



CPRG Implementation Grant Competitions: Frequently Asked Questions February 15, 2024 | 3:00 PM Eastern

Welcome



- This webinar will be recorded, and a recording will be posted on EPA's <u>website</u>.
- The Question and Answer (Q&A) is closed for this meeting, but if you have additional questions, please send them to <u>CPRG@epa.gov</u>.
- This is the third CPRG Implementation Grant webinar of 2024. The previous two on getting ready to apply for the general competition and the tribes and territories competition can be found on EPA's <u>website</u>.

Q&A Topics



EPA continues to monitor inquiries relating to the CPRG grant program via <u>CPRG@epa.gov</u>.

EPA will not provide direct responses relating to the implementation grant competitions.

To ensure equal access to information for all potential applicants, applicable questions related to the implementation grant competitions will be answered in documents posted on the CPRG website:

- General competition Q&A document
- Tribes and territories only Q&A document

Q&A documents are updated regularly, so please be sure to check back frequently to see if your question or a similar one has been responded to. The deadline to submit questions is *March 15th* for the General Competition and *April 15th* for the Tribes and Territories competition.

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

Frequently Asked Questions and Answers

Relationship to Planning Grants



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

- The CPRG implementation grants are designed to fund measures contained in climate action plans developed under CPRG planning grants.
- Lead organizations for CPRG planning grants must submit Priority Climate Action Plans (PCAPs) by March 1, 2024 (for general competition) and April 1, 2024 (for Tribes and territories competition) so that lead organizations and other eligible applicants can submit applications to fund measures contained in PCAPs.

If I didn't receive a planning grant, am I still eligible to apply?

- Eligible entities that did not directly receive a planning grant but that seek funding to implement one or more GHG reduction measures included in an applicable PCAP 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.
- Eligible entities that did not receive a planning grant should coordinate with the lead organization developing the applicable state, MSA, Tribal, or territorial PCAP to ensure that priority measures are included in the plan that can be implemented by the entity.

Questions I.4 and II.2 for general competition Q&A document, and I.4 and II.1 in Tribes and territory competition Q&A document

Relationship to Planning Grants



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

- 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.
- Eligible entities that did not directly receive a planning grant but that seek funding to implement one or more GHG reduction measures included in an applicable PCAP are eligible to apply for an implementation grant.

Questions II.6 for general competition Q&A document, and II.5 in Tribes and territory competition Q&A document

Eligible Municipal Entities



What municipal applicants are eligible?

- Eligible municipal applicants: lead organizations for metropolitan statistical areas (MSA) CPRG planning grants; other municipal agencies, departments, or other municipal government offices; and, councils of government, metropolitan planning commissions, or other regional organizations comprised of multiple municipalities.
- A "municipality" defined under CAA section 302(f) is a city, town, borough, county, parish, district, or other public body created by or pursuant to State law.
- Other municipal entities such as regional transit authorities, public housing authorities, port authorities, water, sanitation, and waste districts, public school districts, and flood authorities may be eligible to apply if they meet the below criteria and can provide documentation proving so:
 - They constitute a public body created by or pursuant to State law, and
 - They are accountable to municipal or state units of government.

Question II.21 for general competition Q&A document

Eligible State Entities



What state applicants are eligible to apply for the general competition?

- Eligible state applicants: lead organizations for state CPRG planning grants and other state agencies, departments, and other executive branch-level offices.
- A state entity such as a public utility commission, state green bank, or state public university system may be an eligible applicant if they meet the below criteria and can provide documentation proving so:
 - They constitute a public body created by or pursuant to State law, and
 - They are accountable to state-level government.
- State agencies in Florida, Iowa, Kentucky, South Dakota, and Wyoming are not eligible to apply for CPRG implementation grants.

Questions II.22, II.7 for general competition Q&A document

For-Profit and Non-Profit Entities



Are for-profit or non-profit entities eligible to apply for CPRG implementation grants? If not, how can these types of entities participate in the CPRG program?

- For-profit entities are <u>not</u> eligible to apply for this funding opportunity and cannot serve as a coalition member.
- In general, non-profits/community-based organization are also *not* eligible to apply for this funding opportunity and cannot serve as a coalition member. (There are some exceptions to this prohibition for non-profits.)
- However, there are circumstances in which these types of entities may participate in a GHG reduction measure funded under an implementation grant. For-profit and non-profit entities may:
 - Receive rebates, subsidies, or similar one-time, lump-sum payments to these entities as participant support costs.
 - Contract work from eligible entities.
 - Receive subawards for a portion of the grant.
- Additionally, these entities can elect to participate in the community engagement aspects of the program.

