

**Climate Pollution Reduction Grants Program:
Implementation Grants Competition for Tribes and Territories
Notice of Funding Opportunity (NOFO)
EPA-R-OAR-CPRGT-23-09
Questions and Answers as of **April 22, 2024****

The U.S. Environmental Protection Agency (EPA) is accepting applications for funding under the Climate Pollution Reduction Grants Program: Implementation Grants Competition for Tribes and Territories (EPA-R-OAR-CPRGT-23-09) until **May 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 27, 2023, and October 5, 2023. Recordings and material from those webinars can be found [here](#).

This document contains responses to questions raised in EPA's informational webinars 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 Competition for Tribes and Territories. (Note that responses to questions about the CPRG Implementation Grants General Competition (EPA-R-OAR-CPRGI-23-07) are located in a separate document available [here](#)).

Please review all questions and answers in this document. The deadline for submitting questions related to this competition was April 15th. Questions marked **NEW** or **UPDATED** have been added or revised since the last posting of this document. This is the last iteration of this document before the May 1st application deadline.

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Q27: The CPRG Implementation Grant NOFO outlines that emission reductions must be scaled based on the percentage of measure cost covered by CPRG. Does this apply to incentive programs or rebates that, by definition, do not cover all of the eventual project costs, or just for specific projects or programs that also receive an already known percentage of other federal funds? 62

Q28: Will EPA accept approvals and dates for “pre-award authority” from other agencies (such as FTA for the procurement of vehicles)? What would we need to do to get approval from EPA on pre-award expenses that are greater than 90 days prior to the award? 63

Q29: Would the projects that receive a grant award under CPRG be required to undergo environmental review via the National Environmental Policy Act (NEPA)? If so, what federal authorities does EPA have, if any, to help navigate or avoid NEPA and the time constraints associated with it? 63

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Q30: Can you please tell me how measurement and verification will occur for CPRG competitively funded projects? How will the projects and measurements be verified?..... 63

Q31: What are EPA's expectations for recipient reporting, property management oversight, or other ongoing obligations beyond the end date of the performance period?..... 64

Q32: Section II.F. of the NOFO states "The estimated period of performance for awards resulting from this solicitation will be up to five years." Does this mean that all of the funds must be spent by the end of this period of time or if all of the funds only have to be obligated by then? Does the project need to be completed at the end of the 5 years? What is the definition of "expended"? Could the grant go to an endowment?..... 64

Q33: For Waste and Sustainable Materials Management projects, can we use EPA's WARM model to calculate the GHG reductions? 64

Q34: How will grantees receive funding for awarded implementation grants? Can funds be requested from EPA in advance of expenses incurred to facilitate effective cashflow to support the project or will grantees be required to incur costs prior to seeking reimbursement from EPA? For contractual items listed in the budget, are they reimbursable or will funding be provided upfront? UPDATED February 27, 2024 64

Q35: If a coalition application falls through for any reason, what will be the process of reallocating funds?..... 65

Q36: Will EPA accept a range of a low estimate and high estimate for the GHG reduction analysis in the application (i.e., a range of low-high emissions reductions for 2025-2030 and another range for 2025-2050 for each measure)? 65

Q37: If multiple Tribes decided to go in on an application together, how would the quantification of GHG reductions need to be done for the application? Would each Tribe do their own calculation (which may include modeling) and just combine the results? If that's the case, does each Tribe have to use the same approach, tool or modeling program for that? OR, would the lead applicant do quantification for the entire coalition? 65

Q38: What models and tools would EPA accept? For instance, is it acceptable to use the Energy Policy Simulator (<https://rmi.org/energy-policy-simulator/>) to model implementation measures for the Implementation Grant application?..... 66

Q39: In Evaluation Criterion 1a you state "The application should also include an explanation...of why each measure was selected as a priority." Do you mean why the applicant has selected the measure or why the planning grant lead organization (e.g., a state) has made the measure a priority?..... 66

Q40: Can you please provide further clarification on the criteria or indicators that grant recipients should use to assess their existing statutory or regulatory authority?..... 66

Q41: Are applicants obliged to account for prospective program income in the budget? What if program income is earned only after the period of performance?..... 66

Q42: In the case where the period of performance is 3 years, over how many subsequent years is reporting required? 66

Q43: Regarding the optional GHG emission reduction calculations spreadsheet, I plan to use a couple different models that are in Excel format, like C40 Cities Pathways, but also asking for results from MOVES modeling from our regional planning agency. How would you like us to include the different models and will you want a spreadsheet with the summary of those calculations? 67

Q44: Are there any exemptions to the Davis-Bacon and Related Acts? For instance, for Department of Housing and Urban Development grants, Davis Bacon only applies to buildings above a certain size. Does EPA plan to issue explicit guidance on any exemptions?..... 67

Q45: Would the installation of energy efficient HVAC equipment (e.g., heat pumps) and/or building insulation or other weatherization products in a private dwelling constitute a "construction" project under section 314 of the Clean Air Act if the project receives financial assistance drawn from CPRG funds?..... 67

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Q46: Would the issuance of a cash incentive or rebate exceeding \$2,000 from a CPRG subrecipient to a third party to support the purchase of energy efficient equipment or products constitute a “contract” under 29 C.F.R. section 5.5? Would this determination differ if a cash incentive or rebate is issued for the installation, rather than the purchase, of building equipment or products?..... 67

Q47: Construction timelines may require a commissioning date as late as 2030. In the application, can we base the magnitude of the GHG reduction rate for the first 5 years after commissioning?..... 67

Q48: For projects that will be partially funded by CPRG Implementation Grant funds, and partially funded by other sources, does the ENTIRE project need to adhere to Davis-Bacon and BABA requirements, or does only the portion of the project funded by CPRG need to adhere to Davis-Bacon and BABA requirements?..... 68

Q49: We are using ClearPath for the inventory and need CH4 emissions estimates from landfilled and incinerated waste. This data is available on the EPA FLIGHT Tool in tons of CO2 equivalence but ClearPath requires this data in tons of methane. Is there a standardized conversion factor that the EPA accepts to convert tons of CO2 equivalence back into tons of methane?..... 68

Q50: How should items be categorized in the budget? For example, if a recipient intends to issue contracts for construction activities, should the cost of those contracts be budgeted under the “Contractual” budget category or the “Construction” category? Additionally, if a recipient intends to issue contracts and/or subawards for construction activities, which include the purchase and installation of equipment, should the costs of the equipment be broken out and included in the “Equipment” budget category, with the remaining contract costs budgeted under the “Contractual” category (for Contracts) and “Other” budget category (for Subawards)? 68

Q51: What are the requirements for the funds beyond the initial five-year term? Would a Revolving Loan Fund be allowed to sustain funds beyond 5 years?..... 68

Q52: In a coalition, do all coalition members need to submit EPA form 4700 as part of the grant application or just the lead applicant?..... 69

Q53: If rebates (or vouchers) are provided to applicants of an e-bike incentive program, do procurement requirements such as Build America, Buy America (BABA) apply to electric bicycles discounted through the rebate program funded under the CPRG implementation grant? Will the EPA issue a waiver for BABA for electric bicycles and accessories? UPDATED March 14, 2024. 69

Q54: Does each member of a coalition need to be a subrecipient and receive some portion of the grant funds? If so, does each coalition member need to receive the same amount of CPRG funding?..... 69

Q55: For coalition applications, can different eligible applicants receive funding for different project elements that fit under one GHG measure umbrella? For example, can one member of a coalition receive funding for recycling infrastructure programs while another receives funding for recycling collection programs?..... 69

Q56: If a subawardee is unable to complete their portion of the project, is there flexibility to move that funding in the same budget category to fulfill other project measure goals? How does EPA address changes in budget after grant agreements are executed? 70

Q57: Will construction or improvement projects on private residences be subject to Davis-Bacon and Related Acts prevailing wage requirements?..... 70

Q58: EPA’s AVERT online tool provides estimated reductions in many gases, including CO2 and also NOx. Should the NOx be counted the same as N2O, in GHG equivalencies as per the IPCC GHG equivalencies?..... 70

Q59: Is there an online tool to project the expected greening of the electrical grid over the 2025-2050 time period, as grid electricity uses more and more renewables over time? 70

Q60: Do tax benefits such as credits or deductions (e.g., for residential solar installation) trigger Davis-Bacon and Related Acts requirements? 71

Q61: Who at EPA should I send a request for EPA approval of pre-award authority?..... 71

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Q62: Will EPA continue to have interest in purchased equipment after the end of the grant’s performance period?..... 71

Q63: Is a grantee subject to repayment of funding to EPA if a project fails to attain the estimated emission reductions?..... 71

Q64: Is Vehicles Miles Traveled (VMT) an acceptable metric for measuring GHG reductions? 71

Q65: The title of Form 424A indicates it is for "non-construction" projects. If we are applying for funding for a construction project, do we fill out a different project budget form? Where in 424A should we include "Construction"? We are aware that Form SF424C, "Budget Information for Construction Programs," exists, but it is not mentioned in the NOFO. 71

Q66: Regarding Form 424A, "BUDGET INFORMATION - Non-Construction Programs," it is unclear where we include federal and non-federal funds already committed to the project. Does the total project cost in Form 424A include both committed and requested funding? On what part of the form do we include funds already committed to the project, so it is clear to EPA the difference between committed funds and requested funds?... 72

Q67: Specific to CPRG implementation grant funding, are there any restrictions on using CPRG funds to implement carbon removal measures on land purchased with other federal funding? Would this project scenario be viewed as a Duplication of Benefits?..... 72

Q68: Will projects related to multi-use trails be subject to FHWA, DOT, and Federal Uniform Act requirements and processes? If so, will grantees be subject to following those processes in the same order as required by DOT? 72

Q69: Please expand on existing Question 34, which indicates that "Grant recipients must only draw funds for the minimum amounts needed for actual and immediate cash requirements to pay employees, contractors, subrecipients, or to satisfy other obligations for allowable costs. The timing and amounts of the drawdowns must be as close as administratively feasible to actual disbursement of funds." Would a lump sum disbursement comply with this requirement? Do the same restrictions apply to coalitions (can a lead applicant provide lump sum payments or fixed amount subawards to coalition members)? 72

Q70: Is a power purchase agreement (PPA) that establishes a sale price for each Megawatt-hour of energy generated by a new renewable energy power plant considered a "construction contract" for purposes of determining Davis-Bacon Act and Build America Buy America requirements?..... 73

Q71: I am not able to download the Lobbying Form or fill it out as a webform. What do I do?..... 73

Q72: The NOFO lists "documentation of GHG reduction assumptions" as part of the workplan in Section 2d. Should this contain the same information as the Technical appendix, or are they the same document? 73

Q73: My agency is contemplating including a project as part of an application made by an MPO as lead applicant. This would ultimately make us a subrecipient to the MPO should the application be successful. Is there an option whereby if the MPO application is successful, we could ultimately manage the award directly with EPA without going through the MPO? 73

Q74: What kinds of considerations have been given to supply chain issues that may arise in the procurement of equipment, supplies, and/or services that are vital to the implementation of grantees’ GHG reduction measures? For instance, if a measure is impacted by unpredictable supply chain issues that are out of the grantee’s control, what allowances will be made when evaluating the progress and ultimate success of that grantee’s project?.... 73

Q75: Please clarify what level of detail is needed for an activity-level "Reference Case Scenario" documentation in the Technical Appendix..... 74

Q76: Can you layer measures to achieve emission reductions and community benefits? For example, could the emission reductions associated with a medium- and heavy-duty electric charging station also include reductions if the project requires a vegetative barrier or complementary urban green space?..... 74

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- Q77: In our community engagement process, organizations are interested in creating a community benefit agreement structure with an implementation or an advisory committee role for projects that are being built across the region reducing climate pollution from the freight sector. Could the budget reflect adequate quarterly compensation for members of CBO's to help implement projects under CPRG?..... 74*
- Q78: We are developing estimated budgets based on currently available information. Is it permissible to adjust budgets based on new information at a later date, either before the award agreement is in place or after, if the overall level of administrative funding remains the same?..... 75*
- Q79: How should I include staff who will work on the project in the personnel section of the budget? Should I include their entire salary and then reference the percentage of that salary that would go towards CPRG work? Staff are typically paid by the city and therefore we are not requesting CPRG funding to help pay their full-time salary. 75*
- Q80: If an application specifies the location of a GHG reduction activity (e.g., a specific facility, building, or geographic area), is there any flexibility to modify the location of the activity after a grant is awarded if there is no change in the expected outputs or outcomes?..... 75*
- Q81: Does the EPA Small Project General Applicability Waiver of Section 70914(a) of P.L. 117-58, Build America, Buy America Act (BABA) which waives BABA requirements for small projects under \$250,000 apply to a situation in which individual subrecipients will receive less than \$250,000 each but the total amount of all EPA-funded subawards under the project will exceed \$250,000? 75*
- Q82: Is this grant subject to Intergovernmental Review under Executive Order 12372?..... 76*
- Q83: Regarding the evaluation criterion 1.b Demonstration of Funding Need, given the challenges inherent in applying for multiple grants and the uncertainty of securing grants, should an applicant: 76*
- Q84: Can you provide additional guidance on program income related to a project that involves selling generated solar power to a local utility? What type of financial tracking is required for revenue generating projects? What can program income be used for during and after the project? Is program income ever required to be paid to EPA? How long does program income need to be tracked?..... 77*
- NEW Q85: When filling out the SF424A for the EPA CPRG Implementation Tribal competition, do you put in the total budget amount requested in column 1e or do you put the amount requested for year 1 funds only? 77*
- NEW Q86: I work for a federally recognized tribe that wants to apply as a pass-through entity for our non-profit partner. Should I apply as an individual applicant or as a lead applicant for a coalition?..... 77*

I. Application Process and Timeline

Q1: What is the application deadline for the CPRG implementation grants Tribes and territories competition?

A1: Applications for the implementation grants competition for Tribes and territories (EPA-R-OAR-CPRGT-23-09) are due on May 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 Tribes and Territories 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.

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 March 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 NOIs.

Q7: How many applications can I submit?

A7: As described on page 19 of the NOFO, each eligible applicant is limited to submitting two grant applications for this NOFO: 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.

Note, Tribes and territories may submit applications to both this competition and the CPRG Implementation Grants General Competition.

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 December 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 April 1, 2024, for Tribes, Tribal consortia, or territories that plan to apply to the CPRG implementation grants competition for Tribes and territories. Otherwise, PCAPs are due March 1, 2024, for states, Metropolitan Statistical Areas (MSAs) and Tribes, Tribal consortia, and territories that plan to apply to the CPRG implementation grants general competition.

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? **UPDATED March 14, 2024.***

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. All PCAPs EPA has received to date from States, MSAs, Tribes, and Territories are now accessible on the CPRG website: <https://www.epa.gov/inflation-reduction-act/priority-climate-action-plans-states-msas-tribes-and-territories>.

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 27), 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 18), 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 in October 2024 and funds for the competition for Tribes and territories in 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 on the Tribes and territories competition on September 27 and October 5, 2023, and on the general competition on September 21 and October 3, 2023. 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 on the Tribes and territories competition, and a separate Q&A document for the general competition, with questions received through the CPRG@epa.gov inbox and during the EPA informational webinars. Updated versions of each document will be posted publicly to the EPA CPRG website: <https://www.epa.gov/inflation-reduction-act/cprg-implementation-grants>.

New questions posted October 31, 2023

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

A17: As explained on page 6 of the NOFO, applications for CPRG implementation grants under the Tribes and territories 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.

Q18: How should we determine the scope of measures to include in our application?

A18: 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.

New questions posted January 8, 2024

Q19: How do I know who to contact at a lead organization to get involved?

A19: EPA has compiled a list of lead organizations and their available contact information at: <https://www.epa.gov/system/files/documents/2023-12/cprg-planning-grant-contact-information-for-states-msas-and-Tribes-and-territories.pdf>. This is a running contact list that will continue to be updated as grantees share their information. The spreadsheet includes information on location (state, MSA,

Tribe, or territory), lead organization name and contact info, and related website and/or newsletter (if available).

Q20: Should an eligible applicant that did not receive a planning grant apply directly to the Agency for an implementation grant? Do they need to get approval from the lead organization for the PCAP that contains the measures the eligible applicant is seeking funding for?

A20: All eligible applicants interested in this funding opportunity should apply directly using Grants.gov. Detailed instructions regarding application submission can be found in Section IV of the NOFO. Eligible applicants applying for funding to implement measures contained in an applicable PCAP developed by another organization (the lead organization) do not need express approval from the lead organization to apply. However, EPA recommends that an eligible applicant that did not receive a planning grant coordinate with the lead organization developing the applicable PCAP to develop priority measures that can be implemented by the entity and to avoid multiple grant applications to implement the same measure in the same location.

Q21: Does the EPA have preferred filenames for material submitted by applicants?

A21: The EPA has provided recommendations on filenames for relevant material submitted as part of an implementation grant application. Use of these file name conventions by applicants will help EPA manage an efficient application review process. See Appendix D of the NOFO (pages 65-66) for more information and details on preferred filenames.

Q22: What are the new Memorandum of Agreement (MOA) expectations for coalitions in the revised NOFO published on December 15, 2023?

