in implementing a GHG measure to apply as a coalition or to submit separate applications?*

A13: As explained in Section I.B of the NOFO, the CPRG general competition is designed to incentivize eligible applicants to apply for funding together as a coalition to implement GHG reduction measures regionally, across multiple municipalities, state boundaries, or even state and tribal boundaries. Details on eligible applicants and coalitions are available in Section III.A. Each eligible applicant is limited to submitting two grant applicants: one as the individual applicant and one as the lead applicant for a coalition. Applicants may also participate in more than one coalition (as a non-lead applicant). However, it is up to each applicant (or coalition of applicants) to determine the approach that is most appropriate for the selected measure(s) and most responsive to the evaluation criteria in the NOFO. Each application, whether from an individual entity or a coalition, will be evaluated on the strength of its proposal; there is no adjustment to evaluation criteria or to scoring for coalition applications.

NEW Q14: *Are Tribal consortia receiving planning grants, such as the Alaskan Native Tribal Health Consortium (ANTHC), eligible to apply for implementation grants? Are Alaskan Native Corporations eligible? May Tribal consortia subgrant to Alaskan Native Corporations?*

A14: Tribes and Tribal consortia that received planning grants as well those that did not receive a planning grant but are covered by an applicable Tribal, state, or MSA PCAP are eligible to apply. ANTHC received a CPRG planning grant and is eligible to apply for an implementation grant.

As explained in footnote 4 on page 5 of the general competition NOFO and the Tribes and territories competition NOFO, Alaskan Native Corporations are not eligible applicants for an implementation grant but could receive subawards from eligible CPRG implementation grantees as long as they meet EPA subaward requirements.

III. Eligible Measures

Q1: What types of projects are eligible for funding?

A1: Applications must propose to implement GHG reduction measures contained in a PCAP developed under a CPRG planning grant and meet the threshold eligibility criteria in Section III.C. of the NOFO (page 20). Additionally, any application should be consistent with EPA's goals for implementation funding (see Section I.B of the NOFO, page 6). It is up to each applicant to make the case to EPA in their application how their proposed measure adheres to the workplan requirements in Section IV of the NOFO and meets to the evaluation criteria established in Section V of the NOFO. An illustrative list of potential GHG reduction measures can be found on page 9 of the NOFO. However, this list is neither exhaustive nor definitive with respect to the measures that may be included in applications under this NOFO. Applicants should consider the evaluation criteria in Section V.A when deciding on which measure or measures to include in their applications.

EPA will not respond to individual questions about whether specific GHG reduction measures are eligible and how they might score in the general competition.

Q2: Are carbon sink projects, or projects that enhance carbon removal, eligible?

A2: An eligible GHG reduction measure under the CPRG implementation grants program may reduce GHG emissions or enhance carbon removal. Measures that enhance carbon removal are those that increase the removal of carbon dioxide from the atmosphere through, for example, the uptake of carbon and storage in soils, vegetation, and forests. Such measures may include actions related to management of lands in their current use, or as lands are converted to other uses (see Section I.B., page 7, of the General competition NOFO).

Q3: Are climate adaptation or resilience measures eligible?

A3: Eligible projects must meet the threshold eligibility criteria in Section III.C. of the NOFO (page 20), including reducing GHG emissions or enhancing carbon removal. Climate adaptation and resilience measures that do not result in a reduction in GHG emissions or enhance carbon removal are not eligible.

Q4: Can an implementation grant application request funds to hire staff to implement GHG reduction measures included in the application?

A4: In the budget detail for the application, costs for implementing GHG reduction measures may include staffing and contractual costs necessary to implement GHG measures and training and staff capacity-building costs. See page 40 of the NOFO for more information.

Q5: Can an implementation grant application request funds for job training?

A5: In order to be eligible, applications must be fully responsive to the NOFO and must be to implement GHG reduction measures contained in a PCAP developed under a CPRG planning grant. Applications may request funding to be used for high-quality workforce development activities that are tied to or facilitate implementation of a proposed GHG reduction measure (page 35 of the NOFO).

