## EPA Grants Competition Process Webinar, March 26, 2024 Frequently Asked Questions (FAQ)

Q1: Do we have to go through the training before we apply?

A1: No, however it would be most beneficial to you if you complete it before applying. It will help you with your application. It will also be required should you be offered an award.

Q2: I work for a pass-through entity, are our subrecipients required to take these new trainings?

A2: The training requirement is only for direct EPA grant applicants/recipients.

Q3: Can an applicant name a consultant/partner upfront in the grant application, i.e., a consultant that they want to support them, should they win the grant?

A3: Please refer to the Notice of Funding Opportunity (NOFO) for requirements specific to that grant opportunity. However, please note that if you name a contractor in your grant application, you should demonstrate that you complied with proper procurement procedures. If you do not demonstrate this or have not already gone through proper procurement procedures to select them, it may impact EPA's ability to award the grant or deem the application ineligible. Please also see the Contracts and Subawards clause in our EPA Solicitation Clauses.

Q4: Is Grants.gov down? I can't seem to be able to log in?

A4: Grants.gov isn't an EPA system and we're unsure of whether it's down. If the issue persists, you may need to submit a help desk ticket with them.

Q5: Will we get access to a recording of this webinar?

A5: A recording of today's webinar will be available on the Competition Process Webinar webpage at: <a href="https://www.epa.gov/grants/competition-process-webinar-march-26-2024">https://www.epa.gov/grants/competition-process-webinar-march-26-2024</a>.

Q6: Will you need a CAGE #?

A6: That is not a requirement for EPA grants. We do require that applicants register in SAM.gov, which includes the assignment of a Unique Entity Identifier (UEI) from SAM.gov

Q7: To recap, are the basic steps: 1. Register in Grants.gov, 2. Register in SAM.gov, 3. Complete training?

A7: First register in SAM.gov, then Grants.gov. You can complete the training anytime during the process, although it would be more helpful to you prior to applying.

Q8: We are writing grants for various clients. Can we use our Grants.gov for their applications?

A8: If the applicant organization provides you with the proper roles in Grants.gov, you should be able to apply on behalf of any organization that provides you with those roles. However, please make sure that when you submit the application the UEI and applicant organization name match. Applying on behalf of multiple organizations sometimes leads to confusion and has led to applications being deemed ineligible due to the wrong UEI or applicant organization being listed.

- Q9: We are a subrecipient now, but will apply to be a main recipient. How will you know we completed the required trainings?
  - A9: After the completion of each training, you should get a certificate of completion which you can save for your records. We compile completions automatically within the Agency.
- Q10: For a previous question, you said doing the training prior to applying would help you with your application. Do you mean help you fill it out since you know more about the process, or do you actually score people higher if they had already taken the training already?
  - A10: The trainings cover various topics, such as applying for a grant, managing a grant, and how to develop a budget, which will provide you with information that may help you prepare a more effective and responsive application. While taking the training will not result in an automatic increase in score, the knowledge you gain from the trainings may improve the quality of your application, which may result in a higher score.
- Q11: Will you be sending links to register for the required trainings to today's participants?
  - A11: The trainings are available at <a href="https://www.epa.gov/grants/how-develop-budget">https://www.epa.gov/grants/epa-grants-management-training-applicants-and-recipients</a>. They can also be found on our Recipient Training Opportunities page.
- Q12: If you are having technical difficulties with Grants.gov and try submitting the application via email just in case, what email would you send that to? The one available in Section VII?
  - A12: Please review the NOFO carefully, including instructions on what to do when experiencing technical difficulties during application submission which are located throughout the NOFO. If you anticipate difficulties or are experiencing them, follow the instructions and reach out to the Agency contact listed in Section VII as soon as possible.
- Q13: We are new to developing grant applications. We plan on partnering with a for-profit entity to carry out part of the grant. We have gone through the CFR 200.331 and 333 etc. and see that contractors need to have certain characteristics, etc. and as per the NOFO, it should be approved by EPA's award official. We just want to confirm that we don't have to go through the solicitation process before or after applying for the grant.
  - A13: Please refer to the NOFO for requirements specific to that grant opportunity. However, please note that if you name a contractor in your grant application, you should demonstrate that you complied with proper procurement procedures. If you do not demonstrate this or have not already gone through proper procurement procedures to select them, it may impact EPA's ability to award the grant or deem the application ineligible. Please also see the Contracts and Subawards clause in our <a href="EPA Solicitation Clauses">EPA Solicitation Clauses</a>.
- Q14: What are your thoughts on using Chat GPT for writing grants? Such as can it be used merely to clean up wording?
  - A14: There is no legal prohibition to an applicant using Artificial Intelligence (AI) to write their grant application. However, applicants must keep in mind that whatever they submit they are proposing to do regardless of whether they wrote the proposal or AI wrote the

