

Frequently Asked Questions and Answers: FY24 Reducing Embodied Greenhouse Gas Emissions for Construction Materials and Products Grant Program (AKA EPD Assistance Grants)

The Notice of Funding Opportunity (NOFO) for this competition details the application requirements and formally requests applications. This document addresses frequently asked questions to help potential applicants apply for this grant funding. Topics posed relate to the pre- and post-application phase. Periodic updates to this document will be made during the application submission period. Please refer to the NOFO for full details.

Note that there may be limited updates to the frequently asked questions in the final 30 days of the application period.

Contents

General Program Questions.....	2
Application Assistance Resources.....	2
Application Logistics	2
Application and Threshold Eligibility	3
Eligible Applicants.....	3
Notice of Intent to Apply.....	5
Number and Amount of Awards	5
Scope of Work	6
Period of Performance.....	7
Cost Sharing or Matching.....	7
Grant Competition.....	7
Partnerships, Subawards, and Contracts	8
Award Administration.....	11
National Policy Requirements	11
Fund Draw Down Mechanisms.....	11
Use of Funds	12
Reporting Requirements.....	13

General Program Questions

Application Assistance Resources

Where can applicants go for help in applying for EPA grants in general?

- Prior to applying for an EPA grant, applicants must have an active account on the Sam.gov.
- For more information on how to apply for EPA grants please see EPA's [How to Apply for Grants](#).
- EPA also recommends applicants refer to information on Grants.gov including the following:
 - [Support page](#)
 - [Self-Service Knowledge Base page](#)
 - [Introduction to Grants.gov Video Series](#)

I have never submitted a federal grant application before. Are there resources that I can refer to?

- Yes. Please see the information on the following site, EPA's Grant Recipient Training Opportunities page contains information for prospective grant applicants and grant recipients: <https://www.epa.gov/grants/recipient-training-opportunities>. These pages provide useful information on how to develop a budget, understanding the grant process from application to closeout, understanding the different uses of subawards and contracts in a grant, and more.

Application Logistics

Whom can I contact with technical questions that are not addressed in a current solicitation notice or in the FAQs?

- Please email Embodiedcarbon@epa.gov.

When is the deadline for submitting applications?

- The deadline for submitting applications is **January 16, 2024** at 11:59 PM (Eastern Time) through Grants.gov.

When does EPA plan to start making awards?

- EPA anticipates beginning to make selections in the Spring of 2024 and awards in Summer 2024.

Will there be additional competitions for funding under IRA 60112 for Reducing Embodied Greenhouse Gas Emissions for Construction Materials and Products?

- EPA does anticipate additional competitions but has not established any future competitions.
- The Inflation Reduction Act requires EPA to obligate all IRA Section 60112 funds by September 30, 2031.

What is the difference between a grant and a cooperative agreement? How should I note my preference in my application?

- The determination of whether a grant or cooperative agreement will be awarded will be made by EPA. If an applicant would like to designate a preference for a grant or cooperative agreement, they may do so by indicating that preference in the project narrative of their application.
- Grants: Awards of financial assistance issued by the federal government to eligible recipients based on approved workplans. EPA will not be substantially involved in the performance of

grants but will monitor and perform oversight of grant work to ensure federal funds are being used as intended and expended in a timely and efficient manner.

- Cooperative Agreements: Cooperative agreements involve substantial involvement between the EPA and the selected applicant in performance of supported work. EPA will negotiate precise terms and conditions relating to substantial involvement as part of the award process.

Reducing Embodied Greenhouse Gas Emissions for Construction Materials and Products is focused on construction materials manufacturers' development of disclosure documents called Environmental Product Declarations (EPDs) to reliably report emissions and gain access to growing markets for low embodied carbon materials. Are there any similar federal programs that support low embodied carbon construction materials and products?

- Yes. Please see the [Tools & Resources](#) of this website.

Application and Threshold Eligibility

Eligible Applicants

Who is eligible for an award under this competition?

According to Section III.A. of the Notice of Funding Opportunity, entities eligible to apply for this funding opportunity include businesses that manufacture, remanufacture, and refurbish construction materials and products, and States, Indian Tribes, and nonprofit organizations that will support such businesses.

Consistent with Assistance Listing No. 66.721 and EPA's Policy for Competition of Assistance Agreements (EPA Order 5700.5A1), competition under this solicitation is available to the following:

- Businesses (for profit or nonprofit) that manufacture, remanufacture, or refurbish construction materials and products.
- States, including the District of Columbia, the Commonwealth of Puerto Rico, U.S. Virgin Islands, Guam, American Samoa, the Commonwealth of the Northern Mariana Islands, and any agency or instrumentality thereof (including port authorities) exclusive of local governments.
- Indian tribes are defined as any Indian tribe, band, nation, or other organized group or community, including any Alaska Native Village or regional or Village Corporation as defined in or established pursuant to the Alaska Native Claims Settlement Act (43 U.S.C. Chapter 33), which is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians (25 U.S.C. 450b(e)). See annually published Bureau of Indian Affairs list of Indian Entities Recognized and Eligible to Receive Services." Note that Alaskan Native Corporations are Indian tribes for the purposes of 2 CFR 200.1.
- Nonprofits, consistent with the definition of Nonprofit organization at 2 CFR § 200.1, mean any corporation, trust, association, cooperative, or other organization that is operated mainly for scientific, educational, service, charitable, or similar purpose in the public interest and is not organized primarily for profit; and uses net proceeds to maintain, improve, or expand the operation of the organization. The term includes tax-exempt nonprofit neighborhood and labor organizations. Note that 2 CFR 200.1 specifically excludes Institutions of Higher Education from the definition of non-profit organization because they are separately defined in the regulation.

While not considered to be a non-profit organization(s) as defined by 2 CFR 200.1, public or nonprofit Institutions of Higher Education are, nevertheless, eligible to submit applications under this NOFO. Private universities who can demonstrate that they qualify as nonprofits based on the nature of how they are incorporated under state law or through their federal tax-exempt status are eligible.

Who is ineligible to apply under this competition?

- According to Section III.A. of the Notice of Funding Opportunity, ineligible applicants include entities who are not incorporated in the United States, for profit firms who do not manufacture construction materials and products (e.g., consulting firms and individual consultants, management firms, architectural and engineering firms, information technology vendors, proprietary colleges, universities and trade schools), and Local governments as defined in 2 CFR § 200.1.

Are individual companies eligible to apply?

- Yes. Individual companies that meet the eligibility requirements in Section III.A. of the NOFO can apply.

If an entity is waiting for a 501(c)3 approval, will the entity qualify as a nonprofit with provisional approvals from IRS?