Q6: How broadly or narrowly do GHG reduction measures need to be defined in the application?

A6: Applicants should review the application expectations in Section IV and the evaluation criteria in Section V of the NOFO to determine what level of specificity of the GHG reduction measures to include in the application. As explained in Section IV.B. of the NOFO, applications should provide details on each measure (page 26). Applicants should provide a detailed description of each of the proposed GHG reduction measures to be undertaken. These descriptions should include the major features, tasks, and milestones for each measure and explain how to ensure success of the measures. The application should also describe underlying assumptions and risks associated with those features, tasks, and milestones.

Q7: Can I apply for funding to implement multiple GHG reduction measures in one application?

A: Yes, applications may include one or more proposed GHG reduction measures. Applications will be evaluated as a whole, and GHG reduction measures will not be scored individually (page 8 of NOFO). Therefore, applicants should include only those measures that are eligible and that meet the requirements described in this announcement. For applications that include multiple GHG reduction measures, applicants should provide assumptions, calculations, and documentation for each GHG reduction measure.

*Q8: Are implementation grants meant to implement a PCAP measure in its entirety, or can it focus on a subset of the components and actions in one measure? **UPDATED October 23, 2023***

A8: An eligible applicant may apply to implement a portion of a measure included in a PCAP but should explain how the measure included in the application relates to a GHG reduction measure included in the relevant PCAP(s) (page 26 30 of the NOFO). Applications should only quantify emission reductions that will occur as a result of CPRG implementation grant funding. If CPRG funding represents a fraction of the total funding for a GHG measure, the total estimated GHG emission reductions should be scaled as explained on page 31 of the NOFO.

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NEW Q9: What types of infrastructure projects are eligible for CPRG funding (i.e., EV equipment infrastructure, pedestrian and bike path infrastructure, green infrastructure, etc.)?

A9: Infrastructure projects that reduce GHG emissions and meet the threshold eligibility criteria in Section III.C of the NOFO are eligible measures. An illustrative list of potential GHG reduction measures for which applicants may choose to seek CPRG implementation grant funding can be found on page 9 of the NOFO. EPA will not respond to individual questions about whether specific infrastructure projects are eligible and how they might score in the general competition.

Certain infrastructure projects that may be funded under this competition may be subject to domestic content sourcing requirements under the Build America, Buy America (BABA) provisions of the Infrastructure Investment and Jobs Act (IIJA). For more information, please see Section VI.D of the NOFO.

NEW Q10: How specific do the measures listed in the PCAP have to be to ensure a given project is eligible under the implementation grant funding opportunity?

A10: Planning grantees and potential applicants for implementation grants should review the CPRG planning grant guidance for information about what to include in the PCAP, specifically, section 15.3 of the planning grant program guidance for states, municipalities, and air pollution control agencies and section 14.2 of the planning grant program guidance for Tribes, Tribal consortia, and U.S. territories. The planning grant program guidance documents explain that, for each measure, the PCAP must provide an estimate of the quantifiable GHG emissions reductions, key implementing agency or agencies, implementation schedule and milestones, expected geographic location if applicable, milestones for obtaining legislative or regulatory authority as appropriate, identification of funding sources if relevant, and metrics for tracking progress. While the PCAP does not necessarily need to identify specific GHG reduction projects by name and/or location, it should adequately describe the GHG reduction measures that will be implemented in the future. Measures must be described with enough detail such that implementation grant applicants can provide an estimation of future GHG reductions associated with the measure. The PCAP does not need to identify the specific names of other eligible entities (e.g., such as specific cities or counties) that may implement a particular measure.