Questions II.15 for general competition Q&A document, and II.14 in Tribes and territory competition Q&A document

Application Limits



How many applications can I submit?

- Each eligible applicant is limited to submitting two grant applications: one as an individual applicant and one as the lead applicant for a coalition.
- An individual agency or office within a state or local government is an eligible applicant.
- Applicants may participate in more than one coalition but may only serve as lead applicant for one coalition.

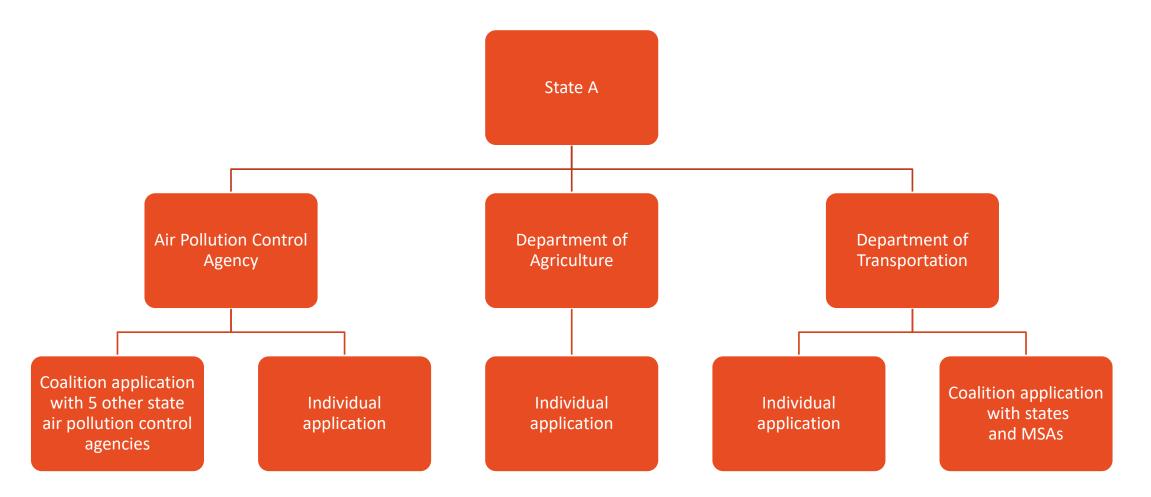
Are multiple agencies or office within a state or municipal government able to apply?

- Yes, multiple agencies, departments, or other executive branch-level offices from a state or municipality are each eligible to apply.
- Each agency or office can submit up to two applications one as an individual application and one as the lead for a coalition.
- 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.

Questions I.7, II.4 for general competition Q&A document, and I.7, II.3 in Tribes and territory competition Q&A document

Example: Applications from State Agencies





US ENVIRONMENTAL PROTECTION AGENCY

Award Limits



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"?

- Award limits are different from application limits.
- At the end of the merit review process, EPA anticipates making selections to ensure diverse geographic coverage of funding across the different funding tiers.
- EPA anticipates that:
 - Within a single state, no more than two state-level applications would be awarded a grant.
 - Within a single municipality, no more than two municipal applications would be awarded a grant.
 - Within a single Tribe, no more than two Tribal applications would be awarded a grant.
 - Within a single territory, no more than two territorial applications would be awarded a grant.
- These targets do not necessarily apply to coalition applications because of their (potentially) geographically diverse nature.
- EPA reserves the right to exceed the above targets in the event of an inadequate number of meritorious applications from entities in other jurisdictions.

Questions V.7 for general competition Q&A document, and V.6 in Tribes and territory competition Q&A document

"Same Measure in Same Location"



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"?

- EPA will not fund duplicative work (i.e., multiple grants cannot fund the same measure being implemented) in the same or overlapping geographic vicinity. If the lead organization for an MSA applied to implement a measure across all jurisdictions in the MSA and a municipality within that same MSA applied to implement the same measure within their municipality, EPA would evaluate both applications but would not fund both applicants, as there would be an overlapping geographic scope for the same measure.
- Examples of duplicative and non-duplicative work are provided via the general competition Q&A V.21.
- 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.

Questions V.4 for general competition Q&A document and Tribes and territory competition Q&A document

Coalition Requirements



What are the coalition requirements?