- An entity may still qualify as a nonprofit organization without 501(c)(3) approval because 501(c)(3) status is not required for an entity to meet the definition of “nonprofit organization” in 2 CFR § 200.1.
- 2 CFR § 200.1 states that a nonprofit organization “means any corporation, trust, association, cooperative, or other organization, not including Institutes of Higher Education, that: (1) is operated primarily for scientific, educational, service, charitable, or similar purposes in the public interest; (2) is not organized primarily for profit; and (3) uses net proceeds to maintain, improve, or expand the operations of the organization.

Are agencies and instrumentalities of a unit of government eligible to apply?

- Yes, an entity recognized by an eligible unit of government (i.e., a state, territory, or tribal government,) as an agency or instrumentality is eligible to apply as the unit of government. Please refer to Eligibility Criteria Section III.A. of the NOFO.

Do applicants need to be U.S. owned/operated?

- Yes. See Section I.C. Scope of Work and Eligible Projects and Section III.A. Eligible Applicants of the NOFO.

Could a foreign-owned for-profit company that would otherwise be ineligible for a grant award establish a US-based non-profit for purposes of eligibility?

- Yes. However, the non-profit would be prohibited from using the grant award for projects taking place outside of the U.S. Funds under this program can only be used to support U.S.-based facilities, manufacturers, EPD verifiers, Program Operators, or Community Assessment Bodies. See Section I.C. Scope of Work and Eligible Projects.

Notice of Intent to Apply (NOTE: The date has been extended to November 15, 2023.)

Do applicants need to provide a Notice of Intent (NOI) for their application?

- No. It is optional but encouraged to send a NOI to embodiedcarbon@epa.gov. Please include your approximate funding request amount and one to two sentences about the scope of your project. The submission of a Notice of Intent to Apply is optional, confidential, and not binding (applicants may choose to take a different approach/scope in the final proposal). The NOI is a process management tool that will allow EPA to better anticipate the total staff time required for efficient review, evaluation, and selection of submitted applications.

Is EPA reviewing NOIs to confirm applicant eligibility?

- EPA will not be reviewing or making determinations about an applicant's eligibility based solely on the information provided in the Notice of Intent; EPA will determine an applicant's eligibility based on the information provided in the full application. To understand if you are an eligible applicant, please refer to Section III.A. of the NOFO.

Will the number of NOIs received by EPA be shared publicly?

- As noted on the summary page of the Notice of Funding Opportunity, submissions of NOI will be kept confidential.

Can an entity withdraw a Notice of Intent?

- Yes, applicants may withdraw a Notice of Intent by emailing embodiedcarbon@epa.gov.

Will EPA "approve" NOIs? Should applicants wait to hear from EPA before drafting their application?

- No, EPA is not approving NOIs. Applicants should not wait to hear from EPA before drafting their full application.

Number and Amount of Awards

How many grants will be awarded?

- EPA anticipates making up to 40 awards under this announcement in FY24.

Will EPA award partial awards?

- Yes, EPA may partially fund applications. See Section II.B. of the NOFO:
- Partial Funding - In appropriate circumstances, EPA reserves the right to partially fund applications by funding discrete portions or phases of proposed projects. If EPA decides to partially fund an application, it will do so in a manner that does not prejudice any applicants or affect the basis upon which the application, or portion thereof, was evaluated and selected for award, and therefore maintains the integrity of the competition and selection process.

How much funding is available?

- Funding award amounts in FY 24 are expected to be \$250,000 to \$10 million for up to \$100 million total. EPA anticipates making awards in these funding subranges: \$250,000 to \$750,000; \$750,000 to \$5,000,000; and \$5 to \$10 million with periods of performance of up to five years.

If the selected applications exceed the total funds available, is it more likely EPA will partially fund applications or award fewer awards?

- EPA reserves the right to modify this award allocation based on the quality of applications that are received and other program considerations. EPA aims to maximize national geographic coverage of the program across all the awards.
- As described in Section II.B. of the NOFO, in appropriate circumstances, EPA reserves the right to partially fund applications by funding discrete portions or phases of proposed projects.

Scope of Work

The goal of the EPD Assistance Program, as outlined in Inflation Reduction Act Section 60112(a), is “to support the development, enhanced standardization and transparency, and reporting criteria for Environmental Product Declarations that include measurements of the embodied greenhouse gas emissions of the material or product associated with all relevant stages of production, use, and disposal, and conform with international standards, for construction materials and products by providing technical assistance to businesses that manufacture construction materials and products in developing and verifying Environmental Product Declarations, and to States, Indian Tribes, and nonprofit organizations that will support such businesses.

What kinds of projects will be considered for funding under this NOFO?

- Per Section I.C. of the Notice of Funding Opportunity, EPA envisions selected projects to fall under five broad categories:
 1. **Robust Data for EPDs:** Projects that contribute new and/or improve critical data, analysis, or feedback for producing robust EPDs.
 2. **Robust Product Category Rule (PCR) Standard Development, PCRs, and Associated Conformity Assessment Systems:** Projects that encourage the development of robust, standardized PCRs, including identifying what data needs to be collected for EPDs, how that data should be collected, how it should be reported in EPDs, and what transparency and verification needs to be in place to ensure credible EPDs.
 3. **Robust Tools & Resources to Support & Incentivize Development and Verification of EPDs:** Projects that contribute to the development of tools and resources to make it easier, faster, and more cost effective to produce and disclose robust EPDs.
 4. **EPD Development and Verification:** Projects that offer construction material and product manufacturers assistance in producing robust EPDs, or in which a construction material or product manufacturer is producing robust EPDs.
 5. **Robust EPD Data Platforms and Integration:** Projects that support EPD reporting, availability, and verification; support the standardization of disparate EPD systems; and support future EPD integration into construction design and procurement systems.
- Please see Appendix B for an expanded list of example eligible projects in these categories. Projects described in Appendix B are intended to provide examples of the range of the types of projects and activities that may be eligible for funding under this funding opportunity. Please see Section I.D. for the definition of “robust,” as used in this section and throughout the document.

Can a jurisdictional entity propose a program that serves a geography larger than the entity's geographic boundaries?

- Yes, a jurisdictional entity may propose a program that serves a geography larger than the entity's geographic boundaries.
- For a jurisdictional entity, carrying out activities in another jurisdiction may pose more challenges, such as having to seek approval from the other jurisdiction for projects. This varies by state and local law. It is the responsibility of the recipient to address these challenges in carrying out the award. An applicant should therefore be mindful of any jurisdictional issues in developing a program strategy.

Period of Performance

Should applicants plan to fully spend financial assistance dollars by the end of the 5-year period of performance, or is it sufficient to plan to commit these dollars to projects by the end of the five-year period?

- The recipient must liquidate any financial obligation (i.e., commitment) that the recipient incurred under the award within 120 days following the end of the five-year period of performance, per 2 CFR § 200.344(b).

Cost Sharing or Matching

Are there any match or cost-sharing requirements? Do applicants need to secure other sources of funding to apply?