A22: In the December 15, 2023, revision of the CPRG implementation grants Tribes and territories competition NOFO, EPA modified the requirements for applications from coalitions. A MOA or other written instrument or documented arrangement signed by the lead applicant and all coalition members is no longer due at the time of application. Rather, coalition applications are now expected to include a letter of intent from each coalition member. The letter of intent from a coalition member should state the member's intent to participate in the coalition. A signed MOA or other written instrument or documented arrangement is required before any coalition application can receive an award. EPA strongly recommends that the coalition lead applicant submit the MOA or other written instrument or documented arrangement to EPA by August 1, 2024, via email to CPRG@epa.gov. Failure to provide the EPA with a timely MOA or other written instrument or documented arrangement will impact EPA's ability to award the grant. More information on the new guidelines for coalition agreements can be found in Appendix E of the revised NOFO.

New questions posted February 6, 2024

Q23: What if a planning grantee has not submitted their PCAP by the PCAP due date? Will that impact our eligibility to submit an implementation grant application?

A23: The PCAP is a precursor to the implementation grants and each implementation grant application must reference an applicable PCAP. As such, applications submitted by the May 1, 2024 deadline that do not reference an applicable PCAP will be ineligible. Applications will not otherwise be evaluated on the timeliness of when the PCAP was submitted. EPA strongly encourages lead organizations for planning grants to make draft versions of their PCAPs publicly available as early as possible. EPA recognizes that

there may be some minor delays in grantees finalizing their a PCAP. For instance, a planning grantee may have a substantively complete PCAP by April 1 but is still awaiting final internal approval. Planning grantees that anticipate missing the April 1, 2024 deadline for submitting the PCAP should discuss with their EPA Project Officer their justification and plans for timely disseminating their PCAP to other eligible applicants in their jurisdiction. EPA plans to post submitted PCAPs on the CPRG website upon receipt.

Q24: Does the same measure need to be included in each coalition member's PCAP or just in the lead applicant's PCAP? How should entities ensure that the measures in their PCAPs are similar enough to qualify for a coalition grant application?

A24: Measures included in a coalition application must be included in the applicable PCAP for each coalition member. Having the measure in only the lead applicant's PCAP is not sufficient. EPA encourages applicants to coordinate ahead of the PCAP due date of April 1, 2024 to ensure consistency across PCAPs. While the PCAP does not necessarily need to quantify specific GHG reductions by location, it should describe the GHG reduction measures with enough detail that implementation grant applicants can provide an estimation of future GHG reductions associated with the measure.

Q25: How closely does the GHG reduction quantification methodology for the implementation proposal need to match to the reduction quantification for the corresponding PCAP measure? Do they need to use the same inputs for adoption rates, elasticities, and emissions rates?

A25: Scoring of an implementation grant application will be based solely on the information provided in the application itself. The calculations provided in a PCAP are not per se part of the scoring evaluation for the implementation grant outlined in Section IV.A It is up to the applicant to demonstrate the quality, thoroughness, reasonableness, and comprehensiveness of the methodology, assumptions, and calculations included in their application.

Q26: Will EPA provide a template for a coalition's Letter of Intent?

A26: The lead applicant must include in their application a letter of intent from each coalition member (signed by an authorized official) stating the member's intent to sign the coalition's Memorandum of Agreement (MOA) or other written instrument or documented arrangement. The EPA does not intend to provide a template for coalition members' letters of intent.

Q27: What is the submission deadline for the Notice of Intent?

A27: The Optional Notice of Intent to Apply to the Tribes and Territories Only Competition is due to CPRG@epa.gov by March 1, 2024.

New questions posted February 27, 2024

Q28: How many projects can be included in each application for the CPRG Implementation Grant? For example, if a coalition submits one application on behalf of multiple groups, how many projects can they apply for?

A28: There is no limit to the number of GHG reduction measures that can be included in an implementation grant application as long as the total funding requested for all proposed measures does not exceed \$25 million. Note that coalition applications should only include measures that will be implemented by the entire coalition.

Q29: Does EPA offer technical assistance service for the grant writing process under this program?

A29: No, EPA does not offer services to aid potential applicants in applying for this grant opportunity. However, EPA's Office of Grants and Debarment offers webinars and training modules on applying for and managing grants. Visit <https://www.epa.gov/grants/epa-grants-webinars> or <https://www.epa.gov/grants/recipient-training-opportunities>.

Q30: Are you able to provide more details on exactly what you are looking for in the MOA related to the proposed operating model for a coalition?

A30: The MOA should describe the roles, responsibilities, and commitments each coalition member will be responsible for to ensure project success. The MOA should also include a proposed operating model for the coalition that describes *how* those roles, responsibilities, and commitments will be achieved by laying out the coalition's structure, methods and expectations for communication among members, and decision-making and conflict resolution processes.

Q31: If submitting a coalition application, who must sign the MOA or other written agreement? Specifically, who from the participating Tribe must be the signatory?

A31: The MOA or other written agreement must be signed by all coalition partners. Signatories must be an official authorized to sign on behalf of their agency or organization, and their signature block should include title and agency name.

New questions posted March 14, 2024

Q32: For Tribes applying to either the general or Tribal competition, is there any requirement for a Tribal Council resolution to support a CPRG implementation application?

A32: The CPRG program does not require a Tribal Council resolution. Tribes should follow their own policies to determine if a resolution is required in order to submit an application.

Q33: Can applicants attach Letters of Support from elected persons or non-partner/coalition organizations backing the project (i.e., distinct from Letters of Intent or Letters of Commitment) to their applications? Would they be considered outside of the 15-page workplan limit? Will the EPA be accepting letters of support from supporting organizations outside of the lead and sub-applicants? Or are letters limited to letters of commitment? UPDATED April 4, 2024

A33: Applicants may submit letters of support using the "Other Attachments" Form. Letters of support do not count toward the workplan 15-page limit. Letters of support should be addressed as "to whom it may concern."

Q34: Under Section 5a, EPA requests a list of up to five federal or non-federal assistance agreements under way or recently completed from the applicant. If applying under a coalition, can examples of relevant agreements completed/held by coalition members be submitted or can only examples from the lead application be submitted?

A34: Only assistance agreements held by the lead applicant may be considered under evaluation criterion 5a.

Q35: On page 31 of the Notice, under the "Demonstration of Funding Need" section, do all applicants in a coalition need to demonstrate the funding need and therefore submit information that is specific to each organization? Or is it just the lead applicant?

A35: The application must demonstrate the funding need for the proposed coalition measure(s) as a whole. This may include information specific to individual coalition members or it may be documented more broadly across all coalition members. It is up to the applicant to make the case why CPRG funding is needed.

Q36: For a coalition application, can each partner combine the required Letter of Intent (to sign an MOA) and the optional Letter of Commitment (demonstrating the strength of the partners) into one document, or do the documents need to be drafted separately by each partner?

A36: Letters of intent from each coalition member are a threshold requirement for this grant competition, without which an application will not be considered as a coalition application. Letters of commitment from partners are optional and generally would be from non-coalition member partners. Applicants may provide information in their letter(s) of intent demonstrating the strength of the coalition member(s).

Q37: Are we able to include hyperlinks in the grant application, or will the reviewers only be looking at the materials that were provided?

A37: In order to ensure consistency and compliance with the page limits established in the Notice of Funding Opportunity, reviewers will only consider the materials included in the application package. Content provided via a link will not be evaluated.

New questions posted April 4, 2024

Q38: When completing the Project Manager section of the EPA Key Contacts Form 5700, would we put the person managing the grant (the applicant), or the expected sub-recipient project manager (the subawardee).

A38: When completing EPA Key Contacts Form 5700, the applicant should list the project manager for the grant, not the subrecipient for the grant.

Q39: What are the open records policies surrounding this grant application? Some of our potential implementation partners for the grant application have concerns about publicly disclosing planned projects before any formal MOAs and commitments have been made.

A39: As described in Section IV.D of the NOFO, applications submitted under this NOFO may be released in part or in whole in response to a Freedom of Information Act request. Furthermore, copies or portions of the applications selected for award may be made publicly available on EPA's website or another public website for a period of time after selected applications are announced.

EPA strongly recommends that applications not include trade secrets or commercial or financial information that is confidential or privileged, or sensitive information that, if disclosed, would invade an individual's personal privacy (e.g., an individual's salary, personal email addresses, etc.). However, if such information is included, it will be treated in accordance with 40 CFR § 2.203. (Review EPA clause IV.a, Confidential Business Information, under [EPA Solicitation Clauses.](#))

Applicants should have submitted an MOA signed by all members of the coalition by August 1, 2024 or provide an alternative date and justification if they will not be able to meet the August 1st date. EPA intends to announce selected decisions by September 2024.

Q40: Can we include tables, charts, graphics and/or pictures in the application?

A40: The application should use the section and subsection numbers and headings as outlined in Section IV. B. of the NOFO. There is no predetermined format on where to include tables, charts, graphics and/or pictures in the application sections. Hence, these materials can be included in the application sections/subsections as long as the entire content can fit in the page limit of 15 pages. If related to the assumptions and methodologies used in developing the estimated GHG emissions reductions, these materials can be submitted as a part of technical appendix to the application within the 10 pages limit.

Q41: Where is the most appropriate place within an application to share information on partner experience and qualifications? This is for an individual application where we have partners who are signing letters of commitment.

A41: Applicants may elect to share information on partner experience and qualifications. Such information may be relevant to several sections including Section 1 “Description of GHG reduction measures”, Section 3c “Authorities, Implementation Timeline, and Milestones,” Section 4b “Community Engagement”, Section 5 “Job Quality”, or Section 6 “Programmatic Capabilities and Past Performance” of the workplan. Applicants may also attach letters of commitment using the “Other Attachments” form or include biographies and resumes of key staff using the “Other Attachments” Form.

Q42: How many letters of commitment can I submit? Is there a cap (e.g., EPA will only look at 10)?

A42: Letters of commitment that demonstrate strong, long-term involvement throughout the project from project partners are optional but encouraged. There is no cap on the number of letters of commitment an applicant can attach to the application.

Q43: Do we need to re-upload the same federal documents to grants.gov that we included in the CPRG planning grant application?

A43: Applicants must submit all mandatory documents listed in the NOFO in order to be eligible for the CPRG implementation grants competition. Please see Appendix D: Application Submission Checklist (page 65) for a comprehensive list of the forms and attachments required during the application process.

Q44: If another separate entity within the same region is submitting a separate CPRG implementation grant application for a different GHG reduction measure, does it need to be acknowledged in our application?

A44: No, EPA does not expect applicants to acknowledge other, separate submissions in their application.

Q45: I have been having difficulties accessing the CPRG Implementation Grants General Competition application page on the grants.gov website. Who do I contact to assist with my grants.gov issues?

A45: Contact Grants.gov for assistance at 1-800-518-4726 or support@grants.gov to resolve technical issues with Grants.gov.

Q46: What should I do if I get a “bad request” message when I try to apply for the CPRG grant through grants.gov?

A46: This error message indicates that a user does not have the correct permissions in grants.gov to apply for a grant on behalf of their organization. Please make sure you have followed the instructions in Section IV.A. Step 2 of the NOFO to set up your grants.gov account.

The following [Frequently Asked Question](#) is found on the Grants.gov website:

“Q: Why do I receive BAD REQUEST, blank page or other error when clicking on the APPLY button?

A: If you receive a BAD REQUEST, blank page or other errors when clicking on the APPLY button, it indicates that you don't have the necessary roles. If you are an organizational applicant, please make sure you have added the organization's Unique Entity Identifier (UEI) as an Organization profile to your Grants.gov account. If you are an individual applicant, please make sure you have added an Individual profile to your account.

If you are not the Electronic Business Point of Contact (EBIZ POC), please also ensure that your organization's EBIZ POC has registered with Grants.gov and added the UEI as a profile to their Grants.gov account and ask them to assign roles to your account.”

Grants.gov has also created a set of [instructional videos](#) to assist users with this process. If the error persists after following the steps in the NOFO, please contact Grants.gov at 1-800-518-4726, or support@grants.gov for assistance. Support is available 24 hours a day, seven days a week.

Section IV.A. Step 2 of the NOFO also contains information about documenting any unresolvable technical issues prior to the application deadline of May 1, 2024 at 11:59 PM ET. Any application submitted after the application deadline will be deemed ineligible and not be considered.

Q47: Can you please provide a list confirming what information needs to be included by each coalition member in a coalition application? For example, will resumes and past performance from the lead applicant only be evaluated or should an applicant include all of this information for each coalition member? Does each coalition member need to complete the required forms, or just the lead applicant?

A47: The lead applicant for a coalition should submit one application containing all relevant forms and materials for that coalition. See Appendix D for a list of required forms and attachments. Each coalition application must clearly identify each of the coalition members and include a signed letter of intent from each coalition member stating that member's intent to participate in the coalition. Coalition members should not submit supplemental applications, and only the lead applicant needs to submit the required forms.

Only the lead applicant's past performance will be considered under evaluation criteria 6a and 6b. Applications may include biographies, resumes, and other information that demonstrate that the applicant and associated members of a coalition have the expertise to undertake the GHG reduction measures in the application. Such information may be considered in evaluation criteria 1a, 3c, and 6c. Applicants should use the Other Attachments form to attach biographies and resumes.

Q48: Will EPA accept our CPRG application if the physical address in our SF424 forms is different than the address associated with our UEI in SAM.gov?

A48: This is acceptable. However, the applicant will be expected to update and maintain a current SAM.gov registration prior to receiving an award, as noted on page 6 of the [EPA Solicitation Clauses](#). These clauses are also linked under Section I.E. of the NOFO.

New questions posted April 16, 2024

Q49: Can you clarify whether there is a page limit for the cover page?

A49: The cover page serves as a short summary of the application. It does not have a specific page limit and is not included in the 15 page limit for the application workplan. A sample cover page format is provided on the [CPRG website](#). Please see section IV.B of the NOFO for more details.

II. Eligible Applicants

Q1: Who is eligible to apply for an implementation grant under the Tribes and territories competition? If I didn't receive a planning grant, am I still eligible to apply? Do I have to develop my own PCAP to apply?

A1: As explained in Section III.A (pages 16-18) of the Tribes and territories competition NOFO, entities eligible to apply for an implementation grant under this announcement are federally recognized Tribes, Tribal consortia, and territories. More specifically, Tribes, Tribal consortia, and territories that directly received a CPRG planning grant are eligible to apply for an implementation grant. In addition, Tribes, Tribal agencies, Tribal consortia, and territorial municipal agencies, departments, or other municipal government offices in Guam, American Samoa, Northern Mariana Islands, and U.S. Virgin Islands 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 April 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. Please consult Table 2 of the NOFO for additional detail.

Q2: What does it mean to be covered by a PCAP? Can I be covered by multiple PCAPs?

A2: As explained in Section III.A of the NOFO, Tribes, Tribal agencies, Tribal consortia, and territorial 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 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 Tribal PCAP and an applicable state PCAP may each include measures that a particular Tribe could implement. The Tribe could reference measures from either or both PCAPs in its application.

Q3: Are multiple agencies or offices within a Tribal or territorial government able to apply?

A3: Yes, multiple agencies, departments, or other offices from a Tribe or territory 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 16-17) of the NOFO for more information.

Q4: Are there any restrictions on the size and type of coalition I can organize for an implementation grant application?

A4: 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 two or more Tribes or Tribal consortia, or multiple territorial municipalities. 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. For purposes of this program, a Tribal consortium is an eligible applicant and as such may participate as a member and/or a lead applicant for a coalition.

As explained in section 1 of the workplan expectations (page 28 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.

Q5: Can I use a climate action plan that is not funded through a CPRG planning grant as the basis for my implementation grant application?

A5: 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). Under the Tribes and territories competition, implementation grant applicants must seek to implement measures included in a PCAP submitted to EPA by April 1, 2024 (state and MSA PCAPs are due March 1, 2024).

*Q6: What entities are eligible to apply from Florida, Iowa, Kentucky, South Dakota, and Wyoming?
UPDATED January 8, 2024*

A6: 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.

Q7: Under a coalition, would coalition members be subrecipients of the coalition lead? UPDATED January 8, 2024

A7: Yes, coalition members would be subrecipients of the lead applicant for a coalition. However, the lead applicant for a coalition must submit a Memorandum of Agreement (MOA) or other written instrument or documented arrangement that clarifies the roles and responsibilities of all coalition members. All members of the coalition 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.

Q8: Can I still apply for a planning grant to develop a PCAP?

A8: 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 Tribes and territories competition NOFO.

Q9: 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? UPDATED January 8, 2024

A9: For the Tribes and territories competition, coalition members must demonstrate their commitment to the coalition and to fulfilling their role to ensure success of the proposed measures through a signed Memorandum of Agreement (MOA), or through another written instrument or documented arrangement. In the December 15, 2023, revision of the CPRG implementation grants Tribes and territories competition NOFO, EPA modified the requirements for applications from coalitions. A MOA or other written instrument or documented arrangement signed by the lead applicant and all coalition members is no longer due at the time of application. Rather, coalition applications are now expected to include a letter of intent from each coalition member. The letter of intent from a coalition member should state the member's intent to participate in the coalition. A signed MOA or other written instrument or documented arrangement is required before any coalition application can receive an award. EPA strongly recommends that the coalition lead applicant submit the MOA or other written instrument or documented arrangement to EPA by August 1, 2024, via email to . Failure to provide the EPA with a timely MOA or other written instrument or documented arrangement will impact EPA's ability to award the grant. More information on the new guidelines for coalition agreements can be found in Appendix E of the revised NOFO.

Q10: Does the MOA or other written instrument or documented arrangement need to be complete by the time I submit a Notice of Intent to Apply (NOI)?

A10: No, the MOA or other written instrument or documented arrangement 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.