Implementation grant applications should provide, on the cover page, references to applicable PCAPs under which each GHG reduction measure is covered (including PCAP lead organization, PCAP title, PCAP website link, list of GHG reduction measures and corresponding PCAP page numbers) (page 29 of NOFO). As explained in section 1.a of the workplan expectations, applicants should include an

explanation of how each GHG reduction measure included in the application relates to a GHG reduction measure included in the relevant PCAP(s) (page 30).

NEW Q11: *Does this program allow CPRG funding to be combined with other federal or non-federal funding? Are projects that receive CPRG Implementation grants allowed to apply for and receive federal tax credits through elective pay (also called "direct pay")?*

A11: Yes, CPRG funding may be combined with other federal funding, including federal tax credits, or non-federal funding. As explained on page 8 of the NOFO, a GHG measure could be an expansion of a measure that is already being implemented. Furthermore, a GHG measure could be a new measure for which the applicant has already secured partial funding and needs additional funding from the CPRG program to secure the total funding needed to fully implement the measure.

As discussed in Section I.B of the NOFO, CPRG aims to support measures for which dedicated funding or financing from other sources is unavailable or that leverage other sources of public and private funding to the fullest extent possible prior to seeking CPRG funding. In section 1b of the workplan, applicants should explain if and how an applicant has explored the availability of other federal and state grants, tax incentives, and other funding sources to implement their GHG reduction measures and why these sources are not sufficient. The application should include a list of federal and non-federal funding sources that the applicant has applied for, secured, and/or will secure to implement the GHG reduction measures, if applicable. For GHG reduction measures for which the applicant has secured partial funding, which may include tax incentives, the applicant should explain why CPRG funds are also needed.

When quantifying GHG reductions in section 2 of the workplan, applicants should scale the GHG emission reductions by the fraction of CPRG funding and total funding for the GHG measure (page 31 of NOFO).

NEW Q12: *Are grants in the program covered under Build America, Buy America (BABA)?*

A12: As explained in Section VI.D of the NOFO, certain projects funded under this competition may be subject to domestic content sourcing requirements under the BABA provisions of the Infrastructure Investment and Jobs Act (IIJA) (P.L. 117-58, §§70911-70917). These provisions apply when a grantee uses federal funds for the purchase of goods, products, and materials on any form of construction, alteration, maintenance, or repair of public infrastructure in the United States.

CPRG implementation grants are subject to BABA. Implementation grant recipients must comply with BABA requirements or obtain a waiver for each infrastructure project. Under BABA, the Buy America preference only applies to articles, materials, and supplies that are consumed in, incorporated into, or affixed to an infrastructure project. Mobile source vehicles/engines and infrastructure on a private residence for personal use do not constitute infrastructure projects under this program. A list of approved EPA [waivers](#) is available on the EPA [Build America, Buy America](#) website. Please see Section VI.D of the NOFO for additional details.

NEW Q13: *Are CPRG grants involving construction activities subject to the requirements of the Davis-Bacon Related Acts?*

A13: Yes, as required by Section 314 of the Clean Air Act, grants under this program that involve construction activities are subject to prevailing wage requirements as determined by the U.S.

Department of Labor under the Davis-Bacon Related Acts. These requirements apply to subgrantees and contractors of a CPRG implementation grant. See Section VI.C of the NOFO. The CPRG program uses the definition of construction defined in OGD Policy/40 CFR 33.103 which is the “erection, alteration, or repair of buildings, structures or other improvements to real property.”

Costs for architectural and engineering services are not construction costs subject to Davis-Bacon Related Acts and should be considered “contractual” costs. Construction activities carried out by the applicant’s own employees are not construction costs subject to Davis-Bacon Related Acts and should be considered “personnel” costs.

IV. Contracts, Subawards, and Participant Support Costs

Q1: Can an applicant applying as an individual applicant make subawards to other eligible applicants, non-eligible entities, and contractors? If so, what requirements apply to subawards?

A1: Yes, an individual applicant that is awarded an implementation grant may procure contractual support and/or issue subawards to subrecipients to carry out a portion of the grant project as described in Appendix A of the NOFO.