- No, there are no match nor cost-sharing requirements for this grant competition.
- Applicants do not need to secure other funding sources to apply to this grant competition.

Grant Competition

How will applications be selected? What are the threshold criteria and how are they used?

- All applications will be reviewed against the threshold eligibility criteria noted in Section III.C & III.D. of the NOFO. The threshold eligibility criteria are used to screen which applications are eligible to merit further review. Applications that meet all threshold eligibility criteria will be evaluated against the evaluation criteria noted in Section V of the NOFO.

Can EPA perform a cursory review of my application and tell me if my project is a good fit for this grant competition?

- No.
- In accordance with [EPA's Assistance Agreement Competition Policy – EPA Order 5700.5A1](#), EPA may not meet with individual applicants to discuss draft proposals/applications, provide informal comments on draft proposals/applications, or provide advice to applicants on how to respond to ranking criteria.
- Applicants are responsible for the contents of their applications. However, consistent with the provisions in the announcement, EPA will respond to questions from applicants regarding threshold eligibility criteria, administrative issues related to the submission of the application,

and requests for clarification about the announcement.

How long does the application review process take and when will I be notified of EPA's decision?

- Applications that do not pass the threshold eligibility review (based upon the criteria noted in Section III.D of the grant announcements will be deemed ineligible. Applicants that fall into this category will receive a letter of ineligibility within 15 calendar days upon EPA making their decision. The letter of ineligibility will explain the reason for the disqualification from competition.
- EPA anticipates it will notify prospective grantees of anticipated funding recommendations between 60 – 90 days from the date of application submissions. Applications that met threshold criteria but did not merit funding consideration will receive an email notification.
- Official grant award notices will be issued by EPA's Grants and Interagency Agreement Management Division (GIAMD) of the Office of Grants and Debarment (OGD).

Will EPA hold debriefings for applicants?

- Applicants found to be ineligible are advised to request a debriefing within 15 calendar days of receiving the ineligibility letter from EPA.

Are grant awards issued under this program eligible for inclusion in PPGs?

- No. Grant awards issued under this program are ineligible for inclusion in Performance Partnership Grants (PPGs).

Will there be a set aside for Tribal projects?

- No. The grant programs will not include a funding set aside for Tribal projects.

Will applications be reviewed by EPA staff, outside experts/advisors, or combination?

- The application review teams may include a combination of EPA staff and qualified external reviewers.

Partnerships, Subawards, and Contracts

Do all members of a partnership have to be eligible applicants?

- Yes. See the section IV.E.5. of the NOFO.

Can an entity be in a partnership on multiple applications?

- Yes, an entity may be a partner with more than one lead applicant, so long as each application is for a different type of work (e.g., serving a different geography or sector, and/or different scope of work).

Is there a maximum or minimum amount of grant funds that a pass-through entity applicant may subaward?

- There is no maximum or minimum amount of grant funds that a pass-through applicant can subgrant. Entities exploring subawards with a pass-through applicant should discuss the amount of grant funds they need to perform their respective scope of work. However, the pass-through

proposal for subaward management must describe how they will manage the subaward process. See Section IV.E.4.

Is there a requirement on how much funding must be distributed through pass-through entities versus how much can be used by the primary awardee?

- No, while there is no set amount a pass-through must distribute, the purpose of a pass-through is to ‘pass-through’ the grant funds to subrecipients. The pass-through should retain an amount of funding sufficient to oversee its subawards and contractors.

Can a pass-through entity allocate some funds for the purpose of engaging a consultant as a contractor (versus as a subawardee)?

- Yes the pass-through entity can enter into contracts with consultants or engineers subject to the competitive procurement requirements of 2 CFR 200, Subpart D, and 2 CFR 1500. See [EPA’s Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#) for further information.

Can an eligible applicant apply with the intent of contracting with another entity to administer the program?

- Yes. Applicants do not need (and are not encouraged to) to identify contractors at the time of application but need to follow procurement policy guidelines as outlined in the following link: [EPA’s Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#).

Could an eligible entity receive both a direct grant and a subaward or a contract via another entity’s direct grant? What if that entity were to receive greater than \$10 million total?

- There is no legal prohibition on an entity receiving both a direct grant and a subaward in the same grant program, regardless of the total amount awarded to the entity. The applications will be evaluated and scored based on the criteria identified in the NOFO, and final awards will be distributed accordingly.

Could pass-through funds be allocated to a U.S. entity that distributes (rather than manufactures) a construction material, or would support be limited to technical assistance provided by the primary awardee?

- No, subrecipients must be eligible entities under the NOFO, which are businesses that manufacture, remanufacture, or refurbish construction materials and products.

How should applicants indicate that they intend to apply as a pass-through entity?

- Information on pass-through entity applications is included in Section I.C, I.D, and IV.E.4 of the Notice of Funding Opportunity.
- Applicants should specify in the Budget Narrative and the Budget Table the intent to act as a pass-through entity and issue subawards and/or enter into a procurement contract. Applicants should also explain in the Program Narrative their vision, plan, and strategy for the program and the role of the program administrator in implementation.

Do contractors and/or subrecipients receiving financial assistance from grantees need a SAM.gov registration and/or a Unique Entity Identifier (UEI)?

- Contractors do not need to have either a SAM.gov registration or a UEI.
- Subrecipients who receive subawards from a pass-through entity will need a UEI, although they will not need a SAM.gov registration.

Can EPA share the partner connection list with organizations that did not complete the [partner connection forms](#)?

- No, EPA cannot share the partner connection list with organizations that did not complete the partner connection forms.

What is the difference between a subrecipient and a contractor?

- A subrecipient is an entity that receives a subaward from the recipient (referred to as the “pass-through entity”) to carry out part of the federal award. Subrecipients only receive reimbursement for their actual direct or approved indirect costs such that they do not “profit” from the transaction.
- A partner in a partnership agreement is considered a subrecipient.
- A contractor is an entity that receives a contract from the recipient to carry out the federal award. Contractors (including individual consultants) typically provide goods and services on commercial terms, operate in a competitive environment and a reasonable profit is allowable. A contractor does not need to be an eligible recipient but grant recipient must follow procurement guidelines.
- For additional information on determining whether a transaction qualifies as a subaward or a procurement contract, please refer to Section II.C. Award Types of the NOFO, [EPA’s Subaward Policy](#), and [EPA’s Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#).

What is a partnership?

- A “partnership” is a formal relationship between two or more eligible grant or cooperative agreement recipients that is memorialized in writing and is legally binding under applicable law. The partnership agreement must specify which member of the partnership will enter into the assistance agreement with EPA for the purposes of accountability for the proper expenditure of Federal funds, performance of the assistance agreement, liability for claims for recovery of unallowable costs incurred under the agreement and must specify roles in performing the proposed scope of work for the assistance agreement. One eligible recipient in the partnership must receive EPA funding as the direct recipient of the grant or cooperative agreement and the other partner(s) receiving funding as a subrecipient(s).