Q11: Can I add someone to the coalition after I apply? **UPDATED January 8, 2024**

A11: EPA will not consider information submitted to EPA after the close of the NOFO, such as the addition of new members to a coalition, when evaluating grant applications. In the event that an applicant needs to make updates to a submitted application *prior* to the application deadline, they may submit a revision. Grants.gov provides instructions for applicants to make modifications to their application and resubmit their Grants.gov Workspace prior to the application deadline.

New questions posted October 31, 2023

Q12: Are there benefits of applying as a coalition? Would EPA prefer that Tribes and territories interested in implementing a GHG measure apply as part of a coalition or that they submit separate applications?

A12: As explained in Section I.B of the NOFO, the CPRG Tribes and territories competition is designed to incentivize eligible applicants to apply for funding together as a coalition to implement GHG reduction measures regionally and across multiple Tribal boundaries and consortia. Details on eligible applicants and coalitions are available in Section III.A. Each eligible applicant is limited to submitting two grant applications: 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. Please note that for purposes of this program, a Tribal consortium is an eligible applicant and as such may participate as a member and/or a lead applicant for a coalition.

Q13: Are Tribal consortia that are 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?

A13: Tribes and Tribal consortia that received planning grants as well as 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 both 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.

New questions posted November 14, 2023

Q14: Are for-profit entities eligible to apply for CPRG implementation grants? If not, how can a for-profit entity participate in the CPRG program?

A14: For-profit entities are not eligible to apply for this funding opportunity. However, there are several circumstances in which a for-profit entity may participate in a GHG reduction measure funded under an implementation grant.

A CPRG grant recipient may provide rebates, subsidies, or similar one-time, lump-sum payments to for-profit entities for the purchase of technologies that reduce GHG emissions. Such expenditures by the grant recipient would be considered participant support costs. For example, a state could receive funding to implement a rebate program and provide funding to for-profit entities (e.g., private trucking companies) to replace their existing fleet with EVs. Please see Appendix A of the NOFO, [RAIN-2018-G05](#), and "[EPA Guidance on Participant Support Costs](#)," for further guidance on participant support costs.

A for-profit entity also may participate in a GHG reduction measure if the grant recipient chooses to contract work out to the for-profit entity. 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](#). For example, a city could hire a private company to conduct energy audits on city buildings. As noted in [2 CFR § 200.319](#), the example procurement would likely require a fair and open competition. Please see [EPA's Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#).

Finally, a grant recipient may subaward a portion of the grant to a for-profit 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. For example, a state could provide a subaward to a private company to carry out a specific project under their broader state-run industrial energy efficiency program. While it is not common for subawards to be provided to for-profit entities, EPA's subaward policy notes that "EPA's Award Official must approve subawards to for-profit entities and individuals on the basis of either a precise description of the subaward in the EPA approved budget and project narrative, or on a transaction-by-transaction basis." Subrecipients are subject to the same federal requirements as the grant recipient (also known as the "pass-through entity") and they must comply with applicable subaward provisions of 2 CFR Part 200, the [EPA Subaward Policy](#), and [EPA's General Term and Condition for Subawards](#).

For-profit entities that receive a contract or subaward are subject to [Build America, Buy America](#) requirements and the Davis-Bacon Act.

Q15: Does a Tribal consortium need to submit a memorandum of agreement (MOA) as part of its implementation grant application?

A15: A consortium of federally-recognized Tribes is an eligible applicant in its own right and does not need to submit an MOA as part of its implementation grant application if it is accountable to the Tribes in the Tribal consortium.

A Tribal consortium may apply as an individual applicant, and as the lead for a coalition of other eligible applicants. A Tribal consortium may also participate in a coalition (i.e., as a member of the coalition, not the lead applicant for the coalition). A Tribal consortium does not need to submit an MOA if applying as an individual applicant but would need to sign an MOA if participating with other eligible applicants in a coalition.

Q16: How can non-profits and non-profit community-based organizations (CBOs) participate in a CPRG implementation grant?

A16: Eligible applicants for CPRG implementation grants are states, municipalities, Tribes, territories, and groups thereof. In general, non-profits and CBOs are not eligible to apply for CPRG implementation

grants. However, there are several circumstances in which a non-profit or CBO may participate in a GHG reduction measure funded under an implementation grant.

A grant recipient (also known as the pass-through entity) may subaward a portion of the grant to a non-profit or CBO. 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. Subrecipients are subject to the same federal requirements as the pass-through entity and must comply with applicable subaward provisions of 2 CFR Part 200, the [EPA Subaward Policy](#), and [EPA's General Term and Condition for Subawards](#).

Non-profits or CBOs may also be beneficiaries of participant support costs from an implementation grantee. For example, a grantee could provide participant support costs in the form of a rebate to a non-profit to install solar panels plus storage on the non-profit's facility. Please see Appendix A of the NOFO, [RAIN-2018-G05](#), and "[EPA Guidance on Participant Support Costs](#)," for further guidance on participant support costs.

A non-profit or CBO also may participate in a GHG reduction measure if the grant recipient chooses to contract work out to the non-profit or CBO. 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](#). Please see [EPA's Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#).

Finally, non-profits and CBOs may participate in community engagement aspects of the implementation grants program. For example, a CPRG Tribes and territories implementation grant application will be evaluated on how measures taken are expected to impact communities, particularly those that are disadvantaged, and how continued meaningful engagement has shaped the application and future implementation of proposed measures (page 32 of the NOFO).

New questions posted January 8, 2024

Q17: For coalition applications, can a portion of the application include measures that only the lead applicant would implement?

A17: As described on page 20 of the NOFO, a coalition is a partnership with a shared commitment to implementing the proposed measures. With this understanding, a coalition's application should only include measures that will be implemented by the entire coalition. An application that includes measures that do not apply to all coalition members will be treated as an individual application for the lead applicant.

Q18: Are Federally recognized Indian Tribes considered to be eligible applicants? What about Tribal housing authorities?

A18: As noted in Section III.A. of the NOFO, eligible Tribal applicants include lead organizations for Tribal CPRG planning grants and other Tribal agencies, departments, other Tribal government offices and Tribal consortia. This definition includes federally recognized Tribes that are covered by a PCAP.

Other Tribal entities (such as a Tribal housing authority) may be eligible applicants if:

- they constitute a Tribal government body created by or pursuant to Tribal law, and

- they are accountable to Tribal-level government.

These other Tribal entities must provide documentation that the associated Tribe considers these entities to be a public body created by or pursuant to Tribal law. Tribal entities as described above may also be subrecipients of a CPRG implementation grant. For example, a Tribal office could receive a CPRG grant and provide a subaward to the Tribal housing authority to implement a GHG reduction measure.

Q19: Can multiple non-contiguous eligible applicants apply together as a coalition? For example, can all the Tribal governments located within the geographical boundary of a given state apply as a coalition despite being spread out geographically?

A19: Non-contiguous eligible applicants may apply together as a coalition if the proposed measures are contained in PCAPs applicable to each coalition member and the coalition members share a strong and substantial commitment to the proposed measures (e.g., financially, materially, or operationally) such that withdrawal by any single member from the coalition would fundamentally alter the design or expected outputs and outcomes of the proposed measures. As referenced in question 4 above, a coalition may be comprised of any combination of eligible applicants. For example, a coalition could include two or more Tribes or Tribal consortia, or multiple territorial municipalities.

New questions posted February 6, 2024

Q20: Does an explicit accounting of an entity's GHG emissions have to be accounted for in the PCAP in order for that entity to be eligible to apply for an implementation grant?

A20: PCAPs are expected to cover the geographic scope of the entities (e.g., Tribes, territories, Tribal consortia, Tribal agencies, etc.) that comprise the territory or Tribe. The GHG emissions inventory may be aggregated at the territory or Tribal level. The PCAP GHG inventory does not need to be disaggregated to the level of each individual entity or jurisdiction within the territory or Tribe.

An entity must seek funding to implement one or more GHG reduction measures that are included in an applicable PCAP to be 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. A PCAP may include GHG reduction measures that apply broadly and can be implemented by various entities comprising the territory or Tribe (e.g., local governments within a territory, Tribal nations within a consortium, etc). While the PCAP does not necessarily need to quantify specific GHG reductions by location, it should describe the GHG reduction measures with enough detail 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 that may or may not implement a particular measure, however.

Q21: What happens if one member of a coalition withdraws?

A21: As with any EPA grant with a grant recipient subawarding to subrecipients, the grant recipient (in this case, the lead applicant for the coalition) is accountable to EPA and accepts responsibility for carrying out the full scope of work and proper financial management of the grant. In the event that a coalition member withdraws, the grant recipient continues to be subject to EPA's terms and conditions for the grant, the subaward policy, and EPA grants policy. In circumstances where EPA deems that the withdrawal of a coalition member fundamentally alters the project or jeopardizes the project's success,

the EPA will consider appropriate remedies and reserves the right to terminate an awarded grant (see [2 CFR 200.339 through 343](#)).

Q22: Would a community choice aggregator be eligible to lead a coalition, or be a coalition member? If not, can a community choice aggregator be a subrecipient?

A22: A coalition may only be comprised of eligible applicants, defined in Section III.A of the NOFO. A non-eligible entity, however, may receive a subaward. If a grant recipient chooses to pass funds from its grant to other, non-eligible entities through subawards, the recipient and subrecipient must comply with applicable subaward provisions of 2 CFR Part 200, the [EPA Subaward Policy](#), and [EPA's General Terms and Conditions for Subawards](#).

Q23: Could funds be expended on projects occurring on federal lands? Are federal agencies, including the branches of the military, eligible partners or subrecipients?

A23: Each implementation grant applicant needs to demonstrate that their proposed projects are covered by an applicable PCAP and that they have authority to implement the projects. An applicable PCAP is one that geographically covers an entity and contains GHG reduction measures that can be implemented by the entity. Projects that occur on federal lands would need to meet these requirements. Federal agencies are not eligible applicants and therefore cannot serve on a coalition.

Regarding subawards, an applicant would have to work with the federal agency to determine whether it has the authority to accept a subaward from an EPA grantee. In limited cases, federal agencies can receive subawards, as outlined in the Subaward Policy linked in Appendix A of the NOFO: "As provided in 2 CFR Part 25, Appendix A, Federal agencies are subrecipients for the purposes of the System for Award Management and Universal Identifier Requirements when they receive "subawards" from pass-through entities. Federal agencies may also be subrecipients for the purposes of 2 CFR Part 200 as indicated in the definition of Subrecipient in 2 CFR 200.1. Nonetheless, Federal agencies must have statutory authority to provide services to non-Federal entities on a reimbursable basis or otherwise receive and use funds from non-Federal entities under subawards. Examples of statutes available to all Federal agencies for receipt and use of EPA financial assistance funds are the Intergovernmental Cooperation Act for services to state and local governments, the Federal Technology Transfer Act for Cooperative Research and Development and Agreements, and the Omnibus Territories Act for reimbursable services agreements with U.S. Territories."

Q24: Can Tribal nonprofits be a lead applicant if they are in a coalition of other Tribes? I saw that "In general, non-profit organizations are not eligible entities for the CPRG program." However, new section 137(d)(1) of the Clean Air Act defines "a group of Tribes" as an eligible entity.

A24: Non-profit organizations are generally not eligible applicants and therefore are not eligible to serve as the lead applicant or member of a coalition. However, a Tribal consortium, as a group of federally-recognized Tribes, is an exception and can be an eligible applicant, even if they are a non-profit organization. Otherwise, a Tribal non-profit that is not a Tribal consortium may partner with an individual applicant or coalition to carry out a portion of the grant activities in accordance with the guidelines outlined in Appendix A of the NOFO.

New questions posted February 27, 2024

Q25: For a proposed project intended to reduce electric power consumption emissions for electricity customers in several different communities, must each such community be listed as a coalition partner on the grant application?

A25: This type of project does not necessarily require a coalition. 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. When considering which entities should be listed as coalition members, applicants should consider whether the other entities are eligible applicants in their own right (only eligible applicants may be members of a coalition) and if the potential coalition members share a strong and substantial commitment to the proposed measures (e.g., financially, materially, or operationally) such that withdrawal by any single member from the coalition would fundamentally alter the design or expected outputs and outcomes of the proposed measures (page 20-21 of the NOFO).

Q26: Are Tribes and territories each limited to two applications?

A26: Each agency, department, or other executive branch-level office from a Tribe or territory is eligible to apply. As such, each agency, department, or other executive branch-level office from a Tribe or territory may submit one individual application and one application as the lead for a coalition. For example, a Tribal air pollution control agency may submit an individual application and an application as the lead for a coalition. A Tribal health department from the same Tribe may *also* submit an individual application and an application as the lead for a separate coalition.

Q27: When submitting a coalition application, does the lead applicant need to reference all applicable PCAPs to ensure the coalition members are eligible for funding?

A27: Yes. Coalition applications must include a reference to the applicable PCAP for each coalition member that contains the proposed measures.

New questions posted April 16, 2024

Q28: Can a Section 17 Corporation under a Tribe apply for a CPRG implementation grant?

A28: Eligibility for Section 17 corporations is dependent on the exact relationship between the corporation and the Tribe and whether the corporation could be considered an arm of the tribe that created it. To be eligible, the Section 17 corporation would need to be considered to share in the tribe's sovereign immunity and to be acting as a part of the tribal government. This determination will be made on a case-by-case basis.

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 18). 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 pages 8-11 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 Tribes and territories 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 Tribes and territories 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 18), 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, as well as training and staff capacity-building costs. See pages 35-39 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 32 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 27). 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?

A7: 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?

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 28 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 29 of the NOFO.

New questions posted October 31, 2023

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 Tribes and territories 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.

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 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 implementing 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 27 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 27-28).

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 7 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.

Applications should only quantify emission reductions that will occur as a result of EPA's 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 by the same fraction in order to quantify GHG emission reductions associated with CPRG funding. In other words:

$$\text{Quantified GHG reductions from CPRG funding} = \left[\frac{\text{Requested CPRG funding}}{\text{Total funding to implement measure}} \right] \times (\text{Total estimated GHG reductions of measure})$$

Quantified reductions should not include those that would already occur because of federal, state, Tribal, territorial, local and/or other regulatory requirements or other funding sources.

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 waiver exempting the three Pacific Island territories (Guam, American Samoa, and Northern Mariana Islands) from BABA requirements was granted effective July 5, 2023. 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.

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.

Q14: Are carbon capture and storage projects eligible for CPRG funding?

A14: Yes, an application that includes carbon capture and storage to reduce GHG emissions is eligible as long as the application meets the threshold eligibility criteria in Section III.C of the NOFO. 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 the evaluation criteria established in Section V of the NOFO. Applicants should consider the evaluation criteria in Section V.A when deciding on which measure or measures to include in their applications.

New questions posted on November 14, 2023

Q15: Can applicants apply to implement a workforce development program on its own or must the workforce development program be tied to GHG emissions reductions?

A15: Applicants may request funds to be used for workforce development activities as long as the activities are tied to a proposed GHG reduction measure. While applicants do not need to estimate GHG reductions associated with a workforce development component of a proposed GHG reduction measure, applicants must estimate GHG reductions associated with each measure included in the application. Workforce development activities should be focused to enable the applicant to carry out the proposed GHG reduction measures in their application by training workers and building a skilled workforce. For example, a GHG reduction measure focused on industrial efficiency and electrification may include workforce development activities to train energy efficiency auditors and electricians.

Q16: Are approaches and technologies included in a GHG reduction measure limited to those that result in zero GHG emissions? For example, could a measure employ technologies that reduce GHG emissions but do not achieve zero emissions?

A16: An application that includes approaches to reduce GHG emissions is eligible for the CPRG implementation grant competition as long as the application meets the threshold eligibility criteria in Section III.C of the NOFO. A proposed GHG reduction measure does not need to result in zero GHG emissions. It is up to each applicant to make the case to EPA in their application how their proposed measure meets the evaluation criteria established in Section V of the NOFO. Applicants should consider the evaluation criteria in Section V.A when deciding on which measure or measures to include in their application.

New questions posted on January 8, 2024

Q17: Can an implementation grant fund the design of a project, or only implementation? (e.g., some federal grants require transportation projects to be at the 30% design stage in order to be eligible).

A17: An implementation grant application can include costs in the budget to cover both the design and implementation of GHG reduction measures. However, the application should describe the implementation of the GHG reduction measures with sufficient detail to ensure that EPA can effectively evaluate the measures. As with any proposed GHG reduction measure, it is up to each applicant to make the case to EPA how their proposed measure adheres to the workplan requirements in Section IV of the NOFO and meets the evaluation criteria established in Section V of the NOFO. Applicants should consider the evaluation criteria in Section V.A when deciding on which measure or measures to include in their application.

Q18: Would proposals that include projects in multiple sectors (e.g., transportation AND waste/recycling) be rated more favorably by EPA than proposals for measures in single sectors?

A18: EPA cannot comment on how certain measures or applications might score in the CPRG implementation grant competitions. Each applicant should therefore focus on the evaluation criteria in Section V.A. and the application instructions laid out in Section IV.B. to help develop the best application for its jurisdiction.

New questions posted on February 6, 2024

*Q19: The project we are considering will address upstream carbon emissions that are well-documented but occur out of our jurisdiction (e.g., hyperlocal energy efficiency measures, green steel procurement, food-waste diversion, etc.). Will you consider the GHG reductions of implementing such a project? **UPDATED February 27, 2024***

A19: While the measures included in an application should align with the jurisdiction of the applicant, some measures may involve activities that take place beyond the applicant's direct jurisdiction and/or may result in GHG emission reductions that occur outside their direct jurisdiction. For instance, energy efficiency and electrification measures may affect emissions from the power sector outside of the direct geographic region of the applicant. In such cases, it is up to the applicant to "show their work" and demonstrate the quality, thoroughness, reasonableness, and comprehensiveness of the methodologies, assumptions, and calculation used for developing the estimated GHG emission reductions.