- proposal. The applicant is submitting the proposal, so the applicant is standing behind what is written.
- Q15: Is the ability to request a debrief specific to EPA, or do other agencies do this?
  - A15: Each federal agency has processes for sharing information that are specific to their programs and needs, so it is best to check with the Agency whose program you are applying for to learn the specifics.
- Q16: You mentioned that funding opportunities are usually open 45 60 days. Does this include funding opportunities with rolling application deadlines like the Change Grant? In other words, are there discrete timelines/funding rounds between now and November 21?
  - A16: Please check the Environmental and Climate Justice Community Change Grants Program
    Notice of Funding Opportunity (Funding Opportunity Number EPA-R-OEJECR-OCS-23-04)
    for information on the review and selection process for this specific opportunity. If you
    have additional questions after reviewing the NOFO, please reach out to the Section VII
    contact listed in the NOFO.
- Q17: I am a contracted LTAP for the EPA Community Change Grants. I had not heard about the two new courses for applicants from my contracting agency which has a grant for providing technical assistance. Are the people who get technical assistance in this way exempt, or should we be advising all of our clients to get this training? Also, are they required or recommended for an application?
  - A17: The training requirement is only for direct EPA grant applicants/recipients and must be completed before a grant award can be made.
- Q18: As a potential new applicant to the EPA grant process, how will you weigh the requirement for a new applicant to demonstrate successful past performance for grant management? If an organization does not have "previous" grant experience, will this have impact on your decision to fund?
  - A18: Please review the evaluation criteria contained in the NOFO. In most cases, if an organization does not have previous grant experience and states this in their application, reviewers will be directed to provide a neutral score for that criterion (for example, 2.5 out of 5 points total).
- Q19: Do you guys ever consider not awarding the same organization more than once to give other communities a chance?
  - A19: Yes. Some programs put in place a "new applicant set-aside" or include a selection factor that takes into account whether the applicant has received a grant under the program in the past. This allows the program to select applications from new applicants, even if they are not the highest ranked application.
- Q20: For eligibility does the entire project area have to be defined as "disadvantaged communities" or is it ok for parts to be in disadvantaged census tracts?
  - A20: Please review the information contained in the NOFO and, if clarification is needed, reach out to the Agency contact in Section VII.
- Q21: If a consultant prepares a grant application for an applicant, are they precluded from bidding on the work funded by the grant?

- A21: No. EPA does not prohibit consultants who prepare grant applications from competing for contracts that will be funded under the grant as long as the competition is conducted fairly and openly. The contractor may not assist with drafting specifications, requirements, statements of work, or invitations for bids or requests for proposals and also be allowed to compete for the services or products that will be procured as indicated in 2 CFR § 200.319(b). This practice violates 2 CFR § 200.319(b) and may result in EPA disallowing any costs for the tainted contract that are charged to the grant. Noncompetitive contracts with consulting firms on retainers are another example of an unfair competitive practice as indicated at 2 CFR § 200.319(b)(4). Additionally, EPA will not accept sole source justifications for procurement contracts for services such as consulting, engineering, construction services, or information technology support that are available in the commercial marketplace.
- Q22: Just to confirm: you mentioned two training options at the beginning of the presentation. Are they mandatory for all applicants or recommended?
  - A22: They are required for new applicants/recipients (entities that have not had any EPA grants since October 1, 2014).
- Q23: Do you have trainings for small businesses to understand the procurement procedures?
  - A23: We do have a webinar coming up tomorrow that covers Procurement, Subawards, and Participant Support Costs, although the webinar itself is intended for EPA applicants/recipients: <a href="https://www.epa.gov/grants/procurement-subawards-and-participant-support-costs-webinar-march-27-2024">https://www.epa.gov/grants/procurement-subawards-and-participant-support-costs-webinar-march-27-2024</a>.
- Q24: Can you award a design-build contract under an EPA grant agreement?
  - A24: It depends on the grant program. Please reach out to the Section VII contact in the NOFO.
- Q25: Are you going to include the questions and answers on an FAQ on the Clean Ports site?
  - A25: Questions and answers from this webinar on the EPA Competition Process are posted in the EPA Grants Community Library of Frequently Asked Questions. For specific program-related FAQs, webinars, and other detailed program information, please check the program website or the NOFO.
- Q26: I couldn't find information about subrecipient requirements for the community change grant program. Is there a link for that?
  - A26: Please contact the EPA point of contact listed in Section VII of the Environmental and Climate Justice Community Change Grants Program Notice of Funding Opportunity (Funding Opportunity Number EPA-R-OEJECR-OCS-23-04).
- Q27: What about a for profit eligible applicant?
  - A27: If this question relates to whether a for-profit organization is eligible to apply to an EPA grant program, you should check the eligibility requirements for applicants contained in each program's NOFO.
- Q28: Does the contractor and consultant procurement requirement also apply to any subawardee? In short, do not mention a subawardee name in the proposal unless that subawardee is selected based on the procurement procedure, right?