If a grantee has underperforming subrecipients, can the grantee withdraw and redeploy the capital to other subrecipients?

- Yes. As provided in 2 CFR § 200.332(d), the pass-through grantee has authority to monitor subrecipient performance to verify that the subrecipient achieves performance goals. The pass-through grantee has discretion to take any of the remedial actions described at 2 CFR § 200.339 if the subrecipient is unable or unwilling to take corrective actions, including termination of the subgrant.

Do applicants need to identify all subrecipients and/or contractors before submitting their applications?

- EPA does not require nor encourage applicants to name contractors.

May contractors, subrecipients, and other award partners change over the program period?

- It depends. Any changes must be consistent with the applicable regulations and terms and conditions of the grant. Some changes may require modifications or amendments to the grant and approval by the Grant Management Office (GMO).

Can grantees purchase goods and services from foreign-owned companies?

- Recipients may purchase goods and services from foreign-owned companies using the applicable procurement standards in 2 CFR 200, with the exception of the prohibition in 2 CFR 200.216 on the procurement of certain telecommunications and video surveillance services and equipment, and the requirement that all travel services must be on available U.S. air carriers certified under 49 U.S.C. Section 40118.

Award Administration

National Policy Requirements

Does Build America, Buy America apply to this grant program?

- No. It does not apply to this grant program. Since no iron, steel, manufactured products, or other construction materials can be purchased with this grant program, Build America, Buy America does not apply.

Does Davis-Bacon and Related Acts apply to this grant program?

- No.

Do Title IX Requirements apply to this grant program?

- Yes. If the recipient is an education program or activity (e.g., school, college or university) or if the recipient is conducting an education program or activity under the assistance agreement, the recipient must comply with Title IX of the Education Amendments of 1972. Title IX prohibits discrimination on the basis of sex in education programs and activities operated by entities receiving Federal financial assistance. For further information about compliance obligations regarding Title IX, see 40 CFR Part 5 and the [Department of Justice](#).

Is this grant program a covered program under Justice40?

- No.

Fund Draw Down Mechanisms

Will grant funds be disbursed to grantees once awards are made?

- No, EPA will not disburse grant funds at the time of award. Once EPA awards the grant or cooperative agreement, the recipient will only have access to funding (“draw down”) to the extent authorized in 2 CFR 200.305(a) for states and 2 CFR 200.305(b) for non-state recipients.
- States draw down funds based on the standards specified in their Cash Management

Improvement Act agreements with the U.S. Treasury or the Treasury regulations at 31 CFR part 205 and Treasury Financial Manual (TFM) 4A-2000, "Overall Disbursing Rules for All Federal Agencies" as provided in 2 CFR 200.305(a).

- Non-state recipients are subject to the "Proper Payment Draw Down" General Term and Conditions in [EPA's General Terms and Conditions](#) for Assistance Agreements which interpret 2 CFR 200.305(b). Essentially, non-state recipients may only draw down funds to meet their immediate cash needs and must disburse substantially all of the drawn down funds within five business days to pay employees, contractors, subrecipients or other allowable costs.

Use of Funds

If EPA funds are used to help develop a toolkit or other resource for an industry sector or manufacturers, who owns the toolkit or other resource once it is complete?

- The recipient will own the toolkit.
- However, as discussed in 2 CFR 200.315, EPA reserves a right to use the toolkit for Federal purposes.
- By accepting the grant funds subject to the regulation, the grant recipient has agreed to EPA having a license to use the product and data generated with grant funds and allowing others to access and use the material for Federal purposes as discussed in the regulation.
- At the time of the grant closeout, an agreement can be made between EPA and the recipient on future uses and accessibility.

Can we purchase equipment using grant funding? What happens to the equipment after the grant is over?

- Equipment may be purchased with grant funding as noted in 2 CFR 200.313, provided the equipment is integral to the grant activity and as such will provide technical assistance, training or tools to businesses.
- Grant recipients may use such equipment for which it was acquired as long as needed, regardless of whether the project or program continues to receive federal funding.
- The recipient may also use the equipment in other activities currently or previously supported by a federal agency.
- When the recipient no longer needs the equipment for the original project or program, or for other activities currently or previously supported by a federal agency, and the fair market value is less than \$5,000, the equipment may be kept, sold, or disposed of by the applicant with no further obligation by EPA.
- If the fair market value of the equipment is \$5,000 or more, the recipient may keep or sell the equipment at which point EPA would have the right to proceeds from the sale.
- The amount of compensation will be computed by calculating the percentage of federal participation in the cost of the project – this will be assessed on the current fair market value of the equipment. If the recipient has no need for the equipment, the recipient will need to submit a formal request to EPA to state that there will not be a need for keeping the equipment.
- Refer to 2 CFR 200.313. In cases where a recipient fails to take appropriate disposition actions, EPA may direct the recipient to take such actions.

Reporting Requirements

Will EPA consider extending the semi-annual update performance reporting requirement from 30 days after the end of each reporting period to 45 days?

- No; 2 CFR § 200.329(c)(1) states that such performance reports “submitted quarterly or semiannually must be due no later than 30 calendar days after the reporting period.”
- However, the regulation does provide that if “a justified request is submitted by a non-Federal entity, the Federal agency may extend the due date for any performance report.” If unanticipated circumstances prevent a recipient from submitting a particular performance report in a timely manner, EPA’s Project Officer may extend the due date for that specific report.

Do applicants need to submit a reporting plan for their proposed project? What are the reporting expectations for grantees?

- According to Section VI of the Notice of Funding Opportunity, applicants must provide an estimate of expected outputs and outcomes, as well as a plan for reporting outputs and outcomes during the grant period.
- Once grants are awarded, grantees will be required to submit:
 1. Midyear updates at the 6-month and 18-month mark should be emailed to the grantees’ Project Officer providing an update on the number of businesses provided technical assistance. This is a brief email update.
 2. Annual reports detailing the outputs and outcomes described in Section VI, should be submitted annually.
 3. In addition to the annual reports, a final report should be submitted at the conclusion of the grant period detailing outputs and outcomes as described in Section VI.

When will EPA provide further guidance on reporting requirements?

- EPA will include reporting requirements within the terms and conditions of each grant agreement.