Q20: What does EPA mean by “Quantified reductions should not include those that would already occur because of federal, Tribal, territorial, local and/or other regulatory requirements or other funding sources” and “Using CPRG funds to aid regulated entities to comply with EPA regulatory requirements is not an eligible activity under this program.” If an eligible entity already has a law affecting a given sector, would that prohibit CPRG funds for related activities from being awarded to any entity in the state?

A20: The NOFO instructs applicants to quantify GHG reductions that will occur as a result of the CPRG implementation grant funding and not take credit for GHG emission reductions that are already projected to occur. The NOFO does not necessarily “prohibit” awarding funds to implement existing state programs. As explained on page 8 of the NOFO, EPA anticipates that applications may seek funding for, among other things, an expansion of a GHG reduction measure that is already being implemented, where the expansion of the measure will be funded through CPRG funding.

The sentence in the NOFO that reads “Using CPRG funds to aid regulated entities to comply with EPA regulatory requirements is not an eligible activity under this program,” applies to compliance activities associated with EPA (federal) regulations.

Q21: A GHG reduction measure in our PCAP would be located on incorporated city land but the impacts would extend to unincorporated areas. Can a GHG reduction measure cover both incorporated and unincorporated areas?

A21: Applications must request EPA assistance funds to implement GHG reduction measures contained in a PCAP developed under a CPRG planning grant. An applicable PCAP is one that geographically covers an entity and contains GHG reduction measures that can be implemented by the entity (page 19 of the NOFO). As long as the PCAP covers the location where the measure will be implemented and the applicant has the authority to implement it, the impacts of the measure may extend elsewhere.

Q22: How will EPA determine eligibility for projects that facilitate but do not drive greenhouse gas emission reductions? For example, a navigator program that helps households access incentives for home energy retrofits could increase uptake of heat pump incentives, but would EPA consider the navigator program itself responsible for the emission reductions associated with the heat pump installations?

A22: A program or activity is eligible as long as it is tied to a proposed GHG reduction measure from an applicable PCAP. As with any proposed GHG reduction measure, it is up to each applicant to make the case to EPA how their proposed measure adheres to the workplan requirements in Section IV of the NOFO and meets the evaluation criteria established in Section V of the NOFO.

Q23: Are measures that focus on reducing black carbon emissions eligible?

A23: Eligible measures must reduce GHG emissions as defined in section 137 of the Inflation Reduction Act (see page 8 of the NOFO). Black carbon is not a covered GHG and therefore applicants may not include black carbon reductions in their GHG reduction estimates. However, measures that reduce GHG emissions as well as other air pollutants, such as black carbon, are eligible.

Q24: Can CPRG funding go towards operations of existing programs? For example, could it cover the operating cost of expanding the operational hours of public transit?

A24: CPRG funding may not be used to simply pay for existing programs, but applicants may apply for CPRG funds to *supplement or expand* existing programs. As stated on page 10 of the NOFO, applications may seek CPRG funding for an expansion of a GHG reduction measure that is already being implemented via other means. When calculating the magnitude of GHG emission reductions of the measure (in this case, expansion of an existing measure), applicants should only quantify emission reductions that will occur as a result of the CPRG implementation grant funding. If CPRG funding represents a fraction of total funding for a measure, the total estimated GHG emission reductions should be scaled by the fraction in order to quantify GHG emission reductions associated with CPRG funding.

Q25: Could an implementation grant fund operational expenses or may funds only go toward capital investments?

A25: Yes, operational costs are eligible costs under this program.

Q26: Is land acquisition an eligible use of implementation grant funds?

A26: Yes, grantees can acquire real property using grant funds to implement measures outlined in an applicable PCAP. For land acquisitions, the grantee must follow the provisions of 2 CFR 200.311, the Uniform Relocation Assistance and Real Property Acquisitions Policy Act (URA) (42 USC § 4601 et seq.) and the URA's regulations (49 CFR Part 24). It will be up to the applicant to demonstrate that the measures included in the proposal address the evaluation criteria included in Section V of the NOFO, including quantifying the magnitude of GHG reductions achieved and describing the durability of those GHG reductions.

Q27: For applicants considering building-related measures, is there a list of eligible or ineligible equipment models?

A27: There is no list of acceptable or unacceptable equipment models eligible for funding under CPRG, provided such equipment meets [federal energy efficiency standards](#) and BABA requirements, as applicable.

Q28: If a program that funds the replacement of heavy-duty diesel vehicles with cleaner vehicles is awarded, will the grant conditions include similar requirements as those included in Diesel Emissions Reduction Act (DERA) grants? For example, will the award include specific engine model years that are eligible for replacement?

A28: The CPRG program is not bound by the conditions or restrictions of other grant programs, including DERA funding. See [2 CFR § 200.319](#) and pages 9 and 10 of the [Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#) for information on applicable procurement policy.

Q29: Is early implementation of measures that will be required by EPA under future regulations eligible, if completed prior to the effective date of applicable regulations?

A29: No, using CPRG funds to aid regulated entities (e.g., subaward from a state to private entity) to comply with EPA regulatory requirements is not an eligible activity under this program (see page 22 of the NOFO).

New questions posted February 27, 2024

Q30: Is loan disbursement considered an eligible use of grant funds? If so, are there stipulations regarding the utilization of funds following the initial loan dispersal?

A30: Yes. Loans provided under a grant program, including the CPRG implementation grants, are considered a type of subaward and are subject to the Uniform Grants Guidance Regulations and [EPA's Subaward Policy](#).

EPA will have to close out the CPRG grants at the end of the period of performance and enter into a close-out agreement with the recipients. During that process, EPA and the grant recipient would make decisions regarding what Federal requirements (e.g., DBRA and BABA) will continue to apply after the grant is closed out.

Q31: Can implementation grant funding be used to support a revolving loan program to, for example, disburse funds to homeowners to do energy efficiency rehabilitation projects?

A31: Yes, the program income rules in 2 CFR Parts 200 and 1500 provide legal basis for EPA to allow recipients to use the grant funding to capitalize a revolving fund. However, revolving loan fund capitalization grants can be complicated if the recipient does not have experience managing such a program.

In addition, energy efficiency projects could require compliance with the prevailing wage requirements of Davis Bacon and Related Acts (DBRA), where the loans issued are over \$2,000, and could be subject to Build America, Buy American Act (BABA) depending on whether the project is an infrastructure project being done for a public function. Alternatively, DBRA and BABA requirements would likely not apply to individuals/families/businesses if the grant recipient uses CPRG funds to create a Participant Support Cost Program that issues rebates or incentives for energy efficiency rehabs.

New questions added April 4, 2024

Q32: Are we allowed to apply for funding for community meaningful engagement activities? Can community engagement activities be its own separate budget item or does it have to be included in the overall cost per each measure? For example, some engagement activities will not be exactly tied to the measure but will be part of the overall engagement strategy for the implementation of measures in the application.

A32: An implementation grant application can include costs in the budget to cover community engagement around the design and implementation of GHG reduction measures. Activities for engagement may be listed as a separate budget item. It is up to each applicant to make the case to EPA how their proposed measures and associated budget adhere to the workplan requirements in Section IV of the NOFO and meets the evaluation criteria established in Section V of the NOFO. Accordingly, applicants should explain how the proposed engagement activities relate to the proposed GHG reduction measures.

Q33: If we receive CPRG funding to purchase electric vehicle charging stations, is there a stipulation that we have to make the charging stations public?

A33: There is no requirement that CPRG funds exclusively serve the public.

Q34: Are utility-side (behind-the-meter) electrical infrastructure upgrades eligible costs under CPRG if they are necessary to support the increased load of a beneficial electrification project?

A34: Yes, utility-side (behind-the-meter) infrastructure upgrades may be eligible costs under the CPRG program as long as they are connected to a GHG reduction measure contained in a PCAP developed under a CPRG planning grant and meet the threshold eligibility criteria in Section III.C. of the NOFO (page 21). Private-sector utilities are not eligible entities but may receive a subgrant from an eligible entity to undertake a GHG reduction measure that meets these criteria. Additionally, any application should be consistent with EPA's goals for implementation funding (see Section I.B of the NOFO, page 9). 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.

Q35: Are we confined to applying for measures that are specifically mentioned in an applicable PCAP that covers the geography or can we expand a listed PCAP priority (e.g., building energy efficiency measure assistance for residential weatherization) to include something complementary (e.g., residential solar assistance)?

A35: As described in the Threshold Eligibility Criteria in Section III.C of the NOFO, applications must propose to implement GHG reduction measures contained in a PCAP developed under a CPRG planning grant (page 21). Furthermore, in Section I.a. of the workplan, 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). 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.

Q36: Are grant recipients allowed to collect and generate revenue from activities funded under CPRG? If so, what are the requirements or guidelines regarding revenue generation?

A36: Recipients are allowed to collect and generate revenue from activities funded under CPRG. Typically, such revenue would be treated as program income and be subject to specific requirements in [2 CFR 200.307](#) and [2 CFR 1500.8](#). However, certain revenues generated by a recipient that is a governmental entity will be treated as governmental revenue and would not be subject to the program income requirements. Under [2 CFR 200.307\(c\)](#), taxes, special assessments, levies, fines, and other such revenues generated by a governmental entity are considered governmental revenue, and not program income. Additionally, EPA considers permit fees to be governmental revenue. If the revenue falls outside of the types of governmental revenue identified above, it would be treated as program income and subject to relevant requirements under 2 CFR 200.307 and 2 CFR 1500.8.

Q37: Is it possible for an EPA grant awardee to engage in a sale/leaseback transaction involving energy property, or would that violate 2 CFR 200.311?

A37: The purchase or lease of real property is allowed under CPRG. However, any purchases (including leasing arrangements) made with CPRG funds would be subject to the costs principles at [2 CFR 200, Subpart E](#), meaning the purchase or lease would need to be reasonable and necessary to carry out the project being funded by CPRG.

Under [2 CFR 200.311](#), if the CPRG grant recipient purchases property with CPRG funds, title to the property vests in the grant recipient. The recipient must use the property for the purpose for which it

was purchased, i.e., if the recipient purchases the property from the non-profit to develop a solar project, the property must be used to develop a solar project.

If the CPRG recipient purchases the property and then enters into a lease-back situation, under [2 CFR 200.465\(b\)](#), the rental costs are allowable only up to the amount that would be allowed had the recipient continued to own the property. This amount would include expenses such as depreciation, maintenance, taxes, and insurance. The rules on depreciation for purchases using grant funds can be found at [2 CFR 200.436](#).

Q38: If an applicant receives CPRG implementation grant funds to install electric vehicle charging stations for light-duty passenger vehicles, does the grant recipient need to comply with National Electric Vehicle Infrastructure (NEVI) Standards and Requirements under 23 CFR 680?

A38: The NEVI requirements apply to all NEVI Formula Program projects and projects for the construction of publicly accessible EV chargers that are funded with funds made available under Title 23, United States Code, including any EV charging infrastructure project funded with Federal funds that is treated as a project on a Federal-aid highway (see [23 CFR 680.102](#)). The NEVI standards would not apply to projects funded through CPRG that do not also involve funding under the NEVI Formula Program or other funds issued by DOT under title 23.

Q39: Within the NOFO, insurance is listed as an allowable expense. Does this include the cost of insuring vehicles purchased with CPRG funding?

A39: Yes, vehicle insurance is an allowable expense provided it meets the cost principles established in [2 CFR 200 Subpart E](#).

Q40: If a measure funded by a CPRG grant results in reductions in criteria pollutant or precursor emissions, can those reductions be used as offsets to satisfy federal nonattainment new source review requirements under Title I, Part D of the Clean Air Act?

A40: Using CPRG funds to aid regulated entities to comply with EPA regulatory requirements is not an eligible activity under this program. Therefore, emissions reductions funded by CPRG grants may not be used to satisfy federal nonattainment new source review requirements.

New questions added April 22, 2024

NEW *Q41: We are looking to replace the small school buses of our Tribal Community school with comparable electric buses and have found that the only manufacturer of such a bus is located in Canada. Does this Canadian option that is distributed by an American transportation company comply with the BABA requirements given that these are mobile vehicles/engines and we have no other viable options?*

A41: 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. EPA considers school buses to be exempt from BABA requirements. Please note, however, that electric vehicle charging infrastructure will be subject to BABA.

NEW Q42: *Our team has identified a site to undergo solar panel upgrades and installation, however the building of interest would need to first go through repairs due to a lack of structural integrity to support the panels. Would repairs for this building prior to solar panel installation qualify for funding under this grant?*

A42: 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. As explained in 2(c) of the evaluation criteria, the cost effectiveness of GHG reductions will be evaluated.

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. See Section VI.C of the NOFO for more information.

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 Tribe, Tribal consortium, or territory?

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.

New questions posted on November 14, 2023

Q3: Would a contractor that is working for a CPRG grantee on developing its Priority Climate Action Plan have a conflict of interest that would prevent it from doing work on a GHG reduction measure that is funded by an implementation grant?

A3: Under 2 CFR 200.319(a), the grantee must, to the maximum extent possible, ensure open and free competition when seeking procurement contracts. A contractor working on a Priority Climate Action Plan for a planning grantee is not inherently conflicted from conducting work for an awarded implementation grant. A contractor would be able to compete for implementation work so long as the contractor did not develop or draft sample language, templates, specifications, requirements, statements/scopes of work, invitations for bids, or requests for proposals that the grantee of an implementation grant will use in a request for proposals for the implementation grant. See 2 CFR 319(b). Also see pages 9 and 10 of the [Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements, which](#) list circumstances that may indicate restricted competition for grantees seeking procurement contracts.

Q4: Can EPA explain more about what it means by “firms or individual consultants that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals must be excluded from competing for such procurements as provided in 2 CFR 200.319(b)”?

A4: Under 2 CFR 200.319(a), the grantee must, to the maximum extent possible, ensure open and free competition when seeking procurement contracts. As indicated in the [Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#), EPA interprets 2 CFR 200.319(b) to preclude applicants and recipients from working with, using sample language or templates from, accepting free services from, or hiring any contractors to develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals for procurements if that contractor will be competing for the resultant contract. For example, if a grantee hires a consultant to draft the statement of work for a request for proposal for a procurement contract it is seeking, that consultant cannot also compete for that procurement contract.

*Q5: Does a grant applicant or grant recipient need to conduct a competition for participant support costs (PSCs) or subawards? If so, must that competition be done in advance of receiving the grant or can grantees select program beneficiaries after the grant is awarded? **UPDATED January 8, 2024***

A5: PSCs are not competed and subawards do not need to be competed. Grantees may select subrecipients of a subaward and program beneficiaries of PSCs after the grant is awarded.

However, under 2 CFR 200.456, grant recipients must obtain prior written approval from EPA’s Award Official or another authorized official (typically a Grants Management Officer) to use Agency funds for PSCs. This is met by specifying the amount of PSCs in the recipient’s budget narrative and workplan (PSCs belong under the ‘Other’ category). Under 40 CFR Part 5 and 40 CFR Part 7, recipients may not administer EPA funded PSC programs in a manner that discriminates on the basis of race, color, national origin, sex, age or disability. Applicants should review EPA’s guidance on [Participant Support Costs](#) for more information.

An eligible applicant participating as a member of a coalition would be a subrecipient of the lead applicant for a coalition and must be a signatory of the Memorandum of Agreement (MOA) or other written document or documented arrangement.

New questions posted on January 8, 2024

Q6: Can a grant recipient subcontract the financial management of grant funds to another entity? For instance, could a lead applicant for a coalition subcontract the financial management function to another entity in the coalition?

A6: Yes, the grant recipient could subcontract the financial management responsibilities of the grant to a subrecipient. However, the grant recipient would remain responsible for ensuring that the funds are used by the subrecipient in accordance with Federal statutes, regulations, and the terms and conditions of the grant.

Q7: Can an applicant competitively award subawards to other entities (e.g., a territory subaward to local governments) to implement measures? If so, would this competitive process need to occur prior to applying for implementation funding, or could it occur after an application has been awarded?

A7: A grant recipient may competitively award subawards to other entities. Such a competitive process does not need to occur prior to application. If an entity takes this approach, the competitive process must be consistent with applicable statutes, regulations, and the terms of their EPA financial assistance agreement.

Q8: Is the inclusion of indirect costs allowable for subrecipients?

A8: Subrecipients receive reimbursement for their actual direct and/or approved indirect costs such that they do not “profit” from the transaction. A subrecipient’s indirect cost rate may be a rate negotiated and approved by the subrecipient’s cognizant Federal agency (if applicable). If a subrecipient does not have a Federal indirect cost rate, the recipient may negotiate an indirect cost rate with the subrecipient that complies with [2 CFR Part 200, Subpart E](#), or use the 10% *de minimis* indirect cost rate described at [2 CFR 200.414\(f\)](#).

New questions posted on February 6, 2024

Q9: Are for-profit entities taxed if they receive CPRG grant funds as a subaward?

A9: EPA does not provide guidance on tax-related questions.

New questions posted February 27, 2024

Q10: For a utility green power program that offers participating customers the benefits of contracted renewable electricity generation in exchange for a bill surcharge, could an EPA award under this program cover the cost of this bill surcharge as a participant support cost (PSC) across thousands of electricity customer bills?

A10: Participant support costs (PSCs) include rebates, subsidies, stipends, or other payment to program beneficiaries to enable beneficiaries to participate in the recipient’s program or project. As such, EPA would consider the subsidy described in the question to be a PSC.