- A coalition consists of <u>2+ *eligible* applicants</u> 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.
 - E.g., multiple cities in an MSA; multiple MSAs; multiple states, a state and multiple cities; and/or a state and 1+ Tribes
- Each member must be eligible applicant and covered by a PCAP that contains the measure(s) for which the coalition seeks funding.
- Letters of intent due at time of application.
- In section 1a of the workplan and evaluation criteria, a coalition application should describe the role(s) and responsibilities of each coalition member in the project design and implementation; and affirmatively declare that lead applicant will submit:
 - For the general competition, an MOA signed by all coalition members by July 1, 2024 or provide an alternative date and justification.
 - For the Tribes and territories only competition, an MOA or other written instrument or documented arrangement by August 1, 2024 or provide an alternative date and justification.
- The lead applicant for a coalition must submit a MOA¹ signed by all coalition members prior to award.
- All coalition members should be listed as subrecipients, except the eligible applicant that will be the recipient of the grant (the lead applicant).
 - Partners that aren't eligible entities should not be listed a coalition members.

¹ For the Tribes and territories competition, MOA or other written instrument or documented arrangement

Questions II.5, II.10 for general competition Q&A document, and II.4, II.9 in Tribes and territory competition Q&A document

US ENVIRONMENTAL PROTECTION AGENCY

Coalition Examples



Scenario 1: Two local governments are looking to collaborate on a joint transit project. Each will play a substantive role in the project, and the project cannot happen without both of their participation. Is this a coalition?

• If the two local governments include a letter of intent to be a coalition as part of their application, yes.

Scenario 2: Same as above. In addition, the two local governments would like to work with a NGO that will develop an outreach campaign on the benefits of the transit project for the region. Is this a coalition?

• If the two local governments include a letter of intent, yes. The NGO is not an eligible applicant and should not be listed as a member of the coalition. The local governments may subaward to the NGO.

Scenario 3: A state plans to design a program which will subaward small amounts to multiple local governments. The number and identity of the involved local governments could change without substantively changing the overall project. Is this a coalition?

If the state does not include letters of intent from the local governments, no, this is not a coalition.
 Applications may still include partnerships and subgrant to eligible applicants without being a coalition.

Questions II.5 for general competition Q&A document, and II.4 in Tribes and territory competition Q&A document

Coalitions (Continued)



Does the same measure need to be included in each coalition member's PCAP or just in the lead applicant's PCAP?

• 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.

Can multiple non-contiguous eligible applicants apply together? For example, can all the CPRG Planning Grant MSAs in a given state apply as a coalition despite being spread out geographically?

• 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).

Questions I.25, II.26 for general competition Q&A document, and I.24, II.19 in Tribes and territory competition Q&A document

Coalitions (Continued)



What happens if a coalition member withdraws?

- 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).

Question II.28 for general competition Q&A document, and II.21 in Tribes and territory competition Q&A document

Eligible Measures



What types of projects are eligible for funding? How specific do the corresponding PCAP measures need to be?

- <u>EPA will not respond to individual questions about whether specific GHG reduction measures</u> are eligible and how they might score in the general competition.
- Applications must propose to implement GHG reduction measures **contained in a PCAP** developed under a CPRG planning grant and meet the threshold eligibility criteria in Section III.C. of the NOFO (page 20).
- Projects must reduce greenhouse gas emissions to be eligible.
- It is up to each applicant to make the case to EPA in their application how their proposed measure adheres to the workplan requirements and evaluation criteria established in the NOFO.
- An illustrative (not exhaustive) list of potential GHG reduction measures is on page 9 of the NOFO.

Questions III.1 and III.10 for general competition Q&A document, and III.1 and III.10 in Tribes and territory competition Q&A document

Eligible Measures



Are approaches and technologies included in a GHG reduction measure limited to those that result in *zero* GHG emissions?

• A proposed GHG reduction measure does not need to result in zero GHG emissions

Will you consider the GHG reductions of implementing a project that will address upstream carbon emissions occurring out of our jurisdiction?

• While the measures included in an application should align with the jurisdiction of the applicant, some measures may result in GHG emission reductions that occur outside of their direct jurisdiction.

How will EPA determine eligibility for projects that facilitate but do not drive greenhouse gas emission reductions?

• A program or activity is eligible as long as it is tied to a proposed GHG reduction measure from an applicable PCAP

For all of these questions: 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.