PART 2 – Updated November 29, 2023

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Contents

Low Carbon/EPD/Subject Matter Questions	14
Grant Admin/Subawards	17
Applicant Eligibility.....	19
Project Eligibility	22
Subgrantees/Contractors/Consultants	23
Selection.....	25
Application	25
Misc.....	26

Low Carbon/EPD/Subject Matter Questions

1. If a company plans to develop its EPD library over a period of several years due to barriers that preclude speeding that effort up and this is presented as a prioritized, but still phased approach, is it possible to receive an award for the entire project, subject to the review provisions that are described in the NOFO or is it intended that we would need to apply for each phase and be subject to meeting criteria for award each time
 - a. The project period for selected proposals under this NOFO is for up to five years. If selected, the award for the project would be continuous over the course of five years and conditions for release of funds will be outlined in the terms and conditions. As funding allows, EPA anticipates an additional grant competition though the timing is

undetermined.

- b. Section IIB: Partial Funding - In appropriate circumstances, EPA reserves the right to partially fund applications by funding discrete portions or phases of proposed projects. If EPA decides to partially fund an application, it will do so in a manner that does not prejudice any applicants or affect the basis upon which the application, or portion thereof, was evaluated and selected for award, and therefore maintains the integrity of the competition and selection process.
 - c. Additional Awards - EPA reserves the right to make additional awards under this solicitation, consistent with Agency policy and guidance, as additional funding becomes available after the original selections are made. Any additional selections for awards will be made no later than 6 months after the original selection decisions.
 - d. Award Funding and Incremental/Full - Awards may be fully or incrementally funded, as appropriate, based on funding availability, satisfactory performance, and other applicable considerations.
2. Does the grant program support developing both facility-specific EPDs and industry-averaged EPDs?
 - a. The funding opportunity is not restricted by EPD type. However, note that Table I. Grant Application Merit Evaluation Criteria and Weighting in Section V.A includes the following merit evaluation criteria under “Advancing Robustness of EPDs”:
 - i. “- Degree to which the project will result in facility and supply-chain specific data in EPDs.”
3. PCR development is a focus in the grants, but Program Operators are for-profits. If applicants included projects that require program operators to receive funding to make possible, could POs receive funding as long as they bid as part of a process that meets government procurement requirements?
 - a. Yes, a grantee can enter into contracts with for-profit Program Operators subject to the competitive procurement requirements of 2 CFR 200, Subpart D, and 2 CFR 1500. See EPA’s Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements.
4. One might submit verified EPDs to many publicly accessible platforms, which may or may not publish them on their websites. Is the proof of the EPD and submittal to the platform(s) acceptable at minimum?
 - a. See Section VI.C.5
 - b. All EPDs generated with support from this grant must be submitted to and accessible on an open, public, free-to-use EPD data platform that is reliable, secure, 508 compliant in terms of accessibility (see www.section508.gov) with data discoverability via APIs, and with robust search and filtering capabilities.
 - c. Grantees must notify EPA that such EPDs were submitted to an open, public, and cost-free EPD data platform within ten business days of submitting them and include in the

notification to EPA links to these EPDs, along with copies of the EPDs to ensure that all fields are properly captured and provided to EPA.

5. EPD are not just limited to embodied energy. Is this just focused on energy or all areas of an EPD?
 - a. See Merit Evaluation Section V.A of NOFO for additional information.
6. What are the end-of-project requirements for maintaining developed EPDs, tools and data sources after the grant ends?
 - a. Full details will be outlined in the Terms and Conditions of the Assistance Agreements. All EPDs generated with support from this grant must be submitted to and accessible on an open, public, free-to-use EPD data platform that is reliable, secure, 508 compliant in terms of accessibility (see www.section508.gov) with data discoverability via APIs, and with robust search and filtering capabilities.
 - b. Grantees must notify EPA that such EPDs were submitted to an open, public, and cost-free EPD data platform within ten business days of submitting them and include in the notification to EPA links to these EPDs, along with copies of the EPDs to ensure that all fields are properly captured and provided to EPA.
 - c. See Section VI.C.5 of NOFO for additional information.
7. Are there existing or future funding opportunities for information technology vendors, who can assist producers in producing faster/more robust EPDs? Are there international standards that EPDs should match to be accepted?
 - a. See Section I.A.
The goal of the EPD Assistance Program, as outlined in Inflation Reduction Act Section 60112(a), is “to support the development, enhanced standardization and transparency, and reporting criteria for Environmental Product Declarations that include measurements of the embodied greenhouse gas emissions of the material or product associated with all relevant stages of production, use, and disposal, and conform with international standards, for construction materials and products . . .”
 - b. There may be additional federal resources available, some of which are compiled here: <https://www.epa.gov/greenerproducts/tools-resources>
8. How will the data in EPDs be verified?
 - a. See Appendix B, Sections C & D.
9. Can you provide any further definition of “salvaged” such as how long it must be in service before it would be considered “salvaged” and not “surplus”?
 - a. The terms *Salvage* and *Reuse* are defined in Section I.D Key Terminology of the NOFO. The definition of *Salvage* states that materials are reclaimed from the disassembly, deconstruction, or demolition of buildings or structures. There is no time limit consideration for how long the material was in service. The definition of *Reuse* states that the material was previously utilized and requires limited to no processing. This would preclude surplus materials.

10. Can you please clarify if a timber that is recovered from an existing building that is remilled (resawn, remolded, planed, etc) into a solid wood flooring product is considered "reuse" or "salvage - minimally processed".
- This example would qualify as reuse. The term *minimally processed* is used to differentiate a salvaged and reused material/product from a recycled material/product. Processing that results in the destruction of a material or product for the purposes of creating a new product is considered *recycling* (e.g., Grinding concrete at end-of-life for use as aggregate or road base is considered *recycling*. Salvaging a concrete slab at end-of-life for use as a landscape retaining wall would be considered *reuse*). Additionally, salvage and reuse does not include *surplus* materials/products sourced from over ordering or unrealized use (e.g., canceled construction project). Please see Section I.D Key Terminology of the NOFO for the definition of both *salvage* and *reuse*.
11. In simple terms please define an Environmental Product Declaration (EPD)?
- Please visit this site for more information: <https://sftool.gov/plan/402/environmental-product-declarations-epds>
 - Environmental Product Declaration (EPD): Environmental Product Declaration refers to an environmental report providing quantified environmental data using predetermined parameters and, where relevant, additional environmental information. An EPD also includes additional product and company information. This is consistent with the definition found in ISO 14025:2006.
12. Our organization owns a digital marketplace for building materials and products, would we be an eligible applicant?
- Your organization would have to be a non-profit to be considered an eligible applicant. The entity that applies for the grant (regardless of who owns or operates the marketplace) must be an eligible applicant. See Section III.A Eligible Applicants in the NOFO.