Q11: What should we do if we have questions about filling out Form 4700-4: Pre-Award Compliance Review Report?

A11: Questions about Form 4700-4 should be directed to [4700-4 Form Questions@epa.gov](mailto:4700-4_Form_Questions@epa.gov).

Q12: CFR 200.439 (b)(1) costs for acquisition of land for a project site are only allowable as direct costs with prior written approval of EPA. Can you please explain what the procedure is for requesting this approval? Do we include the request in the grant application itself?

A12: If the land acquisition project is included in an approved workplan, this can be considered prior written approval. Otherwise, a grantee would need to notify the project officer and receive their written approval prior to expending grant funds on land acquisition.

Q13: Are coalition members who are subrecipients able to make subawards to other entities to work on GHG measure implementation projects? Or is it only the lead applicant that is allowed to make subawards?

A13: Yes, coalition members who are subrecipients are able to further subaward CPRG funding to other entities as described in Appendix A of the NOFO. These grant recipients or subrecipients that in turn pass funds to other entities through subaward must comply with applicable subaward provisions of 2 CFR Part 200, the [EPA Subaward Policy](#), and [EPA's General Term and Condition for Subawards](#).

New questions posted March 14, 2024

Q14: If we need to procure services, equipment, or contractors to implement a proposed measure, can we utilize another public agency's federally compliant RFPs and/or an existing bench of consultants/contractors?

A14: Recipients can enter into intergovernmental or inter-entity agreements to competitively procure common goods and services under 2 CFR 200.318(e). When using such an agreement, competition requirements will be met with documented procurement actions using strategic sourcing, shared services, and other similar procurement arrangements. If the services of consultants/contractors predating EPA assistance were procured competitively consistent with federal financial assistance procurement standards ([2 CFR 200.317-327](#)), those consultants/contractors could be used by the recipient. See also [EPA's Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#).

New questions posted April 4, 2024

Q15: If we develop a group or consortium of multiple entities and they are all government and/or non-profit companies, do the entities identified in the application and budget need to go through a procurement process, and does it make a difference if the government/nonprofit is a subrecipient or subcontractor?

A15: An 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.

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." Competition of subawards is not required. 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. 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.

Q16: Does each coalition member (subrecipient) need to be listed in the budget as subawardees?

A16: Yes, an applicant's project narrative and budget narrative should include detailed descriptions of any proposed subawards, including those to coalition members, and include cost estimates for subawards as line items under the "Other" budget category in the SF-424A.

Q17: Will EPA allow lead applicants/recipients of grant funds in coalitions for go through one procurement process to procure contractors that benefit all coalition members on behalf of the other coalition members, or will EPA require each of the separate coalition members to go through procurement to secure a "shared" contractor?

A17: It is possible that a lead applicant can enter into intergovernmental or inter-entity agreements to competitively procure common goods and services. As noted on page 6 of [EPA's Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#).

"For example, some states have contracts with environmental consultants that local governments may also use to acquire consulting services without further competition. Two or more recipients or subrecipients could also solicit offers for common services such as developing web sites or laboratory analysis and share the cost of the contract. Recipients should document how the costs are allocated, the competitive procedures used to select the contractor, and the basis for selecting the individual or firm awarded the contract."

See [2 CFR 200.318](#) for the general procurement standards.

Q18: Is a sole source contract with an electric utility company for necessary upgrades to their infrastructure possible, given that they are the only utility serving our area?

A18: A sole source contract is possible if the contract can meet the sole-source requirements on page 13 of EPA's [Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#). The fact that a recipient has named a contractor in its proposal as a "partner" or otherwise does not in and of itself justify a sole-source award. If, at any time, EPA finds that a sole-source contract does not comply with EPA's interpretation of the Uniform Grant Guidance, EPA may disallow all or part of the cost of the contract as provided at 2 CFR 200.339.

Also, depending on the arrangement with the utility, it is possible the agreement is a subaward, which does not need to be competed. For further information on the distinction between contracts and subawards, see page 1 of [EPA's Grants Policy Issuance 16-01: EPA Subaward Policy for EPA Assistance Agreement Recipients](#).

Q19: If entities are named as “Implementing Agencies” in the mitigation strategies of a submitted PCAP, is a procurement process required in order for them to be included as entities supporting the implementation project?

A19: 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 2 CFR Part 1500, as applicable.

Grant recipients may also 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.” Competition of subawards is not required. 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. 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.

Q20: Can the lead coalition member make subawards to municipalities that fall inside another coalition member’s boundaries?

A20: Yes, the lead applicant of a coalition can subaward to other entities (including to municipalities outside of the lead applicant’s jurisdiction but inside one of the coalition member’s boundaries).

Q21: The NOFO states “EPA’s Award Official must approve PSCs on the basis of either a precise description of the PSCs in the EPA approved budget and workplan, or on a transaction-by-transaction basis.” At what point does EPA intend to make this determination?

A21: The EPA Award Official or other authorized grants management officer will approve PSCs at time of award. To facilitate this approval, applicants selected for award may need to submit additional documentation to an EPA grants official prior to award. Any changes to a grant recipient’s budget after award will need to be approved by the EPA Award Official on a case-by-case basis.

Q22: We intend to offer financial support to local governments for purchase and installation of equipment that reduces emissions. Would that be categorized as a subaward or a participant support cost?

A22: The determination of whether these costs should be categorized as a subaward or as participant support costs (PSCs) will depend on the exact nature of the project and expected relationship with the local governments. 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 over the grant period. PSCs can be provided by the CPRG grant recipient in the form of rebates, subsidies, or similar one-time, lump-sum payments to other entities for the purchase of technologies that reduce GHG emissions. For more information, please see [EPA’s Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#).

Q23: What is the distinction between a contractor, a sub-awardee, participant support costs, and a program beneficiary? Should specific entities be named as contractors, subrecipients, or program beneficiaries in an application? If we are purchasing technology, what type of financial agreement would be most appropriate with the supplier?

A23: Applicants may procure supplies, equipment or professional services from individuals or companies through procurement contracts. A contract is for the purpose of obtaining goods and services for the recipient's own use and creates a procurement relationship with the contractor.

Applicants may fund a program or project that carries out a public purpose through a subaward of financial assistance to an organization eligible to receive such an award. A subaward establishes 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.

For-profit entities participating in grant activities are typically contractors rather than subawardees. For more information on the distinction between contracts and subawards, see [EPA Subaward Policy Appendix A](#).

Applicants may support the participation of individuals or entities in an EPA-funded program through participant support costs (PSCs). PSCs include rebates, subsidies, stipends, or other payments to program beneficiaries by a grantee, subrecipient, or contractor. PSCs differ from subawards in that the beneficiary is usually participating in the grant recipient's project instead of implementing their own project.

EPA does not require recipients to identify contractors in grant applications. The fact that a recipient has named a contractor in its application does not impact the requirement that contracts be awarded under the competitive procurement procedures of 2 CFR Part 200 and 2 CFR Part 1500, as applicable.

The purchase of commercially available technology would typically fall under a contractual arrangement rather than a subaward or participant support cost, however the appropriate mechanism will be dependent on the exact nature of the arrangement. Please see Appendix A. Additional Information Regarding Contracts, Subawards, and Participant Support Costs (page 57 of the NOFO) for further detail.

Q24: If a grantee subawards equipment to a subrecipient, is the grantee responsible for monitoring of equipment between the end of the grant's performance period and the date that the equipment depreciates to a fair market value less than \$5,000?

A24: Upon completion of the grant's performance period, EPA will enter into an equipment disposition agreement with the grant recipient. Consistent with [2 CFR 200.313](#), unless instructed otherwise a grant recipient may keep the equipment and continue to use it on the project originally funded through this assistance agreement or on other federally funded projects whether or not the project or program continues to be supported by Federal funds. Per 2 CFR 200.313(b), state agencies may manage and dispose of equipment acquired under this assistance agreement in accordance with state laws and procedures.

Subrecipients are subject to the same federal requirements as the grant recipient (also known as the "pass-through entity") and they must comply with applicable subaward provisions of 2 CFR Part 200, the EPA Subaward Policy, and EPA's General Term and Condition for Subawards.

Q25: Our Tribal consortium would like to disburse funding through participant support costs to each of the member Tribes so that they can implement measures within their reservations and communities. One such measure is a residential decarbonization program, but due to the variances in homes, it is difficult to predict how much funding will be required for various elements of each Tribe's program (e.g., for contract support vs equipment vs training, etc.). How specific do we need to be on the budget regarding participant support costs? Is it appropriate to provide an educated estimate of the amount of funding it will take to implement this measure in each home, and state the justification for this number?

A25: From the description provided, it is likely that the funds should be disbursed to the individual Tribes as subawards rather than as participant support costs (PSCs). In order for the member Tribes to be in charge of the funding/PSC programs, there would need to be a subaward relationship between the consortium and the individual Tribes. The individual Tribes could then establish PSC programs to upgrade Tribal members' houses.

Indicators that the transaction is a subaward rather than a PSC include eligible and allowable costs to support personnel and overhead including indirect costs, operations and maintenance, design and engineering services, and post-installation sampling or monitoring activities. Funding for projects conducted at facilities owned by state, Tribal, or local governments will typically be in the form of subawards. In contrast, PSC for subsidies and rebates only reimburse the program beneficiary for the one-time cost of purchasing and installing pollution control equipment at a facility.

See Guidance on [EPA Participant Support Costs](#) for more information on the distinction between subawards and participant support costs as well as guidance on creating PSC budgets.

When proposing a subaward, applicants must provide the aggregate amount they propose to issue as subaward work as a separate line item in the "Other" category of the budget table and must include a description of the types of activities to be supported. Refer to [EPA's Subaward Policy and Supplemental Frequent Questions](#) for additional guidance.

As mentioned in the Appendix A.D. of NOFO, EPA's Award Official must approve Participant Support Costs (PSCs) on the basis of either a precise description of the PSCs in the EPA approved budget and workplan, or on a transaction-by-transaction basis. EPA expects applicants to identify each proposed activity in the budget and specify its purpose and estimated cost (Section 6 of the workplan on page 38 of the NOFO). The applicant's workplan and budget narrative should include detailed descriptions of any proposed PSCs and include cost estimates for PSCs as line items under the "Other" budget category.

If a grant recipient needs to make any changes to the budget after the grant agreements are executed, the recipient must obtain prior written approval from EPA's Award Official.

Q26: Is it an eligible cost to hire a contractor to write an RFP for a competitive construction contract?

A26: It depends. Contractual services (including consultant services) are an eligible cost under the CPRG program. Contractual services are those services to be carried out by an individual or organization, other than the applicant, in the form of a procurement relationship. EPA does not require applicants to identify specific contractors in their application.

Under 2 CFR 200.319(a), the grantee must, to the maximum extent possible, ensure open and free competition when seeking procurement contracts. As indicated in the [Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#), EPA interprets 2 CFR 200.319(b) to preclude applicants and recipients from working with, using sample language or templates from, accepting free services from, or hiring any contractors to develop or draft specifications, requirements,

statements of work, or invitations for bids or requests for proposals for procurements if that contractor will be competing for the resultant contract. For example, if a grantee hires a consultant to draft the statement of work for a request for proposal for a procurement contract it is seeking, that consultant cannot also compete for that procurement contract.

V. Competition Structure

Q1: What size grants can I apply for?

A1: As explained in Section II.B (page 14) of the NOFO, applicants for the Tribes and territories competition can apply for grants ranging from \$1 million to \$25 million:

Tier	Grant Ranges	Funds Targeted for Each Tier	Anticipated Number of Grants to be Awarded
Tier A	\$15,000,000 – \$25,000,000	\$125 million	5-8
Tier B	\$5,000,000 – \$14,999,999	\$100 million	7-20
Tier C	\$1,000,000 – \$4,999,999	\$75 million	15-75

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 for Tribes and territories: 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 under this NOFO. Furthermore, Tribes and territories may apply to implement the same measure in both the Tribes and territories competition and the general competition. However, EPA will not award multiple grants to implement the same measure in the same location (e.g., a territory and territorial municipality will not both receive a grant to implement a particular measure from the territory’s PCAP in the municipality; either the territory 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 19 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"?

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 a territorial agency applied to implement a measure across all jurisdictions in the territory and a municipality within that same territory 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., a Tribe and a municipality) within the same state boundaries applied to

implement the same measure only within their own respective 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).

New questions posted October 31, 2023

Q5: Will EPA partially fund an implementation grant application? Would my application compete in a separate tier if it is partially funded?

A5: 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).

New questions posted on November 14, 2023

Q6: What does EPA mean by “EPA anticipates awarding no more than two grants to applicants at the same level of government within a single jurisdiction”? Would EPA only award two grants total to local governments in a state?

A6: In Section V.B of the Tribes and Territories NOFO (page 48), EPA explains that *EPA anticipates awarding no more than two grants to applicants at the same level of government within a single jurisdiction* (e.g., a single Tribal area or territory). This means that EPA anticipates that:

- No more than two applications from a single Tribe would be awarded a grant.
- No more than two applications from the government of a territory (such as from different agencies) would be awarded a grant.
- No more than two applications from a given municipality would be awarded a grant.

It is possible that more than two Tribes or Tribal consortia located within the geographic boundary of a state may receive implementation grants. Also, as coalitions may be comprised of geographically diverse entities, these targets do not necessarily apply to coalition applications. In addition, as stated in the NOFO, EPA anticipates making selections to ensure diverse geographic coverage of CPRG implementation funding across the different funding tiers. As stated on page 48, EPA reserves the right to exceed the targets outlined above in the event that there is an inadequate number of meritorious applications from entities in other jurisdictions.

New questions posted February 27, 2024

Q7: Is there a limit to the number of coalitions an eligible applicant can be a part of?

A7: There is no limit to the number of coalitions each eligible applicant may participate in. However, an eligible applicant may serve as the lead applicant for only one coalition (see Section III.A of the NOFO).

Q8: My estimated project cost is \$250K-300K. I know this is far below the CPRG Tribes and Territories C tier of 1,000,000-5,000,000 dollars. Is there any way that this application can still be eligible?

A8: No, applications that request less than \$1 million are not eligible and will not be reviewed.

New questions posted March 14, 2024

Q9: We are interested in understanding the mechanism(s) we could use to avoid overlap in our grant proposal with another proposal within our territory. Would it be sufficient to add the clause “any awardees of CPRG for an overlapping project will be ineligible for this funding from [applicant name]” when describing an otherwise overlapping project in the grant?

A9: As a threshold matter, EPA does not prohibit two eligible applicants from applying to fund the same measure. However, EPA will not fund duplicative work, i.e., multiple grants cannot fund the same measure being implemented in the same or overlapping geographic vicinity. Therefore, EPA strongly recommends that entities that may be considering applying for funding to implement similar measures communicate and coordinate prior to submitting applications. In the case where two eligible entities (e.g., a territory and an MSA within that territory) apply to implement the same measure, each application could include safeguards outlining how each particular entity will only fund what the other does not (whether by limiting program scope or restricting support to areas not otherwise covered by the other applicant).

In the case where two eligible entities (e.g., cities or counties) within the same territory apply 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). Adding clarifying language to the application to address potential overlaps (including but not limited to the suggested clause above) is an acceptable approach to avoid overlap in grant applications from the same area.

Q10: Is it acceptable for two non-overlapping proposals to reference the same “umbrella” measure in the PCAP?

A10: 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 31 of NOFO). It is acceptable for multiple applications to reference the same “umbrella” measure. The number of applications referencing a specific measure in an applicable PCAP does not impact how each application is evaluated.

Q11: Is a project allowed to be included in two different Tribe applications?

A11: EPA does not prohibit two eligible applicants from applying to fund the same measure. 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 22 of NOFO). Applications should seek funding to implement GHG reduction measures that are included in an applicable PCAP, meaning a PCAP that geographically covers the entity and contains GHG reduction measures that can be implemented by the entity.

VI. Evaluation and Awards

Q1: What are the differences between the Tribes and territories NOFO and the general competition NOFO? 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 Tribes and territories competition, EPA will have three 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 the rankings and preliminary recommendations of the EPA evaluation team and the other factors listed in Section V.C.

Q3: Will Tribes need to discuss and calculate benefits to low-income and disadvantaged communities if applying under the Tribes and territories competition?

A3: As described on page 32 of the Tribes and territories competition NOFO (regarding section 4 of the work plan on benefits and community engagement), applications should discuss benefits and potential disbenefits to communities, particularly those that are disadvantaged or overburdened by pollution, from their proposed GHG reduction measures.

Federally recognized Tribes meet the definition of disadvantaged communities for the purposes of the CPRG grant program (page 11 of the NOFO). A Tribal application to the Tribes and territories competition should include Tribal community benefits that would result from implementation of the measures.

Q4: If we do not have a history of managing EPA grants, will that negatively affect the points we get for criteria 5.a (past performance) and 5.b (reporting requirements)? Will this effectively disqualify our application or limit our chances to secure CPRG grant funding?

A4: If your organization does not have a history of managing EPA grants, it will not disqualify your application. Page 47 of the Tribes and territories NOFO, under section 5, "Programmatic Capability and

Past Performance,” states: “Note: In evaluating applicants under the past performance criteria in 5.a and 5.b, EPA will consider the information provided by the applicant and may also consider relevant information from other sources, including information from EPA files and from current/prior grantors (e.g., to verify and/or supplement the information provided by the applicant). 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 5.a and 5.b. A neutral score is 2.5 points of 5 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.

Q5: 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?

A5: 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.

Q6: Where should I send a question about the Evaluation Criteria or other application requirements?

A6: 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.