Questions III.16, III.19, and III.22 for general competition and Tribes and territories competition Q&A document

Use of CPRG Funding



Can an implementation grant fund the design of a project, or only implementation?

• An implementation grant application can include costs in the budget to cover both the design and implementation of GHG reduction measures.

Can CPRG funding go towards operations of existing programs? (e.g., cover the operating cost of expanding the currently operational hours of public transit?)

 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. When calculating the magnitude of GHG emission reductions in this case, applicants should only quantify emission reductions that will occur as a result of the CPRG implementation grant funding.

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

• Yes, operational costs are eligible costs under this program.

Questions III.17, III.24, and III.25 for general competition and Tribes and territories competition Q&A document

Build America, Buy America and Davis-Bacon Act Requirements



- CPRG implementation grants are subject to Build America, Buy America (BABA).
- 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. 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.
- 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.
- There are no exceptions to the above.
- In the case where CPRG funding is combined with other federal or non-federal funding to implement a GHG reduction measure, all federally funded aspects of the project must adhere to the above.

Questions III.12, III.13 for general competition and Tribes and territories competition Q&A document

Evaluation of GHG Measures



How "shovel ready" do measures in implementation grant applications need to be?

- Each application should reference measures outlined in a PCAP, which should include a focused list of near-term, high-priority, implementation-ready measures to reduce GHG pollution.
- Grant awards will have an estimated period of performance of up to 5 years with the estimated project start date for awards of:
 - For the general competition: October 1, 2024.
 - For the Tribes and territories competition: December 1, 2024.
- EPA will score grant applications based on multiple evaluation criteria (criterion 1.c, 2, and 3.c) with an emphasis on the magnitude of near-term GHG reductions that will be achieved by the proposed measures.

Questions VI.18 for general competition Q&A document, and VI.16 in Tribes and territory competition Q&A document

Overlap of Measures



If a state PCAP includes a measure, does that measure also need to be included in the PCAP for a MSA within that state?

Will this impact who can apply for implementation grant funds?

If the state wants to include the same measure that is included in the MSA plan, do the state and MSA need to use the same GHG reduction quantification method?

• A municipal eligible applicant may apply for implementation funding for GHG reduction measures contained in either an applicable MSA PCAP or an applicable state PCAP, or both, as long as the applicant has authority to implement such measures. In addition, GHG quantification approaches do not need to be aligned across different PCAPs.

Question I.26 in the general competition Q&A document

Documenting Measures in Coalition PCAPs



In a coalition application, 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?

- 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 March 1, 2024 (for general competition) and April 1, 2024 (for Tribes and territories only competition) 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.

Questions I.25 in the general competition Q&A document, and I.24 in Tribes and territories competition Q&A document

Expansion of Boundaries



If a MSA expanded the geographic area covered by their PCAP beyond the original MSA boundaries, will municipalities and tribes in this expanded area be able to apply for implementation funding using that PCAP?

• Yes, since a MSA planning grantee can develop a PCAP for an area that includes additional jurisdictions outside the boundary of the MSA, the jurisdictions outside the OMB defined boundary that are geographically covered by such a PCAP would be eligible to apply for funding to implement GHG reduction measures included in the PCAP.

Question II.19 for general competition Q&A document

State Subgranting to Other States



In a non-coalition application, can a state subaward to an entity to implement projects that may involve activities that take place in a neighboring state?

In some cases, a measure included in an applicant's PCAP may involve activities that take place beyond the applicant's direct jurisdiction (e.g., from one state into a neighboring state). In the event that a state wishes to subaward to a neighboring state or local governments in an MSA that extends into a neighboring state, such measures must be covered by an applicable PCAP. The applicant will be expected to articulate which party or parties have the authority to carry out each proposed measure or, in the case where they do not currently have authority, provide a clear plan and timeline to obtain it during the grant period.

Can a state apply for an implementation grant for measures that involve activities that take place in a state that did not develop a PCAP, and that entail subgranting a portion of the awarded funds to a state not participating in the CPRG planning grant program?

• Applications must request EPA assistance funds to implement GHG reduction measures contained in a PCAP developed under a CPRG planning grant. In this case, the measures must be included in *State A*'s PCAP. State B may receive a subaward from State A if State A is awarded a grant to implement measures contained in State A's PCAP that involve activities that take place in State A and State B.