A contract (as described in 2 CFR § 200.331) is for the purpose of obtaining goods and services for the grant recipient’s own use and creates a procurement relationship with the contractor. Grant recipients that enter into procurement contracts must comply with the applicable procurement provisions in 2 CFR § 200.317 through 200.327.

Grant recipients may make subawards to subrecipients to carry out a portion of the grant project; in such case, the grant recipient is also known as a “pass-through entity.” Subawards establish a financial assistance relationship under which the subrecipient’s employees and contractors implement programs and projects to accomplish the goals and objectives of the grant. It is important to bear in mind that subrecipients are subject to the same federal requirements as the pass-through entity. Under this competition, a non-federal entity is eligible to receive a subaward even if it is not eligible to receive a grant from EPA directly. If a recipient chooses to pass funds from its grant to other entities through subawards, the recipient must comply with applicable subaward provisions of 2 CFR Part 200, the [EPA Subaward Policy](#), and [EPA’s General Terms and Conditions for Subawards](#).

Q2: Could a non-profit group be paid with CPRG planning grant money to write an implementation grant for a public agency?

A2: Funds from the CPRG planning grants must go toward completing the required deliverables established in the Planning Grant Program Guidance. While grantees may sub-award planning grant funds to non-profits and may procure contractors to support the development of the CPRG planning grant deliverables, sub-awarding planning grants to a non-profit group to write an implementation grant application is not an eligible cost for the planning grants.

V. Competition Structure

Q1: What size grants can I apply for?

A1: As explained in Section II.B (page 15) of the NOFO, applicants for the general competition can apply for grants ranging from \$2 million to \$500 million:

Tier	Grant Ranges	Funds Targeted for Each Tier	Anticipated Number of Grants to be Awarded
Tier A	\$200,000,000 – \$500,000,000	\$2 billion	4-10
Tier B	\$100,000,000 – \$199,999,999	\$1.3 billion	6-13
Tier C	\$50,000,000 – \$99,999,999	\$0.6 billion	6-12
Tier D	\$10,000,000 – \$49,999,999	\$0.3 billion	6-30
Tier E	\$2,000,000 – \$9,999,999	\$0.1 billion	10-50

Q2: How many applications can an eligible applicant submit? Is there an application limit per tier?

A2: Each eligible applicant is limited to submitting two grant applications in total for this competition: one as an individual applicant, and one as the lead applicant for a coalition. Such applications may be in the same or in different tiers. Applicants may participate in more than one coalition but may only serve as lead applicant for one coalition (see Section III.A of the NOFO).

Q3: Can two entities submit separate applications to fund the same measure?

A3: As a threshold matter, EPA does not prohibit two eligible applicants from applying to fund the same measure. However, EPA will not award multiple grants to implement the same measure in the same location (e.g., a state and municipality will not both receive a grant to implement a particular measure from the state’s PCAP in the municipality; either the state or the municipality may receive the grant, but not both). Therefore, EPA strongly recommends that entities that may be considering applying for funding to implement similar measures communicate and coordinate prior to submitting applications.

EPA **does** prohibit a group of eligible applicants applying as a coalition from submitting multiple applications for the same set of GHG reduction measures using different lead applicants (page 21 of NOFO).

Q4: The NOFO states that EPA will not award multiple grants to implement the same measure in the same location. Can you clarify what you mean by "same location," i.e., does that mean the same city, same MSA, same state?

A4: EPA will not fund duplicative work, i.e., multiple grants cannot fund the same measure being implemented in the same exact or overlapping geographic vicinity. For example, if the lead organization for an MSA applied to implement a measure across all jurisdictions in the MSA and a municipality within that same MSA applied to implement the same measure within their municipality, EPA would not fund both applicants as there would be an overlapping geographic scope for the same measure. However, if two eligible entities (e.g., cities or counties) within the same MSA or same state applied to implement the same measure only within their own boundaries and there was no overlap of geographic area, then both applications could receive funding (if both ranked highly enough to be recommended for funding).