Q7: EPA provides a list of GHG reduction measures in the Tribes and territories competition NOFO. Are these the only measures that EPA will fund under this program?

A7: On pages 8-11 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 Tribes and territories competition. 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.

Q8: What types of applicant diversity will be considered in the selection process?

A8: EPA anticipates awarding no more than two grants to applicants at the same level of government within a single jurisdiction (e.g., a single 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 areas.

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., 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).

Q9: Do I need to quantify criteria air pollutant (CAP) and hazardous air pollutant (HAP) emissions impacts in the application?

A9: While quantified CAP and HAP emissions estimates are not required for the application, applicants should **list** CAP and HAP emissions reductions 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.

Q10: Do I need to quantify GHG emissions impacts in the application?

A10: Yes, EPA will assess applications on the magnitude of GHG emission reductions estimated for the proposed measures.

Q11: How will EPA evaluate the magnitude of GHG emission reductions? Will it consider the relative reductions achieved for the entities?

A11: Under evaluation criteria 2.a and 2.b, EPA will evaluate applications on the magnitude of GHG reductions achieved, regardless of the type of applicant (Tribe, Tribal consortium, coalition, etc.). 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.

New questions posted October 31, 2023

Q12: How will applicants be expected to demonstrate that they have explored federal and non-federal funding sources that are alternatives to the CPRG? For example, would an applicant need to have applied and been rejected by another IRA or BIL grant program, or would it be sufficient for the applicant to provide a general discussion of other funding sources they looked at and considered (but did not apply for)?

A12: 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. Where applicants identified other funding sources but did not pursue those sources, the applicant may explain their reasoning. The

implementation grants NOFO does not require that applicants must have applied to another grant program and been rejected in order to apply to CPRG.

New questions posted November 14, 2023

Q13: How is EPA defining “high-quality jobs”? What are “short-term” versus “long-term” jobs?

A13: Applicants should review the eight [Good Jobs Principles](#) developed by the U.S. Department of Labor. Key characteristics of a high-quality job include family-sustaining wages and benefits, the free and fair choice to form or join a union, and an emphasis on worker health and safety. The Good Jobs Principles describes good jobs as those where workers have job security, adequate hours and predictable schedules, and where temporary or contractor labor solutions are minimized. Furthermore, good jobs are those where workers have equitable opportunities to progress to future good jobs within their organizations or outside them; and where workers have transparent advancement opportunities and access to quality training and education.

Workforce development activities included in the application should focus on career pathways to high-quality jobs that enable economic mobility, rather than short-term, low-wage jobs (e.g. short-term seasonal, contract, or otherwise temporary employment). The goal of workforce development programs should be to improve the long-term economic wellbeing of the participant. As such, retention of participants in training programs and on the job is an important objective. Furthermore, workforce development programs should include strategies for including individuals with barriers to obtaining and retaining a job. Applications may request funding for supportive services, such as transportation and childcare. Workforce development programs should partner with employers, labor unions, and other similar organizations that are committed to interviewing, hiring, retaining, and mentoring participants.

The Department of Labor has produced several resources that can help potential applicants understand the Good Jobs Principles and implement them through federal funding programs including: [Good Jobs in Federal Investments: A Toolkit for Employers, Workers, and Government](#); [Good Jobs Initiative Job Quality Check List](#); [Good Jobs In Federal Investments: Data and Reporting Appendix](#).

Q14: How does EPA define “equitable workforce development”?

A14: Equitable workforce development means creating workforce development opportunities that are broadly available and accessible to all individuals in low-income and disadvantaged communities regardless of income, race, color, national origin, Tribal affiliation, disability, or any other non-merit factor. Equitable workforce development activities may consider the barriers to training, employment, and job retention participants may face and incorporate appropriate supports for participants to address those barriers. Equitable workforce development may focus on outreach and recruitment to all individuals from low-income and disadvantaged communities. Finally, equitable workforce development should focus on providing high-quality job opportunities where workers have a safe, healthy, and accessible workplace and where they are free from harassment and discrimination at work, in keeping with the Department of Labor [Good Jobs Principles](#).

Q15: How does EPA define “middle-skilled careers,” and is there a list of such careers?

A15: EPA considers middle-skilled careers as those that require education and training beyond an entry-level job. Middle-skill careers often require an industry-recognized credential. These are careers that enable upward economic mobility and strong middle-class wages, including for those without a college degree.

EPA does not provide an exhaustive list of middle-skilled careers. In addition to industry-recognized credentials, wages and benefits are important metrics for the quality of a job. Applicants may consider reviewing data from the U.S. Department of Labor's Bureau of Labor Statistics on wage data by area and occupation.

EPA highlights [Registered Apprenticeships](#) as an example of a high-quality training model that promotes entrance into middle-skilled careers. Registered Apprenticeship Programs are industry-led and aligned with employer needs; provide structured learning and mentorship opportunities; are paid jobs with progressive wages; and allow participants to earn a portable, nationally-recognized credential within their industry.

Q16: How "shovel ready" do measures in implementation grant applications need to be? Will projects be scored higher if they can demonstrate speedy implementation?

A16: Any measure proposed for funding under the CPRG implementation grants general competition must be included in a Priority Climate Action Plan (PCAP), a narrative report due on March 1, 2024, that includes a focused list of near-term, high-priority, implementation-ready measures to reduce GHG pollution. Implementation grants awarded under this program will have an estimated period of performance of up to five years with the estimated project start date for awards of October 1, 2024 (see Section II.F of the NOFO).

As explained in Section I.B of the NOFO, EPA encourages applicants to seek funds for GHG reduction measures that will significantly reduce cumulative GHG emissions by 2030 and beyond and that will accelerate decarbonization across one or more major sectors responsible for GHG emissions. EPA will score grant applications based on multiple evaluation criteria described in Section V.A of the NOFO with an emphasis on the magnitude of near-term GHG reductions that will be achieved by the proposed measures. As explained in evaluation criteria 2 in Section V.A of the NOFO, applications will be evaluated on the magnitude of cumulative GHG emission reductions and the durability of the reductions to be achieved from 2025 through 2030 and from 2025 through 2050.

In evaluation criterion 1.c, EPA will also evaluate applications on the extent to which the proposed GHG reduction measures have the potential to create transformative opportunities or impacts that can lead to significant additional GHG emissions reductions (page 28 of the NOFO).

Finally, in evaluation criterion 3.c, EPA will evaluate each application on the extent to which it provides a detailed implementation timeline for each measure, including key milestones for specific tasks, and discusses the key actions needed to meet the projects goals and objectives by the end of the grant period.

Q17. What is considered cost effective (in terms of dollars per CO2e reduced)? Is there a standard we should be striving for?

A17: EPA does not have a threshold or recommended cost per dollar of CO2e reduced. As discussed under evaluation criterion 2.c in Section V of the NOFO, each application will be evaluated on the quality of the response and the:

- Cost effectiveness of the GHG reduction measures in terms of the CPRG implementation grant dollars requested divided by cumulative GHG metric ton of CO2-equivalent emission reductions to be achieved from 2025 through 2030 for the set of measures in the application, and

- Qualitative narrative explaining any factors that may affect the cost-effectiveness calculation.

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.

Q18. Will we need a Quality Assurance Project Plan (QAPP) for projects funded with implementation grant funds?

A18: A QAPP is required for all projects funded by EPA that involve collection and/or use of environmental data. For more information see [Frequently Asked Questions about EPA's Quality Program](#).

Q19. Please expand upon your guidance on Question 4 above, which states "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."

A19: EPA will not fund duplicative work, i.e., two entities may not both receive funding if they would spend funds on the same or overlapping measures. Additional examples of applications that would be considered duplicative or not considered duplicative are listed below.

Examples of Duplicative Work:

- A grant to build heavy-duty electric vehicle charging at locations A, B, and C and a grant to build heavy-duty electric vehicle charging at locations A and B.
- A grant to reduce methane emissions by capping landfills across an entire territory and a grant to reduce methane emissions by capping a specific landfill in a territorial municipality also included on the territory's list of landfills.
- A grant to install energy efficient heat pump water heaters in Tribal households at or below the federal poverty line and a grant to another department of the same Tribal government to perform comprehensive energy efficiency upgrades including installing heat pump water heaters in households at or below 150% of the federal poverty line.

Examples of Non-Duplicative Work:

- A grant to reduce emissions from heavy-duty vehicles on Tribal lands by building heavy-duty electric vehicle charging and a grant to reduce emissions from heavy-duty vehicle on the same Tribal lands by providing rebates for electric heavy-duty vehicles.
- A grant to a coalition of local governments to reduce methane emissions by capping a landfill in one part of the territory and a grant to a different coalition of local governments to reduce methane emissions from a different landfill in a different part of the territory.
- A grant to a Tribe's housing authority to pay for residential energy efficiency projects and a grant to a Tribe's economic development department to pay for commercial energy efficiency projects.

EPA does not prohibit two eligible applicants from applying to fund duplicative work as each application would be reviewed independently. However, EPA will not award multiple grants to implement the same work in the same location. Further, EPA does not intend to partially fund applications. Therefore, EPA

strongly recommends that entities that may be considering applying for funding to implement similar measures communicate and coordinate prior to submitting applications.

Note: In limited circumstances, 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).

New questions posted January 8, 2024

Q20: How can we meaningfully engage with communities throughout this process?

A20: EPA has compiled a number of [resources](#) to provide awardees with information on meaningful engagement with impacted communities from project inception through implementation. [The “Capacity Building Through Effective Meaningful Engagement” booklet](#) is a tool intended to help create or expand plans for building trust and engaging meaningfully with communities. EPA also provides other resources and webinar recordings on meaningful engagement with communities on our CPRG website at <https://www.epa.gov/inflation-reduction-act/climate-pollution-reduction-grants>.

Q21: Can you expand upon your expectations for quantifying GHG emissions reductions? What level of detail is required? Is an estimate of percent reduction in general sufficient?

A21: Information regarding the required documentation of GHG reduction assumptions, as outlined in Criteria 2 of the evaluation criteria, can be found in Appendix C of the NOFO. Applicants must submit documentation for their estimates of both annual and cumulative GHG emissions reductions for each proposed measure and the estimated cost per metric ton of CO₂-equivalent GHG reductions to be achieved from 2025 through 2030 for the measures in the application. The GHG reductions estimates must be provided in metrics tons of CO₂-equivalent, not a percentage reduction.

EPA offered a training on December 18, 2023, on the “Documentation of GHG Reduction Assumptions” to help potential CPRG implementation grant applicants. When published, a link to the recording of this webinar will be available at: <https://www.epa.gov/inflation-reduction-act/about-cprg-implementation-grants#Training>.

Q22: What is the allowable percentage for administrative costs for the CPRG implementation grants?

A22: EPA does not provide a specific limit on the percentage of funds that may be allocated for administrative costs. However, as explained in section 7 of the workplan and evaluation criteria, applications will be evaluated on the proposed budget. Specifically, an application will be evaluated on the quality of the response and extent to which the proposed grant expenditures are reasonable for accomplishing the proposed goals, objectives, and measurable environmental outcomes described in the application.

Q23: Which values for Global Warming Potential (GWP) should we use when calculating GHG emissions?

A23: As explained in Appendix B, applicants should use Global Warming Potential (GWP) values from the 2013 IPCC AR5 Fifth Assessment Report. A table of these values can be found in Appendix B of the NOFO.

Q24: Do the data generated in the Optional Budget Table complement the SF-424 (i.e., do the data easily transfer from the table to the SF-424)?

A24: The Optional Budget Table included as an attachment on the [CPRG implementation grants webpage](#) complements the SF-424A “[Budget Information for Non-Construction Programs](#)” budget categories. The calculations in the optional spreadsheet can be used to accurately calculate the budget numbers that applicants include in their SF-424A and total amounts in the SF-424.

New questions posted February 6, 2024

Q25: Does EPA have a tool or technical resource available for evaluating and quantifying the avoidance of imminent emissions resulting from the conversion and loss of coastal habitats due to sea level rise?

A25: EPA’s National Greenhouse Gas Inventory includes information on emissions from coastal wetlands. Please see [Chapter 6](#) of the US National GHG Inventory (pages 6-96 through 6-119) for a discussion of emissions related to wetlands. Additional information on calculating emissions from wetlands and wetland conversion is available in Section 4: Coastal Wetlands of the [IPCC 2013 Wetlands Supplement](#).

Q26: If limited or incomplete data is used in the PCAP, could that potentially weaken an implementation grant application? If an applicant makes a good faith effort to calculate emissions, reductions, and benefits to the best of their ability – but those calculations are limited/incomplete due to the data – will their implementation grant application score be reduced?

A26: The PCAP is required to include estimates of expected GHG emissions reductions in order to assist CPRG planning grantees and other jurisdictions in assessing and prioritizing actions to include in applications for CPRG implementation grants or to implement through other mechanisms. Scoring of an implementation grant application will be based solely on the information provided in the application itself. The quality of calculations in the PCAP are not per se part of the scoring evaluation for the implementation grant application. Limited or incomplete data or documentation of the calculations in the implementation grant application, however, may impact the scoring of Criteria 2: Impact of GHG Reduction Measures, as it is up to the applicant to demonstrate the quality, thoroughness, reasonableness, and comprehensiveness of the methodology, assumptions, and calculations included in their application.

Q27: The CPRG Implementation Grant NOFO outlines that emission reductions must be scaled based on the percentage of measure cost covered by CPRG. Does this apply to incentive programs or rebates that, by definition, do not cover all of the eventual project costs, or just for specific projects or programs that also receive an already known percentage of other federal funds?

A27: Applications should scale the estimated GHG emission reductions attributed to the CPRG funding by the ratio of CPRG funding to total funding to implement the GHG reduction measure. In this example, the GHG reduction measure is an incentive program or rebate program. The total measure funding should include the total funding used to administer the GHG reduction measure (in this case, the incentive or rebate program), including federal and state funding. The reductions do not need to be scaled to reflect costs outside of the program (e.g. the full cost of the equipment purchased by a consumer that is receiving the rebate).

For example, if an applicant is applying a CPRG grant to establish a new program that provides rebates for heat pumps and does not supplement that program with any state or federal funds, the applicant

could claim 100% of the GHG emissions reductions resulting from the program (i.e., the GHG reductions from the total number of heat pumps installed that receive rebates under the program) – even though the rebate does not cover the entire cost of purchasing and installing a heat pump.

Conversely, if an applicant is applying to expand an existing program that provides rebates for heat pumps and the requested CPRG funds would double the budget of that existing program, the magnitude of GHG reductions attributable to the CPRG should be half of total GHG reductions from the total expanded program. In practice, the applicant could take two different approaches for addressing this example GHG reduction measure scenario: 1) Multiply total estimated rebate program emission reductions by 0.5 (based on the 50/50 ratio of funding sources); or 2) provide an emission reduction estimate based solely on the portion of the expanded program that would be funded by a CPRG grant (e.g., based on the incremental number of rebates that would be provided under the existing program through the use of CPRG grant funds).

Q28: Will EPA accept approvals and dates for “pre-award authority” from other agencies (such as FTA for the procurement of vehicles)? What would we need to do to get approval from EPA on pre-award expenses that are greater than 90 days prior to the award?

A28: As outlined on page 18 of the NOFO, “EPA award recipients may incur allowable costs 90 calendar days before EPA makes the award. Pre-award expenses more than 90 calendar days prior to the date of award require prior approval by EPA.” As the CPRG grants are offered via an EPA grant program and not an FTA grant program, the applicant would need approval from EPA as outlined in EPA’s grant regulations (as described in 2 CFR 1500.9) to incur expenses more than 90 calendar days prior to the date of award. Any pre-award expenses incurred are at the grantee’s risk before the grant is awarded.

Q29: Would the projects that receive a grant award under CPRG be required to undergo environmental review via the National Environmental Policy Act (NEPA)? If so, what federal authorities does EPA have, if any, to help navigate or avoid NEPA and the time constraints associated with it?

A29: Projects funded under this competition are not subject to NEPA because NEPA does not apply to projects funded under the Clean Air Act. An applicant should contact their appropriate state or local agency if they have questions regarding whether a proposed project is subject to state or local environmental reviews.

Q30: Can you please tell me how measurement and verification will occur for CPRG competitively funded projects? How will the projects and measurements be verified?

A30: Once selected for award, grant recipients must meet the reporting requirements outlined in Section VI.B of the NOFO. Grant recipients are required to submit semi-annual progress reports summarizing technical progress, accomplishments, and milestones achieved, planned activities for the next six months, and a summary of expenditures to date. Each recipient is also expected to provide a detailed final report within 120 calendar days of the completion of the period of performance, outlining the GHG reduction measures implemented, outputs and outcomes achieved, and costs of the measures, total GHG emissions and other pollutants reduced, a summary of community engagement, and to discuss the problems, successes, and lessons learned.

Q31: What are EPA's expectations for recipient reporting, property management oversight, or other ongoing obligations beyond the end date of the performance period?

A31: The estimated project start date for awards is December 1, 2024, and the estimated period of performance for awards resulting from this solicitation will be up to five years. Implementation grant applicants will be assessed on the durability of the emissions reductions of their projects by 2030 and 2050. Selections will be made with the expectation that the anticipated outputs and outcomes specified in each application will be achieved.

Q32: Section II.F. of the NOFO states "The estimated period of performance for awards resulting from this solicitation will be up to five years." Does this mean that all of the funds must be spent by the end of this period of time or if all of the funds only have to be obligated by then? Does the project need to be completed at the end of the 5 years? What is the definition of "expended"? Could the grant go to an endowment?