Questions IV.9 and IV.11 for general competition Q&A document

Low-Income and Disadvantaged Community Definition



My state/city has its own definition of low-income and disadvantaged community (LIDAC). For the general competition, can we use that definition instead of EPA's definition?

- Implementation grant applicants for the general competition must use EPA's definition for LIDACs, which includes any community that meets at least one of the following characteristics:
 - Any census tract that is included as disadvantaged in the Climate and Economic Justice Screening Tool (CEJST);
 - Any census block group that is at or above the 90th percentile for any of EPA's EJScreen's Supplemental Indexes when compared to the nation or relevant state; or,
 - Any geographic area within Tribal lands as included in EJScreen.
- Applications will be evaluated on how they discuss, and quantify, if possible, the benefits to communities meeting EPA's definition.
 The EPA IBA Disadvantaged Communities

The <u>EPA IRA Disadvantaged Communities Layer</u> combines these datasets

Question VI.3 for general competition Q&A document

NEPA and CPRG



Would the projects that receive a grant award under CPRG be required to undergo environmental review via the National Environmental Policy Act (NEPA)?

- 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.

Questions VI.31 for general competition Q&A document, and VI.29 for Tribes and territories competition Q&A document

Partial Funding



Will EPA partially fund an implementation grant application?

- 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.
- 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.

Questions V.6 for general competition Q&A document, and V.5 in Tribes and territory competition Q&A document

Lump Sum vs. Reimbursement Expenses



How will grantees receive funding for awarded implementation grants? Can funds be requested from EPA in advance of expenses incurred 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?

- 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. Preaward expenses 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 about the grants drawdown process please see: <u>https://www.epa.gov/financial/grants</u>

Questions VI.36 for general competition Q&A document, and VI.34 for Tribes and territories competition Q&A document

Expending Funds



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 funds must be spent by the end of this period of time or all funds must be obligated by then? Does the project need to be completed at the end of the five years? What is the definition of "expended"?

• 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.

Questions VI.34 for general competition Q&A document, and VI.32 for Tribes and territories competition Q&A document

NOIs and Application Deadlines



Can I still submit a general competition application by April 1 if I didn't submit a Notice of Intent (NOI) to Apply by February 1?

• Yes, the submission of a NOI was optional. EPA's request for NOIs was purely a process management tool to allow EPA to better anticipate the resources required for efficient evaluation of submitted applications.

Can I change my project from what I included in my NOI submission?

• Yes, the submission of a notice of intent is non-binding. Applicants may continue to modify their proposal up to the April 1 deadline, after which applications will be scored against the evaluation criteria outlined in Section V.A. of the NOFO.

Questions I.5 for general competition Q&A document, and I.5 in Tribes and territory competition Q&A document





Will EPA allow extensions for the April 1st application submission deadline for the general competition?

• No, EPA does not intend to alter the deadlines of the implementation grant application deadline.

Should I submit an NOI if I'm still determining the specifics of my Tribes and Territories Only competition and things may change before the May 1 application deadline?

• The submission of a notice of intent is optional and non-binding; its purpose is to inform EPA's management of the competitive process. Please submit as much as information as you are able to provide. The Optional Notice of Intent to Apply to the Tribes and Territories Only Competition is due to <u>CPRG@epa.gov</u> by March 1, 2024.

Questions I.18 and I.5 for general competition Q&A document, and I.5 in Tribes and territory competition Q&A document

For More Information



EPA Grants Office Trainings: <u>https://www.epa.gov/grants/recipient-training-</u><u>opportunities</u>

EPA Grants Office Webinars: https://www.epa.gov/grants/epa-grants-webinars

Best Practices for Procuring Services, Supplies, and Equipment: https://www.epa.gov/grants/best-practice-guide-procuring-services-supplies-andequipment-under-epa-assistance

EPA Subaward Policy: <u>https://www.epa.gov/sites/default/files/2020-</u> 11/documents/gpi-16-01-subaward-policy_attachments.pdf</u>

Build America, Buy America (BABA): https://www.epa.gov/cwsrf/build-america-baba

For More Information



Past Webinars, NOFOs, Questions and Answers, Newsletter Signup www.epa.gov/inflation-reduction-act/climate-pollution-reduction-grants

Submit Questions to: <u>CPRG@epa.gov</u>

The deadline to submit questions is March 15th for the General Competition and April 15th for the Tribes and Territories competition.

Application deadline:

- General Competition April 1st
- Tribes and territories competition: May 1st