- A28: Please review the specific NOFO (or contact the Section VII point of contact in the NOFO) for subaward requirements specific to that grant opportunity. However, subrecipients are not generally required to be competitively selected. You can learn more about making subawards under EPA grants by reviewing GPI 16-01: EPA Subaward Policy for EPA Assistance Agreement Recipients. Please also see the Contracts and Subawards clause in our EPA Solicitation Clauses.
- Q29: EPA Form 4700-4, Pre-award Compliance Review Report for All Applicants and Recipients Requesting EPA Financial Assistance OMB (Control No 2030-0020) states the approval expires on 06/30/2024. Will this form be acceptable?
  - A29: Yes. This form is in the final stages of being approved with no changes. Its expiration date will be updated soon to confirm its viability through 2027. If the new form is not approved by the expiration date, the expired form will be able to be used until the new form is available.
- Q30: I've had conflicting responses from Thriving Communities Technical Assistance Centers (TCTACs) regarding what kind of technical grant assistance they can provide. Please clarify.
  - A30: This issue should be addressed directly by the TCTAC Program Office. You can find EPA contacts on this website: <a href="https://www.epa.gov/environmentaljustice/environmentaljustice-thriving-communities-technical-assistance-centers">https://www.epa.gov/environmentaljustice/environmentaljustice-thriving-communities-technical-assistance-centers</a>.
- Q31: If a municipality writes a grant for the purpose of a specific nonprofit -- would that be a problem if they don't go through a procurement process for community outreach?
  - A31: You might benefit from an upcoming webinar on Procurement, Subawards, and Participant Support Costs, which can help answer some questions about whether your relationship with the non-profit is most suited as a contract or as a subaward. Procedures differ based on the relationship: <a href="https://www.epa.gov/grants/procurement-subawards-and-participant-support-costs-webinar-march-27-2024">https://www.epa.gov/grants/procurement-subawards-and-participant-support-costs-webinar-march-27-2024</a>.
- Q32: Our procurement procedure follows California CUPCCAA that allows us to conduct informal bidding for projects under \$200,000. Does our purchasing procedure supersede procurement guidelines in the EPA contract? Or does the contract supersede our purchasing policy?
  - A32: Applicants and grant recipients must follow the Procurement Standards outlined in Subpart D of 2 CFR 200. Please note that this includes 2 CFR 200.317, which requires that States follow their own policies and procedures for procurements.
- Q33: How are we notified if we are selected for an award? Is it an email?
  - A33: In most cases, you will receive an email from the Program Office. However, this may vary depending on the program. Check the applicable NOFO, which should contain details on how notification is made in Section VI.
- Q34: How do we get a copy of evaluation of my submitted application? I tried through FOIA, it didn't work.
  - A34: Applicants have the opportunity to request a debriefing within 15 days of being notified that they are ineligible or were not selected. See the Debriefings and Disputes clauses located in our <u>EPA Solicitation Clauses</u>, which are referenced in every NOFO.

- Q35: What's the schedule for EPA responses to questions being submitted via email regarding the Clean Ports Program? Do we anticipate responses within a week?
  - A35: Please refer to Section VII of the NOFO of the opportunity you are interested in for details about question submissions.
- Q36: If for-profit agencies are existing partners who will provide additional services for a project being considered for funding, are the procurement requirements still applicable?
  - A36: Procurements must comply with the procurement requirements at 2 CFR 319.
- Q37: Does it make grant reviewers' job easier if more graphs and charts are used versus a lot of narrative?
  - A37: This could be subjective depending on the program and what the evaluation criteria necessitate the applicants to provide. Review the NOFO carefully for guidance.
- Q38: Can a community applying for EPA grant funding initiate a request for proposals for the type of entities that may be utilized in deployment of a grant infrastructure, equipment, or vehicles?
  - A38: Yes, applicants may solicit proposals and applications from partners and/or contractors when applying for grant awards.
- Q39: Are Change Grant awards being allocated based on need/merit alone or is a specific amount being parceled out for each EPA region?
  - A39: For details concerning the Change Grant program, please refer to their program website or to the related NOFO.