A32: All project activities are to be completed during the period of performance and all funds must be spent by the end of the period of performance. See *Period of Performance* definition under [2 CFR 200.1](#). Grantees have up to 120 days after the period of performance to draw down their funds for activities that were conducted during the period of performance. Grantees may request no cost extensions to their award to extend the period of performance (see [2 CFR 200.308\(e\)\(2\)](#)) if the grantee needs more time due to unforeseen circumstances.

Grantees cannot put the money in an endowment. Applicants should review the definition of "Expenditures" under [2 CFR 200.1](#) and the "Financial" section of [EPA's General Terms and Conditions](#), which applies to all EPA grants. Grantees can only draw down funds for the minimum amount needed for actual and immediate obligations, and can only drawdown within 5 business days of an obligation. The money remains in EPA's accounts until the grantee draws down funds.

Q33: For Waste and Sustainable Materials Management projects, can we use EPA's WARM model to calculate the GHG reductions?

A33: The Waste Reduction Model (WARM) is a tool developed and managed by EPA's Office of Land and Emergency Management. Yes, applicants may use the WARM tool or other tools to estimate GHG reductions.

*Q34: How will grantees receive funding for awarded implementation grants? Can funds be requested from EPA in advance of expenses incurred to facilitate effective cashflow to support the project or will grantees be required to incur costs prior to seeking reimbursement from EPA? For contractual items listed in the budget, are they reimbursable or will funding be provided upfront? **UPDATED February 27, 2024***

A34: Successful applicants will be awarded funding as a grant. Awards will be fully funded at the start of the grant period. EPA award recipients may incur allowable costs 90 calendar days before EPA makes the award. Pre-award expenses incurred more than 90 calendar days prior to the date of award require prior approval by EPA. All costs incurred before EPA makes the award are at the applicant's risk.

Grant recipients must only draw funds for the minimum amounts needed for actual and immediate cash requirements to pay employees, contractors, subrecipients, or to satisfy other obligations for allowable costs. The timing and amounts of the drawdowns must be as close as administratively feasible to actual disbursement of funds. For more information please see: <https://www.epa.gov/financial/grants>.

Q35: If a coalition application falls through for any reason, what will be the process of reallocating funds?

A35: If an applicant, including the lead applicant for a failed coalition, withdraws prior to award, the EPA selection official will determine the next application to fund consistent with the process and factors explained in Section V.B and C of the NOFO. If a coalition member withdraws from the project after award, as with any EPA grant with a grant recipient subawarding to subrecipients, the grant recipient (in this case, the lead applicant for the coalition) is accountable to EPA and accepts responsibility for carrying out the full scope of work and proper financial management of the grant. In the event that a coalition member withdraws, the grant recipient continues to be subject to EPA's terms and conditions for the grant, the subaward policy, and EPA grants policy. In circumstances where EPA deems that the withdrawal of a coalition member fundamentally alters the project or jeopardizes the project's success, the EPA will consider appropriate remedies and reserves the right to terminate an awarded grant (see [2 CFR 200.339 through 343](#)). EPA will determine at the time whether and how the remaining funds will be reallocated.

Q36: Will EPA accept a range of a low estimate and high estimate for the GHG reduction analysis in the application (i.e., a range of low-high emissions reductions for 2025-2030 and another range for 2025-2050 for each measure)?

A36: Applicants should present a singular estimate of the magnitude of GHG reductions achieved between 2025-2030 and the magnitude of GHG reductions achieved between 2025-2050. If an applicant submits a range of low to high emission reductions, EPA will calculate the mid-point of the range for use during review of the application. As there may be uncertainties associated with the estimated GHG emission estimates, the NOFO asks applicants to describe such uncertainties in their Technical Appendix. In doing so, applicants may present both a range and a singular estimate of the magnitude of GHG reductions for additional context. If the singular estimate is not the mid-point of the range, applicants should thoroughly discuss any uncertainties and factors that support the selection of a singular estimate below or above the mid-point of the range.

Q37: If multiple Tribes decided to go in on an application together, how would the quantification of GHG reductions need to be done for the application? Would each Tribe do their own calculation (which may include modeling) and just combine the results? If that's the case, does each Tribe have to use the same approach, tool or modeling program for that? OR, would the lead applicant do quantification for the entire coalition?

A37: Coalition members are not prohibited from doing their own approach to calculating GHG reductions or from using different approaches to estimate the magnitude of GHG reductions. The coalition application should include the magnitude of GHG emissions reductions for implementing the measure across the entire coalition. EPA will not provide a preferred approach for calculating the magnitude of GHG emission reductions. The coalition application will be evaluated on the quality, thoroughness, reasonableness, and comprehensiveness of the methodologies used in developing the GHG reductions.

New questions posted February 27, 2024

Q38: What models and tools would EPA accept? For instance, is it acceptable to use the Energy Policy Simulator (<https://rmi.org/energy-policy-simulator/>) to model implementation measures for the Implementation Grant application?

A38: Yes, applicants may use a tool such as the Energy Policy Simulator to model the GHG reduction measures. EPA does not have specific preferred tools. Applicants will need to demonstrate the reasonableness of their methodology for calculating GHG reductions as part of their applications (see evaluation criteria 2.d. on page 33 of the NOFO).

Q39: In Evaluation Criterion 1a you state "The application should also include an explanation...of why each measure was selected as a priority." Do you mean why the applicant has selected the measure or why the planning grant lead organization (e.g., a state) has made the measure a priority?

A39: The EPA will be evaluating why the applicant has selected each measure as a priority, not why it was selected as a priority measure for inclusion in the Priority Climate Action Plan (PCAP) by the planning grantee.

Q40: Can you please provide further clarification on the criteria or indicators that grant recipients should use to assess their existing statutory or regulatory authority?

A40: Applicants must currently possess, or provide a clear plan and timeline to obtain, the authority necessary to implement each proposed GHG reduction measure. Considerations may include whether any existing statute or regulation prohibits or restricts implementation of the measure; whether any legislative, council, or executive action is required to allow implementation; or whether any permits or other permissions are required.

Q41: Are applicants obliged to account for prospective program income in the budget? What if program income is earned only after the period of performance?

A41: Yes, applicants should account for program income in their application. Please see page 10 of [EPA's "Interim General Budget Development Guidance for Applicants and Recipients of EPA Financial Assistance,"](#) also linked in Section IV.B.2 of the NOFO. There are no federal requirements on the use of program income earned after an award period ends unless an EPA regulation or the terms of the agreement provide otherwise.

Q42: In the case where the period of performance is 3 years, over how many subsequent years is reporting required?

A42: The grant recipient would not have subsequent reporting requirements after submitting the final report which is due to the EPA within 120 calendar days of the end of the project's period of performance (which, in the example provided, is 3 years). Reporting requirements for each grant awarded are semi-annual progress reports, including a more detailed one-year report (i.e., second semi-annual report), and a detailed final report (see Section VI.B. of the NOFO). More information about these requirements can be found in Section VI.B of the NOFO.

Q43: Regarding the optional GHG emission reduction calculations spreadsheet, I plan to use a couple different models that are in Excel format, like C40 Cities Pathways, but also asking for results from MOVES modeling from our regional planning agency. How would you like us to include the different models and will you want a spreadsheet with the summary of those calculations?

A43: In addition to the required Technical Appendix, which explains the assumptions and methodologies used in developing the estimated GHG emissions reductions for each GHG reduction measure, applicants may include, as additional documentation, a GHG Emission Reduction Calculations Spreadsheet (see Appendix C of the NOFO). This optional component has no page limit. If an applicant chooses, they may include model assumptions and output as part of this calculations spreadsheet. If multiple models are used, for example, applicants could use individual tabs of a spreadsheet for providing documentation of inputs and/or outputs for each different model. EPA is not specifying the format for providing information in the optional GHG Emission Reduction Calculations Spreadsheet.

Q44: Are there any exemptions to the Davis-Bacon and Related Acts? For instance, for Department of Housing and Urban Development grants, Davis Bacon only applies to buildings above a certain size. Does EPA plan to issue explicit guidance on any exemptions?

A44: The Davis-Bacon and Related Acts (DBRA) applies to CPRG grants and subawards involving construction contracts and subcontracts in excess of \$2,000 as required by 42 U.S.C. 7614. Other agencies, such as HUD and the IRS, have statutorily authorized exemptions. EPA does not. EPA may issue additional guidance on DBRA in the future.

Q45: Would the installation of energy efficient HVAC equipment (e.g., heat pumps) and/or building insulation or other weatherization products in a private dwelling constitute a "construction" project under section 314 of the Clean Air Act if the project receives financial assistance drawn from CPRG funds?

A45: Construction is defined as the "erection, alteration, or repair of buildings, structures or other improvements to real property." If the energy efficiency projects are funded by a contract, subcontract, or subgrant from a CPRG grantee, Davis-Bacon and Related Acts (DBRA) requirements apply. If the energy efficiency projects are incentivized via a participant support cost program (e.g., through rebates or subsidies), DBRA would likely not apply.

Q46: Would the issuance of a cash incentive or rebate exceeding \$2,000 from a CPRG subrecipient to a third party to support the purchase of energy efficient equipment or products constitute a "contract" under 29 C.F.R. section 5.5? Would this determination differ if a cash incentive or rebate is issued for the installation, rather than the purchase, of building equipment or products?

A46: If the incentive/rebate is issued as part of a Participant Support Cost Program, DBRA would likely not apply. If the incentive/rebate is issued as a subaward for the purchase and/or installation of equipment or products, DBRA would likely apply.

Q47: Construction timelines may require a commissioning date as late as 2030. In the application, can we base the magnitude of the GHG reduction rate for the first 5 years after commissioning?

A47: No, EPA will score grant applications based on multiple evaluation criteria described in Section V.A of this NOFO, with an emphasis on the magnitude of near-term GHG reductions that will be achieved by the proposed measures. At a minimum, the application should list the reduction in cumulative metric tons of GHG emissions from 2025 through 2030 and from 2025 through 2050 (page 16 of the NOFO).

Q48: For projects that will be partially funded by CPRG Implementation Grant funds, and partially funded by other sources, does the ENTIRE project need to adhere to Davis-Bacon and BABA requirements, or does only the portion of the project funded by CPRG need to adhere to Davis-Bacon and BABA requirements?

A48: The Davis-Bacon and Related Acts (DBRA) applies to construction projects funded directly or assisted in whole or in part by federal funds. Therefore, DBRA would apply to the entire project even if CPRG is only provides a portion of the funds to the project. BABA requirements apply to public infrastructure projects. If the project is an infrastructure project that serves a public function and is funded through a mix of CPRG-funds and other non-federal funds, BABA would apply to the entire project.

Q49: We are using ClearPath for the inventory and need CH4 emissions estimates from landfilled and incinerated waste. This data is available on the EPA FLIGHT Tool in tons of CO2 equivalence but ClearPath requires this data in tons of methane. Is there a standardized conversion factor that the EPA accepts to convert tons of CO2 equivalence back into tons of methane?

A49: The data provided in FLIGHT includes information about which Global Warming Potential (GWP) was used to convert reported methane emissions to CO₂ equivalencies. The indicator "AR4" means GWPs from the IPCC 4th Assessment Report were used. The AR4 GWP for methane is 25, meaning the CO₂ equivalents should be divided by 25 to convert to tons of methane. "AR5" would indicate GWPs from the IPCC 5th Assessment Report (28 for methane).

Q50: How should items be categorized in the budget? For example, if a recipient intends to issue contracts for construction activities, should the cost of those contracts be budgeted under the "Contractual" budget category or the "Construction" category? Additionally, if a recipient intends to issue contracts and/or subawards for construction activities, which include the purchase and installation of equipment, should the costs of the equipment be broken out and included in the "Equipment" budget category, with the remaining contract costs budgeted under the "Contractual" category (for Contracts) and "Other" budget category (for Subawards)?

A50: Budget categorization depends on the specific activity. Pre-construction engineering and architectural services should be categorized as "Contractual." The costs of performing construction-related activities, such as excavation, paving, building, installation, etc., would be "Construction." Payment arrangements of the grantee also impact categorization. If the grantee is completing this work themselves, some of the activities would be categorized as "personnel." In addition to [\(PN\)-2022-G07](#), please review the [Budget Development Guidance](#) beginning on page 31. This is also addressed in Module 2 of the [EPA budget development training](#).

Regarding the second question, subawards should always be categorized under the "Other" budget category, with the subaward costs broken out in the budget narrative. As part of a contract, equipment should be categorized in the "Equipment" budget category. The "Contract" budget category generally only includes services. See the [Budget Development Guidance](#) for more details.

Q51: What are the requirements for the funds beyond the initial five-year term? Would a Revolving Loan Fund be allowed to sustain funds beyond 5 years?

A51: EPA will have to close out the CPRG grants at the end of the period of performance and enter into a close-out agreement with the recipients. During that process, EPA and the grant recipient would make

decisions regarding what Federal requirements (e.g., DBRA and BABA) will continue to apply to program income after the grant is closed out.

Please note, revolving loan fund capitalization grants can be complicated if the recipient does not have experience managing such a program.

Q52: In a coalition, do all coalition members need to submit EPA form 4700 as part of the grant application or just the lead applicant?

A52: In a coalition, only the lead applicant needs to submit EPA form 4700-4. This form is a pre-award compliance review report for applicants and recipients requesting EPA assistance. In a coalition, the lead applicant would be the recipient of the grant and must submit EPA form 4700-4.

*Q53: If rebates (or vouchers) are provided to applicants of an e-bike incentive program, do procurement requirements such as Build America, Buy America (BABA) apply to electric bicycles discounted through the rebate program funded under the CPRG implementation grant? Will the EPA issue a waiver for BABA for electric bicycles and accessories? **UPDATED March 14, 2024.***

A53: Build America, Buy America (BABA) requirements apply to iron and steel, manufactured products, and construction materials used in an infrastructure project. BABA requirements would likely not apply to the recipients of vouchers/rebates issued under a Participant Support Cost program. If the vouchers/rebates are issued as subawards, BABA would likely apply if the purchase of the e-bicycles is part of an infrastructure project, like a public e-bicycle share project that includes permanently affixed charging stations.

New questions posted March 14, 2024

Q54: Does each member of a coalition need to be a subrecipient and receive some portion of the grant funds? If so, does each coalition member need to receive the same amount of CPRG funding?

A54: A coalition is a special type of partnership, subject to subaward requirements, including the EPA Subaward Policy. For purposes of this grant program, a coalition is a group of two or more eligible applicants that share 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. As such, coalition members (other than the lead applicant) should be subrecipients. Coalition members may receive subawards of differing amounts commensurate with their roles and responsibilities as outlined in the application.

Please note that applications may include partners (including eligible applicants) that are not coalition members and that will not receive any subawarded funds but will be involved in the proposed measures in other ways.

Q55: For coalition applications, can different eligible applicants receive funding for different project elements that fit under one GHG measure umbrella? For example, can one member of a coalition receive funding for recycling infrastructure programs while another receives funding for recycling collection programs?

A55: The activities that each coalition member performs under a CPRG implementation grant may vary but all activities should be tied to a common GHG reduction measure. Coalition applications should

describe the role(s) and responsibilities of each coalition member in the project design and implementation.

Q56: If a subawardee is unable to complete their portion of the project, is there flexibility to move that funding in the same budget category to fulfill other project measure goals? How does EPA address changes in budget after grant agreements are executed?

A56: If a grant recipient needs to make any changes to the budget after the grant agreements are executed, the recipient must obtain prior written approval from EPA's Award Official. For grants awarded from a grant competition, any changes must be within scope of the original application submitted to the EPA in response to the competition and cannot have a significant impact on the project activities and outcomes.

If a subawardee that is a member of a coalition is unable to complete their portion of the project (e.g. a coalition member withdraws from the project after award), the grant recipient (in this case, the lead applicant for the coalition) is accountable to EPA and accepts responsibility for carrying out the full scope of work and proper financial management of the grant. The grant recipient continues to be subject to EPA's terms and conditions for the grant, the subaward policy, and EPA grants policy. In circumstances where EPA deems that the withdrawal of a coalition member fundamentally alters the projects or jeopardizes the project's success, the EPA will consider appropriate remedies and reserves the right to terminate an awarded grant (see 2 CFR 200.339 through 343). EPA will determine at the time whether and how the remaining funds will be reallocated.

Q57: Will construction or improvement projects on private residences be subject to Davis-Bacon and Related Acts prevailing wage requirements?

A57: If the projects are funded by a contract, subcontract, or subgrant from a CPRG grantee, Davis-Bacon and Related Acts (DBRA) requirements apply. If the projects are incentivized via a participant support cost program (e.g., through rebates or subsidies), DBRA would likely not apply.

Q58: EPA's AVERT online tool provides estimated reductions in many gases, including CO₂ and also NO_x. Should the NO_x be counted the same as N₂O, in GHG equivalencies as per the IPCC GHG equivalencies?

A58: No, NO_x refers to nitrogen oxides, which are not GHGs, although they may have indirect impacts on warming through interactions with other gases in the atmosphere. NO_x should not be confused with nitrous oxide (N₂O), which is a GHG. Therefore, NO_x should not be included in any GHG reduction assessment. NO_x should only be considered in any assessment of co-benefits in reducing criteria air pollutants.

Q59: Is there an online tool to project the expected greening of the electrical grid over the 2025-2050 time period, as grid electricity uses more and more renewables over time?

A59: There are many tools that project the electric sector generation mix and associated emissions. One such tool is EPA's AVERT tool which allows users to evaluate emissions impacts associated with changing electricity demand and renewable energy supply in the short-term (e.g., for assessing impacts over a 0-5 year timeframe). For more information, see <https://www.epa.gov/avert>.