Q5: Are different types of eligible entities competing for the same grants (e.g., applications from cities against applications from state agencies, etc.)?

A5: Yes, applications from all eligible applicants will compete within a given tier regardless of entity type. As explained in Section II.B of the NOFO, EPA has established the five tiers of grant ranges to reflect differences in the scope, scale, and cost of GHG reduction measures. These tiers are intended to help applicants structure their applications to best reflect the cost of their proposed measures and their ability to implement the grant. The total grant amount requested in an application will determine the tier within which the application will be evaluated. Applications will be evaluated against other applications within the same tier.

New questions posted October 23, 2023

NEW *Q6: Will EPA partially fund an implementation grant application? Would my application compete in a separate tier if it is partially funded?*

A6: EPA intends to evaluate and make selections for award based on applications as a whole. If an application includes multiple GHG reduction measures, EPA does not intend to evaluate and score each measure individually. Therefore, applicants should include only those measures that are eligible and responsive to the criteria in the NOFO.

In general, EPA does not intend to partially fund applications or to move applications among tiers. In limited circumstances, however, EPA reserves the right to partially fund an application. If EPA decides to do so, it will do so in a manner that does not prejudice any applicants or affect the basis upon which the application was evaluated and selected for award (see Section II.C of NOFO).

VI. Evaluation and Awards

Q1: What are the differences between the two NOFOs? If Tribes and territories are considering whether to apply to both NOFOs, what do they need to know?

A1: Tribes and territories may apply to both the general competition and the competition only for Tribes and territories. Note that to participate in the general competition, Tribes and territories will have to meet the requirements of the general competition. Importantly, to compete in the general competition, the PCAP on which any Tribal or territorial implementation grant application is based must be submitted to EPA by March 1, whereas to compete in the Tribes and territories competition, the PCAP on which their implementation grant application is based must be submitted to EPA by April 1.

In addition, the evaluation criteria for the two competitions are different and the workplan can be up to 25 pages for the general competition, whereas the workplan is limited to 15 pages for the Tribes and territories competition application. The general competition has five funding tiers with grant awards ranging from \$2 million to \$500 million, whereas the tribal competition has three funding tiers with grant awards ranging from \$1 million to \$25 million. These are some of the major differences between the two competitions.

Q2: What is EPA's process for scoring the applications and awarding the grants?

A: The evaluation criteria and selection process are explained in Section V of the NOFO. Applications will first be evaluated against the threshold factors listed in Section III.C. of the NOFO. Only those

applications that meet all of the threshold factors will be evaluated by a review panel using the evaluation criteria in the NOFO. Each eligible application will be given a numerical score and will be rank ordered by the review panel against other applications in the same funding tier. For this general competition, EPA will have five funding tiers as described in Section II.B. EPA intends to make awards to top ranked applications in each tier. Preliminary funding recommendations will be provided to the EPA selection official based on the panel reviews and rankings. Final funding decisions will be made by the EPA selection official based on 1) the rankings and preliminary recommendations of the EPA evaluation team, and 2) the other factors listed in Section V.C.

Q3: My state/city has its own definition of low-income and disadvantaged community. Can we use that definition instead of EPA's definition? Will an applicant only receive partial points if their definition is more expansive or inclusive than the EJ Screen or CEJST tool?

A3: Applications should discuss and quantify, where possible, direct and indirect benefits and potential disbenefits to low-income and disadvantaged communities (see Section IV.B of the NOFO). EPA recognizes that some applicants may have state-specific or other definitions of low-income and disadvantaged communities. However, applicants for CPRG implementation grants must use EPA's definition as described on pages 11-12 of the general competition NOFO. For the purposes of this NOFO, EPA defines a low-income and disadvantaged community as any community that meets at least one of the following characteristics:

- Any census tract that is included as disadvantaged in the Climate and Economic Justice Screening Tool (CEJST);
- Any census block group that is at or above the 90th percentile for any of EJScreen's Supplemental Indexes when compared to the nation or relevant state; or,
- Any geographic area within Tribal lands as included in EJScreen.