Grant Admin/Subawards

13. Does an applicant need to wait to start their project prior to being awarded? Will EPA approve pre-award costs?
- Notwithstanding the requirements of [2 CFR parts 200](#) and [1500](#), EPA may reimburse recipients for pre-award costs incurred from the beginning of the budget period established in the grant agreement if such costs would have been allowable if incurred after the award. Pre-award costs must be identified in the grant application EPA approves.
 - The applicant incurs pre-award costs at its own risk. EPA is under no obligation to reimburse such costs unless they are included in an approved grant application.**

14. Does the EPA expect to retain any rights or ownership over the project outcomes?
- a. In accordance with [2 CFR 200.315](#), EPA has the right to reproduce, publish, use and authorize others to reproduce, publish and use copyrighted works or other data developed under this assistance agreement for Federal purposes. EPA may also authorize another grantee to use copyrighted works or other data developed with Agency funds provided under this grant to perform another grant when such use promotes efficient and effective use of Federal grant funds.
 - b. Examples of a Federal purpose include but are not limited to: (1) Use by EPA and other Federal employees for official Government purposes; (2) Use by Federal contractors performing specific tasks for [i.e., authorized by] the Government; (3) Publication in EPA documents provided the document does not disclose trade secrets (e.g. software codes) and the work is properly attributed to the recipient through citation or otherwise; or (4) Reproduction of documents for inclusion in Federal depositories.
15. Can you please explain what is meant by consideration of "subranges" \$250K to \$749K; \$750K to \$4.99 million; \$5 million to \$10 million? Do the funding ranges outlined in Section I of the NOFO mean that EPA is considering an allocation of the total funding within each subrange? In other words, will EPA ensure that at a certain percent of funds or proposals are selected within each range?
- a. The awards are anticipated to be made within two tracks (direct grants or pass-through grants) and three funding subranges (\$250-\$750K, \$750-\$5 million, and \$5-\$10 million).
As an applicant, you will decide which track you apply to either for a pass-through grant OR direct grant. Either direct grants or pass-through grants can be a cooperative agreement dependent on if there is substantial federal involvement with the grant recipient. Awards will be considered for eligible projects in each track and within each funding subrange. For example, a \$5 million application for a pass-through cooperative agreement is not being evaluated against a \$250,000 direct grant. Based on merit evaluations, awards could be made to both of those applicants since each is evaluated within its individual track and individual funding subrange. EPA reserves the right to make no awards in any of the subranges.

Pass-through/Cooperative Agreements	Direct Grant and/or Cooperative Agreements
\$250,000 to \$750,000	\$250,000 to \$750,000
\$750,000 to \$5,000,000	\$750,000 to \$5,000,000
\$5 to \$10 million	\$5 to \$10 million

Applicant Eligibility

16. Another non-profit organization has indicated they will be applying for the maximum to support database/data quality efforts across multiple industries. We have considered including them as a subawardee on our proposal to address some of those needs for our industry, but that could result in them receiving over \$10 million in total from this funding opportunity if both proposals are fully funded. Is this problematic from EPA's perspective, or permissible for them to be included on more than one proposal?
 - a. A single eligible organization can submit their own proposal as well as be a partner in another proposal if the projects in each of the proposals are not duplicative.
17. Can one entity apply for two separate grants working on different but similar initiatives or would you like one application to include both activities?
 - a. An applicant may apply for more than one grant, but EPA will not fund duplicative proposals.
18. Would it be possible to be a lead researcher on a grant, as well as a subrecipient on another grant (for separate projects)?
 - a. Yes, for separate projects that are not duplicative.
19. May individual construction product manufacturers submit? If not, what path should they take to seek grant funding for creating product EPDs?
 - a. Yes, individual manufacturers are eligible to apply for this Notice of Funding Opportunity. If their project does not meet the minimum application amount of \$250,000, they may apply to a pass-through grant recipient for a subaward for a lesser amount.
20. Can eligible consultants and/or universities be named subrecipients vs. contractor (vendor) on a project?
 - a. Applicants are not required to name subrecipients or contractors on their project application. EPA policy is to require that pass-through entities include the aggregate amount for subawards in the "Other" budget category of their Standard Form (SF) 424A, "Budget Information for Non-Construction Programs". Only eligible entities may receive subawards from selected pass-through entities. Contracts may only be awarded following full and open competition that meets the requirements of the Uniform Grants Guidance regulations at 2 CFR 200.217- 200.327. Naming a contractor in an application does not mean the applicant can avoid complying with the USGs procurement standards.
21. If you are a small manufacturer and you have limited sales, are you still eligible? What scale of

manufacturing do you have to be at to be eligible?

- a. All eligible entities may apply for this Notice of Funding Opportunity; there is no minimum size of eligible entity, but they must be able to manage the grant administration associated with this NOFO. The minimum grant request is \$250,000. Small manufacturers may also collaborate with pass-through grant recipients.

22. Can a public/private entity under the National Institute of Standards and Technology (NIST), e.g., a Manufacturer Extension Partnership program, apply if they apply as the public entity, e.g., public university? Do you know if Manufacturer Extension Partnership programs are non-profit entities?

- a. It depends. Public universities are eligible entities under this program. If the MEP is a distinct legal entity from the public university, the MEP could receive a subaward from the university. See EPA's Subaward Policy.
- b. The university and MEP would be required to ensure there are no personal conflicts of interest and that any organizational conflicts of interest are mitigated. See EPA's Financial Assistance Conflict of Interest Policy.
- c. If the MEP is a department within the university, any financial arrangement between the university department that accepts the grant and the MEP would be considered an interdepartmental transfer or an internal transfer provided the university's financial management system recognizes the arrangement. See Q.A.8 on page 3 of EPA Subaward Policy Frequent Questions
https://www.epa.gov/system/files/documents/2023-04/epa_subaward_policy_frequent_questions.pdf.

23. Is it a conflict of interest (COI) for non-profit Board members to work on the application, where their companies will plan to bid for contracted work if the grant is awarded?

- a. This may be a conflict of interest. Please see page 8 of EPA's Best Practice [Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#).

24. Is it a conflict of interest for a lead applicant pass-through non-profit organization Board member's non-profit, which is in the producer industry supported by the lead applicant, to receive a sub-award? Is it a conflict of interest for a lead applicant pass-through non-profit organization Board member's for-profit in the industry supported by the lead applicant, to compete for a contract to support the lead applicant?

- a. EPA's [Financial Assistance Conflict of Interest Policy](#) applies to both subawards and procurement contracts. For both (subawards and procurement contracts) recipients must disclose COIs (as described in 2 CFR 200.318(c)(1) and (c)(2)) to EPA. Recipients must also have systems in place to address, resolve, and disclose to EPA the COI situations described in Sections 4.0(b) and (c), and (d) of the Policy that affect any contract or subaward funded under an EPA financial assistance agreement in accordance with the terms and conditions of their award.
- b. Recipients acting as a Pass-through entity must require subrecipients receiving or being considered for a subaward to disclose to the recipient the COI situations described in

Section 4.0(b), (c) and (d) of the Policy. Likewise, recipients seeking procurement contracts, regardless of amount, must report to EPA any COI described at 2 CFR 200.318(c)(1) including, but not limited to, consulting fees or other compensation paid by contractors to employees, officers, agents of the recipient or subrecipient and/or members of their immediate families.