The National Renewable Energy Laboratory (NREL) provides modeled long-run marginal CO₂ emission rates through 2050 by grid region, which can be mapped to states. These are accessible through a web-based interface and available for download as an Excel spreadsheet (2023 Cambium Dataset). For more

information, see <https://www.nrel.gov/analysis/cambium.html> (overview) and <https://data.nrel.gov/submissions/206> (downloadable spreadsheets).

Q60: Do tax benefits such as credits or deductions (e.g., for residential solar installation) trigger Davis-Bacon and Related Acts requirements?

A60: If the projects are incentivized via a Participant Support Cost program (e.g., through tax benefits such as credits or deductions), the Davis-Bacon and Related Acts would likely not apply.

Q61: Who at EPA should I send a request for EPA approval of pre-award authority?

A61: EPA will not consider approving pre-award costs until after selection of CPRG implementation assistance agreements. The selected applicant can submit the request to the EPA project officer. See [2 CFR 1500.9](#) for more information.

Q62: Will EPA continue to have interest in purchased equipment after the end of the grant's performance period?

A62: No, there are no ongoing requirements for the grant recipient after the end of the grant period.

Q63: Is a grantee subject to repayment of funding to EPA if a project fails to attain the estimated emission reductions?

A63: The grant recipient is responsible for ensuring that CPRG funds are used in accordance with Federal statutes, regulations, and the terms and conditions of the grant. EPA reserves the right to terminate an awarded grant (see 2 CFR 200.339 through 343) if the grant recipient fails to comply with the terms and conditions of the award.

Q64: Is Vehicles Miles Traveled (VMT) an acceptable metric for measuring GHG reductions?

A64: Metrics relating to reductions in vehicle miles traveled (VMT) should be converted into metric tons of carbon dioxide equivalent reduced. Applicants may include VMT reductions as an outcome, in addition to including reductions in greenhouse gases as an outcome.

Q65: The title of Form 424A indicates it is for "non-construction" projects. If we are applying for funding for a construction project, do we fill out a different project budget form? Where in 424A should we include "Construction"? We are aware that Form SF424C, "Budget Information for Construction Programs," exists, but it is not mentioned in the NOFO.

A65: An applicant should use form 424A "Budget Information for Non-Construction Programs" when applying for the CPRG program, even if they are proposing GHG reduction measures that involve construction. Activities that meet the definition of "construction" should be included in the "Construction" budget category on the SF-424A. "Construction" includes the "erection, alteration, or repair (including dredging, excavating, and painting) of buildings, structures, or other improvements to real property." They should not use Form 424C. Applicants are encouraged to review [EPA's Interim General Budget Development Guidance](#) beginning on page 30 regarding construction activities. It should be noted that certain activities, such as architectural and engineering services, should be categorized as "contractual" rather than as "construction."

Q66: Regarding Form 424A, "BUDGET INFORMATION - Non-Construction Programs," it is unclear where we include federal and non-federal funds already committed to the project. Does the total project cost in Form 424A include both committed and requested funding? On what part of the form do we include funds already committed to the project, so it is clear to EPA the difference between committed funds and requested funds?

A66: Total project cost should only include the total funds requested from CPRG implementation grants program. Please review EPA's RAIN-2019-G02 "Interim General Budget Development Guidance for Applicants and Recipients of EPA Financial Assistance."

Q67: Specific to CPRG implementation grant funding, are there any restrictions on using CPRG funds to implement carbon removal measures on land purchased with other federal funding? Would this project scenario be viewed as a Duplication of Benefits?

A67: Duplication of Benefits (DOB) refers to assistance from more than one source that is used for the same activity. CPRG projects could take place on property owned by the recipient that was purchased with other federal funding provided that the purpose of that purchase is not the same as the proposed CPRG project.

Q68: Will projects related to multi-use trails be subject to FHWA, DOT, and Federal Uniform Act requirements and processes? If so, will grantees be subject to following those processes in the same order as required by DOT?

A68: If the projects on multi-use trails involve the purchase of real property, yes. The Uniform Relocation Assistance and Real Property Acquisition Act (URA) (42 U.S.C. 4601 et seq.) and its regulations (49 CFR Part 24), administered by the FHWA, apply to any federally funded projects that involve the acquisition of real property or the displacement of persons from their homes, businesses, or farms.

Q69: Please expand on existing Question 34, which indicates that "Grant recipients must only draw funds for the minimum amounts needed for actual and immediate cash requirements to pay employees, contractors, subrecipients, or to satisfy other obligations for allowable costs. The timing and amounts of the drawdowns must be as close as administratively feasible to actual disbursement of funds." Would a lump sum disbursement comply with this requirement? Do the same restrictions apply to coalitions (can a lead applicant provide lump sum payments or fixed amount subawards to coalition members)?

A69: Grant recipients and subrecipients, including subrecipients that are members of a coalition, will receive funds on a reimbursable basis, consistent with [EPA Subaward Policy](#) (see pages 1 and 4). Grant recipients and subrecipients can only draw down funds for the minimum amount needed for actual and immediate obligations. Lump sum payments or fixed amount subawards are not allowed under the CPRG program. Grant recipients (pass-through entities) should draw down funds from EPA to pay subrecipients when the pass-through entity receives an invoice, payment request, or similar documentation that the subrecipient has incurred costs in carrying out the subaward (see pages 3-5 of [EPA's General Terms and Conditions](#)).

New questions posted April 4, 2024

Q70: Is a power purchase agreement (PPA) that establishes a sale price for each Megawatt-hour of energy generated by a new renewable energy power plant considered a "construction contract" for purposes of determining Davis-Bacon Act and Build America Buy America requirements?

A70: No, if there is not a construction project involved and no equipment is being purchased and/or being placed on the customer's properties, the Davis-Bacon Act and the Build America Buy America Act would not apply in this scenario.

Q71: I am not able to download the Lobbying Form or fill it out as a webform. What do I do?

A71: For issues with forms on grants.gov, please contact Grants.gov for assistance at 1-800-518-4726 or support@grants.gov to resolve technical issues.

Q72: The NOFO lists "documentation of GHG reduction assumptions" as part of the workplan in Section 2d. Should this contain the same information as the Technical appendix, or are they the same document?

A72: In meeting the expectations for Section 2d of the workplan, applicants should include the documentation of assumptions in a technical appendix of up to 10 additional pages – as part of "Project Narrative Attachment Form." See Appendix C of the NOFO for more information. Applicants do not need to duplicate this information within the 15-page project narrative.

Q73: My agency is contemplating including a project as part of an application made by an MPO as lead applicant. This would ultimately make us a subrecipient to the MPO should the application be successful. Is there an option whereby if the MPO application is successful, we could ultimately manage the award directly with EPA without going through the MPO?

A73: In the above scenario, the lead applicant (the MPO) would be the grant recipient, and the MPO could make your agency a subrecipient. Grant recipients can make subawards to other organizations to carry out a portion of the Federal award under terms that establish a financial assistance relationship to accomplish a public purpose that is authorized under a Federal program. Subrecipients only receive reimbursement for their actual direct or approved indirect costs such that they do not "profit" from the transaction and subrecipients are subject to the same Federal requirements as the pass-through entity. The MPO, as grant recipient and "pass-through entity," will need to provide adequate resources to manage the award, including providing required financial and programmatic reports to EPA, and for monitoring subrecipients as required by 2 CFR 200.332. The lead applicant/grant recipient would remain responsible for ensuring that the funds are used by the subrecipient in accordance with Federal statutes, regulations, and the terms and conditions of the grant.

There is no option to separate a portion of the funding from a larger grant award and award it directly to a second grant recipient. In order to directly manage an assistance agreement for a project, the agency would need to submit an independent application as the lead applicant.

Q74: What kinds of considerations have been given to supply chain issues that may arise in the procurement of equipment, supplies, and/or services that are vital to the implementation of grantees' GHG reduction measures? For instance, if a measure is impacted by unpredictable supply chain issues that are out of the grantee's control, what allowances will be made when evaluating the progress and ultimate success of that grantee's project?

A74: Applicants should discuss in Section 1.a of the workplan assumptions and risks associated with the features, tasks, and milestones associated with implementing the GHG reduction measures. The

application should discuss risks that could reasonably lead to delays or interruptions in the development or implementation of the GHG reduction measure or could impact its effectiveness, and the extent to which GHG emission reductions may be affected by these risks. Applicants should also include a detailed project timeline in Section 3.c of the of workplan.

CPRG implementation grantees will be subject to the terms and conditions for the grant, including domestic content sourcing requirements under the Build America, Buy America (BABA) provisions of the Infrastructure Investment and Jobs Act (IIJA) (P.L. 117-58, §§70911-70917) for public infrastructure projects. In some cases, a no-cost extension may be possible to allow time for the project to be completed. In circumstances where delays, including those associated with supply chain issues, jeopardize the project's success, the EPA will consider appropriate remedies and reserves the right to terminate an awarded grant (see 2 CFR 200.339 through 343).

Q75: Please clarify what level of detail is needed for an activity-level "Reference Case Scenario" documentation in the Technical Appendix.

A75: An applicant should provide sufficient information within the application such that it will allow reviewers to evaluate the quality, thoroughness, reasonableness, and comprehensiveness of their measure. Appendix C of the NOFO provides more detail on the information that applicants should include in their application.

Q76: Can you layer measures to achieve emission reductions and community benefits? For example, could the emission reductions associated with a medium- and heavy-duty electric charging station also include reductions if the project requires a vegetative barrier or complementary urban green space?

A76: Yes, GHG reduction measures can be multi-sectoral and may include GHG emission reduction estimates from multiple sectors, different GHGs, and/or occurring from multiple aspects of a given measure.

Applications will be evaluated as a whole, and GHG reduction measures will not be scored individually. Therefore, applicants should include only apply to fund those measures that are eligible and that meet the requirements described in the NOFO. For applications that include multiple GHG reduction measures, applicants should provide assumptions, calculations, and documentation for each GHG reduction measure.

Q77: In our community engagement process, organizations are interested in creating a community benefit agreement structure with an implementation or an advisory committee role for projects that are being built across the region reducing climate pollution from the freight sector. Could the budget reflect adequate quarterly compensation for members of CBO's to help implement projects under CPRG?

A77: Yes, the budget may include funds for meaningful community engagement, including subawards to community organizations supporting community engagement aspects of the project and participant support costs for meaningful engagement. Applicants should make clear how community engagement relates to implementation of the GHG reduction measures included in the application.

Q78: We are developing estimated budgets based on currently available information. Is it permissible to adjust budgets based on new information at a later date, either before the award agreement is in place or after, if the overall level of administrative funding remains the same?

A78: If a grant recipient needs to make any changes to the budget after the grant agreements are executed, the recipient must obtain prior written approval from EPA's Award Official. For grants awarded from a grant competition, any changes must be within the scope of the original application submitted to the EPA in response to the competition and cannot have a significant impact on the project activities and outcomes.

Q79: How should I include staff who will work on the project in the personnel section of the budget? Should I include their entire salary and then reference the percentage of that salary that would go towards CPRG work? Staff are typically paid by the city and therefore we are not requesting CPRG funding to help pay their full-time salary.

A79: Applicants must submit a budget narrative, including a detailed description of the budget found in the SF-424A, a discussion of the applicant's approach to ensuring proper management of grant funds, and itemized budget table(s). For personnel, the budget detail must identify the personnel category type by Full Time Equivalent (FTE), including percentage of FTE for full-time employees who will spend only a portion of their time supporting CPRG grant work, number of personnel proposed for each category, and the estimated funding amounts. The Notice of Funding Opportunity and the optional budget table Excel spreadsheet provide examples of how to document partial FTE. If personnel will be funded via other means, that should be explained in the budget narrative and a \$0 cost for that line item may be entered in the itemized budget table.

Q80: If an application specifies the location of a GHG reduction activity (e.g., a specific facility, building, or geographic area), is there any flexibility to modify the location of the activity after a grant is awarded if there is no change in the expected outputs or outcomes?

A80: Modifications to an approved workplan will be considered on a case-by-case basis and the recipient must obtain prior written approval from EPA. For grants awarded from a grant competition, any changes must be within scope of the original application submitted to the EPA in response to the competition and cannot have a significant impact on the project activities and outcomes. Any proposed change must not affect the basis upon which the application was evaluated and selected for award, thereby maintaining the integrity of the competition and selection process. In circumstances where EPA deems that the proposed changes would fundamentally alter the project or jeopardize the project's success, the EPA will consider appropriate remedies and reserves the right to terminate an awarded grant (see 2 CFR 200.339 through 343).

Q81: Does the EPA Small Project General Applicability Waiver of Section 70914(a) of P.L. 117-58, Build America, Buy America Act (BABA) which waives BABA requirements for small projects under \$250,000 apply to a situation in which individual subrecipients will receive less than \$250,000 each but the total amount of all EPA-funded subawards under the project will exceed \$250,000?

A81: Yes, the waiver would apply to each individual subaward that was less than \$250,000. The [Small Project General Applicability Waiver](#) was issued in September 2022 and will be reviewed every five years. Questions about the waiver may be directed to EPA_BABA_Waiver@epa.gov.

Q82: Is this grant subject to Intergovernmental Review under Executive Order 12372?

A82: [Executive Order \(EO\) 12372](#), “Intergovernmental Review of Federal Programs,” issued July 14, 1982 (amended April 8, 1983) is intended to foster an intergovernmental partnership by relying on State processes and on State, areawide, regional and local coordination for review of proposed Federal financial assistance. The Intergovernmental Review requirement does apply to the Climate Pollution Reduction Grants program in specific scenarios (see below). Applicants in US Territories should coordinate directly with affected jurisdictions. Note, financial assistance to Tribes is exempt from Intergovernmental Review as provided in Executive Order 12372.

For the Climate Pollution Reduction Grants, the proposed financial assistance is subject to Intergovernmental Review if it involves land use planning or construction it. As provided at 40 CFR 29.8(a) and (c), applicants for funding for EPA programs and activities subject to Intergovernmental Review must provide directly affected State, areawide, regional, and local entities 60 days to review their applications.

The term “land use planning” refers to EPA funded studies that make recommendations for changes to zoning, policies for siting of infrastructure or industrial facilities, and similar regulations on the use of land in discrete geographic areas. EPA’s intent is to ensure that grantees have coordinated with directly affected State, areawide, regional, and local entities with jurisdiction over such areas.

The term “construction” refers to activities that fall under the definition of Construction in 40 CFR 33.103.

Note: There may be requirements for submission of Federal grant applications to territory agencies based on territory laws that are independent of 40 CFR Part 29. EPA encourages applicants to comply with these requirements but does not enforce those requirements. For more information, see [EPA Financial Assistance Agreements Subject to E.O. 12372](#).

New questions posted April 16, 2024

Q83: Regarding the evaluation criterion 1.b Demonstration of Funding Need, given the challenges inherent in applying for multiple grants and the uncertainty of securing grants, should an applicant:

- a) Not propose a measure because a government grant is available, or an application was submitted that may or may not be funded?*
- b) Include all eligible measures regardless of the availability of other federal funding it could but has not yet sought?*

A83: It is up to the applicant to determine the set of measures to include in their applications. 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 that the applicant has applied for, and indicate whether or not they secured funding, or expect to secure funding from those sources to implement the GHG reduction measures. 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. Where applicants identified other funding sources but did not pursue those sources, the applicant may explain their reasoning. The implementation grants NOFO does not require that applicants must have applied to another grant program and been rejected in order to apply to CPRG.

Q84: Can you provide additional guidance on program income related to a project that involves selling generated solar power to a local utility? What type of financial tracking is required for revenue generating projects? What can program income be used for during and after the project? Is program income ever required to be paid to EPA? How long does program income need to be tracked?

A84: Recipients are allowed to collect and generate revenue from activities funded under CPRG. Typically, such revenue would be treated as program income (PI) and be subject to specific requirements in 2 CFR 200.307 and 2 CFR 1500.8. Applicants should account for expected PI in their application. The budget narrative should include a description of how PI will be generated and expended. Recipients must properly recognize, account for, and expend PI to maximize funding available for environmental protection. Under 2 CFR 200.305(b)(5) and 2 CFR 200.343(d) recipients must disburse PI before requesting payment from EPA and refund PI accrued at the end of the agreement unless an EPA regulation (e.g., 2 CFR 1500.8 for revolving loan fund assistance agreements) provides otherwise. There are no federal requirements on the use of program income earned after an award period ends unless an EPA regulation or the terms of the agreement provide otherwise.

Please see page 10 of EPA's "[Interim General Budget Development Guidance for Applicants and Recipients of EPA Financial Assistance](#)," also linked in Section IV.B.2 of the NOFO for additional guidance.

New questions posted April 22, 2024

NEW Q85: *When filling out the SF424A for the EPA CPRG Implementation Tribal competition, do you put in the total budget amount requested in column 1e or do you put the amount requested for year 1 funds only?*

A85: Please see the [Instructions for the SF424A Form](#) for guidance on completing the form:

Lines 1-4, Columns (c) through (g)

For new applications, leave Column (c) and (d) blank. For each line entry in Columns (a) and (b), enter in Columns (e), (f), and (g) the appropriate amounts of funds needed to support the project for the first funding period (usually a year).

NEW Q86: *I work for a federally recognized tribe that wants to apply as a pass-through entity for our non-profit partner. Should I apply as an individual applicant or as a lead applicant for a coalition?*

A86: 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 non-profit entity is not an eligible applicant, therefore this would not be considered a coalition.

In the above scenario, the grant recipient (the lead applicant) may subaward a portion of the grant to the partner (e.g., a non-profit 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.