As stated under evaluation criterion 4 for "Low-income and Disadvantaged Communities" (Section V.A of the NOFO), applications will be evaluated and scored on how they discuss, and quantify, if possible, the benefits to communities meeting EPA's definition.

Q4: How can I access CEJST and EJScreen data for identifying low-income and disadvantaged communities?

A4: EPA has provided a map layer and the underlying data for this layer that identifies all communities across the country that meet EPA's definition. The EJScreen mapping tool is available at: <https://ejscreen.epa.gov/mapper/>. To locate the map layer displaying areas that meet the EPA definition of low-income and disadvantaged communities, go to the "Places" Tab, then select "Justice40/IRA" from the drop-down menu, and then select "EPA IRA Disadvantaged Communities." The underlying data for this layer are available for download [here](#). The database includes all U.S. census tracts and those designated as disadvantaged and is available in two formats: text file (.csv) and geodatabase file (.gdb). An ArcGIS map identifying EPA IRA disadvantaged communities is available [here](#). CEJST data is available for download [here](#).

Q5: Will Tribes need to discuss and calculate benefits to low-income and disadvantaged communities if applying under the general competition?

A5: As described on page 34 of the general competition NOFO (describing section 4 of the work plan), applications should discuss and quantify, where possible, direct and indirect benefits and potential disbenefits to low-income and disadvantaged communities.

Federally recognized Tribes meet the definition of disadvantaged communities for the purposes of the CPRG grant program (page 11-12 of the NOFO). Therefore, a Tribal application to the general competition should include Tribal community benefits that would result from implementation of the measures.

Q6: If we do not have a history of managing EPA grants, will that negatively affect the points we get for criteria 6.a (past performance) and 6.b (reporting requirements)? Will this effectively disqualify our application or limit our chances to secure CPRG grant funding?

A6: If your organization does not have a history of managing EPA grants, it will not disqualify your application. Page 53 of the general competition NOFO, under section 6, "Programmatic Capability and Past Performance," states: "If the applicant does not have any relevant or available past performance or reporting information, please indicate this in the application. The application will receive a neutral score for criteria 6.a and 6.b. A neutral score is 5 points of 10 possible points for each criterion. If the applicant does not provide any response for these items, they may receive a score of 0 for these criteria."

Applicants may also include information describing their programmatic capability and past performance in managing assistance agreements funded by other federal or non-federal entities.

Q7: EPA provides templates for several of the required deliverables (e.g., Cover Page, Budget Table, etc.). Am I required to use these resources in my application?

A7: No, you are not required to use these templates for your application. Use of these example templates is optional. However, we do encourage the use of these example templates to help expedite EPA's application review process.

Q8: Where should I send a question about the Evaluation Criteria or other application requirements?

A8: Questions regarding all aspects of the CPRG implementation grants NOFOs (including evaluation criteria and required application requirements) should be directed to the EPA email address: CPRG@epa.gov. EPA will update this Q&A document on a regular basis with the responses to incoming questions. EPA does not intend to respond to each email individually.

Q9: EPA provides a list of GHG reduction measures in the general competition NOFO. Are these the only measures that EPA will fund under this program?

A9: On pages 9-11 of the NOFO, EPA provided a list of *example* GHG reduction measures in six key sectors. This list is neither exhaustive nor definitive with respect to the measures that may be included in competitive applications under the general competition NOFO. These are not the only measures that EPA will consider eligible for funding under CPRG implementation grants. Applicants should consider the evaluation criteria in Section V.A when deciding on which measure or measures to include in their applications."

Q10: What types of applicant diversity will be considered in the selection process? Do you hope to make awards in all 50 states?