- c. Disclosure of a potential COI will not necessarily result in EPA disallowing costs, with the exception of procurement contracts that the Agency determines violate 2 CFR 200.318(c)(1) or (2), provided the recipient notifies EPA of measures the recipient or subrecipient has taken to eliminate, neutralize or mitigate the conflict of interest when making the disclosure. A pass-through entity cannot award a subaward to avoid complying with the procurement requirements in 2 CFR 200, Subpart D.
 - d. In both of the situations described, the recipient would need to report to EPA the conflict of interest posed by the Board Member and put in place measures to eliminate, mitigate, or neutralize the conflict of interest.
25. Would a for-profit business that distributes construction materials be eligible, knowing that they manage supply chain and EPDs for their products, but they do not manufacture themselves?
- a. A company that solely distributes construction materials/products would not be eligible. Please see Section III.A for more information on applicant eligibility.
26. What if other manufacturers and/or the broader industry are not seeking funding or working through this solicitation or similar efforts to improve, would this be disqualifying to a single entity?
- a. No. Note that all proposals that pass the threshold criteria under Section III of the NOFO will be ranked according to the merit criteria under Section V.
27. Can you explain what it means by: "nonprofits that support eligible recipients".
- a. To be in-line with the IRA 60112 statute, non-profits must meet the definition in 2 CFR 200.1 and support businesses that manufacture construction materials. Please see Section III.A for more information.
28. If an organization that has applied for and is awaiting a 501(c)(3) tax status, and is currently operating under a 501(c)(3) fiscal sponsor, would that organization be eligible for the grant, assuming the fiscal sponsor meets the other eligibility requirements?
- a. 501(c)(3) status is not required for a non-profit to be eligible for the Embodied Carbon Grant Program. Non-profits must meet the definition found at 2 CFR 200.1: Nonprofit organization means any corporation, trust, association, cooperative, or other organization, not including Institutions of Higher Education, that:
 - i. Is operated primarily for scientific, educational, service, charitable, or similar purposes in the public interest;
 - ii. Is not organized primarily for profit; and
 - iii. Uses net proceeds to maintain, improve, or expand the operations of the organization.
 - b. If the organization meets that definition and the other eligibility requirements for the Program, it could be eligible to apply on its own.

- c. Alternatively, if the organization awaiting 501(c)(3) status is an eligible entity for a subaward under the Program and the fiscal sponsor itself is eligible for the Program, the fiscal sponsor could apply as a pass-through entity. EPA generally does not recognize the “fiscal sponsor” concept because applicants for EPA funding apply on their own behalf and become the Recipient as that term is defined in 2 CFR 200.1. A fiscal sponsor may provide a subaward to an eligible nonprofit organization (subrecipient) acting as a Pass-through entity but as the “Recipient” the fiscal agent/sponsor would remain accountable to EPA for the proper expenditure of EPA funds and effective programmatic performance. See Q.A. 51 of the [EPA Subaward Policy Frequently Questions](#).

Project Eligibility

- 29. Will subawards be only for EPD development and verification and not PCR development?
 - a. Eligible applicants who are applying as pass-through entities will provide subawards to eligible subrecipients for EPD development, not PCR development. Eligible applicants may apply for funding opportunities for PCR development through direct grants, direct grant/cooperative agreements, and/or through partnerships.
- 30. Are relevant paid internships eligible for funding as part of a project?
 - a. Yes, please see slide #31 of the webinar presentation for additional information.
- 31. Will EPA staff be available to answer eligibility questions?
 - a. EPA has limited resources to respond to eligibility questions. Please review Section III of the NOFO as well as the FAQ. If you still need clarification, please email embodiedcarbon@epa.gov with the question.
- 32. Is hiring of new staff for this work a permissible expense?
 - a. Yes, and it should be spelled out in the detailed budget.
- 33. Can funding be used for Capital Expenditure type projects that allow building robust data capturing systems, such as installing metering and automated data collection, or only to cover the Operating Expenses specific to a point and time use of the technology to capture and report the data?
 - a. Please note under Section I.C of the NOFO that ineligible projects include, “Projects that fund the physical act of construction/deconstruction or procurement of construction materials/products.” Funding opportunities under the Department of Energy may be a better fit. For information on related DOE funding opportunities, the grant program website includes a list of “Financial & Technical Assistance Programs that Address Embodied Carbon of Construction Materials” which can be found at this [link](#).

34. Would software costs be allowable if they are not specifically related to LCA/EPD but can be demonstrably shown to be used to communicate this information into a data management system?
- a. These may be eligible costs. Please see the merit evaluation criteria in Section V to determine if this is a good fit for this grant focused on EPD Assistance.
35. Do eligible projects include creating a new software program that is not yet available commercially to conduct LCA?
- a. Please visit Section I.C and Appendix B for eligible projects.
36. Does this opportunity cover the purchase of equipment and/or technology to obtain the data required to produce an EPD?
- a. Yes. For information on developing a budget, please visit these links for [training](#) and [guidance](#).
37. Under Ineligible activities in Section III.D.3.a, what is meant by the phrases “significantly address embodied GHGs” and “use in limited amounts”?
- a. Because “construction materials and products” could encompass thousands of examples and because grant funds are limited, EPA will only support projects under this grant for those materials and products that have potential to significantly address embodied greenhouse gas emissions. This eligibility criterion is meant to address extreme examples of materials and products (fasteners, hardware, bolts, screws, nails, knobs, etc) that, while technically used in construction, do not have the potential to significantly reduce embodied greenhouse emissions because the amount used (actual or potential) in construction is very limited. Use in limited amounts does not refer to market share or total sales, but rather the physical amount of the material that could be reasonably used in construction and infrastructure projects. Nor does it preclude those materials that, while not currently used in large amounts, could have the reasonable potential to replace materials that are currently used in large amounts. If you have a question about the eligibility of a material or product for a potential project, EPA can provide a preliminary determination. Please email embodiedcarbon@epa.gov.

Subgrantees/Contractors/Consultants

38. Is a program operator, that is a for-profit company, eligible to be part of a grant application and receive funding for PCR, LCA, EPD and associated work? Or is it the case that ANY organization who receives any of the grant program must be a non-profit?
- a. A grantee can enter into contracts with consultants or engineers subject to the competitive procurement requirements of 2 CFR 200, Subpart D, and 2 CFR 1500. See [EPA's Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#) for further information. Applicants do not need (and are not

encouraged to) to identify contractors at the time of application but need to follow procurement policy guidelines as outlined in the following link: [EPA's Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#). Any consulting firm selected under this grant program must bid according to Procurement Standards in 2 CFR § 200 and 1500, EPA's Subaward Policy, and EPA's Guidance on Participant Support Costs.

39. Since many or most building product manufacturers are unfamiliar with the EPA grant process both applying and management, can contractors be engaged under the grant to manage the grant process and reporting requirements?
 - a. See previous answer about contractors.

40. May consultants be included as a contractor on the grants? Or be used as a consultant once the funding is handed out?
 - a. Contractors should not be identified on the application. A grantee can enter into contracts with consultants or engineers subject to the competitive procurement requirements of 2 CFR 200, Subpart D, and 2 CFR 1500. Please see: [EPA's Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#).

41. Does this cover the development of EPDs for our suppliers as well - would this be a partnership then? In order for us to complete an EPD we may need a breakdown of a supplier material, but the supplier may not be able to share the information or pay for the development of an EPD for their material separately.
 - a. Yes, that could be an eligible project (as partners or a pass-through entity/subawardee relationship), if other eligibility criteria are met. Please see the Section III for the eligibility section of the NOFO.

42. If contracting part of the work, would our procurement policy need to be shared with EPA at the time of the proposal, or could one be developed later to meet UGG standards (before the work is put out to bid)? Our association has a small professional staff, and it would be a big challenge to both prepare this proposal and develop a compliant procurement policy before Jan 16.
 - a. The procurement policy does not need to be included in the application however it must be stated that it will be addressed later should the application be selected.

43. We have a small professional staff and typically engage a specialized consultant to assist with PCR and industry average EPD development, and our efforts would be strengthened by being able to engage a consultant on this project to assist with educational/outreach efforts to eligible manufacturers.
 - a. A grantee can enter into contracts with consultants or engineers subject to competitive procurement requirements. Please see: [EPA's Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#).

Selection

44. Are you going to announce the award winners?
- a. Yes, they are estimated to be announced in Spring 2024.
45. Is there a known, or estimated number, of award types in each of the 6 categories (pass through and direct, and the three different categories: \$250K-750K, \$750K-\$5M, and \$5M-\$10M)?
- a. There is not an estimated number of awards in each of the categories; award selection will depend on quality of submitted proposals according to the merit criteria and the funding requested.

Application

46. Where can we download all Mandatory Forms to be filled out?
- a. All forms are available for download when applying on grants.gov for this [funding opportunity](#). Download the mandatory forms using Grants.gov Workspace that you create by generating the application for this NOFO.
47. How does an entity estimate costs when the terms and conditions aren't known?
- a. Please visit the budget development guidance found [here](#).
48. Why does the EPA recommend not to include confidential business information in applications? Is there any concern about confidentiality as long as the process claims are made when submitted?
- a. EPA recommends that you do not include confidential business information (CBI) in your application as it may be released following a Freedom of Information Act request. However, if CBI is included, it will be treated in accordance with 40 CFR 2.203. Applicants must clearly indicate which portion(s) of their application they are claiming as CBI. EPA will evaluate such claims in accordance with 40 CFR Part 2. If no claim of confidentiality is made, EPA is not required to make the inquiry to the applicant otherwise required by 40 CFR 2.204(c)(2) prior to disclosure under the Freedom of Information Act prior to or after selections are made.
49. My company provides all the data analytics and has developed customizable AI based software to generate LCAs, EPDs, GHG emissions. We are working in partnership with companies that manufacture sustainable construction materials. Do we apply as a pass through?
- a. Please check eligibility under Section III of the NOFO.

Misc

50. As a non-profit org that is eligible, the \$10 million limit per application limits the ability for us to pass through funds to subrecipients (ineligible entities that provide services needed for execution of grant goals) at the scale we see necessary. Have there been any thoughts on increasing the limit for funding if not enough eligible entities apply in the first round?
- There is a \$10 million limit per application.
 - Subrecipients must be eligible entities. Contracted services do not need to be eligible entities but are subject to the competitive procurement requirements of 2 CFR 200, Subpart D, and 2 CFR 1500. See [EPA's Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#) for further information. Applicants do not need (and are not encouraged to) to identify contractors at the time of application but need to follow procurement policy guidelines as outlined in the following link: [EPA's Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#). Any consulting firm selected under this grant program must bid according to Procurement Standards in 2 CFR § 200 and 1500, EPA's Subaward Policy, and EPA's Guidance on Participant Support Costs.
51. Is the [IRA Grant Collaborator Connection](#) where eligible entities may find other eligible entities to collaborate on a grant application?
- This optional form has been created to help potential applicants and partners identify each other and create partnerships and/or allow others to match with a lead applicant for financial assistance to develop EPDs. By filling out this form, you are consenting to sharing your contact information with everyone who has signed up to be on this list. The previous request to participate by December 8, 2023, is extended throughout the period of the grant program.
52. An association is applying for this grant, and we are a member of theirs. If we receive the grant we request, and the Association does too, are we able to use our funds, in addition to any the Association would allocate to our association?
- EPA will not fund two separate applications for the same project. If your proposed projects are different and you or the Association applied as a pass-through entity, you could award or be awarded a subaward.
53. If we do not receive the grant we request, but the Association does and has our numbers included, are they still able to allocate money to our association?
- If the Association applied as a pass-through entity for EPD development and your organization is an eligible entity, they can allocate funds in their assistance agreement for subawards that they may decide to award to your organization.
54. How can individual manufacturers and organizations seeking financial assistance for qualified

projects under \$250,000 obtain that financial assistance?

- a. The goal of the program is to support the development of as many robust EPDs as possible while minimizing the administrative burden to the Agency and applicants. To this end EPA set a minimum of \$250,000 on applications for financial assistance and encourages single entities whose application would otherwise not meet this threshold to collaborate with others on an application. This results in more funds available to support the development of robust EPDs.
- b. Federal funding amounts for individual grant and cooperative agreements are anticipated to be in the range of \$250,000 to \$10 million. In addition, EPA will provide grants to eligible applicants that will become “pass-through entities,” and those grantees will provide funding and technical assistance to subrecipients to successfully deploy eligible projects.
- c. Individuals and organizations seeking financial assistance for qualified projects under \$250,000 will need to engage grantees selected by this NOFO as “pass-through entities” rather than engaging EPA, and EPA will announce those grantees publicly after selections are made.
- d. Refer to earlier question on [IRA Grant Collaborator Connection](#).

55. What was the website for innovation mentioned in the Nov 14 webinar?

- a. [EPA's Small Business Innovation Research \(SBIR\) Program](#) supports small businesses to develop and commercialize novel environmental technologies that support the Agency's mission of protecting human health and the environment. One solicitation is released per year and the next solicitation is planned for June 2024. Please sign up for the [EPA SBIR listserv](#) to receive notifications for when the topics are released and for other news related to the program. For more information on the government-wide program (including all 11 SBIR agencies): www.SBIR.gov