A10: EPA anticipates awarding no more than two grants to applicants at the same level of government within a single jurisdiction (e.g., a single state, municipality, tribal area, or territory). In addition, EPA will make selections to ensure diverse geographic coverage of CPRG implementation funding across the different funding tiers. However, EPA reserves the right to exceed these targets in the event that there is an inadequate number of meritorious applications from entities in other jurisdictions.

In making the final funding decisions, the EPA selection official may also consider certain programmatic priorities and the geographic diversity of awardees. Additional consideration may be given to making awards that advance the Justice40 Initiative, provide GHG reduction measures in key sectors, and/or provide greater diversity in the types of entities receiving CPRG implementation funds (e.g., state agencies and departments, municipal agencies and departments, Tribal and territorial agencies and departments). Once final decisions have been made, a funding recommendation will be developed and forwarded to the EPA award official (Section V.B and C of the NOFO).

At this time, EPA does not have any specific commitment to make awards in all 50 states, but EPA expects that the awarded grants will reflect substantial geographic diversity.

Q11: Do I need to quantify criteria air pollutant (CAP) and hazardous air pollutant (HAP) emissions impacts in the application?

A11: While quantified CAP and HAP emissions estimates are not required for the application, applicants should **list** CAP and HAP emissions reductions in general and in low-income and disadvantaged communities in particular as expected outcomes in section 3 of the workplan if they are expected from the proposed measures in the application. Such applications should qualitatively list CAP or HAP reductions or, where possible, quantify CAP and HAP emissions reductions in section 4 of the workplan.

Implementation grantees will be expected to quantify CAP and HAP reductions in general and in low-income and disadvantaged communities in particular one year after receiving the grant (See Section VI.B. of the NOFO).

Q12: Do I need to quantify GHG emissions impacts in the application?

A12: Yes, EPA will be assessing applications on the magnitude of GHG emission reductions estimated for the proposed measures.

Q13: How will EPA be evaluating the magnitude of GHG emission reductions? Will it be considering the relative reductions achieved for the entities? For instance, a city or tribe has fewer emissions than a state. Some states have done more already to reduce emissions. Would they be at a disadvantage?

A13: Under evaluation criteria 2.a and 2.b, EPA will evaluate applications on the magnitude of GHG reductions achieved, regardless of the entity. This is in keeping with the programmatic priorities to reduce near-term GHG emissions contributing to climate change.

As explained in Section II.B of the NOFO, EPA has established tiers to reflect differences in scope, scale, and cost of GHG reduction measures. Applications will be evaluated against other applications in the same tier. As explained in Section V.C, in making the final funding decisions, the EPA selection official may also consider certain programmatic priorities and the geographic diversity of awardees. Additional consideration may be given to making awards that advance the Justice40 Initiative, provide GHG

reduction measures in key sectors, and/or provide greater diversity in the types of entities receiving CPRG implementation funds (e.g., state agencies and departments, municipal agencies and departments, Tribal and territorial agencies and departments).

New questions posted October 23, 2023

NEW Q14: How will applicants be expected to demonstrate that they have explored federal and non-federal funding sources that are alternatives to the CPRG?

A14: As explained in section 1b of the workplan, applicants must demonstrate a strong need for CPRG implementation funding that is unmet by other funding sources. Applicants should explain if and how they have explored the availability of other federal and state grants, tax incentives, and other funding sources to implement their GHG reduction measures and why these sources are not sufficient. The application should include a list of federal and non-federal funding sources (e.g., EPA's GHG Reduction Fund Solar for All program) that the applicant has applied for, secured, and/or will secure to implement the GHG reduction measures, if applicable. For GHG reduction measures for which the applicant has secured partial funding, which may include tax incentives, the applicant should explain why CPRG funds are also needed. Applicants should review funding opportunities on the White House BIL Guidebook and IRA websites prior to applying under this announcement.